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Arcola Scott, Vice-Chair, Stewart County Board of Commissioners
Ernie Brown, Stewart County Commissioner
Jimmy Lee, Stewart County Commissioner
Joseph B. Williams, Stewart County Commissioner
P.O. Box 157
Lumpkin, GA 31815

CC: Megan H. Mack
Officer for Civil Rights and Civil Liberties
U.S. Department of Homeland Security
245 Murray Lane, SW
Building 410, Mail Stop #0190
Washington, DC 20528

March 21, 2016

Re: Attorney Access to Detained Clients at Stewart Detention Center

Dear Madams and Sirs:

We write to express our concern regarding policies and practices at Stewart Detention Center (“Stewart”) that hinder detainees’ access to counsel. We represent *pro bono* programs at law firms, law school clinical programs, non-profit legal organizations, and private immigration law practitioners with clients located in the Immigration and Customs Enforcement (ICE) Atlanta Area of Responsibility.

This letter highlights those policies and practices at Stewart Detention Center that “unjustifiably obstruct the availability of professional representation or other aspects of the right of access to the courts,” and identifies measures you should implement immediately to remedy this problem.¹ The policies and practices impede the ability of attorneys to provide legal services and representation to detained clients at Stewart Detention Center, in violation of detainees’ due process right to counsel in immigration proceedings.² These impediments further compound difficulties faced by detainees in securing and communicating with counsel, given Stewart’s location in a “remote area[] lacking attorneys with experience in immigration law,” and “individuals able to act as translators.”³

Stewart Detention Center is located in Lumpkin, Georgia. It is one of the largest immigrant detention centers in the United States, with the capacity to house over 1,700 detainees per day. There is an immigration court on site where judges hear detainees’ cases. There is not a single lawyer in Lumpkin who specializes in immigration law. Lumpkin is nearly 150 miles from Atlanta, where the significant majority of legal resources in Georgia are located, including *pro bono* resources. Travel from Atlanta to Lumpkin takes approximately two and one-half hours by car, meaning that an Atlanta-based attorney who needs to meet with a client will have to travel for at least five hours to make the round trip. There are only three attorney visitation rooms at Lumpkin, so an attorney may have to spend hours waiting for an available room to meet with his or her client. Add the waiting and client meeting time to the travel time, and a visit with one client at Stewart can cost an Atlanta-based attorney an entire day’s worth of work, even without the additional barriers imposed by Stewart’s obstructive policies and practices.

Stewart Detention Center should implement corrective measures to improve detainees’ access to counsel. These corrective measures include: installation of video teleconferencing (VTC) machines to allow detainees to communicate with counsel remotely; designation of duty officers whom attorneys and accredited representatives can contact to schedule confidential

¹ *Procunier v. Martinez*, 416 U.S. 416, 419 (1974); *Wolff v. McDonnell*, 418 U.S. 539 (1974) (recognizing that the requirement of access to courts and counsel extends to civil matters).

² *Dakane v. U.S. Attorney General*, 399 F.3d 1269, 1273 (11th Cir. 2005); 8 U.S.C. § 1362; 29 U.S.C. § 1229a(b)(4)(A) (recognizing due process right to counsel at detainee’s expense).

³ *Louis v. Meissner*, 530 F. Supp. 924, 926 (S.D. Fla. 1981).

telephone calls with detained clients; publication of consistent rules and guidelines for attorney access to visitation and training of Stewart Detention Center staff; implementation of efficient scheduling of meetings for individuals in segregation; and replacement or repair of faulty telephones in attorney visitation rooms to allow communication with detainees. A number of these corrective measures are already required by the existing contract between Stewart County and ICE; the remainder are either no cost or low cost. We further request the opportunity to meet with ICE, EOIR, CCA, and Stewart County officials responsible for implementation of these corrective measures to discuss a timetable for implementation.

