

MEMORANDUM

TO: Victor Cerda, Acting Director, Office of Detention and Removal, Immigration and Customs Enforcement via [b6, b7C] [b6, b7C], Immigration and Customs Enforcement

FROM: American Bar Association Delegation to the Colquitt County, Georgia, Jail¹

COPY TO: [b6], ABA Commission on Immigration

SUBJECT: Report on Observational Tour of the Colquitt County Jail, Moultrie, Georgia

This memorandum summarizes and evaluates information gathered at the Colquitt County Jail ("CCJ" or "the facility") in Moultrie, Georgia, during the delegation's March 16, 2005, visit to the facility. The information was gathered via observation of the facility by the delegation, interviews with two detainees, and discussions with jail and Immigrations and Customs Enforcement ("ICE") personnel.

ICE DETENTION STANDARDS

In November 2000, the Immigration and Naturalization Service (INS), promulgated the "*INS Detention Standards*" to ensure the "safe, secure and humane treatment" of immigration detainees. The thirty-six standards contained in the Detention Operations Manual cover a broad spectrum of issues ranging from visitation policies to grievance procedures and food service. These standards apply to ICE-operated detention centers and other facilities that house immigration detainees pursuant to a contract or intergovernmental service agreement ("IGSA").

The *Detention Standards* (the "*Standards*") went into effect at ICE-operated detention facilities on January 1, 2001. ICE intended to phase in the *Standards* at all of its contract and IGSA facilities by December 31, 2002. The *Standards* constitute a "floor" rather than a "ceiling" for the treatment of immigration detainees. In other words, they are designed to establish the minimum

¹The delegation was composed of attorneys from the Atlanta office of Holland & Knight LLP, including [b6], [b6].

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requirements to which ICE must adhere in its facilities. Each Field Office or Officer-in-Charge has discretion to promulgate policies and practices affording ICE detainees more enhanced rights and protections, beyond those provided for by the *Standards*.

Effective March 1, 2003, the INS ceased to exist as an agency of the Department of Justice. The INS' previous immigration enforcement functions were transferred to Immigration and Customs Enforcement ("ICE"), a division of the newly-created Department of Homeland Security ("DHS").

INTRODUCTION

The Delegation's March 16 Visit

On Wednesday, March 16, 2005, the members of our delegation met with several members of CCJ's staff and a representative from the ICE office in Atlanta: Lt. [REDACTED] b6, b7C and Sgt. [REDACTED] b6, b7C [REDACTED] b6, b7C of the Colquitt County Sheriff's Office and [REDACTED] b6, b7C of ICE. Jail Liaison Officer [REDACTED] b6, b7C led our delegation on a tour of the facilities and participated in pre- and post-tour discussions. The delegation also met with other CCJ personnel along the tour. The delegation appreciates the cooperation of these individuals. They were direct and accommodating during our tour of the facility and in response to requests for additional information.

Our report is based on the discussions we had with these CCJ and ICE employees, as well as observations of the facility and an interview with two immigration detainees. In many instances, the detainees' reports were compatible with statements made by facility personnel and/or our observations. In such cases, the CCJ policy and procedures successfully implemented the *Standards*. However, in certain instances, the detainees' reports conflicted with statements made by facility personnel. Where we were unable to verify the conflicting reports, the delegation was unable to conclusively determine *Standards* implementation.

General Information about the Colquitt County Jail

The Colquitt County Jail houses federal immigration detainees according to an intergovernmental service agreement ("IGSA") with ICE. According to the CCJ personnel, the facility has a current population of about 200, 39 of whom were immigration detainees.

CCJ houses primarily males; at the time of our visit there were 24 women but no women among the ICE detainees. The facility personnel said that the facility housed immigration detainees

from many different countries, but the majority were from Latin American countries.

It is unclear exactly how many of the immigration detainees housed at CCJ have criminal records, although it appears from our discussions with CCJ personnel and the detainees that many have prior criminal records. Both detainees indicated that they had prior criminal records, but that they had served their sentences and were at CCJ only for immigration proceedings. Both were quite eager to return to their home countries.

