

April 28, 2021

The Honorable Alejandro Mayorkas  
Secretary of Homeland Security  
Washington, DC 20528

*Via email*

**Re: Announce the Planned Closure of ICE Detention  
Facilities in May 2021**



National Political  
Advocacy Department  
915 15th St. NW, 6th FL  
Washington, D.C. 20005  
aclu.org

Deborah Archer  
*President*

Anthony Romero  
*Executive Director*

Ronald Newman  
*National Political  
Director*

Dear Secretary Mayorkas,

We write to urge you to announce your intention to close Immigration and Customs Enforcement (ICE) detention facilities across the country. With lower ICE arrest rates and already reduced levels of detention arising from the COVID-19 pandemic, ICE is currently paying to maintain thousands of empty beds at enormous taxpayer expense—wasting hundreds of millions of dollars that would be better spent on alternatives to detention and other programmatic priorities.<sup>1</sup> As a matter of good governance, and particularly in light of the historically low number of people in ICE detention, it is time for ICE to dramatically downscale its network of more than 200 facilities.<sup>2</sup>

Our experience litigating cases concerning due process for detained immigrants and detention conditions—particularly in relation to the COVID-19 pandemic—gives us insight into the factors and facilities that warrant your urgent attention. We urge you to announce the closure of or termination of contracts for the 39 facilities listed in an

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<sup>1</sup> “ICE’s arrests fell by about two-thirds in March compared with the monthly tallies toward the end of the Trump administration, when arrests had already slowed amid the continuing pandemic, the data show. Deportations fell by nearly 50%. And ICE’s population of immigrants in detention—which peaked above 56,000 in 2019—fell to 14,000 in March.” Michelle Hackman, “Deportations and Arrests of Immigrants in the U.S. Illegally Fall Sharply Under Biden,” *Wall Street Journal* (April 4, 2021), <https://www.wsj.com/articles/deportations-and-arrests-of-immigrants-in-the-u-s-illegally-fall-sharply-under-biden-11617544800>; see also Joel Rose, “Beyond the Border, Fewer Immigrants Being Locked Up But ICE Still Pays for Empty Beds,” NPR News (April 1, 2020), <https://www.npr.org/2021/04/01/982815269/beyond-the-border-fewer-immigrants-being-locked-up-but-ice-still-pays-for-empty-beds>.

<sup>2</sup> We join ally organizations across the country in urging that prior to closing a detention facility, ICE release all individuals still detained there—rather than transferring them to distant detention facilities or placing them on electronic surveillance. See Letter Calling For Phase Out of Detention Beginning With Ten Facilities, [https://www.americanimmigrationcouncil.org/sites/default/files/research/letter\\_calling\\_for\\_phase-out\\_of\\_detention\\_beginning\\_with\\_ten\\_facilities.pdf](https://www.americanimmigrationcouncil.org/sites/default/files/research/letter_calling_for_phase-out_of_detention_beginning_with_ten_facilities.pdf)

annex to this letter, identified by the following criteria: (1) the facility was opened without adequate justification; (2) the facility is located in a remote location that effectively limits access to legal counsel or medical care; and/or (3) closure of the facility is warranted by egregious patterns of inhumane treatment or conditions.<sup>3</sup>

The ACLU is also a cosponsor of the #FirstTen campaign and a member of the Detention Watch Network, and endorses its roadmap for detention shutdowns.<sup>4</sup>

### **I. Close facilities that were opened by the prior administration without adequate justification.**

We urge you to close detention facilities opened by the prior administration without adequate justification, including those opened in violation of ICE’s own process for obtaining new detention space.

In February 2021, the Government Accountability Office (GAO) publicly released a report finding that ICE failed to adhere to its own process for obtaining new detention space. In 28 out of 40 contracts initiated between Fiscal Years 2017 and 2020, GAO found ICE “did not have documentation from ICE field offices showing a need for the space, outreach to local officials, or the basis for ICE’s decision to enter them, as required by ICE’s process.”<sup>5</sup> ICE brought new facilities online despite documented poor conditions, remote locations, limited medical care resources, and insufficient staffing.

In multiple cases documented by GAO, ICE disregarded the input of local ICE Field Office staff who advised against opening facilities or entering into contracts due to safety issues for detainees and staff, a history of chronic understaffing, and punitive conditions unsuitable for civil immigration detention.<sup>6</sup>

*Justice-Free Zones*, a recent report by the ACLU, Human Rights Watch, and the National Immigrant Justice Center on detention facilities opened after 2017,

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<sup>3</sup> The ACLU has serious concerns about the care and treatment of people detained at numerous facilities that are not on our list. The ACLU continues to urge the Biden administration to execute a broad reform agenda on immigration detention, including terminating all contracts with county jails and private prison companies. See American Civil Liberties Union, “ACLU Policy Recommendations for the Biden-Harris Administration,” <https://www.aclu.org/aclu-immigration-policy-recommendations-biden-harris-administration>.

<sup>4</sup> See Detention Watch Network, *First Ten to Communities Not Cages* (2021), <https://www.detentionwatchnetwork.org/sites/default/files/reports/DWN%20First%20Ten%20to%20Communities%20Not%20Cages.pdf>.

<sup>5</sup> U.S. Government Accountability Office, *Immigration Detention: Actions Needed to Improve Planning, Documentation, and Oversight of Detention Facility Contracts* (January 2021), 2, <https://www.gao.gov/assets/gao-21-149.pdf>.

<sup>6</sup> U.S. Government Accountability Office, *Immigration Detention: Actions Needed to Improve Planning, Documentation, and Oversight of Detention Facility Contracts* (January 2021), 21–22, <https://www.gao.gov/assets/gao-21-149.pdf>.

corroborates and elaborates on these concerns.<sup>7</sup> We found that new facilities suffered from understaffing and cost-cutting measures that could endanger the health of people in detention, including significant delays to care, failure to receive necessary medication, and a lack of basic infrastructure to treat critically ill people.<sup>8</sup> We also found that people had far less access to attorneys in the new facilities. When comparing immigration detention facilities operating before 2017 to those opened after 2017, there were four times as many immigration attorneys available within a 100-mile radius of pre-existing facilities versus new ones.<sup>9</sup>

## **II. Close facilities in remote locations with limited access to legal counsel.**

We urge you to close detention facilities in remote locations with compromised access to counsel and external medical care and direct a review of the availability of legal counsel, pro bono/low bono legal services, legal orientation program volunteers, and specialized medical and 24-hour emergency and trauma care facilities near all ICE detention facilities that are contracted to hold individuals beyond 72 hours.<sup>10</sup>

While all detained immigrants suffer low rates of legal representation,<sup>11</sup> individuals detained in remote locations suffer acutely. One national study found that detained immigrants in small cities or rural areas had a representation rate of only 10 percent—compared to a representation rate of 17 percent for those detained in large cities.<sup>12</sup> In *Justice-Free Zones*, we found that the prior administration opened detention facilities in some of the most remote, isolated locations in the country, where there are few or no organizations available to provide support or legal services to detained immigrants, and not nearly enough immigration lawyers to serve the detained population.<sup>13</sup>

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<sup>7</sup> ACLU, Human Rights Watch, National Immigrant Justice Center, *Justice-Free Zones: U.S. Immigration Detention Under the Trump Administration* (2020), <https://www.aclu.org/report/justice-free-zones-us-immigration-detention-under-trump-administration> [hereinafter *Justice-Free Zones*].

<sup>8</sup> *Justice-Free Zones* at 4, 6-7.

<sup>9</sup> *Justice-Free Zones* at 5-6.

<sup>10</sup> This would be consonant with recommendations in a 2009 ICE report on immigration detention authored by the former director of the Office of Detention Policy and Planning, urging that “facilities should be placed nearby consulates, pro bono counsel, EOIR services, asylum offices, and 24-hour emergency medical care.” See Dr. Dora Schriro, *Immigration Detention Overview and Recommendations* (U.S. Department of Homeland Security Immigration and Customs Enforcement, Oct. 6, 2009), <https://www.ice.gov/doclib/about/offices/odpp/pdf/ice-detention-rpt.pdf>.

<sup>11</sup> The ACLU wrote recommendations to the new administration to address the pervasive lack of access to counsel in the immigration system. See ACLU, “Recommendations to the Biden-Harris Administration, The Right to Counsel,” <https://www.aclu.org/other/right-counsel>.

<sup>12</sup> Ingrid V. Eagly and Steven Shafer, “A National Study of Access to Counsel in Immigration Court,” *University of Pennsylvania Law Review* 164, no. 1 (December 2015), [https://scholarship.law.upenn.edu/cgi/viewcontent.cgi?article=9502&context=penn\\_law\\_review](https://scholarship.law.upenn.edu/cgi/viewcontent.cgi?article=9502&context=penn_law_review).

<sup>13</sup> *Justice-Free Zones* at 6, 20–21.

Lack of counsel has disastrous implications for detained individuals' ability to win release on bond and parole and, ultimately, their claims for relief from deportation. According to one study, just 3 percent of individuals in detention and without a lawyer succeeded in their cases, compared to 74 percent of represented individuals who were released or never detained.<sup>14</sup> Another study found that detained immigrants represented by counsel obtained successful outcomes at a rate more than 10 times higher than those who were unrepresented.<sup>15</sup>

The location of immigration detention facilities in areas without adequate access to specialized and emergency medical care also endangers the lives of detained people.<sup>16</sup> ICE Field Office staff raised concerns about the lack of availability of specialized medical care near facilities opened after 2017, requiring significant logistical support for detained people with chronic care needs.<sup>17</sup> ICE's own experts have recommended that detention facilities be located near 24-hour emergency facilities.<sup>18</sup>

### **III. Close facilities based on egregious records of inhumane treatment or conditions.**

Finally, we urge you to close detention facilities with egregious records of inhumane treatment or conditions, starting with those in our list and those featured in the #FirstTen campaign. We also urge you to direct the Office for Civil Rights and Civil Liberties to conduct a review of serious allegations of abuse at these ICE detention facilities.

The review should solicit input from nonprofit organizations and impacted individuals and culminate in a report recommending facilities for closure and other

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<sup>14</sup> Stacy Caplow, Peter L. Markowitz, Jojo Annobil, Peter Z. Cobb, Nancy Morawetz, Oren Root, Claudia Slovinsky, Zhifen Cheng, and Lindsay C. Nash, "Accessing Justice: The Availability and Adequacy of Counsel Removal Proceedings: New York Immigrant Representation Study Report," *Cardozo Law Review* 33, no. 2 (2011-2012), <https://brooklynworks.brooklaw.edu/cgi/viewcontent.cgi?article=1551&context=faculty&httpsredir=1&referer=>.

<sup>15</sup> Ingrid V. Eagly and Steven Shafer, "A National Study of Access to Counsel in Immigration Court," *University of Pennsylvania Law Review* 164, no. 1 (December 2015), [https://scholarship.law.upenn.edu/cgi/viewcontent.cgi?article=9502&context=penn\\_law\\_review](https://scholarship.law.upenn.edu/cgi/viewcontent.cgi?article=9502&context=penn_law_review).

<sup>16</sup> Human Rights Watch, *Systemic Indifference: Dangerous & Substandard Medical Care in US Immigration Detention* (2017), [https://www.hrw.org/report/2017/05/08/systemic-indifference/dangerous-substandard-medical-care-us-immigration-detention#\\_ftn211](https://www.hrw.org/report/2017/05/08/systemic-indifference/dangerous-substandard-medical-care-us-immigration-detention#_ftn211).

<sup>17</sup> U.S. Government Accountability Office, *Immigration Detention: Actions Needed to Improve Planning, Documentation, and Oversight of Detention Facility Contracts* (January 2021), 21, <https://www.gao.gov/assets/gao-21-149.pdf>.

<sup>18</sup> Dr. Dora Schriro, *Immigration Detention Overview and Recommendations* (U.S. Department of Homeland Security Immigration and Customs Enforcement, Oct. 6, 2009), <https://www.ice.gov/doclib/about/offices/odpp/pdf/ice-detention-rpt.pdf>.

reforms. This review should focus on conditions of confinement and issues such as sexual abuse, solitary confinement, and use of force.

This review should also include ICE's failures to ensure safe conditions and adequate medical treatment.<sup>19</sup> Many ICE detention facilities have failed to implement COVID-19 public health measures, including refusing to test detained people and failing to provide personal protective equipment and hygiene products.

Additionally, many facilities have records of medical neglect and mistreatment pre-dating the pandemic. Vulnerable immigrants have reported being subject to coercive medical procedures, including hysterectomies and other procedures that could damage reproductive capacity.<sup>20</sup> Lack of adequate medical and mental health care has resulted in serious harm to detained people, including loss of hearing and sight, amputations, and suicide.<sup>21</sup> Many report that they cannot get access to prescribed medications, medical tests, or treatment for serious conditions such as HIV and diabetes.<sup>22</sup> Even prior to the pandemic, the Centers for Disease Control found unsanitary conditions in 57 detention facilities that led to the spread of infectious diseases.<sup>23</sup>

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<sup>19</sup> U.S. Department of Homeland Security Office of Inspector General, *Early Experiences with COVID-19 at ICE Detention Facilities* (June 2020), <https://www.oig.dhs.gov/sites/default/files/assets/2020-06/OIG-20-42-Jun20.pdf>; Letter from Dr. Scott Allen and Dr. Josiah Rich to Hon. Bennie Thompson et al (March 19, 2020), <https://www.documentcloud.org/documents/6816336-032020-Letter-From-Drs-Allen-Rich-to-Congress-Re.html#document/p4/a557238>; Andrea Castillo, "ICE Deliberately Limited Testing at Bakersfield Immigration Facility with COVID-19 Outbreak," *Los Angeles Times* (Aug. 6, 2020), <https://www.latimes.com/california/story/2020-08-06/amid-coronavirus-outbreak-at-bakersfield-immigration-facility-emails-show-ice-deliberately-limited-testing>; Antonio Olivo and Nick Miroff, "ICE Flew Detainees to Virginia So the Planes Could Transport Agents to D.C. Protests. A Huge Coronavirus Outbreak Followed," *The Washington Post* (Sept. 11, 2020), [https://www.washingtonpost.com/coronavirus/ice-air-farmville-protests-covid/2020/09/11/f70ebe1e-e861-11ea-bc79-834454439a44\\_story.html?arc404=true&\\_ddid=2-1599836400](https://www.washingtonpost.com/coronavirus/ice-air-farmville-protests-covid/2020/09/11/f70ebe1e-e861-11ea-bc79-834454439a44_story.html?arc404=true&_ddid=2-1599836400).

<sup>20</sup> Molly O'Toole, "19 Women Allege Medical Abuse in Georgia Immigration Detention," *Los Angeles Times* (Oct. 22, 2020), <https://www.latimes.com/politics/story/2020-10-22/women-allege-medical-abuse-georgia-immigration-detention>.

<sup>21</sup> ACLU, "Recommendations to the Biden-Harris Administration, Ending ICE's Mass Detention System," <https://www.aclu.org/other/ending-ices-mass-detention-system>.

