



The Nakamoto Group, Inc.

September 29, 2016

TO: Tae D. Johnson  
Assistant Director for Detention Management

FROM: (b)(6);(b)(7)(C)  
Lead Compliance Inspector  
The Nakamoto Group, Inc.

SUBJECT: **Annual Detention Inspection of the Denver Contract Detention Facility**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2011 of the Denver Contract Detention Facility in Aurora, CO during the period of September 27-29, 2016. This is a CDF.

The annual inspection was performed under the guidance of (b)(6);(b)(7)(C) Lead Compliance Inspector. Team Members were:

Subject Matter Field	Team Member
Security	(b)(6);(b)(7)(C)
Detainee Rights	
Medical Care	
Safety	

### **Type of Inspection**

This is a scheduled annual inspection, which is performed to determine overall compliance with the ICE PBNDS 2011 for Over 72 hour facilities. The facility received a previous rating of Meets Standards during the September 2015 inspection.

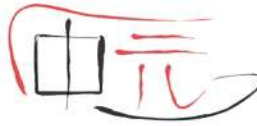
### **Inspection Summary**

The Denver CDF is currently accredited by:

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

### **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 2015 and 2016 PBNDS 2011 compliance annual inspections:



The Nakamoto Group, Inc.

<b>2015 Inspection</b>		<b>2016 Inspection</b>	
Meets Standards	41	Meets Standards	41
Does Not Meet Standards	0	Does Not Meet Standards	0
Repeat Finding	0	Repeat Finding	0
Not Applicable	1	Not Applicable	1

### Facility Snapshot/Description

The Denver Contract Facility, a.k.a. Aurora Detention Center, is owned and operated by the GEO Group and is located in an industrial area in the northern section of Aurora, CO. The two story direct-supervision facility houses adult male and female detainees of all classification levels for ICE and adult male detainees for the U.S. Marshals Service. During the inspection, the total count (b)(7)(E)

(b)(7)(E)

The housing units consist primarily of four-person cells. The housing units have a significant amount of dayroom space, and the cell doors are never locked, except in the segregation areas. Every unit has at least one television, telephone banks, and various recreational equipment, such as ping pong tables. Indoor recreation opportunities are occasionally supplemented by special events, such as concerts, X-box video games, and extra movies. Outdoor recreation times rotate daily between mornings and afternoons, and detainees receive the opportunity for optimal outdoor recreation time, no less than four hours per day. The facility emits a relaxed atmosphere throughout, even in the segregation unit, which is an uncommon characteristic. Detainees interact with staff and each other without hesitation or noticeable anxiety. Detainees enjoy access to activities such as crocheting, arts and crafts, and educational/self-help programs.

Detainees were forthcoming in interviews with the inspection team. There were a number of complaints about possible foreign objects in the food. The Safety SME inspected the food trays and the sanitation in the kitchen and was unable to verify the complaints. The grievance logs did not indicate any complaints about the food. There were three complaints about medical services, all of which were investigated by the Medical SME. Two complaints were determined to be unfounded. On the third complaint, the Medical SME determined that an appointment was somewhat delayed, but was currently scheduled. There were several complaints about a specific officer treating female detainees disrespectfully. The Safety SME followed up on these complaints and it was determined that there were no filed complaints regarding the behavior of the officer in question.

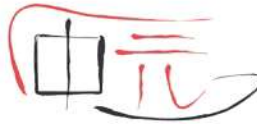
Without exception, detainees stated that they felt safe at this facility. Detainees were familiar with ICE officers and with the ICE officer visitation schedule to the housing units.

In general, the staff gave the impression of standardized, professional conduct, and displayed an understanding of the concept of civil detention and the PBNDS Standards. Many of the staff are bilingual. Interviews with LEP detainees indicated that they had no issues communicating with staff and no problems obtaining services that they needed. Confidential interviews revealed no issues or concerns. The inspection team interviewed no less than eighty ICE detainees during the course of the inspection.

Medical services, food services, and all other services are provided by the GEO Group.

