March 12, 2021

TO:  
   Assistant Director Custody Management

FROM:  
   Lead Compliance Inspector
   The Nakamoto Group, Inc.

SUBJECT: Ninety Day Follow-up Inspection of the David L. Moss Criminal Justice Center

The Nakamoto Group, Inc. performed a ninety day follow-up inspection for compliance with the ICE Under 72 Hour National Detention Standards of the David L. Moss Criminal Justice Center during the period of March 11-12, 2021. This is an IGSA facility.

The inspection was performed under the guidance of [Redacted], Lead Compliance Inspector. Team Members were:

<table>
<thead>
<tr>
<th>Subject Matter Field</th>
<th>Team Member</th>
</tr>
</thead>
<tbody>
<tr>
<td>Detainee Rights</td>
<td></td>
</tr>
<tr>
<td>Security/Safety</td>
<td>[Redacted]</td>
</tr>
<tr>
<td>Medical Care</td>
<td>[Redacted]</td>
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<tr>
<td>Medical Care</td>
<td>[Redacted]</td>
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</tbody>
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**Type of Inspection**

This is a scheduled ninety day follow-up inspection which is performed to determine overall compliance with the ICE NDS for Under 72 hour facilities. A Pre-Occupancy Inspection was conducted in December 2020.

**Inspection Summary**

The David L. Moss Criminal Justice Center is currently accredited by:
- The American Correctional Association (ACA) - Yes
- The National Commission on Correctional Health Care (NCCHC) - Yes
- 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 2020 and 2021 compliance inspections:

<table>
<thead>
<tr>
<th>2020 Pre-Occupancy Inspection</th>
<th>2021 Ninety Day Follow-up Inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td>Meets Standards</td>
<td>Meets Standards</td>
</tr>
<tr>
<td>Does Not Meet Standards</td>
<td>28</td>
</tr>
<tr>
<td>Repeat Deficiency</td>
<td>Does Not Meet Standard</td>
</tr>
<tr>
<td>Not Applicable</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Repeat Deficiency</td>
</tr>
<tr>
<td></td>
<td>Not Applicable</td>
</tr>
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<td></td>
<td>1</td>
</tr>
</tbody>
</table>

The inspection team identified four (4) deficient components in the following two (2) standards:

Food Service - 3
Environmental Health and Safety - 1

Facility Snapshot/Description

Owned by the Criminal Justice Authority, the Tulsa County jail is located in downtown Tulsa, Oklahoma, and operated by the Tulsa County Sheriff’s Department. It houses United States Marshals Service prisoners, local Tulsa County non-ICE detainees, and will house all custody levels of adult male and female ICE detainees. The facility houses local non-ICE juveniles, but no ICE juvenile detainees. Juvenile detainees are not co-mingled with adult detainees. ICE maintains an on-site presence in the facility.

The facility is a single level design although housing units have a lower and upper tier. The facility was constructed in 1999: four additional housing units were constructed and opened in 2017. The facility has 24 housing units; nineteen for general population, three restrictive housing units, and two for detainees with mental health needs. Both cell and dormitory beds are available; all of which are directly supervised by officers stationed in the housing units. Each general population housing unit has a dayroom which contains at least one television; telephones; two kiosks for ordering commissary, communicating with ICE, submitting sick call requests, and filing grievances; and video visitation monitors. Electronic tablets are also available in the housing units which have similar functionality to the kiosks. Detainees may access LexisNexis on the tablets. An outdoor recreation yard is attached to each general population housing unit. ICE detainees will be co-mingled with other detainees of similar classification levels.

Detainee telephone services are provided via a contract with Correct Solutions Group. Video visitation kiosks and monitors are provided by TechFriends.

Medical services are provided by Turn-Key Health Clinics. Detainees are not charged a co-payment for medical or mental health services. Food services are provided by Summit Food Services.

Areas of Concern/Significant Observations

There were no areas of concern or significant observations during this inspection.
Recommended Rating and Justification

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standards. The facility complies with the ICE National Detention Standards for Under 72 Hour Facilities. No (0) standards were found Does Not Meet Standards and one (1) standard was Not Applicable (N/A). All remaining twenty-eight (28) standards were found to Meet Standards.

LCI Assurance Statement

The findings of compliance and non-compliance are accurately and completely documented on the G-324 Inspection Form and are supported by documentation in the inspection file. An out brief was conducted at the facility and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

- ICE Officials –
- Facility Staff –

[Redacted]

[Redacted], Lead Compliance Inspector

March 12, 2021

Printed Name of LCI

Date