<sup>22</sup> Charles Bethea, "A Medical Emergency, and the Growing Crisis at Immigration Detention Centers," *The New Yorker* (Sept. 13, 2017), <https://www.newyorker.com/news/news-desk/a-medical-emergency-and-the-growing-crisis-at-immigration-detention-centers>; Southern Poverty Law Center, *Shadow Prisons: Immigration Detention in the South* (November 2016), <https://www.splcenter.org/20161121/shadow-prisons-immigrant-detention-south> [hereinafter *Shadow Prisons*].

<sup>23</sup> Jessica Leung, Diana Elson, Kelsey Sanders, Mona Marin, Greg Leos, Brandy Cloud, Rebecca J. McNall, Carole J. Hickman, and Mariel Marlow, "Notes from the Field: Mumps in Detention Facilities that House Detained Migrants—United States, September 2018–August 2019," *Morbidity and Mortality Weekly Report* 68, no. 34 (August 2019): 749–750, <https://www.cdc.gov/mmwr/volumes/68/wr/mm6834a4.htm>.

Thank you for your consideration of these important issues. If you have any questions or need further detail, please contact National Political Advocacy Department senior policy counsel Naureen Shah ([nshah@aclu.org](mailto:nshah@aclu.org)), National Prison Project senior staff attorney Eunice Cho ([echo@aclu.org](mailto:echo@aclu.org)), and Immigrants' Rights Project deputy director Michael Tan ([mtan@aclu.org](mailto:mtan@aclu.org))

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald Newman". The signature is fluid and cursive, with the first name "Ronald" being more prominent than the last name "Newman".

Ronald Newman  
ACLU National Political Director

## Annex: Suggested Detention Facilities for Closure

### I. List of Facilities

Facility	Post-2017 Facility	Guaranteed Minimums in Contract <sup>24</sup>	Remote Location	Egregious Conditions
1. Etowah County Jail (Etowah County Sheriff's Office), Gadsden, Alabama			X	X
2. Eloy Detention Center (CoreCivic), Eloy, Arizona			X	X
3. La Palma Correctional Center (CoreCivic), Eloy, Arizona	X	X	X	X
4. Adelanto Detention Center (GEO Group), Adelanto, California		X	X	X
5. Desert View Annex (GEO Group), Adelanto, California	X	X	X	
6. Imperial Regional Detention Facility (Management and Training Corporation), Calexico, California		X	X	X
7. Mesa Verde ICE Processing Facility (GEO Group), Bakersfield, California		X	X	X
8. Otay Mesa Detention Center (CoreCivic), San Diego, California		X		X

<sup>24</sup> Guaranteed minimums are the number of beds ICE pays for each day regardless of whether they are used. See U.S. Government Accountability Office, *Immigration Detention: Additional Actions Needed to Strengthen Management and Oversight of Facility Standards* (October 2014), <https://www.gao.gov/products/gao-15-153>.

<b>Facility</b>	<b>Post-2017 Facility</b>	<b>Guaranteed Minimums in Contract<sup>24</sup></b>	<b>Remote Location</b>	<b>Egregious Conditions</b>
9. Yuba County Jail (Yuba County Sheriff's Office), Marysville, California		X	X	X
10. Baker County Detention Center (Baker County Sheriff's Office), Macclenny, Florida				X
11. Glades County Detention Center (Glades Correctional Development Corporation and Glades County Sheriff's Office), Moore Haven, Florida			X	X
12. Krome North Service Processing Center (Akima Global Services), Miami, Florida		X		X
13. Irwin County Detention Center (LaSalle Corrections), Ocilla, Georgia		X	X	X
14. Stewart Detention Center (CoreCivic), Lumpkin, Georgia		X	X	X
15. Allen Parish Public Safety Complex (Allen Parish Sheriff's Office), Oberlin, Louisiana	X	X	X	X
16. Catahoula Correctional Center (LaSalle Corrections), Harrisonburg, Louisiana	X		X	X
17. Jackson Parish Correctional Center (LaSalle Corrections), Jonesboro, Louisiana	X	X	X	X
18. LaSalle ICE Processing Center (GEO Group), Jena, Louisiana		X	X	X
19. Pine Prairie ICE Processing Center (GEO			X	X



<b>Facility</b>	<b>Post-2017 Facility</b>	<b>Guaranteed Minimums in Contract<sup>24</sup></b>	<b>Remote Location</b>	<b>Egregious Conditions</b>
Group), Pine Prairie, Louisiana				
20. Richwood Correctional Center (LaSalle Corrections), Monroe, Louisiana	X	X	X	X
21. River Correctional Center (LaSalle Corrections), Ferriday, Louisiana	X	X	X	X
22. South Louisiana ICE Processing Center (GEO Group), Basile, Louisiana	X	X	X	X
23. Winn Correctional Center (LaSalle Corrections), Winnfield, Louisiana	X	X	X	X
24. Bristol County House of Correction and Jail (Bristol County Sheriff's Office), North Dartmouth, Massachusetts				X
25. Calhoun County Correctional Facility (Calhoun County Sheriff's Office), Battle Creek, Michigan				X
26. Adams County Detention Center (CoreCivic), Natchez, Mississippi	X	X	X	X
27. Sherburne County Jail (Sherburne County Sheriff's Office), Elk River, Minnesota			X	X
28. Otero County Processing Center (Management and Training Corporation), Chaparral, New Mexico		X		X
29. Okmulgee County Jail (Okmulgee County Sheriff's Office), Okmulgee, Oklahoma	X		X	X

<b>Facility</b>	<b>Post-2017 Facility</b>	<b>Guaranteed Minimums in Contract<sup>24</sup></b>	<b>Remote Location</b>	<b>Egregious Conditions</b>
30. Clinton County Correctional Facility (Clinton County), McElhattan, Pennsylvania			X	X
31. Pike County Correctional Facility (Pike County), Lords Valley, Pennsylvania				X
32. York County Prison (York County), York, Pennsylvania		X		X
33. Bluebonnet Detention Center (Management and Training Corporation), Anson, Texas	X	X	X	X
34. El Valle Detention Facility (Management and Training Corporation), Raymondville, Texas	X	X	X	X
35. T. Don Hutto Residential Center (CoreCivic), Taylor, Texas		X		X
36. IAH Secure Adult Detention Facility (Management and Training Corporation), Livingston, Texas			X	X
37. Montgomery Processing Center (GEO Group), Conroe, Texas	X	X		X
38. Prairieland Detention Center (LaSalle Corrections), Alvarado, Texas	X	X		X
39. Farmville Detention Center (Immigration Centers of America), Farmville, Virginia		X	X	X

## II. Annotated List of Facilities

### 1. Etowah County Jail (Etowah County Sheriff's Office) in Gadsden, Alabama

*Total bed capacity: 325 people*<sup>25</sup>

In 2016, the Department of Homeland Security Office for Civil Rights and Civil Liberties (CRCL) recommended that ICE end its contract with Etowah after documenting repeated complaints and recommendations that the county failed to implement.<sup>26</sup> Etowah has a lengthy history of documented failure to provide adequate medical care,<sup>27</sup> as well as numerous reports of assaults, bribery, solitary confinement, inadequate nutrition, and environmental hazards. More recently, detainees have reported mistreatment and poor conditions during the COVID-19 pandemic, including solitary confinement of detainees without air conditioning in 91-degree heat in retaliation for requesting COVID-19 testing and failure to provide face masks, leading to one-quarter of all its ICE detainees falling sick with COVID-19 in late July 2021.<sup>28</sup>

### 2. Eloy Detention Center (CoreCivic) in Eloy, Arizona

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<sup>25</sup> DHS Office of Detention Oversight, *Compliance Inspection: Etowah County Detention Center* (January 2021), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/etowahCoDetCntrGadsenAL\\_Jan25-29\\_2021.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/etowahCoDetCntrGadsenAL_Jan25-29_2021.pdf).

<sup>26</sup> DHS Office of Detention Oversight, *Compliance Inspection: Etowah County Jail* (December 2016), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/etowahCountyJailGadsdenAlDec13-15\\_2016.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/etowahCountyJailGadsdenAlDec13-15_2016.pdf); DHS Office for Civil Rights and Civil Liberties, *Fiscal Year 2015 Annual Report to Congress* (June 2016), <https://www.dhs.gov/sites/default/files/publications/crcl-fy-2015-annual-report.pdf>; Memo from Megan H. Mack and David Palmer to Sarah Saldaña and Gwendolyn Keyes Fleming, "Recommendations Regarding Ongoing Issues and Open Complaints at the Etowah County Jail" (May 2, 2004), <http://shutdownetowah.org/wp-content/uploads/2015/07/Adelante-Production-May-7-2019.pdf>; Khushbu Shah, "Etowah: the ICE Detention Center With the Goal to 'Make Your Life Miserable,'" *The Guardian* (Dec. 2, 2018), <https://www.theguardian.com/us-news/2018/dec/02/etowah-the-ice-detention-center-with-the-goal-to-make-your-life-miserable>; Letter to Jeh Johnson, Secretary of Homeland Security (July 24, 2015), [http://shutdownetowah.org/wp-content/uploads/2015/07/2015-07-24\\_Etowah-Org-Sign-On-Letter.pdf](http://shutdownetowah.org/wp-content/uploads/2015/07/2015-07-24_Etowah-Org-Sign-On-Letter.pdf).

<sup>27</sup> Human Rights Watch, *Systemic Indifference: Dangerous & Substandard Medical Care in US Immigration Detention* (2017), [https://www.hrw.org/report/2017/05/08/systemic-indifference/dangerous-substandard-medical-care-us-immigration-detention#\\_ftn211](https://www.hrw.org/report/2017/05/08/systemic-indifference/dangerous-substandard-medical-care-us-immigration-detention#_ftn211); DHS Office of Detention Oversight, *Compliance Inspection: Etowah County Jail* (2016), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/etowahCountyJailGadsdenAlDec13-15\\_2016.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/etowahCountyJailGadsdenAlDec13-15_2016.pdf).

<sup>28</sup> Clarissa Donnelly-DeRoven, "Immigrants Detained by ICE Say They Were Punished for Requesting COVID-19 Tests," *The Intercept* (Dec. 3, 2020), <https://theintercept.com/2020/12/03/etowah-ice-detention-covid-outbreak/>.

*Total bed capacity: 1,550 people*<sup>29</sup>

The Eloy Detention Center is one of the deadliest ICE facilities in the country, with more than 16 deaths in custody,<sup>30</sup> including five by suicide.<sup>31</sup> Advocacy groups report the use of solitary confinement, including holding people in small cells for 22 hours a day and using it against people suffering from suicidal ideation.<sup>32</sup> There are long-standing reports of a lack of basic hygiene at the facility, including lack of potable water.<sup>33</sup> These longstanding hygiene issues and medical neglect caused COVID-19 to ravage the facility, with at least one employee dying from complications from the virus.<sup>34</sup>

### 3. **La Palma Correctional Center (CoreCivic) in Eloy, Arizona**

*Total bed capacity: 1,620 people; guaranteed minimum: 1,800*<sup>35</sup>

The La Palma Correctional Center became a new ICE detention facility in 2019, after California announced that it would stop using the facility for its prisoners. Since La Palma opened, it has become notorious for poor conditions and abuse. La Palma has set the record for the highest number of COVID-19 cases in any detention facility nationwide.<sup>36</sup> A recent DHS Office of Inspector General (OIG) report confirmed the dangerous use of force, abuse, and lack of medical care at La Palma Correctional Center throughout the COVID-19 pandemic. The OIG concluded

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<sup>29</sup> DHS Office of Detention Oversight, *Compliance Inspection: Eloy Federal Contract Facility* (June 2020), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/eloyFCF\\_EloyAZ\\_Jun15-18\\_2020.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/eloyFCF_EloyAZ_Jun15-18_2020.pdf).

<sup>30</sup> Monsy Alvarado, Ashley Balcerzak, Stacey Barchenger, Jon Campbell, Rafael Carranza, Maria Clark, Alan Gomez, Daniel Gonzalez, Trevor Hughes, Rick Jervis, Dan Keemahill, Rebecca Plevin, Jeremy Schwartz, Sarah Taddeo, Lauren Villagran, Dennis Wagner, Elizabeth Weise, and Alissa Zhu, “Deaths in Custody. Sexual Violence. Hunger Strikes. What We Uncovered Inside ICE Facilities across the US,” *USA Today* (updated April 23, 2020), <https://www.usatoday.com/in-depth/news/nation/2019/12/19/ice-asylum-under-trump-exclusive-look-us-immigration-detention/4381404002/>

<sup>31</sup> *Id.*

<sup>32</sup> *Id.*

<sup>33</sup> *Id.*

<sup>34</sup> Daniel Gonzalez, “Guard at Eloy Detention Center May Have Died of COVID-19 as Coronavirus Cases at Facility Soar,” *Arizona Republic* (June 16, 2020), <https://www.azcentral.com/story/news/politics/immigration/2020/06/15/coronavirus-cases-arizona-eloy-detention-center-guard-covid-19-deaths/3193118001/>.

<sup>35</sup> Rodney Bivens, *PREA Audit Report: La Palma Correctional Center* (June 18, 2017), [https://www.corecivic.com/hubfs/\\_files/PREA/Facilities/2017-La%20Palma%20Correctional%20%20Center%20final%20PREA%20Report.pdf](https://www.corecivic.com/hubfs/_files/PREA/Facilities/2017-La%20Palma%20Correctional%20%20Center%20final%20PREA%20Report.pdf); U.S. Department of Homeland Security Immigration and Customs Enforcement, “Detention Statistics FY 2021 YTD” (Accessed April 14, 2021), <https://www.ice.gov/detain/detention-management> [hereinafter ICE FY 2021 Detention Statistics].

<sup>36</sup> Spencer Hardenbergh, “Detention Center in Eloy Has Most COVID-19 Cases of Any ICE Facility,” *Cronkite News* (Oct. 8, 2020), <https://cronkitenews.azpbs.org/2020/10/07/eloy-detention-center-most-covid-19-cases-ice-facility/>.

that conditions at La Palma “threatened the health, safety, and rights of detainees” and “created an environment of mistreatment and abuse.”<sup>37</sup> An ACLU report released prior to the pandemic also documented complaints of physical and verbal abuse of detained people, poor hygiene and ventilation, and due process violations, including denial of access to legal orientation programs.<sup>38</sup>

#### 4. **Adelanto Detention Center** (GEO Group) in Adelanto, **California**

*Total bed capacity: 1,940 people; guaranteed minimum: 1,455*<sup>39</sup>

The DHS OIG,<sup>40</sup> California Department of Justice,<sup>41</sup> and numerous nongovernmental sources<sup>42</sup> have long criticized conditions at the Adelanto ICE Processing Center. The OIG documented nooses in cells, detainees with rotting teeth, abuses of disciplinary segregation, and retaliation against detainees who raised concerns about conditions.<sup>43</sup> This facility, located more than 80 miles from downtown Los Angeles, holds up to 1,940 detained men and women (many of them asylum seekers) several hours away from counsel.<sup>44</sup> Adelanto has also been a source of liability for the federal government: Class actions at the facility have led to injunctions protecting the right to counsel,<sup>45</sup> requiring better medical treatment for people in detention,<sup>46</sup> and requiring ICE to stop treating COVID-19 precautions at

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<sup>37</sup> DHS Office of Inspector General, *Violations of Detention Standards Amid COVID-19 Outbreak at La Palma Correctional Center in Eloy, AZ* (March 2021), <https://www.oig.dhs.gov/sites/default/files/assets/2021-04/OIG-21-30-Mar21.pdf>.

