



C A L I F O R N I A

DEPARTMENT OF JUSTICE

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December 19, 2025

The Honorable Kristi Noem
Secretary of Homeland Security
U.S. Department of Homeland Security
2707 Martin Luther King Jr. Ave. SE
Washington, D.C. 20528

Todd M. Lyons
Senior Official Performing the Duties of the Director
U.S. Immigration and Customs Enforcement
500 12th St. SW
Washington, D.C. 20536

Department of Homeland Security Office of the Inspector General
Attn: Office of Investigations
245 Murray Lane SW
Washington, D.C. 20528

RE: *California City Detention Facility (CCDF) Preliminary Findings*

Dear Secretary Noem, Mr. Lyons, and Office of the Inspector General:

We write regarding the dangerous and inadequate living conditions at California City Detention Facility (CCDF). Earlier this year Immigration and Customs Enforcement (ICE) opened this new facility in California, the largest in the state, without ensuring that the facility was adequately prepared to receive civil immigration detainees. After inspecting the facility, the California Department of Justice (Cal DOJ) has grave concerns about the conditions at the facility and the lack of adequate medical care. The United States has a legal duty to assure the safety of these detainees, and the contractor it has retained to execute this duty is manifestly not meeting a minimum standard of care for them.

CCDF is a civil immigration detention facility located at 22844 Virginia Blvd. in California City, California and is privately operated by CoreCivic, Inc. CCDF has been accepting civil immigrant detainees since August 27, 2025, pursuant to (1) an April 1, 2025, letter contract between

CoreCivic and ICE; and (2) a September 1, 2025, contract between CoreCivic and ICE.¹ CoreCivic has stated that the total annual revenue for this facility is expected to be approximately \$130 million.²

On November 20–21, 2025, a team from Cal DOJ traveled to the facility to conduct an initial inspection pursuant to California Assembly Bill 103 (AB 103), codified at California Government Code section 12532. AB 103 provides for review of conditions of confinement, due process, and standard of care at civil immigration detention facilities operated in California. During the inspection, Cal DOJ staff toured the facility, interviewed facility personnel and detained individuals, and reviewed medical and detention files.

Cal DOJ identified the following conditions, which appear to violate numerous ICE National Detention Standards (NDS) 2025, as noted below.

I. CCDF Opened Prematurely and Was Not Prepared to Handle the Needs of the Incoming Population.

CCDF opened abruptly without being prepared for all areas of facility operations to perform adequately. This lack of preparation has had harmful results to civil immigrant detainees, and Cal DOJ is concerned that such harms will only increase as the facility population grows from over 900 to its reported full capacity of 2,560 beds.

Key staff positions at CCDF remained unfilled at the time of Cal DOJ’s site visit nearly three months after opening. For example, an assistant warden, with numerous other duties, is acting as both a grievance coordinator and the Prison Rape Elimination Act (PREA) coordinator. In addition, as noted below, the facility does not have enough medical doctors for its detainee population size. Staff responsible for the day-to-day supervision of detainees appear to be inexperienced and lack basic understanding of civil detention management principles. This is likely because post orders for detention officers are still in production, contrary to ICE detention standards. (See U.S. Immig. and Customs Enforcement, National Detention Standards (2025) Standard 2.6 (Post Orders) (“Each officer will have written post orders that specifically govern his or her current duties.”) (hereafter NDS 2025).) Detainees reported to the inspection team that they are being treated like criminal inmates as opposed to civil detainees, noting that their treatment at CCDF is inferior in most respects compared to other detention facilities in California from which they had been transferred. Due to the significant number of staffing vacancies, CCDF reports being unable to provide contact visitation to any detainees, regardless of security classification level, which is a significant deprivation of support during a period of confinement, especially at a time when detainees are facing removal.

¹ CoreCivic, Inc., *CoreCivic Announces New Contract Awards At California City Immigration Processing Center and Midwest Regional Reception Center* (Sept. 29, 2025)

<https://ir.corecivic.com/node/24926/pdf> (as of Dec. 17, 2025).

² *Id.*

In addition, detention files were incomplete for individuals who arrived at the facility when it initially opened. Documentation that normally evidences that detainees received an orientation, handbook about facility rules, and other important information, was incomplete. (NDS 2025 Standard 2.1(II)(A) (New Arrivals).) This further demonstrates that the facility was not adequately prepared to meet even minimum documentation standards for ICE detention facilities.

Detainees reported that the facility does not have an adequate system in place to protect their constitutional due process rights. The team heard reports of limited access to confidential calls with attorneys, resulting in detainees only being able to access the monitored phone lines within their pods to speak to counsel, to the detriment of their immigration cases.

Further, the reception and discharge area where detainees are processed for intake, departures, and temporary transportation is extremely small for the number of detainees being processed in and out of the facility. Each of the four cells has a purported capacity of 12 people but each cell is approximately 12x12 feet. While the facility has found a work-around by using an empty housing unit to process intakes, this option will not be available when the facility is full, which is anticipated to occur in early 2026.

