



IN THE DISTRICT COURT OF TULSA COUNTY,
THE STATE OF OKLAHOMA

DISTRICT COURT
FILED

001-81 2024

DON NEWBERRY, Court Clerk
STATE OF OKLA: TULSA COUNTY

Francetta L. Mays,

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GJ-2024-1

AMENDED PETITION TO IMPANEL GRAND JURY

WARNING: It is a felony for anyone to sign a petition for the convening of a grand jury with any name other than his own, or knowingly to sign his name more than once for the convening of a grand jury, or to sign such petition when he is not a legal voter of the county. 22 OS § 311.1

COMES NOW, the Petitioner, Francetta L. Mays, respectfully requests that this Court impanel a grand jury to investigate alleged crimes committed against children and their families by employees of Oklahoma State Agencies responsible for child protection. It is alleged that these crimes were committed in collaboration with private entities and multidisciplinary agencies intended to serve the interests of children. This request is made by petition pursuant to 38 OK Stat § 101 (2023).

Petitioner hereby applies to this Court, in accordance with Article 2, Section 18 of the Oklahoma Constitution and 38 O.S. § 101, to convene a grand jury with jurisdiction in Tulsa County to investigate the matters described herein. The grand jury is further requested to indict by information or present accusations for removal against any individuals found culpable, pursuant to Oklahoma Statute, Title 22, §§ 1182, 1193. In support of this petition, Petitioner respectfully shows the following:

On September 16, 2024, the Oklahoma Criminal Justice and Corrections House Committee convened to address allegations of child endangerment (*See Exhibit 1 QR Code*).¹ Testimony was

¹https://sg001-harmony.sliq.net/00283/Harmony/en/PowerBrowser/PowerBrowserV2/20240916/-1/54594?fbclid=IwZXh0bgNhZW0CMTEAAR2feFZuPsApB6loKhUuRchIKZzbTfXVhVa-z6O-KhArr0WUI4fe2vb4f04_aem_IYJsqrnaUNCFKv0bbbmWQ#handoutFile_

provided by the Oklahoma Appleseed Center for Law and Justice; Darrell Dougherty, former Stillwater city councilor and father; and Attorney Shar Agosto, representing Rosario Chico, an Oklahoma Human Services Child Welfare Specialist Level III and mother. Evidence presented indicated that numerous children in Tulsa County have been systematically failed by these agencies. A majority of the Committee, led by Chairman Justin Humphrey, voted to request an OSBI investigation into these allegations on behalf of the affected children (*See Exhibit 2 Order*). The abuses, harassment, rapes, and sexual assaults inflicted upon children were preventable and were a foreseeable consequence of policies, practices, and customs of inadequate housing, supervision, and security within Oklahoma agencies. In sum, the deliberate indifference of Oklahoma agencies toward children's health and safety was a direct and proximate cause of their injuries and damages (*See Exhibit 3, Oklahoma Appleseed Center for Law and Justice Report*). The following individuals and entities, along with their staff and associates, are alleged to have acted in collusion, contributing to these offenses:

- A. Oklahoma Human Services
 - (1) Former Director Deborah Shropshire
 - (2) Region 5 Deputy Director, David Clifton, and/or his Staff
- B. Oklahoma Commission on Children and Youth (OCCY)
 - (1) Executive Director, Annette Jacobi
- C. Oklahoma State Bureau of Investigation (OSBI)
 - (1) Director, Aungela Spurlock
- D. Tulsa County District Attorney
 - (1) Steve Kunzweiler and/or his agent(s)
- E. Tulsa County Judiciary
 - (1) District Judge Kevin Gray, Chief Judge of the Juvenile Division
 - (2) Special Judge Deborah Ludi-Leitch
- F. Oklahoma Juvenile Affairs (OJA)
 - (1) Former Director Jeffrey Cartmell (current Director of Oklahoma Human Services)
- G. Detention Home of the Juvenile Bureau of the Tulsa County District Court (Tulsa Juvenile Center) Staff²

² Over the course of these children's detentions at the Juvenile Detention Center, each was sexually assaulted, harassed, and/or raped by detention officers or other staff at the Juvenile Detention Center, to-wit, including but not

I. JURISDICTION

1. Francetta L. Mays is a bona fide resident of Tulsa County, State of Oklahoma.
2. Francetta L. Mays (hereinafter the "Citizen") is Tulsa NAACP President and pastor of the Historic Vernon AME Church.
3. The Citizen is a qualified elector of the State of Oklahoma. Okla. Const. Art. 3, § 1.
4. The Citizen is registered to vote in Tulsa County, State of Oklahoma.
5. The matters alleged herein pertain to the employees who work in the Tulsa County office or whose jurisdiction encompasses or resides in Tulsa County.
6. The improper actions of the employees of these agencies were committed, enabled, or allowed to happen in Tulsa County.
7. The Court in this county has the authority to impanel a grand jury for this purpose.
8. Dozens of children and their families reside in Tulsa County and are the victims of these crimes.