I. Access to Counsel Issues at Stewart Detention Center

Detainees' access to counsel at Stewart Detention Center is particularly limited, even in comparison to other immigration detention facilities in the United States. As a recent national study revealed, only 6 percent of detainees at Stewart Detention Center were represented by counsel between 2007 and 2012, in contrast to a 14 percent representation rate of all detained individuals, and a 37 percent representation rate of all immigrants in removal proceedings nationwide.⁴ Representation by counsel is critical to ensure that detained individuals may successfully navigate immigration proceedings and fully exercise their rights: detained immigrants represented by counsel obtain successful outcomes in 21 percent of cases nationwide, more than ten times the rate of 2 percent for their unrepresented counterparts.⁵

Attorneys who have attempted to provide representation to individuals at Stewart Detention Center report a wide variety of challenges in accessing clients or potential clients in the last month alone.⁶ These challenges include:

- **Stewart Detention Center does not permit attorneys to schedule calls or appointments with their clients in advance, unlike many other regional facilities. The detention center also lacks any VTC capacity for detainees to consult with their attorneys.** Attorneys' inability to schedule calls or appointments with clients hampers proper representation, as attorneys must either travel a great distance to meet with detained clients to discuss developments in their cases, or hope that a client will place a telephone call to the attorney at a time that he or she may be available to talk.
- **Stewart Detention Center has refused to allow indigent detainees to call their attorneys for free, as required by ICE Detention Standards.** For example, a faculty member from a law school clinic based in New York reported that her client—gay, HIV positive, indigent asylum seeker detained at Stewart—was not allowed to place free calls to her to discuss his case. He was told by detention center staff that he would be charged for attorney calls because his attorney had placed some money in his canteen account. The money was for him to buy extra food and other necessities. The attorney reported that she had to place ten calls to a deportation officer in order to discuss this violation.

⁴ Ingrid V. Eagly & Steven Shafer, *A National Study of Access to Counsel in Immigration Court*, 164 U. Penn. L. Rev. 1, 7, 38 (2015).

⁵ *Id.* at 9.

⁶ Further detailed information is available upon request. These examples arose between December 2015 and January 2016.

- **Attorney requests to meet in person with clients in the facility to prepare for hearings are routinely denied.** For example, one attorney, based in Atlanta, Georgia, reported that she left Atlanta the night before to arrive at Stewart Detention Center at 7:20 a.m. so she could meet with her client for an 8:00 a.m. bond hearing. When she requested to see her client, an officer simply told her that she “should have got here earlier,” and refused to let her see her client. The attorney asked if the client had already been taken to the immigration court, as she only needed ten minutes to discuss the matter with the client. The officer refused to let the attorney see her client. At 7:45 a.m., the attorney was admitted to the immigration courtroom, and her client’s case was called at 8:20 a.m. She never had the chance to communicate with her client prior to the hearing that day.
- **In-person attorney visits are significantly delayed by the facility’s policy of limiting all other visits when detainees in administrative segregation are present, or during count.** Several attorneys reported significant delays in their visits to clients, with waits up to several hours, because of the facility’s policy and practice of limiting access to visitation when an individual in administrative segregation is present. Attorneys who have clients in administrative segregation must wait until all other visits are completed; this policy also delays visits with all detainees if one detainee in administrative detention is in the visitation unit. Attorneys have also reported that staff regularly refuses to allow them to meet with clients between 3:00 and 4:00 p.m., when count takes place, and are often reluctant to bring clients to attorney visitation after that time.
- **Stewart Detention Center lacks clear, posted rules and protocols for attorney visitation, allowing officers and staff to arbitrarily delay and deny access to attorneys who wish to visit clients.** For example, there are no clear posted protocols for the use of electronic devices, such as laptops, within the facility by attorneys, which has led to confusion for both staff and attorneys.
- **Attorneys and clients are unable to communicate with each other in the attorney visitation rooms because of faulty telephone equipment.** Because immigration violations are largely classified as civil, not criminal, violations, immigrant detainees are not supposed to be treated like criminals. Nonetheless, the Stewart Detention Center, unlike many other immigrant detention centers, prohibits contact visits for attorneys and instead requires attorneys to communicate with clients by phone from separate sides of a plexiglass window. Attorneys have complained for several months that the telephone system is broken.