II. The Living Conditions at CCDF are Unsafe and Unsanitary.

Detainees reported leaks from rainwater and/or plumbing that infiltrated their living spaces. The inspection team observed leaks consistent with these reports.

Detainees reported, and Cal DOJ staff noted during its tour, that the air conditioning is kept at an extremely low temperature in housing units. Detainees reported receiving insufficient clothing and blankets to keep them warm, and until recently, detainees were only issued short sleeve items and were forced to purchase sweaters. Detainees also described being threatened with write-ups if they covered vents to prevent cold air from entering their cells. In one housing pod, elderly female detainees reportedly were modifying facility-issued socks to create scarves and sleeves for themselves to endure the low temperatures but were told that they would be written up if they continued to do so. Facility staff confirmed that altering socks constitutes “destruction of property.” While the facility just recently issued windbreakers, the housing units are still too cold and the failure to provide weather-appropriate clothing to detainees violates the applicable standard. (See NDS 2025 Standard 4.4(II)(B) (Issuance of Clothing) (“At no cost to the detainee, all new detainees shall be issued clean, indoor/outdoor, temperature-appropriate, presentable clothing during in-processing. ... Additional clothing shall be issued as necessary for changing weather conditions or as seasonally appropriate.”).)

The facility conducts seven counts each day and each can take up to 90 minutes. During this time individuals are locked in their cells. In addition, women and individuals with higher security classifications eat their meals in the housing units instead of going to the dining hall. Recreation time is only offered one hour a day, five days a week. This practice means that some detainees spend 23–24 hours a day in their housing unit.

The facility also appears to be engaged in potentially unlawful discriminatory conduct against female detainees and detainees who are members of religious minorities. Female detainees are not allowed regular time outdoors, and the large outdoor recreation space in the facility is used exclusively by male detainees. The sole outdoor space intermittently provided to female detainees is full of weeds and has no usable equipment. (See NDS 2025 Standard 5.2(II)(C) (Program Content) (“Exercise areas shall offer a variety of fixed and movable equipment.”).)

Detainees reported that accommodations for dietary requirements, like food that is compliant with religious laws, are inadequate, or at times simply unavailable. We also received a report that religious headwear has been taken away from detainees. (See NDS 2025 Standard 5.3 (Religious Practices) (discussing facility obligations with respect to religious property and dietary requirements).)

There is no apparent system in place for detainees to attend know-your-rights presentations. (NDS 2025 Standard 6.4 (Legal Rights Group Presentations) (“Facilities shall permit authorized persons to make presentations to groups of detainees for the purpose of informing them of U.S. immigration law and procedures, consistent with the security and orderly operation of each facility.”).) There appears to be a designated space for such events at CCDF, but the facility had not started facilitating these presentations as of the date of the site visit.

III. The Healthcare at the Facility Is Inadequate and Endangering Detainees.

Notwithstanding the ongoing, large influx of detainees, the facility does not have an adequate system in place for providing healthcare to these detainees. (NDS 2025 Standard 4.3(II)(A) (General) (“Facilities will employ sufficient medical staff to perform basic exams and treatments for all detainees.”).) The facility only has one doctor and despite occasions of filling in additional medical care with physicians from other facilities, it was obvious that the only doctor onsite is overburdened and always on call, resulting in triaging instead of providing the necessary medical care. Healthcare staff acknowledged being behind standard timeline requirements for routine health assessments, and file review confirmed this fact. (NDS 2025 Standard 4.3(II)(E) (Comprehensive Health Assessment).)

In addition, CCDF began receiving female detainees before obtaining basic supplies for providing women’s health care, contrary to multiple ICE standards. (See NDS 2025 Standards 4.3(II)(B) (Facilities) and 4.3(II)(U) (Women’s Medical Care), inter alia.) This lack of preparedness for the detainee population’s medical needs was reinforced during detainee interviews. File review also revealed that detainees’ paper requests for medical care are not processed in a timely manner. (See NDS 2025 Standard 4.3(II)(I) (Sick Call).) Detainees reported that healthcare requests are not acted on unless the situation is a medical emergency. Detainees also stated that they are widely unable to access care from specialists.

IV. CoreCivic Is Engaged in an Ongoing Course of Conduct that Violates ICE Detention Standards.

The aforementioned conditions constitute numerous violations of the NDS 2025, with which (based on prior private ICE detention contracts) CoreCivic is presumably required to comply as a term of its contract with the United States. "ICE detention standards ensure that detainees are treated humanely; protected from harm; provided appropriate medical and mental health care; and receive the rights and protections to which they are entitled." (NDS 2025 Foreword.) The United States and its contractor CoreCivic are legally required to assure the safety of these detainees and must comply with applicable detention standards and the Constitution.

We urge you to take action to address these issues.

Sincerely,



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Senior Assistant Attorney General
VILMA PALMA-SOLANA
Supervising Deputy Attorney General
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For ROB BONTA
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cc via Email:

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Senator Adam Schiff
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