



U.S. Department of Justice

Civil Rights Division

Office of the Assistant Attorney General

Washington, D.C. 20530

September 13, 1994

Mr. Lewis Harris
Chairman
Tulsa County Board of Commissioners
500 S. Denver
Tulsa, OK 74103

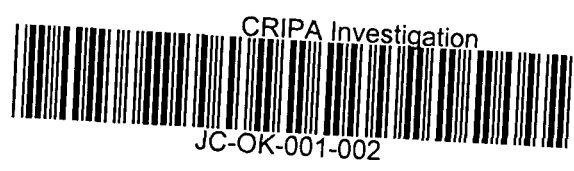
Re: Notice of Findings from Investigation of Tulsa
County Jail

Dear Mr. Harris:

On February 4, 1994, we notified your office of our intent to investigate the Tulsa County Jail (Jail) pursuant to the Civil Rights of Institutionalized Persons Act, 42 U.S.C. § 1997 et seq. Pursuant to statutory requirements, we are now writing you to advise you of our findings from this investigation. Throughout the course of our investigation, County officials provided us with substantial assistance and their cooperation. We appreciate their help.

In making our findings, we recognize that both pretrial detainees and sentenced inmates are confined at the Tulsa County Jail. In general, inmates may not be subjected to conditions that are incompatible with evolving standards of decency or which deprive them of their basic human needs. Estelle v. Gamble, 429 U.S. 97 (1976). For inmates convicted of a crime, the Eighth Amendment's proscription against cruel and unusual punishment provides the relevant constitutional standard. With respect to pretrial detainees, the Fourteenth Amendment generally prohibits punishment of these persons, since they have not been convicted of any crime. Bell v. Wolfish, 441 U.S. 520, 540 (1979). Detainees may not be subjected to any restrictive acts or practices which are not reasonably related to legitimate governmental objectives, such as ensuring the detainees' presence at trial or maintaining Jail security. Id.

Based upon our investigation, we believe that conditions at the Tulsa County Jail violate the constitutional rights of the confined prisoners and detainees. The deficiencies we have found include:



I. The Jail Fails To Provide A Reasonably Safe Environment.

The Tulsa County Jail facilities, and the County Courthouse complex in particular, have very serious problems with violence. Several factors make the Jail an unsafe environment.

1. Staffing and supervision

The eighth and ninth floor housing units of the County Courthouse facility suffer from a host of problems that create a highly dangerous environment and present the most egregious conditions of confinement in the County Jail system. First, the housing units are poorly designed and arranged, not allowing for safe, direct staff observation of inmates. Staff must enter through locked doors and walk through and around mazelike catwalks to observe inmates. Second, the eighth and ninth floors are significantly understaffed. Third, the units are overcrowded, typically housing many more inmates than they are designed to hold. For instance, on the first day of our tour, the facility had 47 inmates sleeping on mattresses on the floor. Fourth, the facility serves as a maximum security facility even though its design is not fit for that purpose. Essentially, the Courthouse Jail consists of a series of small dormitories in a byzantine arrangement. Such an arrangement is more appropriate for a minimum security facility, if at all; yet, the current population includes maximum security detainees - many of whom are charged with serious crimes of violence, are affiliated with major street gangs, or have committed acts of violence inside the Jail. This population requires cellular confinement, which at this time is not available in the County Jail system. Lastly, inmates in this facility are confined to their units for virtually 24 hours a day, since there is no outside yard or even an indoor exercise area at the County Courthouse.

These factors result in an unreasonably dangerous environment, with large numbers of often violent inmates left behind closed doors to fend for themselves. Indeed, this concern is borne out by our consultant's review of incident reports and inmate interviews, both of which indicate a continuing history of incidents of aggression (e.g., extortion and theft) and violence, many of which have resulted in serious injury. Incidents frequently involve a group of inmates attacking one inmate, which often only comes to the attention of staff after the fact. One illustrative example is an incident where a number of staff went into a cell to extricate an inmate being beaten, and were themselves attacked and forced to leave the cell. The inmate was left behind in the cell and continued to be beaten by inmates until the "H.O.T.", or disturbance control team, arrived considerably later to restore order.

It does not appear that remodeling this facility could make it acceptable to meet County needs.