IMPLEMENTATION OF LEGAL ACCESS STANDARDS

A. Legal Access/Visitation

1. Visitation by Attorneys

The *Standards* suggest that facilities permit legal visitation seven days per week.² Attorneys should have access to their clients eight hours per day during the week and four hours per day during the weekend.³ The visits must be private, and should not be interrupted for head counts.⁴ Facilities should establish a procedure by which attorneys may call to determine whether a detainee is housed in a particular facility.⁵ Detention centers should permit visits for attorneys, other legal representatives, legal assistants, and interpreters.⁶

CCJ has implemented most of this section of the Standards.

Because CCJ's detainees are either awaiting deportation or are only temporarily detained at the facility before being transferred to another location, the use of attorneys by detainees is not very high.⁷ Accordingly, there is no formal schedule of attorney visitation at CCJ.⁸ However, both the CCJ employees and the detainees we interviewed confirmed that

² Detention Operations Manual, Detainee Services, Standard 17, Section III.I.2.

³ Detention Operations Manual, Detainee Services, Standard 17, Section III.I.2.

⁴ Detention Operations Manual, Detainee Services, Standard 17, Section III.I.9.

⁵ Detention Operations Manual, Detainee Services, Standard 17, Section III.I.6.

⁶ Detention Operations Manual, Detainee Services, Standard 17, Section III.I.3.

⁷ Notes of delegation member

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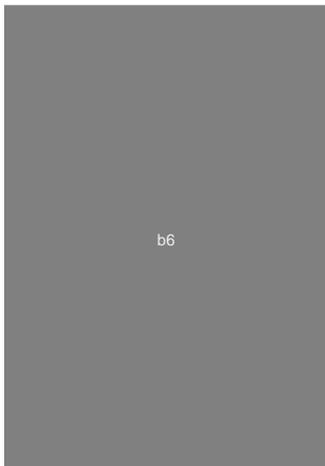
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attorney visitation is openly permitted at the facility.⁹ Legal visits to detainees may be made by attorneys, law students, legal assistants, interpreters, and any other visitor who has a legitimate legal reason to visit detainees.¹⁰

Attorneys are required to present their bar identification cards upon arrival at the facility for a visit with a detainee.¹¹ One "contact" room in the facility is designated for attorney visits, but others can be made available if necessary.¹² According to the CCJ employees we interviewed, one room is sufficient for the current needs of the facility.¹³ Attorneys are allowed to continue a visit through a count or a meal break.¹⁴ Additionally, if a visit continues through a meal, the detainee will have the option to get the meal after the visit concludes.¹⁵ Detainees are subject to strip searches after attorney visits, but only if CCJ employees have probable cause to conduct a strip search.¹⁶ Independent medical service providers and other experts are also allowed to visit detainees and such visits are subject to the same conditions as attorney visits.¹⁷

Our interview with the detainee revealed several possible areas in which detainee standards are not being met by CCJ, or at least a lack of communication. A detainee stated that he is not aware of the hours of attorney visitation; however, he admitted that he has never had to use an attorney at CCJ himself.¹⁸ As a result, he could not answer many of the questions about the actual procedure for attorney visits and any restrictions on such visits.¹⁹ The detainee stated also that he has been transferred to and from courts by bus with arm and leg restrictions and sometimes without food during eight hour bus rides (non-court transfers).²⁰ Finally, the detainee was not aware of any pro bono legal services in the area.²¹ The fact

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that attorney use at CCJ is low, combined with the fact that the detainee we interviewed has not used an attorney himself while detained at CCJ, could explain why the detainee did not know all of the attorney visitation procedures.²²

2. Visitation by Family and Friends

The detainee we interviewed has never had visits from family or friends.²³ Indeed, because most of the detainees have no family or friends in the area and are at CCJ for such a short time, visitors are unlikely. Accordingly, detainees did not know much about the rules and regulations of CCJ in connection with such visits.²⁴ Aside from the fact that contact visits are not allowed, there seemed to be no barriers.

B. Telephone Access

1. General Requirements

The *Standards* suggest that facilities provide detainees with reasonable and equitable access to telephones during established facility waking hours. In order to meet this requirement, facilities must provide at least one telephone to every 25 detainees.