<sup>38</sup> *Justice-Free Zones* at 56-59.

<sup>39</sup> DHS Office of Detention Oversight, *Compliance Inspection: Adelanto ICE Processing Center* (September 2020), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/adelantoICE\\_ProcCntrAdelantoCA\\_Sep14-17\\_2020.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/adelantoICE_ProcCntrAdelantoCA_Sep14-17_2020.pdf); ICE FY 2021 Detention Statistics.

<sup>40</sup> DHS Office of Inspector General, *Management Alert—Issues Requiring Action at the Adelanto ICE Processing Center in Adelanto, California* (September 2018), <https://www.oig.dhs.gov/sites/default/files/assets/2018-10/OIG-18-86-Sep18.pdf>.

<sup>41</sup> California Department of Justice, *The California Department of Justice’s Review of Immigration Detention in California* (January 2021), <https://oag.ca.gov/sites/all/files/agweb/pdfs/publications/immigration-detention-2021.pdf>.

<sup>42</sup> Community Initiatives for Visiting Immigrants in Confinement and Detention Watch Network, *Abuse in Adelanto: An Investigation into a California Town’s Immigration Jail* (October 2015), <https://www.detentionwatchnetwork.org/sites/default/files/reports/CIVIC%20DWN%20Adelanto%20Report.pdf>.

<sup>43</sup> DHS Office of Inspector General, *Management Alert—Issues Requiring Action at the Adelanto ICE Processing Center in Adelanto, California* (September 2018), <https://www.oig.dhs.gov/sites/default/files/assets/2018-10/OIG-18-86-Sep18.pdf>.

<sup>44</sup> See California Department of Justice, *The California Department of Justice’s Review of Immigration Detention in California* (January 2021), <https://oag.ca.gov/sites/all/files/agweb/pdfs/publications/immigration-detention-2021.pdf>.

<sup>45</sup> American Civil Liberties Union of Southern California, “Torres v. DHS” (updated April 2020), <https://www.aclusocal.org/en/cases/torres-v-dhs>.

<sup>46</sup> Southern Poverty Law Center, “Fraihat v. ICE Community Resources” (updated March 2021), <https://www.splcenter.org/fraihat-v-ice-community-resources>.

the facility with deliberate indifference,<sup>47</sup> among other cases.<sup>48</sup> At least five people have died in ICE custody in the past four years at Adelanto.<sup>49</sup>

### 5. **Desert View Annex** (GEO Group) in Adelanto, **California**

*Total bed capacity: 750 people; guaranteed minimum: 120*<sup>50</sup>

The Desert View Annex—opened in early 2021 after President Biden took office—is the GEO Group’s latest effort to expand immigration detention in remote areas. Located next to the Adelanto ICE Processing Center about 80 miles from Los Angeles, Desert View has been plagued by corruption scandals since it was first proposed to the residents of Adelanto in early 2019. California banned private detention facilities in 2018.<sup>51</sup> But in a contentious meeting that advocates say violated state law, the Adelanto Planning Commission voted to grant GEO’s request to modify its use permit for a facility that previously held state prisoners, paving the way for ICE detainees.<sup>52</sup> Within weeks, Desert View became operational.<sup>53</sup> Opening this facility directly contravened the will of California’s voters and legislators.<sup>54</sup>

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<sup>47</sup> *Hernandez Roman v. Wolf*, No. 5:20-cv-768 (C.D. Cal.).

<sup>48</sup> Rebecca Plevin, “Asylum-Seekers Allegedly Pepper-Sprayed at Adelanto Detention Center Settle With GEO Group,” *Palm Springs Desert Sun* (Feb. 6, 2020), <https://eu.desertsun.com/story/news/2020/02/06/asylum-seekers-allegedly-pepper-sprayed-adelanto-detention-center-settle-geo-group/4680659002/>.

<sup>49</sup> U.S. Department of Homeland Security Immigration and Customs Enforcement, “ICE Detainee Passes Away at Victorville Medical Center” (April 14, 2017), <https://www.ice.gov/news/releases/ice-detainee-passes-away-victorville-medical-center-0>; U.S. Department of Homeland Security Immigration and Customs Enforcement, “ICE Detainee Passes Away En Route to Victorville Hospital” (June 1, 2017), <https://www.ice.gov/news/releases/ice-detainee-passes-away-en-route-victorville-hospital>; *Justice-Free Zones* at 68-69.

<sup>50</sup> California Department of Justice, *The California Department of Justice’s Review of Immigration Detention in California* (January 2021), <https://oag.ca.gov/sites/all/files/agweb/pdfs/publications/immigration-detention-2021.pdf>; ICE FY 2021 Detention Statistics.

<sup>51</sup> Office of Governor Gavin Newsom, “Governor Newsom Signs AB 32 to Halt Private, For-Profit Prisons and Immigration Detention Facilities in California” (Oct. 11, 2019), <https://www.gov.ca.gov/2019/10/11/governor-newsom-signs-ab-32-to-halt-private-for-profit-prisons-and-immigration-detention-facilities-in-california/>.

<sup>52</sup> Rebecca Plevin, “Advocates Threaten Litigation if Adelanto Issues Permit to GEO for ICE Detention Center Expansion,” *Palm Springs Desert Sun* (Sept. 15, 2020), <https://eu.desertsun.com/story/news/politics/immigration/2020/09/15/advocates-challenge-adelanto-immigration-detention-center-expansion/5802492002/>.

<sup>53</sup> *Id.*

<sup>54</sup> Rebecca Plevin, “Adelanto Planner Who Voted against Detention Center Expansion Ousted From Commission,” *Palm Springs Desert Sun* (Feb. 27, 2020), <https://eu.desertsun.com/story/news/politics/immigration/2020/02/27/adelanto-council-fires-planner-who-voted-against-geos-expansion-plan/4896260002/>.

## 6. **Imperial Regional Detention Facility** (Management Training Corporation [MTC]) in Calexico, **California**

*Total bed capacity: 704 people; guaranteed minimum: 640*<sup>55</sup>

The Imperial Regional Detention Facility is located in rural Imperial County, about 135 miles east of San Diego County, where most of the nearest pro bono legal services are based. In 2020, the DHS OIG found numerous standards violations at Imperial, including the overuse of segregation, and failures with facility conditions, medical grievances, and detainee communication. The OIG concluded that the facility was “unable to ensure an environment that protects the health, safety, and rights of detainees.”<sup>56</sup> The facility’s remote geographic location results in a lack of meaningful access to counsel, which the California Department of Justice recently noted causes impediments to due process.<sup>57</sup> Due to limitations related to the COVID-19 pandemic, a legal outreach project that used to operate at the facility on a monthly basis has been paused. Additionally, language barriers limit some detained persons’ ability to benefit from the limited resources that are available to help them litigate their immigration court cases.<sup>58</sup>

## 7. **Mesa Verde ICE Processing Facility** (GEO Group) in Bakersfield, **California**

*Total bed capacity: 400 people; guaranteed minimum: 320*<sup>59</sup>

Immediately after ICE and GEO opened Mesa Verde in 2015, the facility was quickly identified as having alarming detention conditions. In 2016, ICE’s Office of Detention Oversight found Mesa Verde in compliance with just four of 16 detention standards, identifying deficiencies in areas including sexual assault prevention, use of force, food service, and medical care.<sup>60</sup> For years, people detained at Mesa Verde had their proceedings before the immigration court in San Francisco, meaning legal providers in the Bay Area had to travel nearly 300 miles to visit their clients. In

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<sup>55</sup> DHS Office of Detention Oversight, *Compliance Inspection: Imperial Regional Detention Facility* (Feb. 2021), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/2021-ImperialRDF-CalexicoCA-Feb.pdf>; ICE FY 2021 Detention Statistics.

<sup>56</sup> DHS Office of Inspector General, *ICE Needs to Address Prolonged Administrative Segregation and Other Violations at the Imperial Regional Detention Facility* (December 2020), <https://www.oig.dhs.gov/reports/2021/ice-needs-address-prolonged-administrative-segregation-and-other-violations-imperial-regional-detention-facility/oig-21-12-dec20>.

<sup>57</sup> California Department of Justice, *The California Department of Justice’s Review of Immigration Detention in California* (January 2021), <https://oag.ca.gov/sites/all/files/agweb/pdfs/publications/immigration-detention-2021.pdf>.

<sup>58</sup> *Id.*

<sup>59</sup> DHS Office of Detention Oversight, *Compliance Inspection: Mesa Verde ICE Processing Center* (January 2021), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/2021-MesaVerdeIPC-BakersfieldCA-Jan.pdf>.

<sup>60</sup> Andrea Castillo, “Immigrant Detention Center in Bakersfield, Thought to Be Set to Close, Will Stay Open,” *Los Angeles Times* (March 9, 2019), <https://www.latimes.com/local/lanow/la-me-immigrant-detention-bakersfield-20190309-story.html>.

2020, the facility's cases began to be heard in immigration court in Los Angeles, still hundreds of miles away. People detained at Mesa Verde allege that they are subjected to persistent retaliation for speaking up about harmful conditions, including raising concerns about the risk posed to them by COVID-19.<sup>61</sup> During the COVID-19 pandemic, GEO and ICE allowed a massive outbreak to spread at the facility by refusing to test the population there and by comingling infected and healthy people. A federal court found that GEO's "appalling" handling of the COVID-19 pandemic at Mesa Verde "showed a deliberate indifference to the safety of the detainees."<sup>62</sup>

## 8. Otay Mesa Detention Center (CoreCivic) in San Diego, California

*Total bed capacity: 1,142 people; guaranteed minimum: 750*<sup>63</sup>

Otay Mesa Detention Center has been in operation since the late 1990s, but public reports of abusive conditions grew under the Trump administration. Multiple detainees have died at Otay Mesa in recent years due to medical negligence and lack of public health precautions, including a 37-year-old Cameroonian man who suffered a brain hemorrhage<sup>64</sup> and a 57-year-old man who died of COVID-19.<sup>65</sup> Facility investigations have documented failure to meet the dental and mental health care needs of detainees, punitive use of solitary confinement, and restricted visitation rights for detainees.<sup>66</sup> Advocates have detailed abusive treatment of LGBTQ people and retaliation for First Amendment protected activities, as well as forced labor and toxic employment practices at the facility.<sup>67</sup> Otay Mesa has been identified as one of the top five facilities in the nation for rates of sexual assault

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<sup>61</sup> Complaint, *Zepeda Rivas et al. v. Jennings et al.*, No. 3:20-cv-02731 (N. D. Cal. Apr. 20, 2020), ECF No. 01.

<sup>62</sup> Order Granting Motion for Secondary Preliminary Injunction, *Zepeda Rivas et al. v. Jennings et al.*, No. 3:20-cv-02731 (N. D. Cal. Dec. 3, 2020), ECF No. 867.

<sup>63</sup> DHS Office of Detention Oversight, *Compliance Inspection: Otay Mesa Detention Center* (Feb. 2020), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/otayMesaDetCtrSanDiegoCA\\_Feb25-27\\_2020.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/otayMesaDetCtrSanDiegoCA_Feb25-27_2020.pdf); ICE FY 2021 Detention Statistics.

<sup>64</sup> Joe Penney, "How Medical Negligence at the US Border Killed an Immigrant Father," *The Nation* (Feb. 25, 2020), <https://www.thenation.com/article/world/ice-death-negligence/>.

<sup>65</sup> Jennifer Lothspeich, "1st COVID-19 Related Death of Otay Mesa Detention Center Detainee Confirmed," CBS 8 (May 6, 2020), <https://www.cbs8.com/article/news/local/coronavirus-san-diego-covid-19-death-otay-mesa-detention-center-detainee/509-4c7c2f6d-abac-43a6-8811-a720c9af3661>.

<sup>66</sup> Disability Rights California, *Otay Mesa Detention Center: Inhumane Conditions and the Harsh Realities of ICE's Civil Detention System* (November 2020), <https://www.disabilityrightsca.org/otay-mesa-detention-center-report>; Freedom for Immigrants, "Otay Mesa Detention Center: Visitation Policy Victory" (2018), <https://www.freedomforimmigrants.org/otay-mesa-detention-center>.

<sup>67</sup> ACLU of San Diego and Imperial Counties, *CoreCivic's Decades of Abuse: Otay Mesa Detention Center* (Apr. 2021), [https://www.aclusandiego.org/sites/default/files/field\\_documents/2021\\_04\\_21\\_final\\_corecivics\\_decades\\_of\\_abuse\\_issue\\_brief.pdf](https://www.aclusandiego.org/sites/default/files/field_documents/2021_04_21_final_corecivics_decades_of_abuse_issue_brief.pdf).



complaints, according to data released under the Freedom of Information Act (FOIA).<sup>68</sup>

#### 9. **Yuba County Jail** (Yuba County Sheriff's Office) in Marysville, **California**

*Total bed capacity: 192 people; guaranteed minimum: 150*<sup>69</sup>

Yuba County Jail has held ICE detainees since 2012.<sup>70</sup> The jail has been under a court order to improve its inadequate medical care for 40 years.<sup>71</sup> In 2019, detained people at Yuba County reported unsanitary conditions,<sup>72</sup> lack of medical care,<sup>73</sup> and cells without running water or light. Detainees went on strike three times in 10 months to protest these conditions. With the emergence of COVID-19, conditions have only worsened. By January 2021, nearly half of the people detained in the jail had been infected by COVID-19.<sup>74</sup>

#### 10. **Baker County Detention Center** (Baker County Sheriff's Office) in Macclenny, **Florida**

*Total bed capacity: 292 people*<sup>75</sup>

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<sup>68</sup> Letter from Community Initiatives for Visiting Immigrants in Confinement to Thomas D. Homan, John F. Kelly, and Veronica Venture, "Re: Sexual Abuse, Assault, and Harassment in U.S. Immigration Detention Facilities" (April 11, 2017), [https://static1.squarespace.com/static/5a33042eb078691c386e7bce/t/5a9da297419202ab8be09c92/1520280217559/SexualAssault\\_Complaint.pdf](https://static1.squarespace.com/static/5a33042eb078691c386e7bce/t/5a9da297419202ab8be09c92/1520280217559/SexualAssault_Complaint.pdf).

<sup>69</sup> DHS Office of Detention Oversight, *Compliance Inspection: Yuba County Jail* (June 2020), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/yubaCoJail\\_MarysvilleCA\\_Jun8-11\\_2020.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/yubaCoJail_MarysvilleCA_Jun8-11_2020.pdf); ICE FY 2021 Detention Statistics.

<sup>70</sup> Global Detention Project, "Yuba County Jail," <https://www.globaldetentionproject.org/countries/americas/united-states/detention-centres/658/yuba-county-jail>.

<sup>71</sup> Freedom for Yuba Detainees, "Detained People Denounce COVID Outbreak at Yuba County Jail, Issue Urgent Demands" (Dec. 28, 2020), <https://yubanet.com/regional/detained-people-denounce-covid-outbreak-at-yuba-county-jail-issue-urgent-demands/>.

<sup>72</sup> Rachel Rosenbaum, "Advocates: Yuba County Jail Conditions Back to 'Normal,'" *The Union* (July 5, 2019), <https://www.theunion.com/news/crime/advocates-yuba-county-jail-conditions-back-to-normal/>.