Unreasonable risks of harm to inmates also exist at the Adult Detention Center (ADC) facility. In the men's section, the three dorm areas and the other units are typically severely overcrowded, with the units containing large numbers of inmates sleeping on the floors - usually in the back of the dorm near, if not in, the toilet and shower areas. When visited on March 29, 1994, the facility housed a total of 74 inmates over its design capacity. Reportedly, the overcrowding has been worse on other occasions. Further, the staffing at ADC is inadequate. Poignantly, incidents repeatedly occur (e.g., an inmate is sick or injured), where officers fail to go inside the dorm but instead instruct other inmates to put the inmate on a blanket and drag him to the door. Inmates are placed at obvious risk if staff customarily fear entering housing units during serious incidents or disturbances due to inadequate staff back-up.

Regarding the new women's unit at ADC, while it is modern and well-designed, and is neither overcrowded nor understaffed, staff allocation poses an unnecessary risk of harm. There are three officers on the unit on each shift, but two remain in the upper-level control room while one patrols the floor level. Instead, there should be at least two officers patrolling the floor level to ensure swift and efficient response to inmate problems or altercations, while maintaining one officer in the control room would suffice. Additionally, at the time of our tour the unit was without post orders. Post orders are essential to ensure consistency between shifts and to ensure staff accountability.

Lastly, the City Jail/Intake Center (City Jail) also presents security and supervision problems. While not overcrowded during the days of our visit, the facility has sometimes been severely overcrowded in the past. Further, the facility is intended to be an intake/holding facility with extremely short lengths of stay. If operated as intended, the facility probably would not need to provide otherwise required services, e.g., inmate out-of-cell time and visitation. However, some inmates are held at the City Jail for extended periods. These conditions tend to foster unrest in the inmate population and increase the likelihood of inmate assaults or altercations.

2. Staff training

From our penologists' standpoint, the amount and substance of correctional officer training is generally sufficient. However, there exist limited areas where the lack of staff training contributes to the general volatility of the

environment. Specifically, the program lacks training of officers in de-escalation techniques. In short, de-escalation techniques are methods of attempting to handle an agitated or threatening inmate with verbal communication rather than immediate use of force. Our corrections consultant concluded that the Tulsa County Jail facilities were in particular need of this type of officer training. Also, as indicated by discussions below, there is a need for additional training of staff with respect to use of restraints and chemical agents.

3. Inmate classification

While the Tulsa County Jail has recently begun to implement a new classification system, further implementation and refinement of this system are needed to ensure adequate inmate protection from harm. At the time of our tour, deficiencies in need of specific attention included: (1) the classification office staff had not received training in techniques for conducting initial inmate interviews, including the identification of gang members and affiliations; (2) housing assignments were not unit specific; and (3) the system did not provide for tracking of inmates beyond initial assessment. Incorporation of information such as gang membership or affiliation into the classification process is important and relates directly to the issue of adequate inmate protection from harm, as the placement of a single gang member in a housing unit with numerous members of a rival gang can and does often result in serious assaults in the Jail.

4. Use of restraints and chemical agents

Physical restraints and chemical agents are overused in the Tulsa Jail facilities, impacting on the inmates' right to a reasonably safe environment. At the County Courthouse Jail, restraints are used inappropriately. In the main corridors on both the eighth and ninth floors, there exist a string of permanently placed handcuffs which hang along the wall, approximately six feet or higher above the floor. Inmates are placed in these cuffs, hands above their heads, when they require removal from their housing units for various reasons, e.g., a routine shakedown. This procedure is apparently used due to a lack of any appropriate holding area in the facility. However, it is a draconian, punitive, and unnecessarily degrading practice, used when no disciplinary violations have even occurred. This practice likely increases hostility among an inmate population which is already violent and poorly supervised.

Concerns also exist regarding the practice of hogtying of inmates by officers. While we are informed that the practice has ceased, we do have information that the practice existed in the not too distant past. Such practice is contrary to current professional strictures both penologically and medically, and

recent studies show that hogtying can directly result in the death of an individual due to positional asphyxiation. Tulsa County must ensure that this practice does not recur.

Based upon his review of the county's outdated mace policies, interviews with staff, interviews with inmates, and incident reports, our corrections consultant also concluded that chemical agents or sprays, e.g. mace, are being overused at the Jail facilities by staff. Chemical agents are used too quickly, rather than as a last resort. The frequency of the use is particularly troubling in the County Courthouse Jail, where numerous inmates are confined together in close quarters. Since the use of chemical agents in an inmate housing area invariably affects and contaminates the entire area, its use frequently punishes inmates not engaged in misconduct. This increases inmate tension, breeds bitterness towards staff, and fosters a feeling of unjust treatment, all of which can lead to unnecessary violence in the Jail.