This standard seems to have been met at CCJ. Each housing unit has its own set of phones for ten to twenty detainees in a unit. Calls may be made from 8 a.m. to 5 p.m. CCJ uses the pre-programmed phone system for detainees' free calls to the consulate and a few legal services. Officers stated that they offer to program the detainee's attorney's phone number into the pre-programmed phone so that the detainee may make free calls to his attorney from the phone. The instructions for the pre-programmed phones are posted next to them in English only. The phones in the housing units are separated by a partition but are along a hallway. Although the phones are not in the main area, they are not completely private. Legal calls are not monitored or recorded.

2. Direct v. Collect Calls

The *Standards* allow facilities to restrict calls generally to collect calls; however the facility must permit detainees to

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make direct calls to the local immigration court and the Board of Immigration Appeals, federal and local courts, consular officials, legal services providers, government offices, and to family members in case of emergency. The facility shall not require indigent detainees to pay for these types of calls if local, nor with non-local calls if there is a compelling need. In addition, the facility should allow detainees to make calls to the ICE list of free legal service providers and consulates at no charge to the detainee or the receiving party.

This standard is followed at CCJ. The facility uses Evercom as its telephone service provider for detainee calls. Normally detainees must purchase debit cards to make phone calls. Detainees are also allowed to call collect. Local calls cost \$2.70 for a twenty minute call. Detainees are limited to twenty minutes on phone calls before the phone cuts off. There is no limit on legal calls or calls to the consulate, and if detainees are using the pre-programmed system, the phone will not cut off after twenty minutes. Only a few legal service providers are programmed into the phone and posted next to it. These are the only legal service providers in the area and there is less demand at this facility, due to the briefness of the detainees' detention. One of the detainees interviewed stated that this was the first facility he had been to where the pre-programmed system actually functioned as it was supposed to. The detainee further stated that detainees may request to have a private phone call with their attorneys if desired.

3. Incoming Calls and Messages

The Standards suggest that facilities take and deliver messages from attorneys and emergency incoming telephone calls to detainees as promptly as possible. If the facility receives an emergency phone call for a detainee, the Standards suggest that the facility obtain the caller's name and number and permit the detainee to return the emergency call as soon as possible.

CCJ has met these standards. The facility takes and delivers phone messages from attorneys, as well as friends and relatives. The officer answering the phone inquires as to the nature of the call. Unless it is an emergency or a call from the detainee's attorney, the detainee is given the message and must return the call later using his collect-call phone card. There is no formal procedure for taking and delivering emergency calls and messages but officers stated that detainees are informed immediately if there is an emergency.

4. Telephone Privileges in Special Management Unit

The *Standards* provide that detainees in the Special Management Unit for disciplinary reasons shall be permitted to make direct and/or free calls, except under compelling security conditions.

CCJ has implemented these standards. Detainees in the SMU receive the same access to telephones as other detainees.

C. Access to Law Library

1. Access

The *Standards* suggest that each facility shall have a flexible schedule for law library use that permits all detainees, regardless of housing or classification, to use the law library on a regular basis.²⁵ Additionally, each detainee shall be permitted to use the law library for a minimum of five hours per week.²⁶

CCJ has implemented this section of the *Standards*. CCJ permits all detainees to use the law library upon request. It should be noted, however, that due to the fact that CCJ holds detainees who have either recently arrived whose proceedings are concluded and who are awaiting deportation, very few detainees ever use the library for legal research.

2. Library Conditions

The *Standards* suggest that a facility provide a law library with sufficient space to facilitate detainees' legal research and writing.²⁷ Furthermore, it must be large enough "to provide reasonable access to all detainees who request its use. It shall contain a sufficient number of tables and chairs in a well-lit room, reasonably isolated from noisy areas."²⁸

²⁵ Detention Operations Manual, Detainee Services, Standard 1, Section III.G.

²⁶ Detention Operations Manual, Detainee Services, Standard 1, Section III.G.

²⁷ Detention Operations Manual, Detainee Services, Standard 1, Section III.A.

²⁸ Detention Operations Manual, Detainee Services, Standard 1, Section III.A.

