



Oregon

SENT VIA FIRST CLASS MAIL

Bryan Brandenburg
Administrator
Northern Oregon Regional Correctional Facility
201 Webber Street
The Dalles, OR 97058

October 26, 2017

Re: Unconstitutional conditions of confinement for immigration detainees at NORCOR

Mr. Brandenburg,

This letter serves to respond to your letter dated September 16, 2017. Your quick response was appreciated. My apologies for the delay in our response. We have carefully considered your letter and have decided to reserve filing a complaint until we can more fully understand your denials.

As a preliminary matter, we are willing to participate in a tour of NORCOR's facilities. Please provide us with dates convenient to your schedule and we will arrange to attend.

In addition, although we disagree with your assertions and have spoken to numerous immigration detainees at NORCOR that have substantiated the facts and unlawful conditions described in our letter dated September 12, 2017, we accept your offer to provide additional documents to us. We therefore request the following:

1. All contracts or other agreements, including amendments, attachments, riders, exhibits, documents incorporated by reference, or modifications, between NORCOR and any third parties (including but not limited to the U.S. Marshals Service, Customs and Border Protection, Immigration and Customs Enforcement, and GEO Group Inc.) related to the detention of people in ICE, CBP, or USMS custody, that were in effect from January 1, 2012 to present
2. All contracts or other agreements, including amendments, attachments, riders, exhibits, documents incorporated by reference, or modifications, related to detention-related services provided at NORCOR (including but not limited to telephone service, video calling, commissary and financial services, food service, and medical and mental health care)

3. Documents relating to NORCOR's compliance with Oregon State Sheriff's Association's Oregon Jail Standards from January 1, 2013 to present
4. Documents relating to NORCOR's compliance with U.S. Immigration and Customs Enforcement's National Detention Standards from January 1, 2013 to present (including but not limited to completed ICE G324A inspection forms, ICE Telephone Serviceability Worksheets, ICE Contract Discrepancy Reports, corrective action plans, documentation of completed corrective actions, reports of inspections by the ICE Office of Detention Oversight, reports of inspections by the DHS Office of Inspector General, and reports of inspections by the DHS Office for Civil Rights and Civil Liberties)
5. Documents relating to any review or audit relating to NORCOR detention operations by independent third-parties from January 1, 2013 to present (including but not necessarily limited to American Correctional Association audits, National Commission on Correctional Health Care audits, audits pursuant to the Prison Rape Elimination Act, sanitation inspection reports from North Central Public Health District, and any corrective actions taken in response to such reviews or audits)
6. NORCOR's internal policies, procedures, or practices relating to the incarceration of detainees that were in effect from January 1, 2013 to present
7. NORCOR's internal policies, procedures, or practices relating to the family visitation rights of detainees that were in effect from January 1, 2016 to present
8. NORCOR's internal policies, procedures, or practices relating to the clergy visitation rights of detainees that were in effect from January 1, 2016 to present
9. NORCOR's internal policies, procedures, or practices relating to interpreters for detainees that were in effect from January 1, 2016 to present
10. NORCOR's internal policies, procedures, or practices relating to legal visitation and telephone calls, legal mail, and other communications related to a detainee's legal case that were in effect from January 1, 2016 to the present
11. Documents and communications related to security infractions committed by visitors to the NORCOR facility from January 1, 2010 to present
12. Documents and communications relating to NORCOR's policies, procedures, and practices relating to health care for detainees from January 1, 2016 to present, including but not limited to:
 - Documents sufficient to show that all currently-serving NORCOR deputies have received training in CPR, First AID, and medication management, and detailing the content of such training

- NORCOR’s policies, procedures, and practices for health screening of individual detainees, including but not limited to basic medical and mental health screening, suicide screening, and Prison Rape Elimination Act screening
 - Documents sufficient to show the medical staffing pattern at NORCOR from January 1, 2016 to the present, including but not necessarily limited to the number of Full Time Equivalents of each category of medical and mental health professional (i.e., LPN/LVN, RN, PA, NP, MHC, MD, etc.) and coverage for each shift on weekdays, weekends, and holidays
 - Documents relating to NORCOR’s claimed evidence-based treatment programs
 - Documents relating to the hunger strike by civil immigration detainees in 2017, including any notes or internal communications
13. Documents relating to the nutritional value of NORCOR detainees’ food from January 1, 2016 to present, including but not limited to the 4-week rotating menu referenced in your letter, any certifications made by a licensed dietician, and documentation of any efforts made to stop or prevent deviations from the approved menu
 14. NORCOR’s internal policies, procedures, or practices relating to law library usage by detainees and law library materials that were in effect from January 1, 2016 to present
 15. NORCOR’s internal policies, procedures, or practices relating to the temperate conditions in NORCOR for all detainees that were in effect from January 1, 2016 to present
 16. NORCOR’s internal policies, procedures, or practices relating to religious services, religious practice, religious books, and religious items (including but not necessarily limited to prayer rugs and rosaries), that were in effect from January 1, 2016 to the present
 17. Documents relating to NORCOR’s claimed satisfaction of national standards for outside recreation
 18. To the extent not already provided in response to the foregoing requests, any other documents or communications that support the assertions in your letter dated September 16, 2017

To be clear, we do not seek any information protected by the Health Insurance Portability and Accountability Act of 1996, also known as HIPAA.

Please respond to this letter by November 6, 2017, indicating which documents you will provide, which documents you will withhold and the basis for withholding the documents and when we can expect to receive the documents. We appreciate your willingness to engage in meaningful discussion and look forward to hearing from you soon.

Thank you,

A handwritten signature in black ink, appearing to read 'M-D-S', with a stylized flourish at the end.

Mat dos Santos
Legal Director.