



U.S. Department of Justice

Civil Rights Division

Office of the Assistant Attorney General

Washington, D.C. 20035

January 7, 1998

Mr. Cruz Salas  
Chairman  
Gila County Board of Commissioners  
1400 East Ash  
Globe, AZ 85501

Re: Notice of Findings Pursuant to 42 U.S.C. § 1997b,  
Regarding the Gila County Jails (Globe and Payson, AZ)

Dear Mr. Salas:

I am writing to you regarding the Department of Justice investigation of conditions of confinement at the Gila County Jails (Globe and Payson, Arizona), pursuant to the Civil Rights of Institutionalized Persons Act ("CRIPA"), 42 U.S.C. § 1997 et seq. On August 21, 1996, we sent you a letter and expert consultant reports providing interim findings so that you would have information to assist you in seeking to accomplish voluntary compliance. In February and March 1997, we re-toured the jails with two expert consultants. We now write to advise you of our findings and recommendations regarding conditions of confinement at the Globe and Payson jails.

Our review of jail conditions included visits by sanitarian and penologist consultants, interviews of staff and inmates, and review of appropriate documents. The investigation focused upon allegations of inadequate supervision of inmates, insufficient officer staffing, inadequate provision of medical services, and general sanitation, food service and environmental deficiencies. We appreciate the assistance provided by Sheriff Rodriguez and jail personnel during our visits.

We conclude that unconstitutional conditions exist at the Globe Jail in the areas of inmate classification, security, inmate supervision, inmate exercise, correctional officer staffing, correctional officer training, and environmental conditions. In contrast, at the Payson Jail the County has implemented sufficient remedial measures to correct the unconstitutional conditions we had identified.

CRIPA Investigation



JC-AZ-001-006

## I. LEGAL FRAMEWORK

Conditions of confinement for inmates are governed by two sources of constitutional law: the Fourteenth Amendment (for pretrial detainees) and the Eighth Amendment (for inmates convicted of a crime). In providing our conclusions regarding the jails, we recognize that Gila County Jails confine both pretrial detainees and convicted persons. Inmates may not be deprived of their basic human needs while incarcerated and must be protected from harm. See, Estelle v. Gamble, 429 U.S. 97 (1976). With respect to pretrial detainees, the Fourteenth Amendment prohibits punishment of these persons or any restrictive condition or practice that is not reasonably related to a legitimate governmental objective such as safety, order or security. Bell v. Wolfish, 441 U.S. 520 (1979). Inmates convicted of crimes and confined in jails are protected against cruel and unusual punishment as set forth in the Eighth Amendment to the Constitution. See, Rhodes v. Chapman, 452 U.S. 337 (1981); Wilson v. Seiter, 501 U.S. 294 (1991); Farmer v. Brennan, 511 U.S. 825 (1994).

## II. THE GLOBE JAIL

### A. Introduction

The Globe Jail is a medium-sized facility, according to American Correctional Association standards, with a rated capacity of 160 inmates. This jail in the past has incarcerated as many as 180 inmates. This crowding requires some inmates to sleep on the floor, often for a considerable period of time. Globe's inmate population ranges from minimum custody misdemeanants to dangerous convicted felons awaiting removal to Arizona Department of Corrections facilities. Globe houses high security and difficult inmate management cases. Immigration and Naturalization Service inmate detainees and other federal inmates also are held at Globe under contract with the United States government. Some inmates are classified and separated on the basis of behavior or the need for protection, but most inmates are assigned to housing units based on whether they are sentenced or unsentenced.

### B. Classification, Security and Supervision

Inmates are constitutionally entitled to incarceration in an environment that offers reasonable protection from harm. A system of inmate housing classification based upon objective behaviorally-based criteria helps attain effective inmate management. Appropriate classification reduces the potential for harm caused by inmate-on-inmate violence. We conclude that the most basic inmate safety and security requirements have been severely compromised at Globe. Predatory inmates are not

separated from others. Inmate-on-inmate assaults are common events. Inmates confided that they were in constant fear of assault from others and could not rely on assistance from staff.

Except for a few segregated inmates, the Globe Jail currently uses a non-behaviorally based system of classification, which merely separates pre-trial detainees from sentenced inmates. This system of classification is inadequate to assure inmates reasonable levels of safety and security. The jail fails to keep accurate records of assaults, particularly inmate-on-inmate assaults, so that it is impossible readily to identify from records which inmates, either sentenced or pre-trial, pose the greatest risk of harm to others. These classification deficiencies are compounded by the practice of detaining as many as 14 to 16 inmates in 8 foot by 10 foot "holding cells" and forcing inmates to sleep on the floor for days in small cells in cramped and unsanitary circumstances.

