

# APPENDIX 1

## WHAT IT TAKES FOR A CAMP TO EXIST

### MAPPING A PAPER TRAIL

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Let us examine an example of some of the work that goes into building a camp. Researching the Adelanto ICE Processing Center, a camp about an hour and a half outside of Los Angeles, reveals a many-layered and wide-reaching bureaucracy of approval, acquiescence, and active allegiance. The hundreds of actors who signed, stamped, certified, licensed, voted for, financed, or took part in—even in minor form—construction, operation, and maintenance all bear responsibility. The following is meant to illustrate not only the myriad steps needed for a camp to be built but also the corresponding number of choke points. One single council-member, contractor, inspector, or landscaper voting no or refusing service will not block a camp, but enough of them taking a stand together will.

#### **1. Land and Facility Purchase and Transfer**

On August 12, 2009, Adelanto City Manager James Hart signed a purchase and sale agreement with GEO Group,

triggering a thirty-day public hearing. In early 2010, GEO Group paid \$28 million to buy the Adelanto Community Correctional Facility, a 650-bed prison at the northeast corner of Raccoon Avenue and Rancho Road. The people locked up in the prison were transferred to other prisons, and the facility closed for a period of time after purchase. The city engineer, Wilson F. So, signed a certificate of compliance. In 2011, the City of Adelanto entered into an intergovernmental service agreement with ICE, and GEO subsequently contracted with the city to start locking up migrants.

- In 2011, GEO Group began building a 650-bed facility, with construction completed in late July of that year, costing \$70 million. This brought the total number of beds to 1,300.
- City sale signed by city manager
- Certificate of compliance signed by city engineer

## **2. Zoning, Land Use, and Permitting**

To use industrially zoned land as a detention center, GEO required a conditional use permit and a location and development plan, plus an array of linked permits: grading, building, vegetation removal, lot merger, and signage. Each of the following departments had to sign off on the plans:

- Planning Department – zoning, landscaping, verification of compliance
- City engineer – grading, storm drainage, mitigation, certification of completion
- Public Works Department – infrastructure, lighting, curbs, collection system
- Fire Department – fire code, water systems, hazardous materials

- Building Department – building permits, parking spaces
- County recorder – lot merger
- Environmental Health Department – abandoned well destruction
- Mojave Desert Air Quality Management District – air quality permit

### **3. Environmental Review**

The California Environmental Quality Act (CEQA) required an Initial Study as part of the “Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program” (2009), with a thirty-day public comment period and a hearing before the Planning Commission. The environmental review required an air quality and climate change impact analysis, a biological resource assessment, a traffic impact analysis, and a geotechnical evaluation. State agencies involved with the review included:

- California Department of Fish and Wildlife (CDFW)
- California Department of Forestry and Fire Protection (CAL FIRE)
- California Department of Parks and Recreation
- California Department of Transportation (Caltrans)
- California Department of Water Resources (DWR)
- California Energy Commission
- California Environmental Protection Agency (CalEPA)
- California Natural Resources Agency
- California Public Utilities Commission (CPUC)

- California State Lands Commission
- CalRecycle (Department of Resources Recycling and Recovery)
- Department of Conservation
- Department of Toxic Substances Control (DTSC)
- Native American Heritage Commission (NAHC)\*
- State Water Resources Control Board

GEO Group applied for Conditional Use Permit (CUP) 09-04, Location and Development Plan (LDP) 09-02, along with the Mitigated Negative Declaration 09-05 to allow construction of a 2,200-bed detention/correctional facility.

#### **4. Consultants, Surveyors, and Specialists**

Private firms prepared environmental, traffic, biological, and geological reports. These included Flores Lund Consultants, MACTEC Engineering, Urban Crossroads, Circle Mountain Biological, Ninyo & Moore, and surveyors Douglas R. Melchior and Mike Radakovich. The final development agreement was completed in 2009.

#### **5. Development Agreement and City Council Approval**

The City Council approved the development agreement on October 14, 2009, after public hearings, declaring the facility consistent with the city's General Plan—signed by city manager, city clerk, city attorney, and GEO representatives.

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\* The chairman of the San Fernando Band of Mission Indians requested that a Native American monitor be present during project construction.

## **6. Services and Utilities**

Electricity from Southern California Edison; water and sewer from Adelanto Public Utility Water District; gas and telecom from Southwest Gas, Time Warner, Verizon. Fire and water service letters required from city and county departments.

## **7. Federal and Local Contracts**

GEO Group contracted with the City (May 17, 2011), followed by an ICE–City intergovernmental service agreement (IGSA) (May 27, 2011), allowing GEO to be paid \$112 per detainee per day. Contracts enabled ICE to bypass procurement rules.