II. PROCEDURE

Oklahoma Statutes Title 38 sections 101-108 provide the procedural framework for the impaneling of a grand jury. Section 101 requires the filing with the Court Clerk of the petition to impanel a grand jury prior to the obtaining of any signatures. Section 102 requires a determination by the presiding district judge of the sufficiency of the petition within four (4) days or the filing of

limited to, Federal Lawsuit Defendants Jonathan Hines, Austin Zenzen, Dquan Doyle, Cindy Treadway, Mandi Lee Raymond, John Does, and Jane Does. As detention officers and other employees, it was "Defendants'" duty to protect these children from harm. However, rather than protect them, these "Defendants" preyed on these children. Knowing the deficiencies in safety and security within the Juvenile Detention Center where their actions would be unmonitored and knowing of the persistent inadequate staffing, these "Defendants" had total control over juvenile detainees like Plaintiffs. In an utter betrayal of public trust and duty, these Defendants exploited their positions of power to abuse, harass, rape, and sexually assault defenseless minor children. The abuses, harassments, rapes, and sexual assaults upon child abuse and neglect victims were eminently preventable. These heinous crimes were the foreseeable result of Defendants' policies, practices and/or customs of inadequate housing, supervision, and security. In sum, Defendants' deliberate indifference toward child abuse and neglect victims' health and safety was a direct and proximate cause of their injuries and damages. **See Case No: 4:24-cv-00380-SEH-JFJ - Exhibit 4**

the petition. Upon the entry of an order finding the petition to be sufficient, Section 103 provides that the circulators' of the petition have forty-five (45) days to obtain sufficient signatures to authorize the entry of an order impaneling a grand jury. If the number of signatures of qualified electors on the petition is certified by the Election Board to the Court Clerk, to be sufficient, and all other requirements of Sections 101 -108 are met, Section 107 mandates that the presiding district judge shall order the impaneling of a grand jury to convene within thirty (30) days of the date the certification was received by the Court Clerk from the Election Board.

Per Oklahoma Statutes Title 38 § 102 (2023) an order determining such petition to be deficient shall quash said petition, and shall set forth clearly in writing each and every deficiency found by said judge. Petitioners shall have two (2) days to amend the petition to conform to the district judge's order. Upon the filing of said amended petition, the district judge shall enter an order within two (2) days stating whether the face of the amended petition contains the requirements set forth in this section. Any such order quashing an amended petition shall be appealable when entered. An order determining such petition or amended petition to be sufficient shall not be appealable.

III. SUFFICIENCY OF PETITION - ALLEGATIONS 38 OS § 101

According to Oklahoma Statutes Title 38 section 1010 provides that

“Beginning November 1, 1989, any person, group of persons or organization desiring to circulate a petition for the impaneling of a grand jury, pursuant to the provisions of Section 18 of Article II of the Oklahoma Constitution shall file a copy of said petition with the court clerk of the county prior to the obtaining of any signatures upon such petition. Any such petition, upon its face, shall state the subject matter or matters of the prospective grand jury and shall state a reasonably specific identification of areas to be inquired into and sufficient general allegations to warrant a finding that such inquiry may lead to information which, if true, would warrant a true bill of indictment or action for removal of a particular public official.”

A. SUBJECT MATTERS OF THE PROSPECTIVE GRAND JURY

Oklahoma Human Services, OCCY, and OJA are not subject to impeachment as per Okla. Const. Art. 8, § 1. However, officials may be removed from office for any of the following causes:

"First. Habitual or willful neglect of duty.
Second. Gross partiality in office.
Third. Oppression in office.
Fourth. Corruption in office.
Fifth. Extortion or willful overcharge of fees in office.
Sixth. Willful maladministration.
Seventh. Habitual drunkenness.
Eighth. Failure to produce and account for all public funds and property in his or her hands, at any settlement or inspection authorized or required by law."
See 22 OS § 1181.