CCJ has implemented this section of the Standards. CCJ provides a law library, and it is well lit, has ample space, and is isolated from noise and foot traffic.²⁹ Specifically, the library provides access to one computer, a table with four chairs, typewriter, and a photocopy machine. Additionally, the library is located in an enclosed room that is as free of distractions and noise as possible in a jail.

3. Materials Identified in the Detention Standards

The *Standards* state that all facility law libraries should contain the materials listed in Attachment A to the chapter on *Access to Legal Materials*.³⁰ These materials must be updated regularly, and information must be added on significant regulatory and statutory changes regarding detention and deportation of aliens in a timely manner.³¹ Damaged or stolen materials must be promptly replaced.³²

CCJ has implemented this section of the Standards. CCJ provides its immigration detainees with computer access (no internet access). Loaded into the computer are two CDs containing immigration cases. ICE also contracts with LexisNexis to maintain all the materials listed in attachment A loaded directly into the computer (*see infra*). LexisNexis updates these materials every five to six months. [REDACTED] b6, b7C of ICE is charged with ensuring that all materials are available to the detainees, and if any materials are lost or are not available, he is charged with replacing those materials or obtaining them anew. CCJ also maintains separate hard copies of the majority of the materials required by the *Standards* as a backup for use by the detainees if the computer is not functioning (*see infra*).

4. Computer Access, Equipment and Holdings

The *Standards* suggest that facility law libraries provide an adequate number of typewriters and/or computers, writing implements, paper, and office supplies to enable detainees to

²⁹ Notes of delegation member [REDACTED] b6

³⁰ Detention Operations Manual, Detainee Services, Standard 1, Section III.C.

³¹ Detention Operations Manual, Detainee Services, Standard 1, Section III.E.

³² Detention Operations Manual, Detainee Services, Standard 1, Section III.F.

prepare documents for legal proceedings.³³ The *Standards* state that the library should provide one typewriter or computer per five detainees, and writing materials as needed.³⁴

While the facility has taken steps to meet the requirements set forth in this section of the *Standards*, it has not fully implemented this section. CCJ has one computer and one typewriter in its law library.³⁵ As CCJ housed approximately 39 ICE detainees upon this visit, the sole computer and typewriter did not meet the requirements set forth, *supra*.³⁶ The delegation was informed that the computer contained all of the materials identified in the ICE law library, and guides demonstrated use of the computer by accessing these materials for the delegation.³⁷ While we did not view every document, the computer appeared to be equipped with *Lexis/Nexis* materials, immigration law materials updated via disk every five to six months, BIA opinions which are updated every three months, and copies of "Know Your Rights" in both English and Spanish.³⁸ Detainees are not allowed to save information on diskettes, although they can save items directly on the hard drive, as long as these documents are not "protected," meaning that the detainees cannot insure that any documents stored on the computer will not be read by CCJ officers.³⁹ Additionally, there is no printer in the library for detainees to print their materials, although ICE officials noted that they were "in the process" of providing a printer to the facility.⁴⁰ Because CCJ holds mostly detainees that are awaiting deportation very few, if any, ever utilize these tools to prepare legal documents.

The delegation noted that physical copies of the books required by the *Standards* were housed in one of the CCJ offices, which, according to CCJ officials, prevented the materials from being destroyed by detainees.⁴¹ It is unclear, however, if detainees are aware that these books exist; the two who were interviewed did not know about them.

³³ Detention Operations Manual, Detainee Services, Standard 1, Section III.B

³⁴ Detention Operations Manual, Detainee Services, Standard 1, Section III.B

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³⁷ Notes of delegation member [REDACTED] b6

³⁸ Notes of delegation member [REDACTED] b6

³⁹ Notes of Delegation member [REDACTED] b6

⁴⁰ Id.

⁴¹ Id.