## **8. Permits**

Permits were approved two years before Adelanto became an immigration detention camp and required other permits, reviewed and approved by city and state officials, including:

- Grading permits
- Native vegetation removal permit
- Land disturbance permit
- Lot merger application
- Building permits
- City encroachment permit (may or may not have been necessary)
- Separate approval for signage
- National Pollutant Discharge Elimination System general permit, as directed by California Water Resources Control Board, approved by Public Works Department

## **9. Licenses and Accreditations**

Business licenses were required from city and state. GEO received accreditation from the American Correctional Association and National Commission on Correctional Health Care. In 2025, the American Correctional Association gave the camp a score of 99.6 percent.

## **10. Inspections and Enforcement Layers**

Multiple inspection regimes overlapped, including the DHS Office of Inspector General, the Environmental Protection Agency, and later the Office of the Immigration Detention Ombudsman inspections, as well as a federal court order.

## **11. Renewals, Amendments, and Terminations**

The original IGSA was terminated in 2019 after California passed AB32, a law that “bans” for-profit prisons and detention centers; ICE later signed a fifteen-year sole-source contract directly with GEO, extended through 2029. Local governments retain leverage via land use and permit renewals.

## **12. Each of These People Could Have Said No**

None of this is inevitable. None of it is necessary.

## APPENDIX 2

### KNOW YOUR RIGHTS

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Your rights on paper:

- *If you are a US citizen or have lawful immigration status and ICE stops you:* You can tell them your status and then ask them if you are free to go. If you are over eighteen and not a citizen, you're legally required to carry your "alien registration" papers with you at all times.
- *If you're undocumented:* You have the right to remain silent and don't have to discuss your immigration or citizenship status. Anything you tell an officer can be used against you if the government tries to deport you. ICE can't search your belongings without your consent, and you don't have to give it. You can carry a know-your-rights card—commonly known as red cards, or *tarjetas rojas*—and hand that to the officer in lieu of answering verbally. Red cards are available to download and print from the Immigrant Legal Resource Center: <https://www.ilrc.org/red-cards>.

- *If an officer knocks on your door:* Don't open it. Teach your children—and your children's friends, neighbors, aunts, and uncles—not to open the door. Officers must have a warrant signed by a judge (a judicial warrant) to enter your home, unless they're in "hot pursuit." ICE warrants aren't signed by judges; they are ICE forms signed by ICE officers, and they don't grant authority to enter a home without consent.
- *Don't sign any papers!*
- *Beware of ICE lies or ruses.* They may say they're investigating a crime, need your help, are protecting your child, but beware and be cautious.

## How to Protect Yourself

Be prepared, have a plan:

- If you have children, identify responsible adults to take care of them if need be; consider identifying a temporary guardian.
- You may want to establish power of attorney, and to plan how you will continue to pay your mortgage, utility bills, and car or loan payments if you're arrested.
- Keep all your documents, including medical records, in a safe place where they will be accessible to someone you trust.
- Consider signing a G28 form to be represented by an attorney and an ICE 60-001 form, which authorizes third-party disclosure about your case. Those documents can be essential to accessing legal

representation and getting your story (and hopefully you) out.

- Get to know your neighbors! Say hello, knock on their doors, offer a dish of food or to water some plants. Make a plan with them in case ICE comes prowling. The strongest weapon against ICE, and against the camp, is a tightly bonded community.

# APPENDIX 3

## PUBLIC RECORDS AND DISSECTING THE CAMP

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### Public Records Requests

*Adapt the records request language below for your state and city/county records law; make use of the Freedom of Information Act (FOIA) for federal records. Search who grants licenses and permits, and start requesting the records.*

- “All current licenses held by [camp name], including application, renewal, and inspection records.”
- “All building, occupancy, and zoning permits for [camp address].”
- “All contracts between [county/city] and ICE, GEO Group, CoreCivic, or any other detention facility operator.”
- “All inspection reports, violation notices, and corrective action plans for [facility name] from [date] to present.”

## Questions to Ask of a Camp

The following questions about camps are meant to serve as a framework, a checklist, and a provocation. These questions aim to open lines of investigation into how immigrant incarceration functions, who profits from it, and how power and responsibility are distributed. Collectively, these questions can expose some of the hidden architecture of detention—and the points at which it may be most vulnerable to challenge and closure. The questions were first developed by the team at Innovation Law Lab.

### I. Detained Population

#### *Custody and capacity*

- What is the total capacity (bed space) of the facility?
- Which agencies have held or currently hold custody of detained people?
  - *ICE*: Currently? If so, since when? Formerly—if so, when?
  - *US Marshals Service*: Currently? Since when? Formerly—when?
  - *State corrections*: Currently? Since when? Formerly—when?
  - *County jail system*: Currently? Since when? Formerly—when?
  - *Other federal agencies*: Currently? Since when? Formerly—when?