II. Request for Corrective Measures

ICE should immediately implement the following corrective measures at Stewart County Detention Center to improve detainees’ access to counsel:

- **Install and make available video teleconferencing (VTC) machines to allow detainees to communicate with counsel remotely.**

As you may be aware, contract terms between ICE and Stewart County require the installation of a video teleconferencing platform at Stewart Detention Center “to allow detainees to consult with their attorneys in preparation for administrative immigration proceedings.” Exh. 1 (Modification 18 to Intergovernmental Service Agreement); Exh. 2 (Email from CCA to ICE Re: VTC Platform). The contract specifies that this term is meant to “comply with the recommendation of the Administrative Conference of the United States” regarding such technology. The contract provides that the Corrections Corporation of America (CCA) will “provide a data circuit, router, and monthly service at Stewart at no cost to the government.” The contract further specifies that “ICE will send (2) laptops or desktops . . . with Polycom Software/Windows to Stewart Detention Center,” and that “CCA will hook-up the laptops or desktops,” and provide data service to support the ICE provided computers. Execution of these services was to take place within 60 days of the execution of the contract. The contract was executed on September 29, 2014.

The Administrative Conference of the United States (ACUS) has recommended that the Department of Homeland Security provide VTC equipment in detention facilities to “allow[] for private consultation and preparation visits between detained respondents and private attorneys and/or pro bono organizations,” and “requir[e] such access in all leased or private controlled detention facilities, where feasible.”⁷ Where VTC equipment is not available, DHS should “designat[e] duty officers whom attorneys and accredited representatives can contact to schedule collect calls from the detained respondent, where feasible.”⁸ In addition, ACUS has recommended that DHS should “facilitat[e] the ability of respondents to have private consultations with attorneys and accredited representatives” in order to “improve the availability of legal consultation for detained respondents and help reduce continuances granted to allow attorney preparation.”⁹

Stewart County, ICE, and CCA have not as of yet complied with the terms of this contract. To the best of our collective knowledge, no VTC platform is available at Stewart Detention Center for detainees to communicate with counsel, nor is there a duty officer available to schedule communication with counsel.

- **Designate duty officers whom attorneys and accredited representatives can contact to schedule confidential telephone calls and VTC sessions with detained clients.**

As noted above, the ACUS has recommended that where VTC machines are not available, duty officers should be designated to allow legal providers to schedule calls with clients. ICE’s Performance-Based National Detention Standards 2011 (PBNDS 2011), which apply to Stewart Detention Center, further provide that detainees should have “reasonable and equitable access to

⁷ Administrative Conference of the United States, *Administrative Conference Recommendation 2012-13, Immigration Removal Adjudication 18* (2012), available at <https://www.acus.gov/sites/default/files/documents/2012-3.pdf>.

⁸ *Id.*

⁹ *Id.*

telephone services” to allow communication with legal representatives. Stewart Detention Center should designate a duty officer whom legal representatives can contact to schedule confidential telephone calls and VTC sessions with detained clients. Legal providers have the ability to schedule calls with clients at other area detention facilities, which enables legal providers to communicate with clients in an efficient and orderly manner. This is practicable at this facility.

- **Post clear rules and guidelines for attorney access to visitation, and train Stewart Detention Center staff on such rules and guidelines.**

ICE’s Performance-Based National Detention Standards 2011 require that facilities provide notification of rules and hours for legal visitation, and that this information be prominently posted in the waiting areas, visiting areas, and in the housing units. As of the time of this writing, no such rules are on display. PBNDS 2011 § 5.7(J.2). We further recommend training of staff on the facility’s written legal visitation policy, PBNDS 2011 § 5.7(J.15), posting the written legal visitation policy on the facility’s website, and provision of the policy to members of the local immigration bar.

- **Efficiently schedule meetings for individuals in administrative and disciplinary segregation, and during count.**

ICE’s Performance-Based National Detention Standards 2011 provide that “[d]etainees in administrative or disciplinary segregation shall be allowed legal visitation.” PBNDS 2011 § 5.7(J.11). Current visitation practices for individuals in administrative or disciplinary segregation hamper all detainees’ access to counsel, as Stewart Detention Center prohibits visitation with any other detainees at the same time, resulting in lengthy wait times for all. We recommend that this practice be changed to allow both efficient visits, and ensure that individuals in segregation maintain access to visitation. In addition, detention center staff should ensure that individuals should be allowed to conduct legal visits during routine counts. PBNDS 2011 § 5.7(J.9).

- **Promptly replace faulty telephones in attorney visitation rooms to allow communication with detainees.**

Defective equipment should be timely replaced. This is especially true for phones which provide attorneys’ only means of communicating with clients from whom they are separated by plexiglass.