Supervision of inmates is inadequate. The ability of inmates to fashion weapons from disassembled light fixtures and air supply duct work, the numbers of escapes and the instances of disturbances at this jail, reflect inadequate supervision of inmates at this facility. On a positive note, Gila County has made improvements to the perimeter security of the facility with the addition of fencing and razor wire. The control room has been upgraded with the addition of many security cameras so that observation of inmates and sensitive areas of the facility may be accomplished by the control room officer.

These physical plant improvements, however, do not alleviate the fundamental problem of inadequate prisoner supervision at this facility. There is an acute need for "hands-on" officer observation and interaction with inmates. Camera observation does not substitute for inmate supervision. As our consultant noted, "[e]ven if the (control room) officer observed something, there are not sufficient staff to respond." Often the entire facility is staffed with only two corrections officers. In this circumstance, the control room officer cannot leave the post, as this officer controls the doors. The second officer is often involved with booking new inmates. Thus, there is often no officer on duty whose primary responsibility is the interactive supervision of inmates in their housing units. Indeed, given the lack of back-up support, officers rarely enter inmate housing areas. Recurrent instances of inmate-on-inmate violence at Globe are directly related to the lack of sufficient numbers of trained staff.

Jail authorities have not taken adequate measures to curtail inmate access to potentially dangerous instruments. The ease with which inmates have been able to fashion and hide homemade weapons directly affects the safety and security of inmates and staff. Some of these problems are relatively simple to correct.

For example, in 1995, our consultant noted instances in which mops, mop wringers and buckets were left unattended in day rooms in inmate housing areas. These items may be dismantled and made into effective weapons. The same haphazard disbursement of cleaning equipment was noted in the most recent tour. In other instances, outdated, easily tampered, lighting and duct work metallic items are utilized in lieu of high security fixtures. A collection of "shanks" fashioned from these fixtures and recovered from inmates was shown to our consultant.

We note other security related deficiencies. The area in back of the jail near the shop is open to inmate trustees. In this area there are a variety of discarded metal items, which may be fashioned into weapons. Our consultant observed that much of this material is lying around in a wholly disorganized, unprotected manner. Furthermore, in other areas of the jail, such as the control center, where again "trustees" have access, scissors and screwdrivers were stored in open view without any sign-out log or other form of tool control. The lack of tool and metal refuse control poses enormous potential for harm.

The safety and security of inmates and staff is at risk due to the fact that the emergency annunciator panel is inoperative, and has been inoperative for a considerable period of time. Moreover, although the jail has made two back-up sets of emergency keys, these keys are not readily available to on-duty staff in the control room. In the event of a security-related emergency, there is a significant chance that back-up keys could not be promptly obtained. These deficiencies have been brought to the attention of jail management in the past by this Department's consultants, as well as State of Arizona authorities, without any indication of the implementation of corrective measures.

There were, however, a few positive improvements in security. The most effective tool control policy at Globe is followed in the food service kitchen where dangerous tools such as knives and other instruments are strictly controlled. Although trustees have access to this area, the food service manager does an excellent job of accounting for every item that conceivably could be removed from the kitchen and used as a weapon. We also noted that showers in inmate housing areas now have privacy panels, which allow for both privacy and appropriate security observation.

### **C. Correctional Staff Training**

Security and safety are also compromised by inadequate staff training. On the day of our correction consultant's most recent visit, the officer working the most sensitive post in the facility, the control center, had received no formal correctional

officer training whatsoever. Our interview of this officer disclosed that this individual did not know what she was expected to do in the case of a fire or security emergency. Placing an untrained novice in the most sensitive post in the jail jeopardizes the safety and security of every person in the jail.

Many of the correctional officers at Globe had not been sent to the basic correctional officer training course. In-service training is similarly inconsistent and inadequate. For example, the jail has developed an emergency response team to respond to serious inmate altercations, but it is poorly planned and presents opportunities for unjustified and unaccountable use of force. Officers are allowed to keep all of their disturbance control equipment in their vehicles, an inappropriate and dangerous practice. If lawful force would have to be initiated, jail management would have no record, control or ability to account for the distribution of security equipment, a situation that invites improper use of force. The net result is a poorly trained, understaffed workforce, unable to cope with emergency situations in the jail.