### *Contracting authority*

- Who signed the current operating contract?
- Are there previous contracts or amendments? Who signed those?

## **II. Oversight and Inspections**

### *Regulatory inspections*

- Is there a comprehensive list of inspections and accreditations required for operation?
- Which agencies conduct annual inspections?
  - Municipal
  - County
  - State
  - Federal

### *Auditing and accreditation*

- Which entities conduct audits or compliance reviews?
- What mechanisms exist for revoking accreditation or certification?
- What alternatives exist if accreditation is revoked?

## **III. Medical and Mental Health Services**

### *Internal medical services*

- What is the name of the medical services provider?
  - Who do they contract with?
  - Is the contract publicly accessible?
  - Do they subcontract any services?
  - Who provides HIPAA oversight?

- What accreditations apply (e.g., National Commission on Correctional Health Care)?
- Who conducts audits and ensures accountability?
- Who is responsible for harm caused by malpractice, negligence, or systemic failures?

### *Mental and dental health services*

- Mental health:
  - Name of provider
  - Contracting details, accreditation, and audit procedures
- Dental health:
  - Name of provider
  - Contracting details, accreditation, and audit procedures

### *External medical services*

- Is there an agreement with outside providers for services unavailable onsite?
- Can records from external providers be obtained?
- Who is liable for harm if external recommendations are ignored?
- Are external providers responsible for due diligence or follow-up?

### *Documentation and accountability*

- What is the operator's level of access to detainee medical records?
- How is that access established (e.g., signed consent forms)?

- What potential HIPAA violations may occur, and what recourse exists (grievance, litigation, accountability)?

### *Costs*

- How much does ICE spend annually on healthcare at this facility?

## **IV. Labor by Detained People**

- Is the facility subject to state labor laws?
  - What is the state minimum wage?
  - Can the operator be compelled to pay minimum wage to detained workers?
- What authority does OSHA have to regulate or penalize unsafe or exploitative conditions?
  - Can OSHA suspend operations or initiate investigations?
- What are the policies on breaks, safety, and workplace hazards?
- Are local or state authorities liable if detained people perform labor under this contract?

## **V. Food Services**

- Who provides food and kitchen services?
- Who conducts kitchen and health inspections? Are records available?
- Who holds food-handling licenses?
  - Is a licensed supervisor present at all times?
  - Are detained workers trained or licensed in food handling?

## **VI. Infrastructure and Environment**

### *Buildings*

- When was the facility built, and what was its estimated lifespan?
- What infrastructure is required for operation (plumbing, sewage, electrical, water, etc.)?
- Who conducts building and systems inspections?
  - Safety
  - Plumbing
  - Electrical
  - Sewage
  - Water and utilities

### *Water and sewage*

- Who is responsible for plumbing and water systems?
- What issues exist with plumbing, sewage, or water quality?
- Is there a separate sewage contract?

## **VII. Transportation**

- Who provides transportation for people in custody?
- Who accredits or regulates transportation operations?
- What standards or regulations govern these contracts?

## **VIII. Commissary**

- Which company operates the commissary?
- Who sets prices, and how are they monitored or regulated?

## IX. Land, Location, and Local Constituencies

### *Geographic and historical context*

- What is the regional and Indigenous history of the land?
- What do US Geological Survey or other maps reveal about the site and its surroundings?

### *Property data*

- Parcel number and assessor's map link
- Current property owner and classification (e.g., nonresidential)
- Recent tax and assessment history
- Are there environmental or public health implications linked to property classification or usage?

## X. Staff and Operations

### *Workforce and unionization*

- Authorized vs. actual staffing levels
- Local vs. temporary-duty staff numbers
- Is there a staff union?
  - Local or shop leadership
  - Camp stewards
  - Collective bargaining agreement
  - Regional contact information

### *Leadership*

- Warden
- Assistant warden
- Warden's secretary
- Visitation and counselor supervisors

### *ICE officials*

- Field office director (FOD)
- Deputy and assistant FODs
- Supervisory and regular deportation officers (SDDOs, DOs)
- ICE liaison(s)

### *Other authorities*

- State officials
- County commissioners
- Municipal authorities

## **XI. Private Camp Operator**

- Company name and headquarters location
- Business information and ownership structure
- SEC filings and shareholder reports
- Annual 10-K filings

## **XII. Oversight, Leverage, and Accountability**

- What auditing or oversight mechanisms could be used to pressure contract termination?
- What factors might motivate officials or operators to end the contract (financial, reputational, legal, or political)?
- Has the facility ever shut down before?
  - If yes, why, and what can be learned from that closure?
- What public records requests can be filed?