5. Other deficient security measures

There is inadequate security regarding the use and storage of kitchen knives and dangerous utensils in the 9th floor kitchen of the County Courthouse facility. During our tour, inmate workers were left alone in the kitchen area for considerable time with ready access to several large kitchen knives lying about. This is contrary to sound operational practice and creates an obvious and unnecessary danger.

Several housing units contain light bulbs that have no security fixtures covering the bulb and/or are in a state of disrepair. This is dangerous as it permits inmates to gain access to light bulbs by which they could do harm to themselves or others.

A further security deficiency regards the use of inappropriate holding cells at the City Jail. The facility has several "strip" cells, i.e., cells which are nothing but bare concrete. There is no justifiable penological purpose for use of such cells. All holding cells should have a toilet, a hand basin, and a source of potable water. All but a few holding cells should have some place on which an inmate can sit. Further, due to exposed bars at the top foot of the holding cells, these cells pose an unreasonable danger regarding potential suicide attempts.

II. Inmates Are Not Provided Adequate Exercise/Out-Of-Cell Time.

The Tulsa County Jail does not provide inmates with their right to adequate exercise. It is well established that regular opportunity for exercise is essential for the maintenance of both

physical and mental health. Again, the most egregious situation exists at the County Courthouse facility where there is absolutely no space allotted for inmate exercise. While some inmates may be transported to the ADC two miles away on an infrequent, sporadic basis for exercise in the ADC yard, it was clear from our tour that the inmates confined in the downtown facilities are not afforded their right to regularly scheduled exercise time.

A fenced-in outside yard does exist at the ADC facility, although it has a paucity of equipment. Moreover, male inmates consistently stated that they were not provided weekly exercise time in the yard. Further, it is apparently ADC policy not to provide any yard time until an inmate has been incarcerated at the facility for at least 30 days. This policy is arbitrary, without penological justification, and serves only to increase inmate tension. Finally, the exercise area for the ADC women's unit consists of bare concrete with no equipment at all.

III. Inmates Are Not Provided Adequate Access To Courts.

The Tulsa County Jail fails to provide inmates with adequate access to the courts. Inmate access to legal materials must be meaningful and effective. The Jail utilizes a law book or material request system to provide inmates needed materials, and does not provide direct access to a law library. The current system does not function effectively. Inmates repeatedly complained about their inability to effectively conduct research and about inordinate delays in receiving responses to their requests. We obtained copies of dated request slips and dated responses which confirm these allegations.

IV. Treatment Of Juveniles Is Inadequate.

The County Jail houses some juveniles awaiting trial as adults. These juveniles, like the adults, receive no regular opportunity for exercise. Furthermore, the juveniles are not provided any type of education program during their detainment.

V. Inmate Medical And Mental Health Care Are Deficient.

Medical care services are deficient at the Tulsa County Jail. There are serious problems with Jail policies and practices in the areas of communicable disease prevention and mental health care as well as deficiencies in regards to inmate access to physician care and other miscellaneous matters.

1. Communicable diseases

The Jail's management of communicable diseases has several deficiencies.

Current HIV disease management practices are substandard, largely because of a confidentiality policy which interferes with proper monitoring and continuity of care for HIV inmates. While the County medical staff sends inmates with HIV to Health Department clinics for specialty care, the clinics do not return the lab results and clinic summaries. The overall result is that the CMS medical staff are unfamiliar with the current status, progress, or lack thereof of their HIV patients. Consequently, there are HIV patients who apparently need structured maintenance and monitoring plans but are not being given the needed care. The County claims that this problem is caused by state confidentiality statutes which restrict the sharing of information between medical care providers regarding HIV patients. This interpretation of state confidentiality requirements results in the denial of adequate medical care for HIV detainees.

The living and working conditions in some Jail facilities are unhygienic and pose a health and safety risk in that they promote the spread of tuberculosis, influenza, meningitis, and other airborne communicable diseases. In particular, the dental unit and the eighth and ninth floors of the County Courthouse are both inadequate facilities from a medical standpoint. For example, the dental space was apparently once a closet or small storage room which was never designed for its present use. The plumbing for dentistry is inadequate, and the ventilation and exhaust to handle airborne pathogens is insufficient. As discussed in more detail under the heading of environmental health and safety, conditions on the dilapidated eighth and ninth floors are generally unhygienic and pose a health risk.