The Globe Jail also lacks a comprehensive set of jail operation policies and procedures and post assignment orders. Policies and procedures are an essential tool for the operation of the jail, and post orders delineate the officer duties associated with a particular job assignment. Moreover, knowledge of these policies, procedures and orders is a key element in correctional officer training. The fact that such policies and post orders are not available to line staff so that they may understand their responsibilities underscores the basic organizational problems at this facility and exacerbates the problem associated with inadequately trained staff.

#### **D. Inmate Exercise**

Inmate outdoor exercise is virtually non-existent. Inmates asserted and staff confirmed that outdoor exercise is an infrequent event, sometimes delayed for weeks. Inmates at Globe have not been provided the opportunity to engage in reasonable amounts of outdoor exercise, a constitutionally recognized right. "Some form of regular outdoor exercise is extremely important to the psychological and physical well being of inmates." Spain v. Procnier, 600 F.2d 189, 199 (9<sup>th</sup> Cir. 1979) (one hour of exercise five days per week); Rutherford v. Pitchess, 713 F.2d 1416 (9<sup>th</sup> Cir. 1983) (minimum of 2½ hours of outdoor exercise per week). Again, this problem directly relates to inadequate correctional officer staffing and supervision problems. Moreover, female inmates appear to have even less opportunity for out-of-cell

outdoor exercise than male inmates. Although inmate exercise opportunities have improved slightly since our consultant's 1995 tour, inmates are still not receiving constitutionally mandated regular periods of outdoor exercise.

#### **E. Sanitation, Environment and Fire Safety**

Significant environmental and safety issues remain unresolved at the Globe jail, some of which are due to increasing numbers of inmates placing greater utilization demands on an aging facility. Other deficiencies reflect the need to increase routine maintenance and to otherwise correct seemingly longstanding deficiencies, particularly in the area of fire safety. These deficiencies are a direct threat to the safety and well being of inmates (and staff) with significant potential for harm from food borne illness, improper climate and air exchange control and, most significantly, potential for fire and smoke-related disaster.

##### **1. Dietary Adequacy and Food Service Sanitation**

Although we had received complaints in the past regarding the quantity of food provided inmates, based upon our review of current menus and observation of the actual inmate meals served, we conclude that the new food service provider, Wackenhut Corporation, and its facility manager are currently providing inmates with meals of sufficient nutritional content to maintain health, and therefore meet or exceed constitutional minimum requirements. Moreover, we find that meals provided are consistent with menus planned in advance by a dietician.

Food service sanitation conditions in the kitchen area, however, are inadequate and significantly affect the health and safety of persons incarcerated in this jail. Utensils were not cleaned and sanitized properly and were not allowed to air dry. These conditions were caused by insufficient storage space in the kitchen area and by the absence of dishwashing equipment. In addition, some food items were not properly dated and covered in the refrigerator. Plastic food trays and covers that allow water to collect in the interior were not discarded, creating a breeding ground for microbial organisms. Proper monitoring and testing of chemical sanitizer levels in the dish and pot washing sinks was not accomplished. These conditions pose a substantial risk of harm from food-borne illness. In addition, the cooking stove had dangerous electrical defects and grease build-up in the stove hood that pose a significant risk of fire.

## 2. Environmental Hazards

Environmental problems needing correction in the jail housing areas include air quality, water quality, general sanitation and sanitizing practices. The heating and air conditioning system is in great need of repair, as temperature control and air movement in this closed ventilation system is erratic. Some areas of the jail receive virtually no fresh air, and temperatures vary significantly. These conditions present substantial risk to the health of inmates and staff. Indeed, we note that environmental authorities closed a portion of the jail on our recent visit due to an undisclosed environmental hazard under investigation at the time.

Although water quality and plumbing are generally adequate, our consultant noted on a prior visit the possibility of water contamination by the absence of back-siphonage/back flow prevention devices. Such devices have been installed in only some locations in which they are needed. Moreover, toilets and urinals in some areas of the jail, particularly the trustee dorm, are inoperative, needing repair or capping. There is an urgent need for a sump pump in the area of the jail containing the electrical transfer equipment and transformers, as that area is below grade, and subject to flooding from burst plumbing. Fire or electrocution could result from this dangerous condition.