Detainees are allowed to retain their legal materials, which, in the case of CCJ, consist of any copies a detainee makes.⁴² CCJ allows a detainee to use "common sense" with the retention of these materials, as long as the detainee can store them all in his personal space.⁴³ Boxes of materials, or amounts large enough to constitute a "fire hazard" are not allowed to be stored by detainees in their pods. However, CCJ allows detainees to leave excess materials in storage as "personal property" where they are available upon request.⁴⁴

5. Photocopies

The *Standards* provide that each facility shall ensure that detainees can obtain photocopies of legal materials, when such copies are reasonable and necessary for legal proceedings involving the detainee.⁴⁵ Enough copies must be provided so that a detainee can fulfill court procedural rules and retain a copy for his records.⁴⁶ Facility personnel may not read a document that on its face is clearly related to a legal proceeding involving the detainee.⁴⁷

CCJ has implemented this section of the Standards. Detainees at CCJ may make copies without limitation of legal documents as long as the request is reasonable. Indigent detainees are permitted to make copies free of charge.

6. Group Rights Presentations

The *Standards* provide that facilities with ICE detainees "shall permit authorized persons to make presentations to groups of detainees for the purpose of informing them of U.S. immigration law and procedures, consistent with the security and orderly operation of the IGSA facility."⁴⁸ Informational posters are to be prominently displayed in the housing units at least

⁴² Notes of Delegation member

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⁴⁴ Id.

⁴⁵ Detention Operations Manual, Detainee Services, Standard 1, Section III.J.

⁴⁶ Detention Operations Manual, Detainee Services, Standard 1, Section III.J.

⁴⁷ Detention Operations Manual, Detainee Services, Standard 1, Section III.J.

⁴⁸ Detention Operations Manual, Detainee Services, Standard 9, Section I.

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forty-eight hours in advance of a scheduled presentation.⁴⁹ While presentations are open to all detainees, the facility "may limit the number of detainees at a single session."⁵⁰ "The facility shall select and provide an environment conducive to the presentation, consistent with security."⁵¹ In addition, detainees shall have regular opportunities to view an "INS-approved videotaped presentation of legal rights."⁵²

As CCJ has never had a request for a Group Rights Presentation, we are unable to ascertain if this section of the *Standards* has been substantially implemented.⁵³ While the facility has the "Know Your Rights" materials in hard copy and on its sole computer, CCJ does not have a copy of the "Know Your Rights" video because ICE did not have sufficient quantities to distribute to all facilities.⁵⁴

OTHER GENERAL OBSERVATIONS UNRELATED TO THE LEGAL ACCESS STANDARDS

A. Access to Medical Care

Each facility should maintain current accreditation by the National Commission on Correctional Health Care.⁵⁵ Facilities should provide each detainee with an initial medical screening, primary medical care, routine dental check-ups, and emergency care. Each facility should have an arrangement with a nearby facility to provide health care services not provided at the detention facility. A physician or qualified medical officer should be available to examine detainees. At a minimum, the sick calls for facilities with 50 or fewer detainees should be scheduled at least one day per week.⁵⁶ Additionally, an initial dental screening exam should be performed within 14 days of the detainee's arrival.⁵⁷

⁴⁹ Detention Operations Manual, Detainee Services, Standard 9, Section III.C.

⁵⁰ Detention Operations Manual, Detainee Services, Standard 9, Section III.C.

⁵¹ Detention Operations Manual, Detainee Services Standard 9, Section III.E.

⁵² Detention Operations Manual, Detainee Services, Standard 9, Section III.I.

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⁵⁴ Id.

⁵⁵ Detention Operations Manual, Standard 24.

⁵⁶ Detention Operations Manual, Standard 24.

⁵⁷ Detention Operations Manual, Standard 24.

While the facility does have on-site medical care available for sick call more than once a week, it does not appear that the facility complies with the *Standards* relating to initial medical screenings and dental screenings. Those screenings occur at the facilities from which the detainees are transferred.

Sergeant [REDACTED] b6, b7C provided much of the information concerning detainees' access to medical care. The facility recently contracted with South Georgia Health to provide on-site medical care. There is a nurse on staff from 7 a.m. until at least 7 p.m. and a physician assistant is on-site twice a week. There are no mental health counselors on site.

Any services that cannot be provided at the facility, including mental health services, will be provided off-site via a contract with the United States Public Health Service (USPHS). The facility sends a request to USPHS, and USPHS, much like an HMO, determines whether further treatment is necessary and, if so, where the detainee should receive treatment. If the detainee is denied treatment, he or she may appeal through the USPHS.

