

October 7, 2021

TO: [REDACTED]
Acting Assistant Director Custody Management

FROM: [REDACTED]
Lead Compliance Inspector
The Nakamoto Group, Inc.

SUBJECT: **Annual Inspection of the Limestone County Detention Center**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS 2000) of the Limestone County Detention Center in Groesbeck, Texas during the period of October 5-7, 2021. This is an IGSA facility.

The inspection was performed under the guidance of [REDACTED] Lead Compliance Inspector.
Team members were:

Subject Matter Field	Team Member
Detainee Rights	[REDACTED]
Security	[REDACTED]
Medical Care	[REDACTED]
Medical Care	[REDACTED]
Safety	[REDACTED]

Type of Inspection

This is an annual inspection which is performed to determine overall compliance with the ICE NDS for Over 72-hour facilities. The October 2020 (NDS 2000) inspection was rated Meets Standards.

Inspection Summary

The Limestone County Detention Center is currently accredited by:

- The American Correctional Association (ACA) - No
- The National Commission on Correctional Health Care (NCCHC) - No
- The Joint Commission (TJC) - No
- Prison Rape Elimination Act (PREA) - Yes

Standards Compliance

The following information is a summary of the standards that were reviewed and overall compliance that was determined as a result of the October 2020 and October 2021 annual compliance inspections:



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October 2020 Annual Inspection	
Meets Standard	37
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	2

October 2021 Annual Inspection	
Meets Standard	36
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	3

The inspection team identified eighteen (18) deficient components in the following eight (8) standards:

Correspondence and Other Mail – 2, both of which are repeat deficiencies

Visitation – 2

Access to Medical Care – 1

Environmental Health and Safety – 3, one of which is a repeat deficiency

Special Management Unit (Administrative Segregation) – 1

Special Management Unit (Disciplinary Segregation) – 4

Staff Detainee Communication – 2, one of which is a repeat deficiency

Detainee Transfer – 3

Facility Snapshot/Description

The Limestone County Detention Center was built in [REDACTED] and is operated by LaSalle Corrections under the jurisdiction of Limestone County. The facility is located in Groesbeck, Texas approximately 100 miles south of Dallas. This IGSA has an operational capacity of [REDACTED] and employs the direct and indirect model of supervision to all classification levels of male ICE detainees and male and female U.S. Marshal Service (USMS). Although all custody levels may be housed at the facility, currently the facility houses only low custody classification level male ICE detainees. [REDACTED]

The facility is single-story in part and a double-story structure which contains six general population housing units, two special management units (SMU) [REDACTED]

[REDACTED] ICE detainees are housed in one wing of the facility separate from other jurisdictions and grouped together based on same or similar custody classification levels. [REDACTED]

[REDACTED] There were no detainees housed in the SMU at the time of the inspection. Onsite inspectors found the ICE living units to be well lit with both natural and artificial light and observed adequate open space for detainees. The dayrooms are furnished with picnic style metal tables with attached seats for detainees to participate in leisure time activities, socializing, playing board games, and playing cards. Televisions are available for detainees to view. Kiosks and/or computer tablets are currently not available at this facility for detainee use. Group religious services and general visitation have been temporarily suspended due to health concerns associated with the COVID-19 virus. Legal visitation is limited to non-contact only and video visitation for a fee or free is not offered to detainees as a visiting option. The telephone provider issues 500 free minutes of telephone call time to detainees each month to help offset the impact of general visitation being suspended. Other COVID-19 response operational changes include all newly received detainees have been quarantined upon admission to the facility. Detainees complaining of symptoms will be COVID-19 tested immediately. Indoor/outdoor recreation is available to detainees one hour per day, five days per week which aligns with the minimum requirement of the standard. ICE detainees do not participate in the voluntary work program.

The facility is climate controlled, and the physical plant was found to be in good repair. All staff interviewed were well-versed in facility guidelines and operating procedures as well as the National Detention Standards. Officers and staff were professional during interviews and detainees that agreed to be interviewed spoke



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willingly and respectfully. A review of sanitation inspection reports, interviews with staff and detainees, and observation by onsite inspectors concluded that the sanitation level of the facility was adequate.

The inspection team interviewed seventy detainees during the inspection. Interviews were conducted by one inspector remotely, in person by onsite inspectors, and with the assistance of an interpreter when needed for LEP detainees. There were no substantive concerns voiced when asked about personal safety, access to telephones, medical services, or food services. All detainees verified that memorandum, posters, and other type of key information are posted in English and Spanish throughout the facility which are the languages primarily spoken by detainees. While conducting formal interviews, two detainees expressed discontent regarding the continued suspension of general visitation. This concern was brought to the attention of the OIC who offered that installation of computer tablets and kiosks capable of video visitation will soon be activated for detainee use and the facility communicates weekly with ICE to determine the safest time to return to general visitation. Several detainees commented positively of the facility's clothing issuance process and the ease of getting personal hygiene items replenished. During interpreter assisted LEP interviews, two detainees stated that they did not receive a handbook in a language that they could read and understand. One detainee was of French descent and the second detainee was Haitian Creole. This concern was brought to the attention of the assigned deportation officer who was able to verify that ICE was aware of the need of the National Detainee Handbook in these languages and others. Orders have been placed to the publisher. Through staff interviews it was found that the intake sergeant documents interpreter led handbook reviews with detainees who speak languages other than English or Spanish. Detainees were reminded of the proper procedures for filing grievances and the availability of the OIG hotline for submitting complaints.

Medical and food services are provided by LaSalle Corrections employees. The facility does not charge co-pays for medical, mental health, or dental care. The detainee telephone system is provided by Correct Solutions Group, Inc.

In March 2021, the Office of Detention Oversight (ODO) inspected for compliance under NDS 2019 and erroneously disclosed in their report that the facility operates under NDS 2019. Through a review of the contract between ICE and the facility, and communication with ICE officials prior to the start of the inspection, it was confirmed that the facility operates under NDS 2000.

Areas of Concern/Significant Observations

There were no areas of concern or significant observations from this hybrid inspection. Onsite inspection team members were provided all requested documentation and observed the practice and procedures of the facility. Remote inspectors relied upon photographs and/or videos to validate the observation of many standards.

Recommended Rating and Justification

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standards unless unobserved practices and conditions are contrary to what was reported to the inspection team. The facility complies with the ICE National Detention Standards (NDS 2000) for Over 72-hour facilities. No (0) standard was rated as Does Not Meet Standard and three (3) standards were Not Applicable (N/A). All remaining thirty-six (36) standards were found to Meet Standards.

LCI Assurance Statement

The findings of compliance and non-compliance are accurately and completely documented on the G-324A Inspection Form and are supported by documentation in the inspection file. An out brief was conducted onsite



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and telephonically with facility staff and ICE representatives. In addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

- ICE Officials – [REDACTED]

- Facility Staff – [REDACTED]

[REDACTED] Lead Compliance Inspector

October 7, 2021

Printed Name of LCI

Date