### Areas of Concern/Significant Observations

Of significance is the fact that there were no deficient components identified during this inspection.



The Nakamoto Group, Inc.

**Recommended Rating and Justification**

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standards. The facility complies with the ICE Performance-Based National Detention Standards (PBNDS) 2011. No (0) standards were found Does Not Meet Standards and one (1) standard was Not Applicable (N/A). All remaining forty-one (41) standards were found to be in compliance.

**LCI Assurance Statement**

The findings of Meets Standards and Does Not Meet Standards 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 at the facility and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

- ICE Officials – AFOD (b)(6);(b)(7) SDDO (b)(6);(b)(7)(C) and COR (b)(6);(b)(7)(C)
- Facility Staff – Warden (b)(6);(b)(7)(C) Assistant Warden (b)(6);(b)(7)(C) Assistant Warden (b)(6);(b)(7)(C) Compliance Administrator (b)(6);(b)(7)(C) and various supervisors and staff

(b)(6);(b)(7)(C)

Lead Compliance Inspector

September 29, 2016

Printed Name of LCI

Date

**A. Type of Facility Reviewed**

ICE Service Processing Center  
 ICE Contract Detention Facility  
 ICE Intergovernmental Service Agreement

**B. Current Inspection**

Type of Inspection  
 Field Office  HQ Inspection  
Date[s] of Facility Review  
09/27/2016 - 09/29/2016

**C. Previous/Most Recent Facility Review**

Date[s] of Last Facility Review  
09/29/2015- 10/01/2015  
Previous Rating  
 Meets Standards  Does Not Meet Standards

**D. Name and Location of Facility**

Name  
Denver Contract Detention Facility  
Address (Street and Name)  
3130 North Oakland Street  
City, State and Zip Code  
Aurora, CO 80010  
County  
Adams  
Name and Title of Facility Administrator  
(Warden/OIC/Superintendent)  
(b)(6);(b)(7)(C) Warden  
Telephone # (Include Area Code)  
303-739-(b)(6);  
Field Office / Sub-Office (List Office with oversight responsibilities)  
Denver  
Distance from Field Office  
22 miles

**E. ICE Information**

Name of Inspector (Last Name, Title and Duty Station)  
(b)(6);(b)(7) LCI/Security SME / Nakamoto Group  
Name of Team Member / Title / Duty Location  
(b)(6);(b)(7) Medical SME / Nakamoto Group  
Name of Team Member / Title / Duty Location  
(b)(6);(b)(7) Safety SME / Nakamoto Group  
Name of Team Member / Title / Duty Location  
(b)(6);(b)(7) Detainee Rights SME / Nakamoto Group  
Name of Team Member / Title / Duty Location  
/ /

**F. CDF/IGSA Information Only**

Contract Number  
HSCEDM-11-D-00003  
Date of Contract or IGSA  
09/16/2011  
Basic Rates per Man-Day  
(b)(7)(E);(b)(4)  
Other Charges: (If None, Indicate N/A)  
; ; ;

Estimated Man-days per Year  
172,663

**G. Accreditation Certificates**

List all State or National Accreditation[s] received:  
ACA, NCCHC  
 Check box if facility has no accreditation[s]

**H. Problems / Complaints (Copies must be attached)**

The Facility is under Court Order or Class Action Finding  
 Court Order  Class Action Order  
The Facility has Significant Litigation Pending  
 Major Litigation  Life/Safety Issues  
 Check if None.