B. Detainee Classification

The *Standards* suggest that detention facilities use a classification system and physically separate detainees in different categories.⁵⁸ A detainee's classification is to be determined on "objective" criteria, including criminal offenses, escape attempts, institutional disciplinary history, and violent incidents.⁵⁹ Opinions, unconfirmed and unverified information, and physical characteristics and appearance are not to be taken into account.⁶⁰ Classification is required in order to separate detainees with no or minimal criminal records from inmates with serious criminal records.⁶¹

⁵⁸ Detention Operations Manual, Detainee Services, Standard 4, Section I.

⁵⁹ Detention Operations Manual, Detainee Services, Standard 4, Section III.D.

⁶⁰ Detention Operations Manual, Detainee Services, Standard 4, Section III.D.

⁶¹ Detention Operations Manual, Detainee Services, Standard 4, Sections III.A. and III.E.

It appears that the facility has substantially implemented this section of the Standards. The information we obtained concerning classification came from [REDACTED] b6, b7C, the ICE Supervisory Detention Officer. According to Johns, detainees are classified as L-1 (purely administrative, i.e., overstayed a visa), L-2 (low for a misdemeanor, high for drug trafficking or felony), and L-3 (violent offenders) based on security risk. There is no other method of classification used. L-1 and low L-2 detainees are housed together; high L-2 and L-3 detainees are housed together. Detainees who are HIV-positive are not segregated. ICE detainees are not commingled with criminal inmates.

C. Immigration Court

According to [REDACTED] b6, b7C from ICE, there is no immigration court on-site because the detainees are housed at the facility on a temporary basis awaiting transfer to another facility or deportation. There are pro bono legal services available to detainees, telephone numbers for which are pre-programmed into the phones the detainees may use. Further, the detainees may request to have their attorneys' numbers pre-programmed into the phones.

D. ICE Presence

The *Standards* suggest that procedures be in place "to allow for formal and informal contact between key facility staff and ICE staff and ICE detainees and to permit detainees to make written inquiries to ICE staff and receive an answer in an acceptable time frame."⁶² The *Standards* suggest both weekly visits be conducted by ICE personnel and that "regular unannounced (not scheduled) visits" be conducted by the ICE OIC, the Assistant OIC, and designated department heads.⁶³

It appears that the facility has partially implemented this portion of the Standards. The facility does not have an on-site ICE presence, but ICE is available by phone. ICE visits the facility at least twice a week related to transports, and [REDACTED] b6, b7C [REDACTED] b6, b7C performs periodic unannounced site visits. No visitation schedule is provided to the facility staff or posted. If a detainee wishes to contact ICE staff, the detainee must fill out a request form. Lieutenant [REDACTED] b6, b7C reads the request forms

⁶² Detention Operations Manual, Detainee Services, Standard 15, Section I.

⁶³ Detention Operations Manual, Standard 15, Section III.A.

before calling ICE because many of the detainees' requests can be disposed of without involving ICE. Detainee requests are forwarded to ICE within 72 hours if not resolved in-house. If resolved in-house, the request is never forwarded to ICE. According to Lieutenant [REDACTED] b6, b7C the request is filed in the detainee's file. If the request is forwarded to ICE, ICE keeps a copy in the office, according to [REDACTED] b6, b7C.

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Facility Name: **Colquitt County Jail, Moultrie, Georgia**

Date of Tour: **March 16, 2005**

Tour Participants: Holland & Knight LLP attorneys [b6], [b6], [b6], [b6], [b6], and [b6]

*Standards are Detainee Services Standards unless otherwise indicated.