We appreciate your prompt attention to these matters. If we do not hear from you within 30 days of the date of this letter, we may pursue any other action we deem appropriate to protect our clients’ rights under law.

We further request the opportunity to meet with ICE, EOIR, CCA, and Stewart County officials responsible for implementation of these corrective measures. Please contact Eunice Cho at eunice.cho@splcenter.org or at 404-521-6700 with any questions.

Sincerely,



Eunice Cho
Staff Attorney
Southern Poverty Law Center

LIST OF ENDORSERS

1. American Immigration Lawyers' Association
2. American Immigration Lawyers' Association, Georgia-Alabama Chapter
3. American Immigration Lawyers' Association, South Florida Chapter
4. Americans for Immigrant Justice
5. Asian Americans Advancing Justice-Atlanta
6. Association of Pro Bono Counsel
7. Columbia Law School, Immigrants' Rights Clinic
8. Community Initiatives for Visiting Immigrants in Confinement (CIVIC)
9. Cornell Law School, International Human Rights Clinic
10. Elon University School of Law, Humanitarian Immigration Law Clinic
11. Georgia Asylum and Immigration Network
12. Georgia Latino Alliance for Human Rights
13. Georgia State University Law School, Immigration Law Practicum
14. Immigrant Defenders Law Center
15. Immigrant Defense Project
16. Immigrant Justice Corps
17. Kids in Need of Defense (KIND)
18. Tamara Serwer Caldas, Pro Bono Partner, Kilpatrick Townsend & Stockton LLP
19. National Immigrant Justice Center
20. National Immigration Project of the National Lawyers' Guild
21. Project South
22. Southern Center for Human Rights
23. Southern Poverty Law Center
24. John Fleming, Pro Bono Partner, Sutherland Asbill & Brennan LLP
25. University of California, Davis Law School, Immigration Clinic
26. University of Miami Law School, Immigration Clinic
27. University of Tulsa Law School, Immigrant Rights Project

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Exhibit 1:
Modification 18 to
Intergovernmental Service Agreement

2. AMENDMENT/MODIFICATION NO. P00018	3. EFFECTIVE DATE See Block 16C	4. REQUISITION/PURCHASE REQ. NO. 192114FHQDPAU0029	5. PROJECT NO. (If applicable)
6. ISSUED BY ICE/Detention Compliance & Removals Immigration and Customs Enforcement Office of Acquisition Management 801 I Street, NW Suite 930 WASHINGTON DC 20536	CODE ICE/DCR	7. ADMINISTERED BY (If other than Item 6) ICE/Detention Compliance & Removals Immigration and Customs Enforcement Office of Acquisition Management 801 I Street NW, suite 930 Washington DC 20536	CODE ICE/DCR

8. NAME AND ADDRESS OF CONTRACTOR (No., street, county, State and ZIP Code) STEWART COUNTY OF PO BOX 157 LUMPKIN GA 318150157	(x) 9A. AMENDMENT OF SOLICITATION NO. 9B. DATED (SEE ITEM 11) x 10A. MODIFICATION OF CONTRACT/ORDER NO. DROIGSA-06-00005/ 10B. DATED (SEE ITEM 13) 06/30/2006
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CODE 0843549190000	FACILITY CODE	11. THIS ITEM ONLY APPLIES TO AMENDMENTS OF SOLICITATIONS	
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The above numbered solicitation is amended as set forth in Item 14. The hour and date specified for receipt of Offers is extended, is not extended.
 Offers must acknowledge receipt of this amendment prior to the hour and date specified in the solicitation or as amended, by one of the following methods: (a) By completing Items 8 and 15, and returning _____ copies of the amendment; (b) By acknowledging receipt of this amendment on each copy of the offer submitted; or (c) By separate letter or telegram which includes a reference to the solicitation and amendment numbers. FAILURE OF YOUR ACKNOWLEDGEMENT TO BE RECEIVED AT THE PLACE DESIGNATED FOR THE RECEIPT OF OFFERS PRIOR TO THE HOUR AND DATE SPECIFIED MAY RESULT IN REJECTION OF YOUR OFFER. If by virtue of this amendment you desire to change an offer already submitted, such change may be made by telegram or letter, provided each telegram or letter makes reference to the solicitation and this amendment, and is received prior to the opening hour and date specified.