- Communications between public entities and the private operator
- Communications between public entities and ICE
- 911 calls or incident reports

# APPENDIX 4

## ADDITIONAL RESOURCES

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Detention Watch Network (particularly DWN’s “Communities Not Cages” campaign), Immigrant Legal Resource Center, as well as other organizations offer a wealth of resources to protect community members and push back against camps. A few minutes of online searching will typically turn up nearby local organizations already doing great work. Go to the Haymarket Books website ([www.haymarketbooks.org/books/2880-how-to-close-a-camp](http://www.haymarketbooks.org/books/2880-how-to-close-a-camp)) to see these and more resources.

### Know Your Rights and Practical Tools

#### *Know-your-rights guides*

- American Civil Liberties Union – Immigrants’ Rights: Know Your Rights: <https://www.aclu.org/know-your-rights/immigrants-rights>
- Immigrant Legal Resource Center – Know Your Rights Toolkit: <https://www.ilrc.org/resources/community/know-your-rights-toolkit>
- Immigration scholar Austin Kocher has collected a voluminous list of know-your-rights information

for individuals and employers, including what to do and where to read more about a wide variety of situations. Learn more: <https://austinkocher.substack.com/p/know-your-rights-resources-for-ice>.

### *Printable rights cards*

- Immigrant Legal Resource Center – Red Cards (Tarjetas Rojas) (wallet-sized cards in multiple languages to assert rights during ICE encounters): <https://www.ilrc.org/red-cards>

### **Organizing and Research**

- Deportation Data Project: <https://deportationdata.org/data.html>
- Detention Watch Network: <https://www.detentionwatchnetwork.org/>
- League of United Latin American Citizens – El Escudo: Immigrant Rights and Resources Toolkit: [https://lulac.org/know\\_your\\_rights/](https://lulac.org/know_your_rights/)
- Legal Aid Justice Center – Rapid Response Toolkit: <https://www.justice4all.org/rapid-response-toolkit/>
- Immigrant Defense Project: <https://www.immigrantdefenseproject.org/raids-toolkit/>
- International Detention Coalition: <https://idcoalition.org/>
- Transactional Records Access Clearinghouse: <https://tracreports.org/immigration/>

## Immigration Policy News and Analysis

- *The Border Chronicle* (news, analysis, interviews): <https://www.theborderchronicle.com/>
- Andrew Free, *#Detention Kills* (newsletter on deaths in detention and tools for immigration research): <https://detentionkills.substack.com/>
- Kelly Hayes, *Movement Memos* (podcast with activists and journalists about movement work and mutual aid): <https://truthout.org/series/movement-memos/>
- César Cuauhtémoc García Hernández, *Immigration Law Unhinged* (Substack newsletter on law, policy, and detention): <https://ccgarciahernandez.com/>
- Austin Kocher, *Immigration Enforcement and Data* (newsletter with detailed analysis of detention trends, ICE data, and enforcement infrastructure): <https://austinkocher.substack.com/>
- Kate Morrissey, *Beyond the Border* (newsletter on immigration policy and weekly recaps): <https://beyondthebordernews.substack.com/>
- John Washington, *Lit and Border News* (newsletter of reflections on border and literature): <https://johnwashington.substack.com/>

## Books

- Kelly Lytle Hernández, *Migra! A History of the US Border Patrol*, University of California Press, 2010.
- Reece Jones, *Violent Borders: Refugees and the Right to Move*, Verso, 2017.

- César Cuauhtémoc García Hernández, *Migrating to Prison: America's Obsession with Locking Up Immigrants*, The New Press, 2019.
- Todd Miller, *Empire of Borders: The Expansion of the US Border Around the World*, Verso, 2019.
- Greg Grandin, *The End of the Myth: From the Frontier to the Border Wall in the Mind of America*, Metropolitan Books, 2020.
- Harsha Walia, *Border and Rule: Global Migration, Capitalism, and the Rise of Racist Nationalism*, Haymarket Books, 2021.
- Michelle Castañeda, *Disappearing Rooms: The Hidden Theaters of Immigration Law*, Duke University Press, 2023.
- Joseph Carens, *The Ethics of Immigration*, Oxford University Press, 2023.
- Silky Shah, *Unbuild Walls: Why Immigrant Justice Needs Abolition*, Haymarket Books, 2024.
- Jonathan Blitzer, *Everyone Who Is Gone Is Here: Seeking Sanctuary in America*, Penguin Press, 2025.
- Nancy Hiemstra and Deirdre Conlon, *Immigration Detention Inc.: The Big Business of Locking up Migrants*, Pluto Press, 2025.