ICE Standard	Delegation Observation	Source	ICE Response
<p>Standard 17, Visitation</p> <ul style="list-style-type: none"> ▪ III.B. Notification. The facility shall provide written notification of visitation rules and hours in the detainee handbook The facility shall also post these rules and hours where detainees can easily see them. 	<ul style="list-style-type: none"> ▪ Detainee indicated he was not aware of hours of attorney visitation (p.4 ¶3). Detainee also stated that he has never had to use an attorney at CCJ (<i>id.</i>). 	<p>Detainee interview</p>	
<p>Standard 17, Visitation</p> <ul style="list-style-type: none"> ▪ III.I.14. Pro Bono List. INS shall provide the facility with the official list of pro bono legal organizations, which is updated quarterly by the EOIR. The facility shall promptly and prominently post the current list in detainee housing units and other appropriate areas. 	<ul style="list-style-type: none"> ▪ Detainee indicated he was not aware of any pro bono legal services in the area (p.4 ¶3). Detainee also stated that he has never had to use an attorney at CCJ (<i>id.</i>). 	<p>Detainee interview</p>	
<p>Standard on Detainee Transfer and Security</p> <ul style="list-style-type: none"> ▪ III.H.2. Food During Transfer. During transfers, food shall be provided to detainees in accordance with the “Meals” section of the Detention Standard “Transportation (Land Transportation).” This standard requires, among other things, that the transporting officers will provide meals and snacks during any long-distance transfer that exceeds six hours. 	<ul style="list-style-type: none"> ▪ Detainee indicated he was sometimes transferred without food during eight hour bus rides that were “non-court transfers” (p.4 ¶3). 	<p>Detainee interview</p>	
<p>Standard 1, Access to Legal Material</p> <ul style="list-style-type: none"> ▪ III.B. Equipment. The law library shall provide an adequate number of typewriters and/or computers . . . to enable detainees to prepare documents for legal proceedings. 	<ul style="list-style-type: none"> ▪ The law library has one computer, for which there is no printer, and one typewriter (p.9 ¶2). There were 39 immigration detainees at the time of the tour, of a population of about 200 (p.2 ¶5). 	<p>Delegation observations</p>	

<p>Standard 9, Group Presentations on Legal Rights.</p> <ul style="list-style-type: none"> III.I. Videotaped presentations. The facility shall play INS-approved videotaped presentations on legal rights, at the request of outside organizations. ... The facility shall provide regular opportunities for detainees in the general population to view the videotape. 	<ul style="list-style-type: none"> The facility does not have a copy of the “Know Your Rights” video because ICE did not have sufficient quantities to distribute to all facilities (p.11 ¶2). The facility has never had a request for a group rights presentation (<i>id.</i>). 	<p>Delegation observations</p>	
<p>Health Services Standard 2, Medical Care.</p> <ul style="list-style-type: none"> III.A. Every facility will provide its detainee population with initial medical screening, cost-effective primary medical care, and emergency care. III.E. Dental Treatment. An initial dental screening exam should be performed within 14 days of the detainee’s arrival. 	<ul style="list-style-type: none"> The facility does not provide initial medical and dental screenings (p.12 ¶1). Screenings occur at the facilities from which the detainees are transferred (<i>id.</i>). 	<p>Delegation observations; information from Sergeant [REDACTED] [REDACTED]</p>	
<p>Standard 4, Detainee Classification</p> <ul style="list-style-type: none"> III.E.2. Level 2 Classification. May not include any detainee whose most recent conviction was for any offense listed under the "HIGHEST" section of the severity of offense guideline (APPENDIX 1 [includes: “Assaulting any person”]). ... May not include any detainee with a pattern or history of violent assaults, whether convicted or not. III.F. The classification system shall assign detainees to the least restrictive housing unit consistent with facility safety and security. 	<ul style="list-style-type: none"> Facility houses “high L-2” detainees (including those with drug trafficking or felony convictions) with “L-3” detainees (violent offenders) (p.13 ¶1). 	<p>Delegation observations; information from ICE Supervisory Detention Officer [REDACTED]</p>	
<p>Standard 15, Staff-Detainee Communication.</p> <ul style="list-style-type: none"> III.B. All detainees shall have the opportunity to submit written questions, requests, or concerns to ICE staff The detainee request shall be delivered to ICE staff by authorized personnel (not detainees) without reading, altering, or delay. 	<ul style="list-style-type: none"> To contact ICE staff, detainees must fill out request forms. Lieutenant [REDACTED] reads the request forms before calling ICE. Requests that are resolved in-house are never forwarded to ICE (p.13 ¶4 – p.14). 	<p>Delegation observations</p>	