12. ACCOUNTING AND APPROPRIATION DATA (If required)
See Schedule

13. THIS ITEM ONLY APPLIES TO MODIFICATION OF CONTRACTS/ORDERS. IT MODIFIES THE CONTRACT/ORDER NO. AS DESCRIBED IN ITEM 14.

CHECK ONE	A. THIS CHANGE ORDER IS ISSUED PURSUANT TO: (Specify authority) THE CHANGES SET FORTH IN ITEM 14 ARE MADE IN THE CONTRACT ORDER NO. IN ITEM 10A.
	B. THE ABOVE NUMBERED CONTRACT/ORDER IS MODIFIED TO REFLECT THE ADMINISTRATIVE CHANGES (such as changes in paying office, appropriation date, etc.) SET FORTH IN ITEM 14, PURSUANT TO THE AUTHORITY OF FAR 43.103(b).
	C. THIS SUPPLEMENTAL AGREEMENT IS ENTERED INTO PURSUANT TO AUTHORITY OF:
X	D. OTHER (Specify type of modification and authority) FAR 43.103 (a)

E. IMPORTANT: Contractor is not, is required to sign this document and return 1 copies to the issuing office.

14. DESCRIPTION OF AMENDMENT/MODIFICATION (Organized by UCF section headings, including solicitation/contract subject matter where feasible.)
 DUNS Number: 084354919
 Contract Specialist: Abeer Saleh, 202-732-2627
 COR: Nashira Baldwin, 404-893-1336,
 ERO Program POC: Lee Shirkey, 202-732-6354
 CO: Robbi Gregg, 202-732-2560
 Stewart POC: Ashley Odubeko, 615-263-3098

The purpose of this bilateral modification is to comply with the recommendation of the Administrative Conference of the United States (ACUS) to implement a videoconferencing platform to allow detainees to consult with their attorneys in preparation for administrative immigration proceedings at the Stewart Detention Center.
 Continued ...

Except as provided herein, all terms and conditions of the document referenced in Item 9A or 10A, as heretofore changed, remains unchanged and in full force and effect.

15A. NAME AND TITLE OF SIGNER (Type or print) JOE LEE WILLIAMS, CHAIRMAN	16A. NAME AND TITLE OF CONTRACTING OFFICER (Type or print) Robbi Gregg
15B. CONTRACTOR/OFFEROR <i>Joe Lee Williams</i> (Signature of person authorized to sign)	15C. DATE SIGNED 9-29-14
	16B. UNITED STATES OF AMERICA (Signature of Contracting Officer)
	16C. DATE SIGNED

NAME OF OFFEROR OR CONTRACTOR
STEWART COUNTY OF

ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)
0005	<p>ICE accepts the proposal of the Corrections Corporation of America (CCA) submitted to ICE on August 28, 2014 to provide a data circuit, router, and monthly service at Stewart at no cost to the government. (A copy of CCA's proposal is attached).</p> <p>Therefore, CLIN 0005 entitled "Monthly Internet Service to support VTC of detainees with their attorneys in preparation for administrative immigrations proceedings" is hereby created at no additional cost to the government.</p> <p>ICE will send (2) laptops or desktops (GFE, to be specifically identified later), with Polycom Software/Windows to Stewart Detention Center. CCA will appoint a POC to receive and sign for the GFE. CCA will hook-up the laptops or desktops. CCA will then provide a monthly bundled T1 (data circuit) service delivering 6M up and down and a router that will support the 2 ICE provided laptops or desktops. CCA will provide very minimal support as described above. Polycom will provide help desk support.</p> <p>Should the ICE provided laptops or desktops malfunction or break, CCA will notify the ICE GFE POC designated for Stewart Detention Center. The ICE GFE POC will examine the GFE and send it to the ICE Program office, Lee Shirkey, who will either fix or replace the GFE.</p> <p>CCA will have 60 days from the date this modification is executed to provide above-referenced services. Exempt Action: Y Accounting Info: NONE000-000 BA 31-19-00-000 18-06-0300-30-00-00-00 GE-25-14-00-000000 00-00-0000-00-00-00-00 000000-000000-000000-000000 000000</p> <p>Change Item 0005 to read as follows (amount shown is the total amount):</p> <p>Monthly Internet Service to support VTC of detainees with their attorneys in preparation for administrative immigrations proceedings at no additional cost to the government. Continued ...</p>	1	EA	0.00	0.00