In the cellblocks, mold and mildew are present throughout the facility. Evidence of roofing leaks and water damage were seen throughout the jail. These conditions contribute to the potential for fungal and bacterial disease transmission. Floor surfaces in shower areas are particularly slippery and are potential sources of injury from falls. Staff acknowledged that the shower areas were particularly dangerous and that inmates had frequently slipped and fallen.

We observed that bedding and mattresses that were worn and filth laden were being replaced. Our consultant previously noted that the jail had insufficient amounts of inmate uniforms and underwear for clothing exchange. Corrective action has been taken in that sufficient supplies of clean clothing were observed during our most recent visit.

Laundry processing is greatly improved. We note that the laundry has expanded its capabilities with the addition of new washers and a commercial dryer. Additional effort and training is needed, however, to separate laundry contaminated with blood or bodily fluids from other laundry. This deficiency reflects a lack of appropriate blood-borne pathogens training among staff and trustees.

### **3. Fire Safety**

Fire protection is dangerously inadequate at the Globe Jail. Inmates and others occupying this jail are at significant risk of harm due to years of neglect of the most basic fire safety equipment. Safety systems including alarms and smoke detectors have been allowed to deteriorate to the point where the entire system is inoperative. Maintenance and record keeping reports were missing or non-existent regarding these essential systems. Local fire authorities repeatedly have noted and advised Globe authorities of violations of the Arizona Fire Code since at least January 1994. As of the date of our consultant's latest visit, the emergency notification system, including smoke detection and alarms remained inoperative, placing staff and inmates equally at risk of harm. These longstanding deficiencies are extremely serious and life threatening.

Other serious fire safety deficiencies exist at Globe. Emergency keys provided to staff to open doors and provide a means of escape to inmates and staff in case of a fire did not work. A self-contained breathing apparatus used to rescue individuals from smoke inhalation was located in the control room but correctional officers, who should have been trained in its use, had no idea whatsoever about how this equipment is operated. To summarize, fire safety equipment in this jail is either inoperative, or if functioning, as in the case of the self-contained breathing apparatus, untrained staff cannot operate the equipment.

Staff fire safety training, disaster training and an updated fire safety plan are not in place. Critical employees such as control room officers were unaware of any fire safety plan, had not received fire safety training, and did not have any idea whether the fire alarm and smoke detection system was operative. Indeed, the only improvement regarding fire safety which we were able to confirm is that previously identified problems regarding testing of the emergency power generator have been corrected. Overall, this facility fails to meet essential fire safety requirements.

### **F. Medical Services**

Medical care was deficient at the time of our previous visits, particularly intake screening, sick call and tuberculosis testing. Gila County authorities have recently retained a full time licensed physician's assistant who was on duty at the time of our most recent tours. The retention of the full-time physician's assistant has changed the situation with respect to medical care issues. If medical services improve as expected, the medical issues previously identified will be resolved. Accordingly, we are deferring any further action or findings with



respect to medical care to allow the new medical professional sufficient time to implement intake procedures, sick call, tuberculosis testing, medication distribution and an appropriate medical records system.

### **III. MINIMUM CORRECTIVE MEASURES AT THE GLOBE JAIL**

#### **A. Inmate Classification, Security, Safety and Supervision, Staff Training and Inmate Exercise**

1. Establish an inmate classification system utilizing objective classification standards based upon safety and security.

2. The jail's physical plant must be upgraded to provide adequate security and safety by repair or replacement of defective emergency notification components. Cell block areas need upgrading and improvement with respect to security fixtures, including lighting and duct work grilles to prevent inmates tampering with and obtaining materials to fashion weapons.

3. A set of emergency keys, which function appropriately on all exit doors, must be kept readily accessible to staff on all shifts. All corrections staff must be educated with respect to the location of emergency keys within the facility.

4. Correctional officer rounds procedures should be improved to provide frequent in-unit surveillance of inmate housing areas. Appropriate documentation of security checks must be maintained in a manner that is readily identifiable and verifiable.

5. The correctional officer staffing complement should be increased. Female officers should be available to attend to female inmates whenever strip searches are conducted or other privacy concerns are implicated. Appropriately trained officers should be on duty during each shift to provide adequate back-up in case of an emergency.

6. Based upon the current configuration, jail personnel should desist from crowding inmates in the holding cell in the booking area for any time longer than three hours. Moreover, for inmates held in the holding area overnight, the jail should provide means to assure that inmates do not have to sleep on the floor.

7. Effective tool control policies should be implemented. Areas in which metal objects are stored or placed in trash should be secured appropriately. If such securing of items is not feasible, then inmate workers must be forbidden access to these areas.