<sup>73</sup> Elliot Wailoo, "Immigrant Detainees Begin Hunger Strike in Yuba County Jail for Improved Conditions," *Sacramento Bee* (July 4, 2019), <https://www.sacbee.com/news/local/article232261867.html>.

<sup>74</sup> Farida Jhabvala Romero, "'They Didn't Listen to Us': ICE Detainee Who Waged Hunger Strikes for COVID-19 Protections Gets Virus," KQED (Jan. 26, 2021), <https://www.kqed.org/news/11856995/they-didnt-listen-to-us-ice-detainee-who-waged-hunger-strikes-for-covid-19-protections-gets-virus>.

<sup>75</sup> In 2017, DHS Office of Detention Oversight reported a bed capacity of 292; its 2021 report, however, describes bed capacity as "as needed." See DHS Office of Detention Oversight, *Compliance Inspection: Baker County Sheriff's Office* (April 2017), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/2017BakerCountyFL.pdf>; DHS Office of Detention Oversight, *Compliance Inspection: Baker County Sheriff's Office* (Jan. 2021), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/2021-BakerCountySO-MacclennyFL-Jan.pdf>.

In the past 10 years, Baker County Sheriff's Office and its detention practices have fallen short of meeting the most basic human needs. DHS OIG has concluded that Baker County had issues in every studied area: segregation practices, living conditions, grievance processing, and the classification system.<sup>76</sup> At least two ICE detainees have died at Baker in the last four years.<sup>77</sup> Detainees have consistently reported inadequate medical care and abusive conditions, including the denial of surgeries, dental care, family visits, and basic hygiene products. Many women have reported an insufficient supply of menstrual pads. Additionally, detainees are kept indoors at all times—even the recreational space provides no exposure to sunlight.<sup>78</sup> During the COVID-19 pandemic, Baker County barred detainees from communicating with family and deprived them of soap and proper personal protective equipment (PPE).<sup>79</sup>

**11. Glades County Detention Center** (Glades Correctional Development Corporation and Glades County Sheriff's Office) in Moore Haven, **Florida**

*Total bed capacity: 324 people*<sup>80</sup>

In July 2020, a man detained at Glades died due to COVID-19.<sup>81</sup> A few months later, detainees filed a complaint reporting the use of excessive force, medical abuse, lack of PPE, poor sanitation, and retaliation for peaceful protest and public reporting.<sup>82</sup> Detained immigrants face significant challenges obtaining counsel at

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<sup>76</sup> ICE Office of Inspector General, *Capping Report: Observations of Unannounced Inspections of ICE Facilities in 2019* (July 2020), <https://www.oig.dhs.gov/sites/default/files/assets/2020-07/OIG-20-45-Jul20.pdf>.

<sup>77</sup> U.S. Immigration and Customs Enforcement, "United Kingdom Man in ICE Custody Passes Away in Florida" (Jan. 27, 2020), <https://www.ice.gov/news/releases/united-kingdom-man-ice-custody-passes-away-florida>; U.S. Immigration and Customs Enforcement, "Russian National in ICE Custody Passes away at Florida Hospital" (Dec. 3, 2018), <https://www.ice.gov/news/releases/russian-national-ice-custody-passes-away-florida-hospital>.

<sup>78</sup> *Shadow Prisons* at 45; Detention Watch Network, *Expose and Close: Baker County Jail* (November 2012), <https://www.detentionwatchnetwork.org/sites/default/files/reports/DWN%20Expose%20and%20Close%20Baker%20County.pdf>.

<sup>79</sup> Thomas Kennedy, "ICE Detention Centers are Not Protecting Immigrants from COVID-19. They Need to Be Freed," *South Florida Sun Sentinel* (May 5, 2020), <https://www.sun-sentinel.com/opinion/commentary/fl-op-opinion-kennedy-immigrant-detainees-ice-covid-19-coronavirus-20200505-2n2zj5b2sba6dkyxp4x537kjm4-story.html>.

<sup>80</sup> DHS Office of Detention Oversight, *Compliance Inspection: Glades County Detention Center* (February 2021), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/2021-GladesCoDC-MooreHavenFL-Feb.pdf>.

<sup>81</sup> U.S. Immigration and Customs Enforcement, "Mexican Man in ICE Custody Passes Away in Florida" (July 13, 2020), <https://www.ice.gov/news/releases/mexican-man-ice-custody-passes-away-florida>

<sup>82</sup> ACLU of Florida, "Immigrant Rights Advocates Submit Civil Rights Complaint to Shut Down Glades County Detention Center, Amidst Reckless COVID-19 Response" (Feb. 22, 2021), <https://www.aclufl.org/en/press-releases/immigrant-rights-advocates-submit-civil-rights-complaint-shut-down-glades-county>.

Glades, which is located more than two hours outside of Miami. People detained at Glades have consistently reported inadequate medical and mental health care, leading detainees to file at least seven civil rights complaints or lawsuits related to conditions in recent years.

**12. Krome North Service Processing Center (ICE; Akima Global Services) in Miami, Florida**

*Total bed capacity: 581 people; guaranteed minimum: 450*<sup>83</sup>

Krome North Service Processing Center has been in use since 1980.<sup>84</sup> In recent years, it has made headlines for its mistreatment of Muslim detainees, forcing them to choose between pork and rotten food, and for its severe overcrowding issues.<sup>85</sup> Overcrowding has contributed to poor medical and mental health care; the facility responded to mental health related incidents with solitary confinement.<sup>86</sup> In December 2020, Akal Security—employed guards reportedly choked, punched and stripped a Haitian detainee receiving mental health treatment, prompting the man to file complaints with DHS OIG and CRCL.<sup>87</sup> At least 243 detainees have tested positive for COVID-19.<sup>88</sup> Detainees have filed a lawsuit against Krome for failing to provide soap and basic hygiene products and failing to enforce effective social distancing measures.<sup>89</sup>

**13. Irwin County Detention Center (LaSalle Corrections) in Ocilla, Georgia**

*Total bed capacity: 1,201 people; guaranteed minimum: 600*<sup>90</sup>

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<sup>83</sup> DHS Office of Detention Oversight, *Compliance Inspection: Krome North Service Processing Center* (June 2015), <https://embed.documentcloud.org/documents/2891477-2015-ODO-Inspection-krome>; ICE FY 2021 Detention Statistics.

<sup>84</sup> DHS Office of Detention Oversight, *Compliance Inspection: Krome North Service Processing Center* (2015), <https://embed.documentcloud.org/documents/2891477-2015-ODO-Inspection-krome>.

<sup>85</sup> Geneva Sands, “Muslim ICE Detainees Forced to Choose Between Expired Meals or Eating Pork, Advocate Groups Say,” CNN (Aug. 24, 2020), <https://www.cnn.com/2020/08/24/politics/muslim-ice-detainees-pork-meals/index.html>; Southern Poverty Law Center and Americans for Immigrant Justice, *Prison By Any Other Name: A Report on South Florida Detention Facilities* (2019), [https://www.splcenter.org/sites/default/files/cjr\\_fla\\_detention\\_report-final\\_1.pdf](https://www.splcenter.org/sites/default/files/cjr_fla_detention_report-final_1.pdf).

<sup>86</sup> Southern Poverty Law Center and Americans for Immigrant Justice, *Prison By Any Other Name: A Report on South Florida Detention Facilities* (2019), 13, [https://www.splcenter.org/sites/default/files/cjr\\_fla\\_detention\\_report-final\\_1.pdf](https://www.splcenter.org/sites/default/files/cjr_fla_detention_report-final_1.pdf).

<sup>87</sup> Jacqueline Charles and Monique O. Madan, “Haitian Detainee Accuses Krome Guards of Attacking Him. ICE Asked to Investigate,” *Miami Herald* (Feb. 9, 2021), <https://www.miamiherald.com/article249124080.html>.

<sup>88</sup> U.S. Immigration and Customs Enforcement, “ICE Guidance on COVID-19” (accessed April 18, 2021), <https://www.ice.gov/coronavirus>.

<sup>89</sup> Nathan Hale, “Fla. Detainees Sue Feds Over COVID-19 Threat in ICE Facilities,” Law360 (April 13, 2020), <https://www.law360.com/articles/1263003>.

<sup>90</sup> LaSalle Corrections, “Irwin County Detention Center” (accessed April 20, 2021), <https://lasallecorrections.com/locations-irwin-county-detention-center/>; DHS Office of Detention Oversight, *Compliance Inspection: Irwin County Detention Center* (December 2020),

In September 2020, whistleblowers at Irwin filed a complaint alleging “jarring medical neglect,” including forced hysterectomies and an alarming number of involuntary gynecological procedures for women detained at the facility, as well as COVID-19 protocol violations and the shredding and fabrication of medical records.<sup>91</sup> In response, the U.S. House of Representatives called for an investigation and halted the deportation of individuals who had received “any” medical procedure at Irwin.<sup>92</sup> Detained people at Irwin have long reported significant abuses, including a lack of medical and mental health care, due process violations, and unsanitary living conditions.<sup>93</sup> ICE’s own inspections resulted in reports of sexual abuse, hunger strikes, and suicide watch lists.<sup>94</sup> Irwin, located 188 miles from the nearest metropolitan area, has one of the lowest rates of immigration attorney availability of any detention facility in the country.<sup>95</sup>

#### 14. **Stewart Detention Center (CoreCivic) in Lumpkin, Georgia**

*Total bed capacity: 1,752 people, guaranteed minimum: 1,600*<sup>96</sup>

More detained people have died at Stewart than at any other ICE facility in the last four years. Since May 2017, eight detainees have died in custody at Stewart, including four due to COVID-19<sup>97</sup> and two suicides by individuals who were put in solitary confinement.<sup>98</sup> More than 490 people had been infected with COVID-19 as of spring 2021.<sup>99</sup> Multiple investigations have reported inadequate medical and

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[https://www.ice.gov/doclib/foia/odo-compliance-inspections/irwinCoDetCntrOcillaGA\\_Dec14-17\\_2020.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/irwinCoDetCntrOcillaGA_Dec14-17_2020.pdf); ICE FY 2021 Detention Statistics.

<sup>91</sup> Letter to Joseph V. Cuffari, Cameron Quinn, Thomas P. Giles, and David Paulk, “Re: Lack of Medical Care, Unsafe Work Practices, and Absence of Adequate Protection Against COVID-19 for Detained Immigrants and Employees Alike at the Irwin County Detention Center” (Sept. 14, 2020), <https://projectsouth.org/wp-content/uploads/2020/09/OIG-ICDC-Complaint-1.pdf>.

<sup>92</sup> H. R. 1153, 116<sup>th</sup> Cong. (2020), <https://www.congress.gov/116/bills/hres/1153/BILLS-116hres1153eh.pdf>.

<sup>93</sup> Letter to Joseph V. Cuffari, Cameron Quinn, Thomas P. Giles, and David Paulk, “Re: Lack of Medical Care, Unsafe Work Practices, and Absence of Adequate Protection Against COVID-19 for Detained Immigrants and Employees Alike at the Irwin County Detention Center” (Sept. 14, 2020), <https://projectsouth.org/wp-content/uploads/2020/09/OIG-ICDC-Complaint-1.pdf>.

<sup>94</sup> DHS, *Condition of Confinement Inspection Worksheet: Irwin County Detention Center* (June 2017), <https://assets.documentcloud.org/documents/7219685/2017-ERO-Inspection-Report-Irwin-County-GA.pdf>; *Shadow Prisons*.

<sup>95</sup> *Justice-Free Zones* at 22.

<sup>96</sup> U.S. Securities and Exchange Commission, Form 10-K, CoreCivic, Inc. (Feb. 22, 2021), <http://ir.corecivic.com/node/21411/html>; ICE FY 2021 Detention Statistics.

<sup>97</sup> American Immigration Lawyers Association, “Deaths at Adult Detention Centers” (March 17, 2021), <https://www.aila.org/infonet/deaths-at-adult-detention-centers#2020>.

<sup>98</sup> U.S. House of Representatives Committee on Homeland Security, *Oversight of ICE Detention Facilities: Is DHS Doing Enough?* (Sept. 26, 2019), <https://www.congress.gov/116/chrg/CHRG-116hrg40455/CHRG-116hrg40455.pdf>.

<sup>99</sup> U.S. Immigration and Customs Enforcement, “ICE Guidance on COVID-19” (accessed April 18, 2021), <https://www.ice.gov/coronavirus>.

mental health care, use of solitary confinement, and abuse.<sup>100</sup> These issues have been apparent for several years: in 2013, CRCL conducted a site visit and made 17 recommendations, including increasing physician oversight of medical care, ceasing to segregate detained individuals with medical and mental health needs, and putting an end to faith tests to determine an individual's eligibility for religious meals.<sup>101</sup> Located three hours from the nearest major city,<sup>102</sup> Stewart has one of the lowest immigration attorney availability rates of any detention facility in the country.<sup>103</sup>

**15. Allen Parish Public Safety Complex (Allen Parish Sheriff's Office) in Oberlin, Louisiana**

*Total bed capacity: 96 people; guaranteed minimum: 100*<sup>104</sup>

ICE awarded the Allen Parish Public Safety Complex a detention contract in 2019.<sup>105</sup> The local sheriff has emphasized the contract as a source of revenue.<sup>106</sup> Concerning reports regarding the use of force at the facility have emerged, including reports of an assistant warden's threats to shoot a detainee for providing other detained individuals with legal assistance.<sup>107</sup> In August 2020, ICE "haphazardly" evacuated the detention center as Hurricane Laura bore down, taking no precautions to isolate COVID-positive individuals from others.<sup>108</sup> In January 2021,

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<sup>100</sup> U.S. House of Representatives Committee on Homeland Security, *Oversight of ICE Detention Facilities: Is DHS Doing Enough?* (Sept. 26, 2019), <https://www.congress.gov/116/chrg/CHRG-116hrg40455/CHRG-116hrg40455.pdf>; *Shadow Prisons* at 36–44.

<sup>101</sup> Memo from Megan H. Mack and David J. Palmer to Thomas J. Winkowski and Peter S. Vincent, "Stewart Detention Center CRCL Complaint Nos. 12-08-ICE-0136, 12-08-ICE-0173, 12-08-ICE-0187, and 12-12-ICE-0250" (Oct. 16, 2014), [https://www.dhs.gov/sites/default/files/publications/stewart-detention-center\\_10-16-14\\_0.pdf](https://www.dhs.gov/sites/default/files/publications/stewart-detention-center_10-16-14_0.pdf).

<sup>102</sup> Anhelica Robles, "Behind the Gates of Stewart Detention Center" (SPLC: Feb. 28, 2019), <https://www.splcenter.org/attention-on-detention/behind-gates-stewart-detention-center>.

<sup>103</sup> *Justice-Free Zones* at 22.

<sup>104</sup> DHS Office of Detention Oversight, *Compliance Inspection: Allen Parish Public Safety Complex* (January 2021), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/2021-AllenParishPSC-OberlinLA-Jan.pdf>; ICE FY 2021 Detention Statistics.