The danger from airborne communicable diseases is exacerbated by a number of deficiencies in the facility's health appraisal and screening process. For example, tuberculosis screening is not done until the time of the fourteen day health assessment and then only on a voluntary basis. The compliance rate with communicable disease screening during the assessment is only 50-60%, a rate that is significantly lower than recommended compliance levels of 85-95%. In comparison, the surrounding Tulsa community has had a 100% increase in new cases of active TB between 1991/1992 and 1992/1993. Given the likely increase in TB cases in the near future, low compliance rates with the health assessment process pose a significant potential health risk for inmates and staff.

2. Mental health care

The Jail's mental health staffing, crisis intervention, and maintenance therapy programs are grossly inadequate. Suicidal inmates are being watched by inadequately trained trustees and are not seen by mental health professionals within a reasonable period of time. For instance, one inmate attempted suicide, but

was not seen by a mental health professional more than twenty hours after his suicide attempt. Suicide cells are also physically inadequate. We found one suicidal inmate housed in an unlit cell which was too dark for the trustee attendant, or our consultants, to actually observe what was going on inside.

3. Timely access to physician care

At present, the sick call process is structured to provide adequate care for the inmates; however, in practice, inmate needs are not met. The doctor sees only 6-8 patients out of 25-30 names on the sick call list, and consequently, there is undue delay before sick inmates see the physician. Based upon his review of inmate grievances, staff interviews, and inmate interviews, our medical consultant found that some inmates do not get to see the doctor for weeks or even longer after they submit a request. The doctor's low productivity and underutilization are caused by his or her triage practices, insufficient custody staff, and limited space. Under such conditions, the doctor has to wait an inordinate amount of idle time just waiting for inmates to be escorted to the clinic.

4. Miscellaneous

A number of other issues are discussed in our medical consultant's report. Many of these problems are likely to be exacerbated if, as is likely, inmate population increases. For instance, overall medical funding and female medical needs are both matters which should be carefully scrutinized by County officials. Given current demographic trends, it is likely that overall quality of care as well as some types of specialized care will deteriorate to unacceptable levels unless precautions are taken.

VI. Environmental Health And Safety Conditions Are Inadequate.

Jail inmates and employees are constantly at risk from disease, fire, and other environmental health and safety threats. These risks are caused by inadequate general sanitation, fire safety, food handling, plumbing, personal hygiene practices, overcrowding, and use of chemical cleaning materials.

1. General sanitation and physical plant

There exist numerous sanitation and physical plant deficiencies at the Jail which present unreasonable risks to inmate safety and health. Cells are littered with debris and need cleaning. The eighth and ninth floors of the County Courthouse are in particular need of thorough cleaning and removal of litter. Gangways and cells are littered with food particles, torn toilet material, bits of plastic, cardboard, and human waste. The roof above the County Jail has been damaged by

fire, and needs to be restored to a usable condition. The ADC has a damaged roof as well. The City Jail contains torn mattresses which are not easily cleaned or disinfected. Both the City Jail and County Courthouse Jail have problems with lighting. Many light bulbs are missing or inoperative, and in working areas especially, light levels were significantly below acceptable levels. While the ventilation is acceptable at the ADC and City Jail facility, there is insufficient air movement in the County Jail. Many air and heating vents are blocked by "materials" to keep cold air from circulating. Overall, the jail provides very little environmental health and safety training.

2. Fire safety

Fire safety at the Jail is dangerously deficient. Generally, Sheriff's employees have been indicating compliance with local fire and safety inspection standards when completing their fire and safety inspection forms. This is untrue. The Jail facilities are not in compliance with fire alarm, smoke detector, system testing, or other fire safety standards. For example, records indicate that there is no regular testing of the fire evacuation plan. We found exposed wiring at both the County Jail and ADC. Jail officials report that the fire evacuation area between the City and County Jails has an evacuation capacity for only 60 inmates in case of fire. Yet it has been used in the past for all the inmates housed in the County Courthouse. The lighting in the evacuation area is below standard, and some lights are missing near the steps that lead to the evacuation corridor from the City Jail. Conditions at the County Jail are especially troubling. Some units on the eighth and ninth floors have heavy fire loading. Nevertheless, at the time of the Justice Department's investigative tour, the smoke detector and fire alarm system had been left completely inoperative since a fire on February 25, 1994. Additionally, lights in the emergency exit stairwell from the County Jail are not turned on or working.