8. Disturbance control equipment must be located in the jail under the direct control of the shift commander. Logbooks must be maintained to assure proper control and accountability of security equipment. Correctional officers and/or emergency response team members must not be permitted to bring their own disturbance control equipment into the jail. (This limitation is not intended to preclude the assistance of other law enforcement authorities when necessary.)

9. Correctional officer training should be improved so that each officer receives academy training within six months of employment. In-service training should be provided all correctional officers on a routine basis. Management should develop appropriate post orders and facility policies and procedures and provide training in these orders and policies to all corrections officers. With respect to the jail control center, in no circumstance shall an untrained correctional officer be assigned alone to this post.

10. All inmates should be provided reasonable opportunities for outdoor exercise on a regular basis. Women inmates should be provided equal access to exercise equipment.

#### **B. Sanitation, Environment and Fire Safety**

1. The food preparation area should be expanded, if at all possible, to adequately service a jail the size of the Globe facility. At minimum, measures must be taken to assure proper food storage and utensil sanitation. Utensils should be cleaned and sanitized properly and allowed sufficient room to dry. Installation of a commercial dishwasher in lieu of the current hand washing of trays and utensils is recommended for appropriate sanitation. Defective food trays and covers should be replaced. Toilet and hand washing facilities should be made readily available to kitchen staff.

2. Back-siphonage prevention devices should be installed wherever there is the possibility of water system contamination. A sump pump should be installed to prevent electrical failure and the possibility of fire in the below-grade maintenance area of the jail. Electrical deficiencies

in the kitchen, particularly above the stove should be corrected. Grease build-up in the stove hood should be remedied to reduce the risk of fire.

3. Showers in cellblocks need to be cleaned and refurbished to provide adequate safety, and sanitation. Appropriate non-slip surfaces or matting should be provided in shower areas. Roofing leaks should be repaired or the entire roof should be replaced.

4. Urinals and toilets should be repaired or capped to prevent disease transmission and objectionable odors. Showers should be repaired and cleaned in dormitory and cellblock areas to prevent falls and the transmission of disease.

5. The entire ventilation, heating and air conditioning system should be evaluated and repaired to provide sufficient volume of fresh air flow and appropriate temperature control in all areas of the jail.

6. The fire and smoke detection system and annunciator panel must be repaired and maintained in good order. Exit doors, keys and locks must operate properly and emergency keys must be readily available to staff.

7. Fire drills and tests of fire exiting must be conducted on a routine basis. Evacuation of all inmates is not required provided a plan is in place for evacuation of inmates posing a risk of escape or violence.

8. A comprehensive fire safety and disaster plan must be developed and all correctional officers must receive appropriate training in the requirements of these plans.

9. All correctional officers must be properly trained to use safety equipment such as self-contained breathing units.

#### IV. THE PAYSON JAIL

##### A. Introduction

The jail at Payson is primarily a short term booking facility and a facility for misdemeanants; prisoners with behavior problems and sentenced felons are transferred from Payson to the more secure facility in Globe. This jail's stated capacity is twenty-five inmates. Particularly on weekends, the facility has held as many as 38 prisoners, some of whom are required to sleep on the floor for relatively short periods of time. The crowding problems at this facility appear to be better

managed than in prior years. The jail staff has a considerably more active workload than the average number of incarcerated inmates would seem to indicate. Because the jail is the primary booking facility for a significant portion of Gila County, large numbers of individuals are processed at this facility disproportionate to the numbers of inmates actually incarcerated in this jail. The majority of inmates are incarcerated in this facility for 48 hours or less. Almost 19,000 meals were provided at this jail in 1996, which is a good indicator of the actual number of persons passing through the jail. Moreover, our visit to the facility disclosed that the number of bookings at this jail have increased significantly over the last decade.

#### **B. Correctional Officer Staffing, Supervision and Inmate Exercise**

Prior to our recent visit, we advised the county that correctional officer staffing appeared inadequate. Our concern was that correctional personnel were drawn away from the jail housing areas for considerable time in order to deal with inmate booking responsibilities. In response to this problem, we note that the county has added two full-time detention officers and one part-time transportation officer to the jail's staffing complement. This is a significant staffing improvement, as there are now ten full-time employees and one part-time correctional officer available to staff this jail. Yet, even with this improvement, approximately 15% of the time there is only one officer present with no back-up officer available. We conclude that although correctional officer staffing is now barely acceptable, consideration should be given to hiring one additional officer to assure appropriate officer coverage on all three shifts. Additionally, a female officer should always be available if a strip search or other invasive action regarding female inmates is required.