<sup>105</sup> Doris Maricle, "Allen Parish Detention Center about 65 Percent Done," *American Press* (Nov. 21, 2018), [https://www.americanpress.com/news/local/allen-parish-detention-center-about-65-percent-done/article\\_6a859ee4-11cf-5e08-bb89-f0414f7a65ae.html](https://www.americanpress.com/news/local/allen-parish-detention-center-about-65-percent-done/article_6a859ee4-11cf-5e08-bb89-f0414f7a65ae.html).

<sup>106</sup> Doris Maricle, "Public Tours \$5M Facility Built to House Federal Detainees," *American Press* (June 17, 2019), [https://www.americanpress.com/news/local/public-tours-5m-facility-built-to-house-federal-detainees/article\\_d38c67f8-9127-11e9-8257-8782841260c4.html](https://www.americanpress.com/news/local/public-tours-5m-facility-built-to-house-federal-detainees/article_d38c67f8-9127-11e9-8257-8782841260c4.html).

<sup>107</sup> Noah Lanard, "Biden Pledged to Close For-Profit ICE Detention Centers. Will He Follow Through?," *Mother Jones* (Jan. 27, 2021), <https://www.motherjones.com/politics/2021/01/biden-pledged-to-close-for-profit-ice-detention-centers-will-he-follow-through/>.

<sup>108</sup> *Id.*

ICE Office of Detention Oversight found major deficiencies in the facility's emergency plans.<sup>109</sup>

**16. Catahoula Correctional Center (LaSalle Corrections) in Harrisonburg, Louisiana**

*Total bed capacity: 738 people*<sup>110</sup>

ICE awarded the Catahoula Correctional Center, operated by for-profit LaSalle Corrections, a contract in 2019.<sup>111</sup> As a former state prison, Catahoula had a reputation of abuse, and little has changed since its transformation into an ICE detention facility.<sup>112</sup> Facility officials ignored basic COVID-19 precautions: As late as April 2020, officials failed to use PPE and instructed detainees to disregard news about the coronavirus.<sup>113</sup> ICE's Office of Detention Oversight found that detainees were denied soap to wash their hands and bunk beds were kept less than six feet apart.<sup>114</sup> Numerous reports have emerged about repeated use of force, including pepper spray and projectiles against detained people requesting protection after COVID-19 outbreaks at the facility.<sup>115</sup>

**17. Jackson Parish Correctional Center (LaSalle Corrections) in Jonesboro, Louisiana**

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<sup>109</sup> DHS Office of Detention Oversight, *Compliance Inspection: Allen Parish Public Safety Complex* (Jan. 2021), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/2021-AllenParishPSC-OberlinLA-Jan.pdf>.

<sup>110</sup> DHS Office of Detention Oversight, *Compliance Inspection: Catahoula Correctional Center* (July 2020), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/CatahoulaCCHarrisonburgLAJuly2020.pdf>.

<sup>111</sup> Noah Lanard, "Warren Demands Answers From ICE About Its New Detention Centers in the South," *Mother Jones* (July 12, 2019), <https://www.motherjones.com/politics/2019/07/warren-demands-answers-from-ice-following-mother-jones-report-on-detention-centers/>.

<sup>112</sup> Debbie Nathan, "Detainees at Privately Owned Immigration Facility Say Sheriff's Office Broke Up Protest with Pepper Spray, Projectiles," *The Lens* (May 27, 2020), <https://thelensnola.org/2020/05/27/detainees-at-privately-owned-immigration-facility-say-sheriffs-office-broke-up-protest-with-pepper-spray-projectiles/>.

<sup>113</sup> World Peace Foundation, *Louisiana COVID-19 in Detention* (June 12, 2020), <https://sites.tufts.edu/wpf/louisiana-covid-19-in-detention/>.

<sup>114</sup> DHS Office of Detention Oversight, *Compliance Inspection: Catahoula Correctional Center* (July 2020), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/CatahoulaCCHarrisonburgLAJuly2020.pdf>.

<sup>115</sup> Noah Lanard, "ICE Detainees Terrified of the Coronavirus Wanted to Be Deported. Guards Pepper-Sprayed Them," *Mother Jones* (April 23, 2020), <https://www.motherjones.com/politics/2020/04/ice-detainees-terrified-of-the-coronavirus-wanted-to-be-deported-guards-pepper-sprayed-them/>; Debbie Nathan, "Detainees at Privately Owned Immigration Facility Say Sheriff's Office Broke Up Protest with Pepper Spray, Projectiles," *The Lens* (May 27, 2020), <https://thelensnola.org/2020/05/27/detainees-at-privately-owned-immigration-facility-say-sheriffs-office-broke-up-protest-with-pepper-spray-projectiles/>.

*Total bed capacity: 1,007 people; guaranteed minimum: 751*<sup>116</sup>

Awarded an ICE detention contract in 2019, Jackson Parish is 166 miles away from the nearest metropolitan area and has one of the lowest rates of immigration attorney availability in the country.<sup>117</sup> Jackson Parish has extremely limited medical care facilities available, made up of only two or three rooms, with few medical staff onsite. Detained people have complained of significant challenges in obtaining visits with medical staff and receiving appropriate treatment at the facility. Even before the COVID-19 pandemic, many detainees reported that they did not have soap for bathing or cleaning supplies for their cells or bathrooms.<sup>118</sup> Interviews with immigrants at Jackson Parish confirmed that the use of solitary confinement to deal with mental health conditions or hunger strikes remains prevalent.<sup>119</sup> ICE's Office of Detention Oversight reported that detainees in solitary confinement—both administrative segregation and disciplinary segregation—were not offered requisite recreation time.<sup>120</sup>

#### 18. LaSalle ICE Processing Center (GEO Group) in Jena, Louisiana

*Total bed capacity: 1,200 people; guaranteed minimum: 1,170*<sup>121</sup>

LaSalle ICE Processing Center was repurposed as an immigration detention center in 2007 after being shut down twice for inhumane treatment and rights violations.<sup>122</sup> In 2018, LaSalle had the highest number of deaths of any immigration prison in the U.S. over the prior two years.<sup>123</sup> Congressional investigators described poor health care, including “a system that depended on non-medically trained people to make health care decisions,” and detainees going several days without

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<sup>116</sup> DHS Office of Detention Oversight, *Compliance Inspection: Jackson Parish Correctional Center* (January 2020), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/2020-JacksonParishCC.pdf>; ICE FY 2021 Detention Statistics.

<sup>117</sup> *Justice-Free Zones* at 22.

<sup>118</sup> Eunice Cho, “Immigration Detention Was a Black Box Before COVID-19. Now, it’s a Death Trap,” (ACLU: April 30, 2020), <https://www.aclu.org/news/immigrants-rights/immigration-detention-was-a-black-box-before-covid-19-now-its-a-death-trap/>.

<sup>119</sup> *Justice-Free Zones* at 40.

<sup>120</sup> DHS Office of Detention Oversight, *Compliance Inspection: Jackson Parish Correctional Center* (January 2020), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/2020-JacksonParishCC.pdf>.

<sup>121</sup> *Southern Poverty Law Center v. U.S. Department of Homeland Security, et al.*, No.18-00760 17 (D.D.C. 2018); ICE FY 2021 Detention Statistics.

<sup>122</sup> *Id.*

<sup>123</sup> Oliver Laughland, “Inside Trump’s Secretive Immigration Court: Far From Scrutiny and Legal Aid,” *The Guardian* (June 7, 2017), <https://www.theguardian.com/us-news/2017/jun/07/donald-trump-immigration-court-deportation-lasalle>.

access to soap and having inadequate access to cleaning supplies.<sup>124</sup> Most recently, LaSalle failed to take measures to reduce the spread of COVID-19, straining the rural community's already limited health care infrastructure.<sup>125</sup> LaSalle is located 178 miles away from the nearest metropolitan area and has one of the lowest rates of immigration attorney availability in the country.<sup>126</sup>

**19. Pine Prairie ICE Processing Center (GEO Group) in Pine Prairie, Louisiana**

*Total bed capacity: 1,088 people*<sup>127</sup>

Pine Prairie, located 100 miles from a metropolitan area, has one of the lowest rates of immigration attorney availability in the country.<sup>128</sup> The detention facility has long-standing issues of egregious medical neglect and use of force that have grown even more severe during the COVID-19 pandemic. In 2019, detained people at Pine Prairie held multiple hunger strikes to protest abusive conditions at the facility. Facility officials shot rubber bullets and pepper spray at detainees and barred them from contacting their families.<sup>129</sup> At the height of the pandemic, between April and May of 2020, detainees were not receiving hand sanitizer, gloves, or any information about the virus.<sup>130</sup>

**20. Richwood Correctional Center (LaSalle Corrections) in Monroe, Louisiana**

*Total bed capacity: 1,000 people; guaranteed minimum: 677*<sup>131</sup>

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<sup>124</sup> US House of Representatives Committee on Homeland Security, *ICE Detention Facilities: Failing to Meet Basic Standards of Care* (Sept. 21, 2020),

<https://homeland.house.gov/imo/media/doc/Homeland%20ICE%20facility%20staff%20report.pdf>.

<sup>125</sup> Center for Constitutional Rights, "Medically Vulnerable People in Immigration Detention in Louisiana Seek Urgent Release Amid COVID-19 Uptick" (Oct. 12, 2020), <https://ccrjustice.org/home/press-center/press-releases/medically-vulnerable-people-immigration-detention-louisiana-seek>.

<sup>126</sup> *Justice-Free Zones* at 22.

<sup>127</sup> DHS Office of Detention Oversight, *Compliance Inspection: Pine Prairie ICE Processing Center*, (September 2020), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/pinePrairieIceProcCtrPinePrairieLA\\_Aug31-Sep4\\_2020.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/pinePrairieIceProcCtrPinePrairieLA_Aug31-Sep4_2020.pdf).

<sup>128</sup> *Justice-Free Zones* at 22.

<sup>129</sup> Chantal Da Silva, "More Than 100 Immigrants on Hunger Strike at ICE Facility Allegedly Pepper-sprayed, Shot at With Rubber Bullets and Blocked From Contacting Families," *Newsweek* (Aug. 7, 2019), <https://www.newsweek.com/ice-detainees-hunger-strike-pepper-sprayed-excessive-force-1452953>.

<sup>130</sup> World Peace Foundation, *Louisiana COVID-19 in Detention* (June 12, 2020), <https://sites.tufts.edu/wpf/louisiana-covid-19-in-detention/>.

<sup>131</sup> DHS Office of Detention Oversight, *Compliance Inspection: Richwood Correctional Center* (December 2020), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/richwoodCorrCtrRichwoodLA\\_Dec14-18\\_2020.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/richwoodCorrCtrRichwoodLA_Dec14-18_2020.pdf); ICE FY 2021 Detention Statistics.



Richwood Correctional Center, located 120 miles from the nearest metropolitan area, became an ICE detention facility in 2019 and has one of the lowest immigration attorney availability rates in the country.<sup>132</sup> Even before the COVID-19 pandemic, detained people at Richwood raised serious concerns about poor medical care and mental health services, verbal and physical abuse by officers, poor sanitation, and lack of food. There are no mental health professionals available onsite at the facility, and in October 2019, Roylan Hernandez Diaz died by suicide there after spending a prolonged period in solitary confinement.<sup>133</sup> Two guards at Richwood died as a result of COVID-19 in 2020. Detention officers at the facility later filed a whistleblowing report disclosing that LaSalle Corrections, which operates the facility, concealed the nature and extent of COVID-19 at Richwood. The guards reported that detainees have been placed on ventilators and that facility administrators forbade guards from wearing face masks or using personal leave to take COVID-19 precautions, and improperly mixed sick and healthy detainees. Staff were instructed to blast air conditioning to hide detainees' fever-like symptoms to "freeze them out" to allow for deportation flights.<sup>134</sup>

## 21. River Correctional Center (LaSalle) in Ferriday, Louisiana

*Total bed capacity: 500 people; guaranteed minimum: 361*<sup>135</sup>

River Correctional, which opened in 2019, is located in the rural town of Ferriday, three hours from New Orleans, the closest metropolitan area. In March 2019, dozens of asylum-seekers at River went on hunger strike to protest the denial of bond and parole.<sup>136</sup> A congressional investigation documented the reported use of solitary confinement to punish individuals on hunger strike.<sup>137</sup> It also documented "bleak" living conditions, including "stagnant pools of water sitting in the housing area," mosquito infestations, and poor sanitation.<sup>138</sup> It found that officials at River "dismissed suicide attempts" and displayed "an utter lack of concern for a migrant's

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<sup>132</sup> *Justice-Free Zones* at 22.

<sup>133</sup> *Justice-Free Zones* at 48-51.

<sup>134</sup> Letter from Government Accountability Project to the Hon. Bennie Thompson, the Hon. Kathleen Rice, the Hon. Mike Rogers, and the Hon. Clay Higgins, "Re: Whistleblower Disclosures on COVID-19—Private Contractors Mismanaging ICE Detention Facilities Are Endangering Public Health and Safety" (Jul. 10, 2020), <https://whistleblower.org/wp-content/uploads/2020/07/071020-letter-to-Congress-from-GovAcctProj-re-whistleblowers-ICE-Detention-COVID-FINAL-Submitted.pdf>.

<sup>135</sup> DHS Office of Detention Oversight, *Compliance Inspection: River Correctional Center* (October 2020), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/2020-RiverCC-FerridayLA-Oct2020.pdf>; ICE FY 2021 Detention Statistics.

<sup>136</sup> Michael Isaac Stein, "Hunger Strikes at ICE Detention Centers Spread As Parole, Bond Are Denied," National Public Radio (April 19, 2020), <https://www.npr.org/2019/04/19/713910647/hunger-strikes-at-ice-detention-centers-spread-as-parole-bond-is-denied>.

<sup>137</sup> U.S. House of Representatives Committee on Homeland Security, *ICE Detention Facilities: Failing to Meet Basic Standards of Care* (Sept. 21, 2020), <https://homeland.house.gov/imo/media/doc/Homeland%20ICE%20facility%20staff%20report.pdf>.

<sup>138</sup> *Id.* at 13.

health” who went into anaphylactic shock four times over the course of four months.<sup>139</sup> Poor conditions at River led to a mumps outbreak only months after its ICE contract began,<sup>140</sup> and only grew worse in the COVID-19 pandemic.<sup>141</sup>

## 22. South Louisiana ICE Processing Center (GEO Group) in Basile, Louisiana

*Total bed capacity: 1,000 people; guaranteed minimum: 700*<sup>142</sup>

ICE began detaining people at this facility in summer 2019, flouting congressional intent to reduce its detention numbers.<sup>143</sup> During the COVID-19 pandemic, people detained at South Louisiana reported the impossibility of social distancing, guards without masks, lack of access to basic hygiene and sanitation supplies, and punishment for speaking to the media about conditions.<sup>144</sup> This facility had held ICE detainees in the past and had been marked by troubling conditions, including multiple hunger strikes, lack of medical care, and poor access to counsel.<sup>145</sup>

## 23. Winn Correctional Center (LaSalle) in Winnfield, Louisiana

*Total bed capacity: 1,900 people; guaranteed minimum: 946*<sup>146</sup>

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<sup>139</sup> *Id.* at 14-15.

<sup>140</sup> Maria Clark, “Louisiana’s Prisons are Increasingly Being Used to Detain Immigrants,” *New Orleans Times-Picayune* (May 8, 2020), [https://www.nola.com/news/article\\_9110ce70-bb2f-54e1-b4e1-54140b7a0559.html](https://www.nola.com/news/article_9110ce70-bb2f-54e1-b4e1-54140b7a0559.html).