3. Food Sanitation

Training and supervision of food handlers needs to be substantially improved at all Jail facilities. For instance, our consultant observed inmate workers pick food up from the floor and return it to the serving trays. Other inmate workers handled food without gloves or hair coverings. The City and County Jails have other serious food service problems as well. They both fail a variety of basic food inspection criteria. Food and refrigerator temperatures are too high, work areas are improperly sanitized, work areas are poorly lit, floor and wall surfaces are hard to clean or otherwise in poor repair, waste receptacles are left uncovered, storage areas are inadequate, and food handling practices are unhygienic at both the City and County Jails. As a general matter, the City and County Jail food preparation facilities are too small for the number of people working there.

4. Plumbing

There are deficiencies with respect to plumbing systems and maintenance. The City and County Jails do not have enough showers, toilets, or wash basins for the number of inmates being housed. It is important to rectify this situation, as showers and other sanitary facilities are essential for maintaining healthful conditions. In the County Jail, some shower drains are filled with debris, mop fragments, and paper. The Adult Detention Center (ADC) has overflowing urinals, drains clogged with debris, mold growth, inoperative showers, roaches, leaking pipes, and malfunctioning hot and cold water systems.

5. Personal hygiene and overcrowding

The jail facilities fail to maintain adequate hygienic practices. We found inmates without clean towels, sheets, or clothing. Apparently, inmates have had difficulty getting uniforms cleaned at the laundry. Poor personal hygiene is especially risky in a facility as overcrowded as the ADC. The situation there has become so bad that inmates are sleeping on mattresses on the floors and near toilets and showers. From a sanitation standpoint, this is unsatisfactory; for such overcrowded conditions make disease and other health problems much more likely.

6. Storage and access to potentially hazardous cleaning materials

The Jail fails to provide adequate chemical handling policies and training, placing inmates at risk from chemical burns, skin infections, fire hazards, toxic fumes, and explosions. There currently exist no written procedures on the safe labeling, handling, or mixing of toxic chemicals. Trustees or others responsible for cleaning the Jail apparently have no training on the handling and mixing of chemical cleansers. Thus, they lack the information needed to do their jobs in a safe manner.

MINIMUM REMEDIAL MEASURES

We have enclosed our consultant reports. These reports contain numerous recommendations regarding the deficient conditions in the Jails. Briefly, to rectify the primary deficiencies in the Jail facilities and to ensure compliance with constitutional standards, we recommend implementation of the following minimum remedial measures:

4. Use of restraints and chemical agents

Ensure staff are appropriately trained in the use of restraints and proper restraint techniques. More specifically, at the County Jail, cease the practice of handcuffing inmates along the corridor walls, and provide for alternative means for holding inmates during occasions when they are removed from their units. Further ensure that no inmates, under any circumstances, are "hogtied" by any staff. In this regard, specifically instruct all staff on the danger of cardio-pulmonary arrest secondary to positional asphyxia which can result from "hogtying" and other dangerous procedures.

Develop and implement new written policies and procedures regarding the use of chemical agents that comport with current professional standards, and ensure that staff are adequately trained in these procedures. Also, cease the practice of permitting individual correctional officers to carry mace. Chemical agents such as mace should be kept locked in the floor control room and issued only by the supervising Sergeant, when needed.

5. Other deficient security measures

a. Kitchen knives/utensils

Establish a system of inventory for kitchen knives and other identified dangerous kitchen utensils and establish a procedure whereby such materials are returned to the staff control station during periods of staff absence from the kitchen.

b. Exposed light bulbs

Install security fixtures around all light bulbs accessible to inmates, and repair all lighting fixtures where needed.

c. Holding cells

Equip each holding cell at the City Jail with a toilet, sink and faucet with potable water. Consider also the provision of seating in these cells. Further, to lessen the risk of inmate suicide attempts, extend the plexiglass currently placed on the outside of the holding cells to cover the entire front and sides of the cells.

II. Out-Of-Cell/Exercise Time

Ensure all inmates are provided regularly scheduled exercise time, outdoors if weather permits, for a minimum of one hour a day, five days a week.

III. Access To Courts

Provide inmates with reasonably timely access to either an adequately stocked on site or off site law library. Access to an on site library must be for a minimum of four hours per week. If an off site system is used, the County must meet inmate requests within twenty-four to forty-eight hours and allow the inmates to keep any materials requested for a reasonable length of time. The County must add additional staff in order to meet these time requirements if it opts to use an off site law library. The County must provide inmates with sufficient legal materials and writing supplies (legal paper, envelopes, pencils and pens, and postage) with which to prepare their legal papers and correspondence.