**I. Facility History**

Date Built  
2010  
Date Last Remodeled or Upgraded  
N/A  
Date New Construction / Bedspace Added  
N/A  
Future Construction Planned  
 Yes  No Date:  
Current Bedspace  
1108  
Future Bedspace (# New Beds only)  
Number: N/A Date:

**J. Total Facility Population**

(b)(7)(E)

**K. Classification Level (ICE SPCs and CDFs Only)**

	L-1	L-2	L-3
Adult Male	(b)(7)(E)		
Adult Female	(b)(7)(E)		

**L. Facility Capacity**

	Rated	Operational	Emergency
Adult Male	(b)(7)(E)		
Adult Female	(b)(7)(E)		
<input type="checkbox"/> Facility holds Juveniles Offenders 16 and older as Adults			

**M. Average Daily Population**

	ICE	USMS	Other
Adult Male	(b)(7)(E)		
Adult Female	(b)(7)(E)		

**N. Facility Staffing Level**

Security:  
(b)(7)(E)  
Support:

### Significant Incident Summary Worksheet

For The Nakamoto Group to complete its review of your facility, the following information must be completed prior to the scheduled review dates. The information on this form should contain data for the past twelve months in the boxes provided. The information on this form is used in conjunction with the ICE Detention Standards in assessing your Detention Operations against the needs of the ICE and its detained population. This form should be filled out by the facility prior to the start of any inspection. Failure to complete this section will result in a delay in processing this report and the possible reduction or removal of ICE detainees at your facility.

<i>Incidents</i>	<i>Description</i>	Jan – Mar	Apr – Jun	Jul – Sept	Oct – Dec
Assault: Offenders on Offenders <sup>1</sup>	Types (Sexual <sup>2</sup> , Physical, etc.)	Physical	Physical/Sexual	Physical	Physical/Sexual
	With Weapon	0	0	0	0/1
	Without Weapon	7	7/1	3	3/0
Assault: Detainee on Staff	Types (Sexual Physical, etc.)	Physical	Physical	N/A	Physical
	With Weapon	0	0	0	0
	Without Weapon	2	2	0	1
Number of Forced Moves, incl. Forced Cell moves <sup>3</sup>		1	0	0	0
Disturbances <sup>4</sup>		0	0	0	0
Number of Times Chemical Agents Used		1	0	0	0
Number of Times Special Reaction Team Deployed/Used		1	0	0	0
# Times Four/Five Point Restraints applied/used	Number/Reason (M=Medical, V=Violent Behavior, O=Other)	N/A	N/A	N/A	N/A
	Type (C=Chair, B=Bed, BB=Board, O=Other)	N/A	N/A	N/A	N/A
Number of Times Canines Used in Facility		0	0	0	0
Offender / Detainee Medical Referrals as a result of injuries sustained.		0	0	0	0
Escapes	Attempted	0	0	0	0
	Actual	0	0	0	0
Grievances:	# Received	25	46	59	32
	# Resolved in favor of Offender/Detainee	6	10	19	9
Deaths	Reason (V=Violent, I=Illness, S=Suicide, A=Attempted Suicide, O=Other)	0	0	0	0
	Number	0	0	0	0
Psychiatric / Medical Referrals	# Medical Cases referred for Outside Care	4	5	5	7
	# Psychiatric Cases referred for Outside Care	0	0	0	0

<sup>1</sup> Any attempted physical contact or physical contact that involves two or more offenders

<sup>2</sup> Oral, anal or vaginal penetration or attempted penetration involving at least 2 parties, whether it is consenting or non-consenting

<sup>3</sup> Routine transportation of detainees/offenders is not considered "forced"

<sup>4</sup> Any incident that involves four or more detainees/offenders, includes gang fights, organized multiple hunger strikes, work stoppages, hostage situations, major fires, or other large scale incidents.