CONTINUATION SHEET

REFERENCE NO. OF DOCUMENT BEING CONTINUED
DROIGSA-06-00005//P00018

PAGE OF
3 3

NAME OF OFFEROR OR CONTRACTOR
STEWART COUNTY OF

ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)
	Obligated Amount: \$0.00				

Exhibit 2:
Email from CCA to ICE
Re: VTC Platform

(b)(6),(b)(7)(C)

From: (b)(6),(b)(7)(C)
Sent: Thursday, August 28, 2014 3:25 PM
To: (b)(6),(b)(7)(C)
Cc:
Subject: FW: RFP for Videoconferencing at Stewart Facility

(b)(6),(b)(7)(C)

We appreciate our long term partnership and will agree to provide a data circuit, router and monthly service at Stewart to assist with the videoconferencing pilot program described below at no cost to ICE. Due to the location of the facility, there are no service providers in the surrounding area that are capable of providing a broadband internet connection. However, our telephone service provider, Century Link, can provide a bundled T1 (data circuit) service delivering 6M up and down and a router that will support the 2 laptops or desktops (GFE) loaded with the Polycom Software/Windows provided by ICE. We have identified Stewart's law library as an appropriate location for the videoconferencing sessions to take place. We look forward to assisting with this pilot program. Please let me know if you have any questions or concerns.

Thanks,

(b)(6),(b)(7)(C)

Director, Partnership Development
Corrections Corporation of America
10 Burton Hills Boulevard
Nashville, Tennessee 37215
Direct: (615) 263-(b)(6),
Cell: (615) 521-(b)(6),(b)
Fax: (615) 263-6919

(b)(6),(b)(7)(C)

From: (b)(6),(b)(7)(C)
Sent: Wednesday, July 23, 2014 11:05 AM
To: (b)(6),(b)(7)(C)
Cc:
Subject: RFP for Videoconferencing at Stewart Facility

Dear (b)(6),(b)(7)(C)

As part of a recent study regarding potential improvements to the procedures for immigration removal adjudication, the Administrative Conference of the United States (ACUS), has recommended that DHS/ICE explore the use of videoconferencing to allow attorneys to consult with detainees.

As a result, ICE is interested in establishing a manner for detainees to meet/consult with attorneys via a videoconference platform in preparation for administrative immigration proceedings at the Stewart Detention Center. Videoconferencing will potentially afford detainees improved access to legal services.

ICE will provide a desktop or laptop, to the facilities. The pilot program will allow detainees to utilize videoconferencing on a laptop/desktop to communicate with their attorneys in preparation for their immigration hearings.

REQUIREMENT: ICE DMD will send (2) laptops or desktops (GFE) loaded with the Polycom Software/Windows to Stewart Detention Center. Stewart Detention Center will provide: a broadband Internet connection with a minimum of 5Mbps down/1Mbps up, a broadband router that can support a minimum of 2 laptops, and the recurring monthly service, and appropriate location where the detainee can conduct a videoconference session with their legal representation.

REQUEST FOR PROPOSAL: Please advise if this is feasible and the estimated cost of providing a broadband Internet connection with a minimum of 5Mbps down/1Mbps up, a broadband router that can support a minimum of 2 laptops, and the recurring monthly service, and appropriate location where the detainee can conduct a videoconference session with their legal representation at the Stewart Detention Center.

Thank you.

(b)(6),(b)(7)(C)

Contract Specialist
Detention Management Division
DHS | U.S. Immigration & Customs Enforcement (ICE) | Office of Acquisition Management (OAQ)
Telephone: 202.733.(b)(6),(b)(7)(C)
Email: (b)(6),(b)(7)(C)

(b)(6),(b)(7)(C)

[See how CCA is making a difference](#)

(i) This e-mail and any files transmitted with it are confidential and intended solely for the use of the intended recipient(s). If you have received this e-mail in error, please notify the sender immediately and delete this e-mail and any associated files from your system. (ii) Views or opinions presented in this e-mail are solely those of the author and do not necessarily represent those of Corrections Corporation of America. (iii) The recipient should check this e-mail and any attachments for the presence of viruses. The company accepts no liability for errors or omissions caused by e-mail transmission or any damage caused by any virus transmitted by or with this e-mail. This email has been scanned for content and viruses by the McAfee Email Security System