IV. Juveniles

Provide all juveniles awaiting trial as adults with an opportunity for regularly scheduled exercise, outdoors if weather permits, at least one hour a day, five days a week, separate from the adult inmates. Further, provide educational programs for all juveniles incarcerated in the County Jail.

V. Medical Care

1. Communicable diseases

Develop and implement a definitive HIV management policy. Attain adequate compliance rates with the communicable disease screening process. Ensure continuity of care and timely communication between jail and outside referral medical providers. Medical records should contain adequate documentation including test results and clinic summaries.

2. Mental health care and suicide prevention

Provide professional mental health staffing for the adequate and timely care of mentally ill and suicidal inmates. Facilities used for the mentally ill and suicidal must be safe and appropriate for such use.

3. Management of pharmaceuticals

Provide an adequate procedure for administration of medication to inmates in order to reduce the occurrence of "hoarded" medications.

4. Dental facilities

Provide dental services at a new facility as soon as possible, such as the ADC-annex, rather than in the current,

physically inadequate location. Dental care facilities should be properly equipped and hygienic.

VI. Environmental Health and Safety

1. General sanitation and physical plant

Comply with currently accepted standards with respect to all food service, pest control, sanitation, and housekeeping.

Appoint a qualified sanitation officer with the authority to inspect all facilities and to take necessary action when environmental health and safety conditions are inadequate. Maintain all Jail facilities in good repair and in clean condition.

2. Food sanitation

Inspect, clean, and maintain kitchen and dining facilities in order to comply with food sanitation standards. Institute food sanitation training with an emphasis on handling of food for all food service personnel.

2. Fire safety

Repair or replace the County Jail's alarm and smoke detector system. Use qualified personnel to conduct comprehensive fire safety training, drills, and inspections. Regular testing of the fire evacuation plan is essential.

3. Lighting and electrical systems

Provide adequate illumination to ensure safe operations in all inmate work areas. Repair exposed wiring and electrical fixtures and maintain electrical system in a safe condition.

4. Plumbing

Provide adequate numbers of showers and other plumbing fixtures for maintenance of inmate hygiene. Repair the plumbing system and maintain it in good working condition.

5. Ventilation and heating system

Clear debris from ventilation grills. Repair and maintain the ventilation and heating/cooling system so as to provide a healthful temperature and humidity level within all facilities.

6. Mattresses

Replace torn and damaged mattresses. Sanitize and clean all bedding materials on a periodic basis.

7. Storage and access to potentially hazardous cleaning materials

Write and implement procedures on the labeling, handling, storage and mixing of toxic chemical cleaning materials. Provide appropriate training to staff and inmate trustees on the handling of such materials.

8. Training

Provide safety and sanitation training for staff, housekeeping and kitchen personnel.

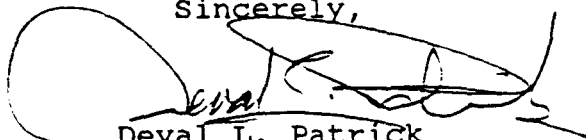
9. Overcrowding and inmate hygiene

Reduce overcrowding and ensure that no inmate has to sleep on the floor. Provide all inmates within twenty-four hours of their admission with a bunk and mattress well above the floor. Facility capacities should be based upon objective square footage requirements which meet environmental health standards. Provide inmates with clean sheets, towels, clothing, and other items needed for good personal hygiene including specialty products, such as sanitary napkins and combs appropriate for African-American inmates.

Pursuant to CRIPA, the Attorney General may initiate a lawsuit to correct deficiencies at an institution forty-nine days after appropriate local officials are notified of them. 42 U.S.C. § 1997b(a)(1). Therefore, we anticipate hearing from you before that date with any response you may have to our findings and a description of the specific steps you will take or have already taken to implement each of the minimum remedies set forth above and in our consultant reports. If you do not respond within the stated time period, we will consider initiating an action against your jurisdiction to remedy the unconstitutional conditions. We look forward to working with you and other County officials to resolve this matter in a reasonable and expeditious

manner. If you or any member of your staff have any questions, please feel free to contact attorneys Timothy Payne at (202) 514-6441 or Christopher Cheng at (202) 514-8892.

Sincerely,

A handwritten signature in black ink, appearing to read "Deval L. Patrick", written over a horizontal line.

Deval L. Patrick
Assistant Attorney General
Civil Rights Division

Enclosures

cc: David Moss, Esquire
District Attorney

Denise Graham, Esquire
Assistant District Attorney

Mr. Stanley Glanz
Sheriff

Stephen Lewis, Esquire
United States Attorney