<sup>141</sup> Belisa Morillo and Damià Bonmatí, “‘I’m Afraid to Take COVID Home,’ a Guard at an ICE Detention Facility Says,” NBC News (May 20, 2020), <https://www.nbcnews.com/news/latino/i-m-afraid-take-covid-home-guard-ice-detention-facility-n1198186>.

<sup>142</sup> DHS Office of Detention Oversight, *Compliance Inspection: South Louisiana Detention Center* (August 2020), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/southLouisianaDetCntrBasileLA\\_Aug17-20\\_2020.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/southLouisianaDetCntrBasileLA_Aug17-20_2020.pdf); ICE FY 2021 Detention Statistics.

<sup>143</sup> Noah Lanard, “ICE Just Quietly Opened Three New Detention Centers, Flouting Congress’ Limits,” *Mother Jones* (July 9, 2019), <https://www.motherjones.com/politics/2019/07/ice-just-quietly-opened-three-new-detention-centers-flouting-congress-limits/>.

<sup>144</sup> Debbie Nathan, “Women in ICE Detention, Fearing Coronavirus, Make Video to Protest Unsafe Conditions,” *The Intercept* (March 30, 2020), <https://theintercept.com/2020/03/30/coronavirus-ice-detention/>; Southern Poverty Law Center, “New Emergency Filing Demands Release of Asylum Seekers Trapped in ICE Cages as Spread of COVID-19 Accelerates” (March 31, 2020), <https://www.splcenter.org/presscenter/new-emergency-filing-demands-release-asylum-seekers-trapped-ice-cages-spread-covid-19>; Kristina Cooke, Mica Rosenberg, and Ryan McNeill, “As Pandemic Rages, U.S. Immigrants Detained in Areas with Few Hospitals,” Reuters (April 3, 2020), <https://www.reuters.com/article/us-health-coronavirus-usa-detention-insi/as-pandemic-rages-u-s-immigrants-detained-in-areas-with-few-hospitals-idUSKBN21L1E4>.

<sup>145</sup> ACLU, “Groups Call on Napolitano to Fix Conditions at Louisiana Immigration Detention Facility” (Aug. 3, 2019), <https://www.aclu.org/press-releases/groups-call-napolitano-fix-conditions-louisiana-immigration-detention-facility>.

<sup>146</sup> DHS Office of Detention Oversight, *Compliance Inspection: Winn Correctional Center* (February 2020), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/winnCorrCntrWinnfieldLA\\_Feb4-6\\_2020.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/winnCorrCntrWinnfieldLA_Feb4-6_2020.pdf); ICE FY 2021 Detention Statistics.

Winn Correctional Center became an ICE detention facility in May 2019 after a long and troubled history as a private prison.<sup>147</sup> Winn is located 178 miles from the nearest metropolitan areas and has one of the lowest rates of immigration attorney availability in the United States.<sup>148</sup> The ACLU recently issued a report regarding the facility's inadequate provision of medical attention and life-saving medication, a pattern of hiding visibly disabled and sick detainees during facility inspections, and violent suppression of free speech and protests.<sup>149</sup> In September of 2020, Romien Jally, a Marshallese detainee, died while in custody due to COVID-19.<sup>150</sup> In addition, at least two officers at the facility have died of COVID-19.<sup>151</sup> Most recently, detainees have filed civil rights complaints<sup>152</sup> about officials' routine use of force to compel them to sign documents and have reported the routine use of force, including tear gas and pepper spray, and solitary confinement for peacefully protesting dangerous conditions at the facility, as well as for speaking to the press.<sup>153</sup>

#### 24. **Bristol County House of Correction and Jail** (Bristol County Sheriff's Office) in North Dartmouth, **Massachusetts**

*Total bed capacity: 152 people*<sup>154</sup>

Detainees and advocates have reported poor detention conditions at Bristol for years. In May 2020, facility staff and the Bristol County sheriff himself used excessive force against ICE detainees, resulting in the hospitalization of three detained people, one of whom required emergency care but was instead placed in

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<sup>147</sup> Nomaan Merchant, "Louisiana Becomes Epicenter in Immigrant Detention Under Trump Administration," Associated Press (Oct. 9, 2019), [https://www.nola.com/news/courts/article\\_36091ed0-ea97-11e9-864c-6730cc7fa7b4.html](https://www.nola.com/news/courts/article_36091ed0-ea97-11e9-864c-6730cc7fa7b4.html).

<sup>148</sup> *Justice-Free Zones* at 22.

<sup>149</sup> *Justice-Free Zones* at 36-37; 40-42.

<sup>150</sup> U.S. Immigration and Customs Enforcement, "Marshallese Man in ICE Custody Passes Away at Louisiana Hospital" (Sept. 26, 2020), <https://www.ice.gov/news/releases/marshallese-man-ice-custody-passes-away-louisiana-hospital>.

<sup>151</sup> Noah Lanard, "A Fourth Guard at an ICE Detention Center Has Died of COVID-19," *Mother Jones* (June 10, 2020), <https://www.motherjones.com/politics/2020/06/a-fourth-guard-at-an-ice-detention-center-has-died-of-covid-19/>.

<sup>152</sup> Freedom for Immigrants, "ICE Use of Torture in Signing of Deportation Documents for Cameroonian Migrants at Winn Correctional Center, Louisiana" (Feb. 2, 2021), <https://www.freedomforimmigrants.org/crcl/2021/2/2/winn-correctional-center-louisiana>.

<sup>153</sup> Noah Lanard, "ICE Detainees Terrified of the Coronavirus Wanted to be Deported. Guards Pepper-sprayed Them," *Mother Jones* (April 23, 2020), <https://www.motherjones.com/politics/2020/04/ice-detainees-terrified-of-the-coronavirus-wanted-to-be-deported-guards-pepper-sprayed-them/>.

<sup>154</sup> DHS Office of Detention Oversight, *Compliance Inspection: Bristol County Detention Center* (July 2020), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/bristolCoDetCntrNorthDartmouthMA\\_Jul20-23\\_2020.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/bristolCoDetCntrNorthDartmouthMA_Jul20-23_2020.pdf).

solitary confinement.<sup>155</sup> As the Massachusetts attorney general concluded, “a series of institutional failures and poor decisions” led to a “planned and deliberate” use of force, including “a variety of less-lethal but dangerous weapons—including a flash bang grenade, pepper-ball launchers, pepper spray canisters, anti-riot shields, and canines—against detainees who had exhibited calm and nonviolent behavior for at least an hour before this operation.”<sup>156</sup> The Massachusetts attorney general recommended that DHS terminate its contract with the facility immediately and transfer all federal immigration detainees held there to other detention facilities.<sup>157</sup> Conditions at the jail under COVID-19 became so problematic that a federal court concluded that it was likely to be found deliberately indifferent to detainees’ needs.<sup>158</sup>

## **25. Calhoun County Correctional Facility (Calhoun County Sheriff’s Office) in Battle Creek, Michigan**

*Total bed capacity: 250 people*<sup>159</sup>

The Calhoun County Correctional Facility has a long track record of failing to provide adequate medical care. Most recently, Jesse Dean, a 58-year-old Bahamian man, died at the jail on February 5, 2021.<sup>160</sup> An expert who reviewed his medical records expressed “serious concerns about the ability of Calhoun to recognize and evaluate concerning symptoms, follow up on abnormal testing, recognize critical illness, and provide basic life support for critically ill patients.”<sup>161</sup> The facility has faced numerous COVID-19 outbreaks, and an expert inspecting the facility reported that conditions at Calhoun present a “serious danger” to medically vulnerable detainees.<sup>162</sup>

## **26. Adams County Detention Center (CoreCivic) in Natchez, Mississippi**

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<sup>155</sup> Office of the Massachusetts Attorney General, *Investigation into the Events of May 1, 2020 at the C. Carlos Carreiro Immigration Detention Center, Unit B, Bristol County Sheriff’s Office* (Dec. 15, 2021), <https://www.mass.gov/doc/ago-report-into-bcso-response-to-may-1-disturbance/download>.

<sup>156</sup> *Id.* at 1.

<sup>157</sup> *Id.* at 54.

<sup>158</sup> *Id.*

<sup>159</sup> DHS Office of Detention Oversight, *Compliance Inspection: Calhoun County Correctional Center*, (August 2020), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/calhounCoCorrCntrBattleCreekMI\\_Aug24-27\\_2020.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/calhounCoCorrCntrBattleCreekMI_Aug24-27_2020.pdf).

<sup>160</sup> Sarah Rahal, “ICE Detainee Died in Michigan Jail That Was Criticized for Lax COVID-19 Protocols,” *The Detroit News* (Feb. 9, 2021), <https://www.detroitnews.com/story/news/local/michigan/2021/02/10/ice-detainee-died-michigan-jail-criticized-lax-covid-19-protocols/4218309001/>.

<sup>161</sup> *Malam v. Adducci*, No. 20-cv-10829 (E.D. Mich.), Weber Declaration, Dkt. 564-9, PageID 14366.

<sup>162</sup> *Id.*, Venters Declaration, Dkt. 483-1, PageID 12579.

*Total bed capacity: 1,100 people; guaranteed minimum: 1,100*<sup>163</sup>

The Adams County Detention Center should never have been given an ICE contract, according to ICE's own officials. As the GAO recently reported, local field office staff informed ICE headquarters that they strongly disagreed with a contract for detention at Adams County because of the facility's "history of chronic understaffing in correctional and health services."<sup>164</sup> A 2016 audit by the Department of Justice's OIG concluded that CoreCivic had failed to maintain adequate staffing levels and provide a safe and secure environment,<sup>165</sup> leading the Bureau of Prisons to end its contract with Adams County in May 2019. The GAO reported that ICE headquarters had directed field office staff to "retroactively write a white paper to support using the facility after the agreement terms ... had already been negotiated." The field office later used the white paper "to express their disagreement with the agreement and its terms."<sup>166</sup> Adams County Detention Center began quietly accepting immigrant detainees in June 2019, and has quickly amassed a reputation of misconduct and abuse.<sup>167</sup> Detainees at Adams County recently filed civil rights complaints detailing a pattern of excessive force and physical abuse by ICE agents and facility staff, use of coercion to get Cameroonian detainees to sign travel documents for deportations, and torture.<sup>168</sup> A few months later, Anthony Jones, an immigrant from the Bahamas, died at Adams County.<sup>169</sup> At least 323 detainees have contracted COVID-19; there is currently a COVID-19 outbreak of over 188 people at the facility.<sup>170</sup>

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<sup>163</sup> DHS Office of Detention Oversight, *Compliance Inspection: Adams County Detention Center* (February 2021), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/2021-AdamsCountyDC-NatchezMS-Feb.pdf>; ICE FY 2021 Detention Statistics.

<sup>164</sup> U.S. Government Accountability Office, *Immigration Detention: Actions Needed to Improve Planning, Documentation, and Oversight of Detention Facility Contracts* (January 2021), 22, <https://www.gao.gov/assets/gao-21-149.pdf>.

<sup>165</sup> U.S. Department of Justice Office of the Inspector General, *Audit of the Federal Bureau of Prisons' Contract with CoreCivic, Inc., to Operate the Adams County Corrections Center in Natchez, Mississippi* (December 2016), <https://oig.justice.gov/reports/2016/a1708.pdf>.

<sup>166</sup> U.S. Government Accountability Office, *Immigration Detention: Actions Needed to Improve Planning, Documentation, and Oversight of Detention Facility Contracts* (January 2021), 22, <https://www.gao.gov/assets/gao-21-149.pdf>.

<sup>167</sup> *Justice-Free Zones* at 19.

<sup>168</sup> Freedom for Immigrants, "ICE is Using Torture Against Cameroonian Immigrants to Coerce Deportation, According to New Complaint Filed by Immigrant Rights Groups" (Oct. 8, 2020), <https://www.freedomforimmigrants.org/news/2020/10/8/ice-is-using-torture-against-black-immigrants-to-coerce-deportation-according-to-new-complaint-filed-by-immigrant-rights-groups>.

<sup>169</sup> U.S. Immigration and Customs Enforcement, "Bahamian Man in Custody Passes Away in Mississippi" (Dec. 18, 2020), <https://www.ice.gov/news/releases/bahamian-man-ice-custody-passes-away-mississippi>.

<sup>170</sup> U.S. Immigration and Customs Enforcement, "ICE Guidance on COVID-19" (accessed April 18, 2021), <https://www.ice.gov/coronavirus>.

**27. Sherburne County Jail** (Sherburne County Sherriff's Office) in Elk River, Minnesota

*Total bed capacity: 350 people*<sup>171</sup>

Sherburne County Jail has 300-350 beds dedicated to ICE detainees within a 732-person facility. The facility provides healthcare to inmates and detainees through a for-profit medical company with a long history of inadequate care, medical neglect, and preventable deaths.<sup>172</sup> Originally designed as a short-term holding facility, the Sherburne County Jail does not provide outdoor time to ICE detainees, meaning many individuals go months or years without sunlight and fresh air. Advocates and ICE detainees have frequently reported abusive and inhumane conditions, including abusive behavior by jail staff, the punitive and prolonged use of solitary confinement for minor infractions or peaceful protests, inedible food, and failure to provide religious accommodations to detainees.<sup>173</sup>

**28. Otero County Processing Center (MTC)** in Chaparral, New Mexico

*Total bed capacity: 311-1,089 people; guaranteed minimum: 500*<sup>174</sup>

The Otero County Processing Center is a 1,089-person facility outside the El Paso metro area with an extensive record of civil rights violations. In recent years, immigrant advocates have documented chronic mistreatment of LGBTQ

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<sup>171</sup> DHS Office of Detention Oversight, *Compliance Inspection: Sherburne County Jail* (December 2020), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/sherburneCoJailElkRiverMN\\_Dec14-17\\_2020.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/sherburneCoJailElkRiverMN_Dec14-17_2020.pdf).

<sup>172</sup> Brandon Stahl, A.J. Lagoe, and Steve Eckert, "KARE 11 Investigates: Jail Death Results in \$2.3 Million Payout," KARE 11 (Feb. 3, 2021), <https://www.kare11.com/article/news/investigations/kare-11-investigates-jail-death-results-in-23-million-payout/89-bb7e639c-f669-4e7b-b44d-4255f7051dbd>; Brandon Stahl, A.J. Lagoe, and Steve Eckert, "KARE 11 Investigates: 'Unethical' Record of Minnesota's Largest Jail Health Care Provider," KARE 11 (Dec. 10, 2020), <https://www.kare11.com/article/news/investigations/kare-11-investigates-unethical-record-of-minnesotas-largest-jail-health-care-provider/89-aed51ef6-ca37-4ace-b6d0-3e079389c9c9>.

<sup>173</sup> Ian Urbina and Catherine Rentz, "Immigrants Held in Solitary Cells, Often for Weeks," *New York Times* (March 23, 2013), <https://www.nytimes.com/2013/03/24/us/immigrants-held-in-solitary-cells-often-for-weeks.html>.