**DHS/ICE Detention Standards Review Summary Report**

1. Meets Standards		2. Does Not Meet Standards		3. Repeat Finding		4. Not Applicable	
	1	2	3	4			
<b>PART 1 SAFETY</b>							
1	Emergency Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
2	Environmental Health and Safety	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
3	Transportation (By Land)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>PART 2 SECURITY</b>							
4	Admission and Release	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
5	Classification System	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
6	Contraband	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
7	Facility Security and Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
8	Funds and Personal Property	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
9	Hold Rooms in Detention Facilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
10	Key and Lock Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
11	Population Counts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
12	Post Orders	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
13	Searches of Detainees	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
14	Sexual Abuse and Assault Prevention and Intervention	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
15	Special Management Units	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
16	Staff-Detainee Communication	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
17	Tool Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
18	Use of Force and Restraints	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
<b>PART 3 ORDER</b>							
19	Disciplinary System	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
<b>PART 4 CARE</b>							
20	Food Service	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
21	Hunger Strikes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
22	Medical Care	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
23	Personal Hygiene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
24	Suicide Prevention and Intervention	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
25	Terminal Illness, Advance Directives, and Death	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
<b>PART 5 ACTIVITIES</b>							
26	Correspondence and Other Mail	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
27	Escorted Trips for Non-Medical Emergencies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
28	Marriage Requests	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
29	Recreation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
30	Religious Practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
31	Telephone Access	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
32	Visitation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
33	Voluntary Work Program	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>PART 6 JUSTICE</b>							
34	Detainee Handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
35	Grievance System	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
36	Law Libraries and Legal Material	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
37	Legal Rights Group Presentations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
<b>PART 7 ADMINISTRATION &amp; MANAGEMENT</b>							
38	Detention Files	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
39	News Media Interviews and Tours	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
40	Staff Training	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
41	Transfer of Detainees	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			

**LCI Review Assurance Statement**

By signing below, the Lead Compliance Inspector (LCI) certifies that all findings of noncompliance with policy or inadequate controls contained in the Inspection Report are supported by evidence that is sufficient and reliable. Furthermore, findings of noteworthy accomplishments are supported by sufficient and reliable evidence. Within the scope of the review, the facility is operating in accordance with applicable law and policy, and property and resources are efficiently used and adequately safeguarded, except for the deficiencies noted in the report.

Lead Compliance Inspector: (Print Name) <b>(b)(6);(b)(7)(C)</b>	Signature <b>(b)(6);(b)(7)(C)</b>
Title & Duty Location LCI/Security SME, The Nakamoto Group, Inc.	Date 09/29/2016

Team Member	
Print Name, Title, & Duty Location <b>(b)(6);(b)(7)(C)</b> Safety SME, The Nakamoto Group, Inc.	Print Name, Title, & Duty Location <b>(b)(6);(b)(7)(C)</b> Medical SME, The Nakamoto Group, Inc.
Print Name, Title, & Duty Location <b>(b)(6);(b)(7)(C)</b> Detainee Rights SME, The Nakamoto Group, Inc.	Print Name, Title, & Duty Location

**Recommended Rating:**       **Meets Standards**  
 **Does Not Meet Standards**

Comments:      This inspection was conducted to determine overall compliance with the ICE Performance-Based National Detention Standards 2011 (42 standards), which include the following additions/changes to the standards listed on page three:

- Medical Care (Women), a new standard, was rated as Meets Standard;
- Classification System is now titled Custody Classification System;
- Suicide Prevention and Intervention is now titled Significant Self-Harm and Suicide Prevention and Intervention;
- Escorted Trips for Non-Medical Emergencies is now titled Trips for Non-Medical Emergencies;
- News Media Interviews and Tours is now titled Interviews and Tours, and;
- Transfer of Detainees is now titled Detainee Transfer

There is no medical co-pay for ICE detainees. There were no detainee deaths or serious suicide attempts during the inspection period. There were six allegations of sexual assault or abuse involving ICE detainees: two were unsubstantiated, three are currently under investigation, and one resulted in a prosecution of an ICE detainee. In all cases, proper protocols were utilized and documentation was as required, and the appropriate measures were taken to protect the possible victims.

Tasers are not used and canines are not deployed at this facility. Chemical agents are stored in the master control center and will be deployed on ICE detainees if needed. There were four immediate physical responses to resistance involving four ICE detainees and two planned physical responses involving two ICE detainees. The incidents were reviewed and it was determined that the force was justified and applied only to the degree necessary to control each situation. Medical staff was involved as appropriate.

The Major Litigation box checked in Paragraph H of the first page of this document refers to a small group of detainees who filed action regarding the amount of pay they received for working at the facility.

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Withheld pursuant to exemption

(b)(7)(E)

of the Freedom of Information and Privacy Act