

# THREE BRANCHES LAW, PLLC

March 6, 2017

By E-Mail: epauli@ci.tacoma.wa.us

Mayor Marilyn Strickland  
City of Tacoma  
747 Market Street, Room 1200  
Tacoma, WA 98402-3766

c/o

Acting City Manager  
Elizabeth Pauli

RE: February 24, 2017 Certificate of Compliance Correspondence

Dear Mayor Strickland:

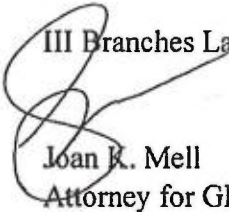
The Northwest Detention Center acknowledges receipt of your letter of concern on February 27, 2017. Warden Clark has signed the Certificate of Compliance with the express consent and authority of The GEO Group, Inc. Please recognize the company has not changed past practices with regard to operating in conformance with the law. We understand that you have not now identified any particular issue of non-compliance, but rather are looking for a written commitment of good faith to be in compliance. Certainly if you have a specific compliance question, the Warden invites you to contact him directly, or via counsel through me in the event you identify instances where the company appears to be out of compliance. GEO has always had a positive working relationship with federal, state, and local regulators, and it does not wish to change its historical practices.

Also enclosed you will find a Detainee Handbook, contact numbers posted for detainees on site, ACA Compliance checklist, the table of contents for GEO (2) and NWDC policies, ICE - Immigration and Detention Standards. The NWDC must comply with many standards, some of which may be more important to you than others. If you find a policy or procedure listed on the enclosed table of contents that you would like copied to you, please direct me to a policy number and the full text will be forwarded. The City Manager agreed that given the volume, we could supplement our response as requested. The facility meets accreditation standards, and operates in conformance with ICE contract standards.

Currently, the NWDC employs approximately 360 individuals at living wages above \$12.00 hour. This number does not include the number of individuals working for ICE, the medical facility, or the courts.

The Warden and GEO appreciate the opportunity for a continuing conversation to address questions as they arise. You have an open invitation to visit the site to view operations first hand at your convenience, which can be arranged with fairly short notice.

Very truly yours,

  
III Branches Law, PLLC

Joan K. Mell  
Attorney for GEO/NWDC

cc: Client



City of Tacoma  
Finance Department

**CERTIFICATE OF COMPLIANCE  
TMC 6B.10.140(6)**

The City and the Business, Geo Corrections and Detention, LLC, acknowledges the following:

Pursuant to Tacoma Municipal Code ("TMC") 6B.10.140(6), the Director of Finance has the power and authority to suspend or revoke any license issued under TMC Title 6 on the following grounds:

Licensee's continued conduct of the business for which the license or registration was issued will result in a danger to the public health, safety, or welfare by reason of any of the following:

...  
b. The licensee, or his/her agents or employees, have in the conduct of the business, violated any local, state, or federal law relating to public health or safety.

The Business certifies that it is not engaged in and will not engage in any activities that constitute violations of any local, state, or federal law relating to public health or safety, specifically that all individuals currently detained or to be detained in its facility have been or are being detained in a manner consistent with all applicable state and federal laws as well as established enforcement priorities.

The Business shall maintain adequate documentation of this certification for inspection upon request.

I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

3-6-17 Tacoma, Wa.  
(Date and Place)

  
(Signature)

Lowell Clark, Facility Administrator  
Northwest Detention Center  
1623 East J Street  
Tacoma, WA 98421