<sup>174</sup> While DHS Office of Detention Oversight reports a capacity of 311, the private operator reports a capacity of 1,089. See DHS Office of Detention Oversight, *Compliance Inspection: Otero County Processing Center* (February 2021), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/2021-OteroCoPC-ChaparralNM-Feb.pdf>; Management & Training Corporation, "Otero County Processing Center" (accessed April 18, 2021), <https://www.mtc trains.com/facility/otero-county-processing-center/>; ICE FY 2021 Detention Statistics.

detainees,<sup>175</sup> the use of solitary confinement to suppress peaceful protests,<sup>176</sup> widespread medical neglect,<sup>177</sup> legal call restrictions and denials,<sup>178</sup> and preventable outbreaks of COVID-19 due to pervasive mismanagement.<sup>179</sup> In the spring of 2020, the facility's private operator, MTC, threatened to terminate its contract with Otero County following a decline in profit margins and urged the county to bolster revenues by detaining more people.<sup>180</sup>

## **29. Okmulgee County Jail (Okmulgee County Sheriff's Office) in Okmulgee, Oklahoma**

*Total bed capacity: 220 people*<sup>181</sup>

ICE signed a contract with the Okmulgee County Jail in 2018, after the Oklahoma Department of Corrections canceled its contract with the county. Nearly three years earlier, the Okmulgee jail had been the site of a riot due to overcrowding, poor living conditions, and lack of access to medical care and showers. The protest left one prisoner hospitalized.<sup>182</sup> One former prisoner spent 50 days sleeping on the

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<sup>175</sup> Robert Moore, "Gay, Transgender Detainees Allege Abuse at ICE Facility in New Mexico," *The Washington Post* (March 25, 2019), [https://www.washingtonpost.com/immigration/gay-transgender-detainees-allege-abuse-at-icefacility-in-new-mexico/2019/03/25/e33ad6b6-4f10-11e9-a3f7-78b7525a8d5f\\_story.html](https://www.washingtonpost.com/immigration/gay-transgender-detainees-allege-abuse-at-icefacility-in-new-mexico/2019/03/25/e33ad6b6-4f10-11e9-a3f7-78b7525a8d5f_story.html).

<sup>176</sup> Jens Gould, "Cubans in New Mexico Say ICE Put Them in Solitary for Hunger Strikes," *Santa Fe New Mexican* (Nov. 16, 2019), [https://www.santafenewmexican.com/news/local\\_news/cubans-in-new-mexico-say-ice-put-them-insolitary-for-hunger-strikes/article\\_80ef746c-c5e4-5c7c-8724-fae3551f6818.html](https://www.santafenewmexican.com/news/local_news/cubans-in-new-mexico-say-ice-put-them-insolitary-for-hunger-strikes/article_80ef746c-c5e4-5c7c-8724-fae3551f6818.html).

<sup>177</sup> Nathan Craig, AnaKaren Ortiz Varela, Marissa C. Nuñez, Margaret Brown Vega, Ian Philabaum, and PJ Podesta, *Process by Torment: Immigration Experiences of Persons Detained at the Otero County Processing Center* (Innovation Law Lab: January 2021), [https://avid.chihuahuan.org/wp-content/uploads/sites/4/2021/01/Process\\_by\\_Torment.pdf](https://avid.chihuahuan.org/wp-content/uploads/sites/4/2021/01/Process_by_Torment.pdf); Ryan Devereaux, "'Theater of Compliance': New Report Details How ICE Escapes Detention Center Oversight," *The Intercept* (Jan. 5, 2021), <https://theintercept.com/2021/01/05/ice-detention-center-oversight-report/>.

<sup>178</sup> American Immigration Council, "Detained Immigrants Ask Court to Stop ICE Interference to Phone Access in Immigration Detention Centers" (Aug. 26, 2020) <https://www.americanimmigrationcouncil.org/news/detained-immigrants-ask-court-stop-ice-interference-phone-access-immigration-detention-centers>.

<sup>179</sup> Patrick Michels and Laura C. Morel, "'We Sent 500 Tests. They Don't Answer Calls': Inside ICE's Coronavirus Testing Disaster," *Reveal* (Sept. 10, 2020), <https://revealnews.org/article/ice-coronavirus-testing-disaster/>.

<sup>180</sup> Susan Dunlap, "During Pandemic, a Privately Run Detention Center Sought to Find New Migrants to Detain," *NM Political Report* (Sept. 14, 2020), <https://nmpoliticalreport.com/2020/09/14/during-pandemic-a-privately-run-detention-center-sought-to-find-new-migrants-to-detain/>.

<sup>181</sup> DHS Office of Detention Oversight, *Compliance Inspection: Okmulgee County Jail* (January 2021), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/okmulgeeCoJailOkmulgeeOK\\_Jan04-08\\_2021.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/okmulgeeCoJailOkmulgeeOK_Jan04-08_2021.pdf).

<sup>182</sup> News on 6, "Okmulgee County Jail Director Blames Overcrowding for Recent Riot" (Sept. 22, 2014), <http://www.news6.com/story/26599863/okmulgee-county-jail-director-blamesovercrowding-for-recent-riot>; Jeremy Kuzmarov, "Protesters Oppose ICE Center in Okmulgee," *The Oklahoma Observer* (March 11, 2020), <https://okobserver.org/protesters-oppose-ice-center-in-okmulgee/>.

concrete floor because Okmulgee County did not have any available mattresses due to overcrowding.<sup>183</sup> ICE detainees report inadequate conditions, including one shower per 60 people at the facility.<sup>184</sup>

### **30. Clinton County Correctional Facility (Clinton County) in McElhattan, Pennsylvania**

*Total bed capacity: 107 people*<sup>185</sup>

Clinton County Correctional Facility has 107-175 beds dedicated to ICE in a 298-person facility.<sup>186</sup> The facility detains people for ICE in the same conditions as people in county custody serving criminal sentences. Beginning in March 2020, the ACLU of Pennsylvania filed a lawsuit on behalf of medically vulnerable people who were at high risk of serious harm or death should they contract COVID-19.<sup>187</sup> People detained at Clinton reported medical neglect that resulted in hospitalizations, and staff who would not even wear masks. After several detainees decided to file a lawsuit and participated in a hunger strike over conditions of confinement at Clinton, ICE transferred them to the Etowah County Jail in Gadsden, Alabama, without providing required notice to their attorneys.<sup>188</sup> The jail also experienced a COVID-19 outbreak: At least 76 detainees and/or prisoners (out of approximately 168) and approximately 11 staff members contracted COVID-19.<sup>189</sup>

### **31. Pike County Correctional Facility (Pike County) in Lords Valley, Pennsylvania**

*Total bed capacity: 219 people*<sup>190</sup>

Pike County Correctional Facility has 210-219 beds dedicated to ICE in a 375-person facility.<sup>191</sup> It detains people for ICE in the same condition as people in

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<sup>183</sup> David Norris, “Ex-Okmulgee County Jail Inmate Says Facility Isn’t Ready for Tulsa’s Inmates,” KTUL (Aug. 17, 2017), <https://ktul.com/news/local/ex-okmulgee-county-jail-inmate-says-facility-insnt-ready-for-tulas-inmates>.

<sup>184</sup> Jeremy Kuzmarov, “Protesters Oppose ICE Center in Okmulgee,” *The Oklahoma Observer* (March 11, 2020), <https://okobserver.org/protesters-oppose-ice-center-in-okmulgee/>.

<sup>185</sup> DHS Office of Detention Oversight, *Compliance Inspection: Clinton County Correctional Facility*, (August 2020), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/ClintonCountyCorrectionalFacilityLockHavenPAAugust2020.pdf>.

<sup>186</sup> While DHS Office of Detention Oversight reports a capacity of 197, an inter-governmental services agreement for this facility describes its capacity as 175 (on file with ACLU of Pennsylvania).

<sup>187</sup> *Thakker v. Doll*, 451 F. Supp. 3d 538 (2020); *Hope v. Doll*, 2020 WL 5035725 (2020).

<sup>188</sup> *Thakker v. Doll*, No. 1:20-cv-00480-JEJ-MCC (M.D. Pa.), Mot. For Prelim. Inj. Enjoining Transfers, Jul. 8, 2020, Dkt. No. 177.

<sup>189</sup> Lana Muthler, “COVID-19 Invades County Prison,” *The Express* (Dec. 9, 2020), <https://www.lockhaven.com/news/local-news/2020/12/covid-19-invades-county-prison>.

<sup>190</sup> DHS Office of Detention Oversight, *Compliance Inspection: Pike County Correctional Facility* (August 2020), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/pikeCoCorrFacHawleyPA\\_Aug17-21\\_2020.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/pikeCoCorrFacHawleyPA_Aug17-21_2020.pdf).

<sup>191</sup> While DHS Office of Detention Oversight reports a capacity of 219, an inter-governmental services agreement for the facility describes its capacity as 210 (on file with ACLU of Pennsylvania).



county custody serving criminal sentences.<sup>192</sup> Beginning in March 2020, the ACLU of Pennsylvania filed a lawsuit on behalf of medically vulnerable people who were at high risk of serious harm or death should they contract COVID-19.<sup>193</sup> In the midst of a COVID-19 outbreak, ICE transferred people from Pike to Prairieland Detention Center in Texas, which then had a COVID-19 outbreak.<sup>194</sup> At least 51 detainees and/or prisoners contracted the virus, two of whom died.<sup>195</sup>

### 32. York County Prison (York County) in York, Pennsylvania

*Total bed capacity: 800*<sup>196</sup>

The York County Prison has 800 beds dedicated to ICE in a 2,245-person facility. They detain people for ICE in the same conditions as people in county custody who are serving criminal sentences.<sup>197</sup> Detainees and advocate observers have reported unsanitary, dirty conditions, inadequate access to medical and mental health care, and poor quality of life.<sup>198</sup> Despite warnings about the cramped, unsanitary conditions, ICE continued to operate at York County Prison. Beginning in March 2020, the ACLU of Pennsylvania filed a lawsuit on behalf of medically vulnerable people who were at high risk of serious harm or death should they contract COVID-19.<sup>199</sup> Just as advocates had warned, the facility had a sustained and extensive outbreak; approximately 834 (out of 1,200 detainees and/or prisoners) people contracted the virus.<sup>200</sup>

### 33. Bluebonnet Detention Center (MTC) in Anson, Texas

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<sup>192</sup> U.S. Immigration and Customs Enforcement, “ICE Guidance on COVID-19” (accessed April 18, 2021), <https://www.ice.gov/coronavirus>.

<sup>193</sup> *Thakker v. Doll*, 451 F. Supp. 3d 538 (2020); *Hope v. Doll*, 2020 WL 5035725 (2020).

<sup>194</sup> Hamed Aleaziz, “ICE Moved Dozens of Detainees Across the Country During the Coronavirus Pandemic. Now Many Have COVID-19,” BuzzFeed News (April 29, 2020), <https://www.buzzfeednews.com/article/hamedaleaziz/ice-immigrant-transfer-jail-coronavirus>.

<sup>195</sup> *Thakker v. Doll*, No. 1:20-cv-00480-JEJ-MCC (M.D. Pa.), Proposed Findings of Fact and Conclusions of Law, July 29, 2020, Dkt. No. 220.

<sup>196</sup> DHS Office of Detention Oversight, *Compliance Inspection: York County Prison* (January 2020), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/2020-YorkCo-YorkPA-0107-092020.pdf>.

<sup>197</sup> York County Pennsylvania, “York County Prison,” <https://yorkcountypa.gov/courts-criminal-justice/prison.html> (“Inmates may be pretrial detainees awaiting trial or those already sentenced by the Court of Common Pleas. The prison also houses federal immigration detainees in the custody of U.S. Immigration and Customs Enforcement.”).

<sup>198</sup> Letter from Advancement Project to Simona Flores and Clair Doll, “Re: Findings From April 2, 2019 Stakeholder Visit to York County Prison” (July 31, 2019), <https://advancementproject.org/resources/letter-of-findings-from-york-county-prison/>.

<sup>199</sup> *Thakker v. Doll*, 451 F. Supp. 3d 538 (2020); *Hope v. Doll*, 2020 WL 5035725 (2020).

<sup>200</sup> Seth Kaplan, “‘Maybe they’ll get the picture now’—Family of prison sergeant and COVID-19 victim wants answers, action,” ABC 27 News (Jan. 27, 2021), <https://www.abc27.com/news/health/coronavirus/coronavirus-pennsylvania/maybe-theyll-get-the-picture-now-family-of-prison-sergeant-and-covid-19-victims-wants-answers-action/>; ECF No. 326-1, Ritchey Decl. ¶ 7 (listing the York County Prison population as 1,266 as of November 10, 2020).

*Total bed capacity: 1,000 people; guaranteed minimum: 750*<sup>201</sup>

In December 2019, ICE announced it would open the Bluebonnet Detention Center, a prison that had been empty for almost a decade after the number of prisoners in Texas began to fall—making the facility obsolete before it could open.<sup>202</sup> Bluebonnet had one of the largest COVID-19 outbreaks in the country, with at least 409 confirmed cases as of April 2021.<sup>203</sup> In May 2020, a former guard described the facility’s failure to provide masks to staff and detainees.<sup>204</sup> Cheryl Eubank, a former employee of the month, explained that it was clear that COVID-19 was “gonna spread like wildfire” at Bluebonnet due to a failure to quarantine people. The true scale of the outbreak may have been much larger than we know; the facility reportedly failed to test many people exhibiting symptoms of COVID-19. Bluebonnet is located in a small town north of Abilene in an area without a robust immigration bar, more than 200 miles from Dallas/Fort Worth, the nearest major metropolitan area—creating significant barriers to access to counsel.

#### **34. El Valle Detention Facility (MTC) in Raymondville, Texas**

*Total bed capacity: 1,000 people; guaranteed minimum: 750*<sup>205</sup>

In 2018, ICE signed a contract with MTC to hold immigrants at the El Valle Detention Facility in Raymondville, Texas, the site of the former Willacy County Correctional Center. Willacy had served as an ICE detention facility between 2006 and 2011, when ICE ended its contract after reports of substandard conditions and sexual abuse.<sup>206</sup> These reports prompted DHS to initiate 13 criminal investigations into staff misconduct at the facility, resulting in at least one guilty plea to sexual abuses of a female immigrant by a contract officer.<sup>207</sup> After ICE terminated its contract, the Bureau of Prisons used the facility from 2011 to 2015 for immigrants

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<sup>201</sup> DHS Office of Detention Oversight, *Compliance Inspection: Bluebonnet Detention Facility* (February 2021), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/2021-BluebonnetDF-AnsonTX-Feb.pdf>; ICE FY 2021 Detention Statistics.

<sup>202</sup> Heather Claborn, “Empty for a Decade, Bluebonnet Will Detain Immigrants for ICE,” KACU (Sept. 2, 2019), <https://www.kacu.org/post/empty-decade-bluebonnet-will-detain-immigrants-ice>.

<sup>203</sup> U.S. Immigration and Customs Enforcement, “ICE Guidance on COVID-19” (accessed April 18, 2021), <https://www.ice.gov/coronavirus>.

<sup>204</sup> Daniela Ibarra, “Ex Employee of ICE Facility in Anson Says Company Didn’t Do Enough to Stop COVID-19 Spread,” KTXS12ABC (May 27, 2020), <https://ktxs.com/news/local/former-bluebonnet-detention-employee-says-mtc-did-not-do-a-good-job-containing-covid-19>.