Because the booking process is extremely staff intensive, we advised you previously that inmate supervision and opportunity for outdoor exercise had been compromised at Payson. Although the amount of outdoor exercise improved during 1996, the outdoor exercise provided does not always ensure that inmates will be afforded a reasonable opportunity for outdoor exercise each week. We note that the addition of correctional staff has greatly alleviated our concerns regarding inmate supervision, and we expect the facility will henceforth be able to provide inmates reasonable opportunities for outdoor exercise.

#### **C. Inmate Safety**

Cells utilized for suicide prevention at this jail have several design deficiencies that place suicidal inmates at risk. This problem has been noted by jail management and is in the

process of being remedied. Additionally, on our previous visit we noted that cells utilized for combative inmates did not have "food pass" slots installed, thereby exposing inmates and correctional officers to possible harm, because officers must open the door each time a meal is brought to the cell. We note that the jail director, Major Cain, has made arrangements to fit high-security doors with food pass slots. In regard to suicide prevention measures, new safety-designed showers have been ordered and delivered to the jail.

Due to instances of inmate crowding noted by our corrections consultant, there have been times in which inmates are forced to sleep on the floor. Except for the briefest duration, inmates should be provided a clean sleeping surface raised at least 12-18 inches off the floor. Unlike Globe, where inmates sleep on the floor for extended periods of time in cramped conditions, at Payson floor sleeping is of very limited duration, usually an evening at most, and conditions are not as confining. We recommend that jail authorities take action to raise mattresses off the floor.

#### **D. Correctional Officer Training**

Another deficiency disclosed during our 1995 visit has been remedied. The Payson jail lacked sufficient correctional officer in-service training programs and comprehensive policies and procedures for jail operation. On our most recent visit to the jail, we found that all officers in this facility have received standardized academy and sexual harassment training. As well, appropriate operational policies, procedures and post orders have been developed by the jail commander so that correctional officers are informed of their responsibilities.

#### **E. Sanitation, Environment and Medical Care**

The Payson Jail has improved substantially since our first tour. From an environmental and food sanitation standpoint, the Payson facility meets or exceeds generally recognized standards in the field. The current arrangement for medical treatment of inmates at Payson, which involves private physician appointments outside the jail, appears to work adequately. We did not find any problem regarding physician response to inmate sick calls or to transportation of inmates to appointments. We conclude that serious medical needs of inmates receive appropriate response.

#### **F. Conclusion Regarding Payson Jail**

For the foregoing reasons we are closing our investigation of the Payson Jail.

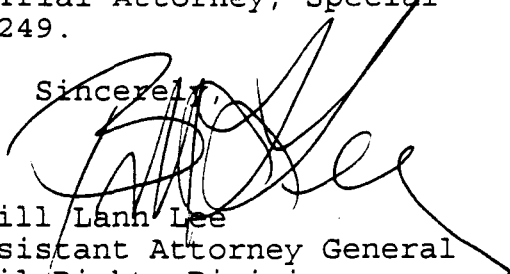
V. CONCLUSION

Under separate cover we are sending you copies of Eugene Miller's and James Balsamo's recent expert evaluations of the Gila County Jail facilities. We provided county authorities the earlier consultant reports previously.

Pursuant to the Civil Rights of Institutionalized Persons Act, the Attorney General may initiate a lawsuit to correct deficiencies at institutions 49 days after appropriate local officials are notified of the deficiencies and given an opportunity to remedy them. 42 U.S.C. § 1997(a)(1). We would like to work with you and other Gila County officials to resolve this matter in a reasonable and expeditious manner. We also will seek assistance from federal sources, as available, to assist you in remedying the conditions outlined in this letter. Please advise us as soon as possible with any response you may have to our findings regarding the Globe Jail and a description of the specific steps you will take to implement each of the minimum proposed remedies.

If you or your staff have any questions, please feel free to contact Andrew J. Barrick, Senior Trial Attorney, Special Litigation Section, at (202) 514-6249.

Sincerely,



Bill Lann Lee  
Acting Assistant Attorney General  
Civil Rights Division

cc: Mr. Joe Rodriguez  
Sheriff

Candyce B. Pardee, Esquire  
Assistant County Attorney

The Honorable Michael A. Johns  
Interim United States Attorney