<sup>205</sup> DHS Office of Detention Oversight, *Compliance Inspection: El Valle Detention Facility* (January 2021), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/elValleDetFacRaymondvilleTX\\_Jan04-08\\_2021.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/elValleDetFacRaymondvilleTX_Jan04-08_2021.pdf); ICE FY 2021 Detention Statistics.

<sup>206</sup> Sarah Childress, “Why Immigrant Detainees Still Aren’t Safe from Abuse,” *Frontline* (Nov. 20, 2013), <https://www.pbs.org/wgbh/frontline/article/why-immigrant-detainees-still-arent-safe-from-abuse/>.

<sup>207</sup> U.S. Department of Justice, “Former Willacy Detention Center Contract Security Officer Pleads Guilty to Sexual Abuse of a Female Detainee in Texas” (Aug. 4, 2011), <https://www.justice.gov/opa/pr/former-willacy-detention-center-contract-security-officer-pleads-guilty-sexual-abuse-female>.

in its custody. Conditions did not improve, resulting in a riot that nearly destroyed the facility prompted by complaints about poor medical care, overuse of solitary confinement, and substandard conditions.<sup>208</sup> The Bureau of Prisons declined to renew the contract, and the facility closed in 2015. It was reopened under contract with ICE in 2018.<sup>209</sup> Since then, the facility has had more than 213 cases of COVID-19. In the past year, detainees have gone on a hunger strike, protesting a lack of soap and cleaning supplies.<sup>210</sup> In March 2020, 22-year-old asylum-seeker Maria Celeste Ochoa Yoc de Ramirez died at an area hospital after being held at the facility.<sup>211</sup>

### 35. T. Don Hutto Residential Center (CoreCivic) in Taylor, Texas

*Total bed capacity: 512 people; guaranteed minimum: 461*<sup>212</sup>

T. Don Hutto Residential Center dates back to 1997, when it operated as a medium-security prison.<sup>213</sup> In 2006, following a rise in anti-immigrant sentiment, Hutto was converted to a detention facility to hold immigrant families. Shortly thereafter, the ACLU filed a lawsuit against the facility for a lack of educational programming, privacy, and healthcare, especially for children.<sup>214</sup> In 2018, Martha Gonzalez sued Hutto for coercing her and other detainees to work for \$1-2 a day with the threat of solitary confinement.<sup>215</sup> Detainees have also raised complaints of repeated sexual

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<sup>208</sup> Seth Freed Wessler, “The True Story of a Texas Prison Riot,” *The Nation* (June 23, 2015), <https://www.thenation.com/article/archive/the-true-story-of-a-texas-prison-riot/>; American Civil Liberties Union, *Warehoused and Forgotten: Immigrants Trapped in Our Shadow Private Prison System* (June 2014), <https://www.aclu.org/sites/default/files/assets/060614-aclu-car-reportonline.pdf>.

<sup>209</sup> Ari Shapiro, “Detention Center in Texas That Once Burned During Riots Reopens,” NPR (Aug. 2, 2018), <https://www.npr.org/2018/08/02/635047714/detention-center-in-texas-that-once-burned-during-riots-reopens>.

<sup>210</sup> Valerie Gonzalez, “Brief Hunger Strike at El Valle Detention Center Protests Long Detention, Conditions,” KRGV (July 28, 2020), <https://www.krgv.com/news/brief-hunger-strike-at-el-valle-detention-center-protests-long-detention-conditions/>.

<sup>211</sup> Dianne Solis and Imelda Garcia, “Guatemalan Asylum-seeker Dies in ICE Custody in Fort Worth Hospital,” *Dallas Morning News* (March 10, 2020), <https://www.dallasnews.com/news/2020/03/10/guatemalan-asylum-seeker-dies-in-ice-custody-in-fort-worth-hospital/>.

<sup>212</sup> DHS Office of Detention Oversight, *Compliance Inspection: T. Don Hutto Residential Center* (February 2021), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/2021-TDonHuttoRC-TaylorTX-Feb.pdf>; ICE FY 2021 Detention Statistics.

<sup>213</sup> Stephanie Mencimer, “Why Texas Still Holds ‘Em,” *Mother Jones* (July 2008), <https://www.motherjones.com/politics/2008/07/why-texas-still-holds-em/>.

<sup>214</sup> ACLU, “ACLU Challenges Prison-Like Conditions at Hutto Detention Center” (2021), <https://www.aclu.org/aclu-challenges-prison-conditions-hutto-detention-center>.

<sup>215</sup> *Gonzalez v. CoreCivic, Inc.*, No. 1:18-CV-169-LY, 2019 WL 2572540 (W.D. Tex. Mar. 1, 2019).

assaults by staff at Hutto.<sup>216</sup> In spite of the significant reports of abuse at the facility, ICE renewed its contract with the center in 2020.<sup>217</sup>

### **36. IAH Secure Adult Detention Facility (MTC) in Livingston, Texas**

*Total bed capacity: 1,000 people;*<sup>218</sup>

The IAH Secure Adult Detention Facility was built in 2005, and in the 16 years since has had a continued record of poor conditions. Under the Trump administration, it held 25 parents separated from their children<sup>219</sup> who reported being unable to contact their children. One 24-year-old Honduran man was unable to talk to his 6-year-old daughter for three weeks after being detained; his wife reported never being able to call or receive a call from him.<sup>220</sup> The facility has also failed to protect detainees from COVID-19, knowingly transferring a COVID-19 positive individual into it.<sup>221</sup> The facility has at least 61 confirmed cases of COVID-19 as of April 2021.<sup>222</sup> In 2012, advocates reported poor medical care and overuse of solitary confinement at the facility.<sup>223</sup>

### **37. Montgomery Processing Center (GEO Group) in Conroe, Texas**

*Total bed capacity: 1,000 people; guaranteed minimum: 750*<sup>224</sup>

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<sup>216</sup> Mary Tuma, “Allegations Mount at T. Don Hutto,” *The Austin Chronicle* (Dec. 1, 2017), <https://www.austinchronicle.com/news/2017-12-01/allegations-mount-at-t-don-hutto/>.

<sup>217</sup> Mary Tuma, “ICE Quietly Renews 10-Year Contract With T. Don Hutto Detention Center,” *The Austin Chronicle* (Aug. 21, 2020), <https://www.austinchronicle.com/news/2020-08-21/ice-quietly-renews-10-year-contract-with-t-don-hutto-detention-center/>.

<sup>218</sup> DHS Office of Detention Oversight, *Compliance Inspection: IAH Secure Adult Detention Facility* (Oct. 2020), <https://www.ice.gov/doclib/foia/odo-compliance-inspections/IAHSecureAdultDetentionFacility-Livingston-TX-Oct-26-29-2020.pdf>.

<sup>219</sup> Jay Root and Shannon Najmabadi, “Kids in Exchange for Deportation: Detained Migrants Say They Were Told They Could Get Kids Back on Way Out of U.S.,” *The Texas Tribune* (June 24, 2018), <https://www.texastribune.org/2018/06/24/kids-exchange-deportation-migrants-claim-they-were-promised-they-could/>

<sup>220</sup> Shannon Najmabadi, “Detained Migrant Parents Have to Pay to Call Their Family Members. Some Can’t Afford to,” *The Texas Tribune* (July 3, 2018), <https://www.texastribune.org/2018/07/03/separated-migrant-families-charged-phone-calls-ice/>.

<sup>221</sup> Acacia Coronado, “At Least Seven Texas Detention Center Employees Who Tested Positive for COVID-19 Were Not Officially Reported by ICE,” *The Texas Observer* (April 16, 2020), <https://www.texasobserver.org/ice-immigrant-detention-centers-coronavirus-positive/>

<sup>222</sup> U.S. Immigration and Customs Enforcement, “ICE Guidance on COVID-19” (accessed April 18, 2021), <https://www.ice.gov/coronavirus>.

<sup>223</sup> Detention Watch Network, *Expose and Close: Polk County Detention Facility* (November 2012), <https://www.detentionwatchnetwork.org/sites/default/files/reports/DWN%20Expose%20and%20Close%20Polk%20County.pdf>.

<sup>224</sup> DHS Office of Detention Oversight, *Compliance Inspection: Montgomery ICE Processing Center* (January 2021), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/montgomeryProcCntrConroeTX\\_Jan04-08\\_2021.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/montgomeryProcCntrConroeTX_Jan04-08_2021.pdf); ICE FY 2021 Detention Statistics.

Montgomery Processing Center (MPC) opened under the Trump administration in September 2018.<sup>225</sup> The ACLU of Texas filed a lawsuit against this facility in 2020 for its refusal to release medically vulnerable individuals in the wake of COVID-19. In spite of the deadly virus and detainees with comorbidities like diabetes, hypertension, and high-risk blood clotting, MPC has failed to provide masks, enforce social distancing, or even make basic hygiene products available to detainees. Guards at MPC also failed to properly wear masks. Further, the facility engaged in the dangerous practice of “cohorting” detainees who had been exposed to COVID-19 together in large dormitories—a practice disapproved by the CDC that risks spreading the virus.

As of April 2021, this facility has at least 292 confirmed cases of COVID-19.<sup>226</sup> It has impacted people like R.V.B., one of the immigrants represented in the suit, who at age 58 had been diagnosed with diabetes, asthma, sleep apnea, and low blood oxygen. As the federal judge presiding over the ACLU of Texas’s case noted, it is impossible to know the true number of infections at MPC because the detention center transferred, removed, or released many detainees at the height of the outbreak—including a plaintiff in the lawsuit who had tested positive for COVID-19 and was symptomatic at the time of removal.<sup>227</sup>

### 38. **Prairieland Detention Center (LaSalle) in Alvarado, Texas**

*Total bed capacity: 782 people*<sup>228</sup>

Prairieland Detention Center opened for operation under the Trump administration in 2017.<sup>229</sup> There have been at least 156 confirmed cases of COVID-19 in this facility.<sup>230</sup> Prairieland Detention Center has a maximum capacity of 707 people; that is to say, at *least* one in seven detainees have tested positive for COVID-19, assuming full capacity. In May 2020, 10 medically vulnerable individuals detained at Prairieland filed a class action lawsuit against the facility for its failures on COVID-19, including the lack of social distancing, limited cleaning supplies, and

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<sup>225</sup> The GEO Group, “Montgomery Processing Center” (accessed April 18, 2021), <https://www.geogroup.com/FacilityDetail/FacilityID/249>.

<sup>226</sup> U.S. Immigration and Customs Enforcement, “ICE Guidance on COVID-19” (accessed April 18, 2021), <https://www.ice.gov/coronavirus>.

<sup>227</sup> *Vasquez Barrera v. Wolf*, No. 4:20-cv-1241 (S.D. Tex.).

<sup>228</sup> DHS Office of Detention Oversight, *Compliance Inspection: Prairieland Detention Center* (January 2021), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/prairielandDetFacAlvaradoTX\\_Jan25-29\\_2021.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/prairielandDetFacAlvaradoTX_Jan25-29_2021.pdf).

<sup>229</sup> Global Detention Project, “Prairieland Detention Center (PDC),” <https://www.globaldetentionproject.org/countries/americas/united-states/detention-centres/2060/prairieland-detention-center-pdc>.

<sup>230</sup> U.S. Immigration and Customs Enforcement, “ICE Guidance on COVID-19” (accessed April 18, 2021), <https://www.ice.gov/coronavirus>.

punitive measures rather than treatment for COVID-19-positive detainees.<sup>231</sup> All 10 later tested positive for COVID-19.

### 39. **Farmville Detention Center** (Immigration Centers of America) in Farmville, Virginia

*Total bed capacity: 690 people*<sup>232</sup>

Farmville opened in 2010. In 2020, a COVID-19 outbreak led more than 300 detained people to become infected, one of whom died; in July 2020, at least 93 percent of detained people were infected.<sup>233</sup> In 2020 and 2019, guards retaliated against detained immigrants who were protesting unsafe conditions by deploying pepper spray and putting individuals in solitary confinement.<sup>234</sup> ICE's own inspection records show long-standing use of force issues, along with unjustified use of restraints and spoiled food.<sup>235</sup> These patterns persist despite ICE's adoption of recommendations from DHS CRCL's 2015-2016 investigation of Farmville.<sup>236</sup>

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<sup>231</sup> Lourdes Vazquez, "Prairieland Detainees File Class-action Lawsuit Against ICE Related to Coronavirus Cases in Facility," WFAA (May 19, 2020), <https://www.wfaa.com/article/news/health/coronavirus/prairieland-detainees-file-class-action-lawsuit-against-ice/287-f0a1996e-f407-4e67-80b0-2c483b85df65>.

<sup>232</sup> DHS Office of Detention Oversight, *Compliance Inspection: Immigration Centers of America (Farmville)* (January 2021), [https://www.ice.gov/doclib/foia/odo-compliance-inspections/farmvilleICA\\_FarmvilleVA\\_Jan04-08\\_2021.pdf](https://www.ice.gov/doclib/foia/odo-compliance-inspections/farmvilleICA_FarmvilleVA_Jan04-08_2021.pdf).

<sup>233</sup> Antonio Olivo and Nick Miroff, "ICE Flew Detainees to Virginia so the Planes Could Transport Agents to D.C. Protest. A Huge Coronavirus Outbreak Followed," *The Washington Post* (Sept. 11, 2020), [https://www.washingtonpost.com/coronavirus/ice-air-farmville-protests-covid/2020/09/11/f70ebe1e-e861-11ea-bc79-834454439a44\\_story.html](https://www.washingtonpost.com/coronavirus/ice-air-farmville-protests-covid/2020/09/11/f70ebe1e-e861-11ea-bc79-834454439a44_story.html); Jenny Gathright, "Inspection Finds 'Systematic' Failings in Farmville Immigrant Detention Center Response to COVID-19 Outbreak," WAMU (Sept. 10, 2020), <https://wamu.org/story/20/09/10/inspection-finds-systematic-failings-in-farmville-immigrant-detention-center-response-to-covid-19-outbreak/>.

<sup>234</sup> National Immigrant Justice Center, "Statement of the National Immigrant Justice Center, House Committee on Homeland Security Hearing, Oversight of ICE Detention Facilities: Examining ICE Contractors' Response to COVID-19" (July 13, 2020), [https://immigrantjustice.org/sites/default/files/content-type/commentary-item/documents/2020-07/NIJCStatement\\_HouseHomelandSecurityCommitteeHearing\\_2020-07-13.pdf](https://immigrantjustice.org/sites/default/files/content-type/commentary-item/documents/2020-07/NIJCStatement_HouseHomelandSecurityCommitteeHearing_2020-07-13.pdf); *Downs v. Hott*, No. 1:19-cv-00882 (E.D. Va.).

<sup>235</sup> La ColectiVA, "New Documents Illuminate a Dark Pattern of Abuse in ICA-Farmville" (Aug. 18, 2020), <https://lacolectiva.org/farmvilleabuse>.

<sup>236</sup> Memo from Megan H. Mack and Susan Mathias to Sarah R. Saldaña and Gwendolyn Keyes Fleming, "Farmville Detention Center" (Sept. 6, 2016), [https://www.dhs.gov/sites/default/files/publications/farmville-detention-center\\_09-06-16.pdf](https://www.dhs.gov/sites/default/files/publications/farmville-detention-center_09-06-16.pdf).