A citizen has submitted a petition herein seeking the removal of the following individuals based on the aforementioned causes:

- Former Director of Oklahoma Human Services Deborah Shropshire
- Oklahoma Human Services Region 5 Deputy Director David Clifton and/or his staff
- OCCY Executive Director Annette Jacobi
- OSBI Director Aungela Spurlock
- Tulsa County Judiciary Members District Judge Kevin Gray³ and Special Judge Deborah Ludi-Leitch
- Tulsa County District Attorney Steve Kunzweiler and/or his agent(s)⁴
- Oklahoma Human Services Director Jeffrey Cartmell (Formerly Director of OJA)

B. IDENTIFICATION OF AREAS TO BE INQUIRED INTO

The Citizen requests that a grand jury make an inquiry into:

³Judicial immunity does not apply to Defendant K. Gray in this matter. "[T]he judge is not acting in a judicial capacity when providing administrative services for the juvenile bureau and the judge's authority is 'subject to the general administrative authority of the county commissioners.'" *Bale v. Board of Cnty. Comm'rs*, Case No. 15-CV-0577-CVE-PJC, 2016 WL 3461292, *2 (N.D.Okla. 2016) (internal citations omitted).

⁴ACCUSATIONS FOR REMOVAL OF STEVE KUNZWEILER, DISTRICT ATTORNEY, PURSUANT TO 22 O.S. § 1181: Conspiracy Against Rights—18 U.S.C. § 241, Deprivation Of Rights Under Color Of Law—18 U.S.C. § 242, Willful Interference In Federally Protected Activities – 18 U.S.C. § 245, Conspiracy To Commit A Crime – 21 O.S. § 421, Preventing Witness From Giving Testimony – 21 O.S. § 455, Common Barratry - 21 O.S. § 551

9. Training Compliance: An inquiry into the adequacy of training provided to Oklahoma Human Services and Tulsa Juvenile Center employees regarding Oklahoma Administrative Code (OAC) 340:75-3-1, which outlines the professional standards for child welfare personnel. This includes oversight by:

OCCY Executive Director Annette Jacobi per 10A OS § 1-4-804, which mandates training requirements for child welfare agency personnel.

10. Statutory Compliance: Whether the training received by the Tulsa Juvenile Center, OCCY, Tulsa County Judiciary, and OSBI complies with Oklahoma Statutes, and the policy and procedure established by their respective Agencies.

Examination of whether the training received by the Tulsa Juvenile Center, OCCY, Tulsa County Judiciary, and OSBI complies with Oklahoma Statutes, particularly 10A OS § 1-4-701, which outlines the duties of the OJA and the standards for juvenile justice services.

11. Accreditation Adherence: Investigate whether Oklahoma Human Services, OJA, OCCY, Tulsa County Judiciary, and OSBI have followed the recommendations of any accrediting agencies, referencing 10A OS § 2-5-202, which addresses the standards for juvenile facilities.

12. Preferential Treatment: Whether District Judge Kevin Gray received preferential treatment from the Tulsa County District Attorney's Office, evaluating compliance with 22 OS § 1089.5, which emphasizes the need for impartiality in the judiciary.

13. Neglect of Duties: Investigate allegations that District Judge Kevin Gray, Tulsa County District Attorney Steve Kunzweiler, Former Director Deborah Shropshire, Region 5 Deputy Director David Clifton, Oklahoma Juvenile Affairs Director Jeffrey Cartmell, OCCY Executive Director, Annette Jacobi, and OSBI Director Aungela Spurlock willfully and habitually neglected their duties as public officials, as outlined in 22 OS § 1181.

14. **Employee Qualification:** Inquiry into whether Tulsa Juvenile Center employees are qualified for their assigned tasks, in accordance with 10A OS § 1-4-100, which mandates minimum qualifications for child welfare professionals.

15. **Operational Safety:** Investigate whether the actions of the aforementioned officials have put children and families at risk, referencing 10A OS § 1-1-103, which emphasizes the responsibility of state agencies to protect the welfare of children.

16. **Training Adequacy:** An inquiry into whether the training and education provided to officials were sufficient for their assigned tasks, aligned with OAC 340:75-3-1, which specifies the training requirements for employees in child welfare roles. Whether District Judge Kevin Gray, Tulsa County District Attorney Steve Kunzweiler, Former Director Deborah Shropshire, Region 5 Deputy Director David Clifton, OJA Director Jeff Cartmell, and OCCY Executive Director Annette Jacobi placed children and families at risk; and whether other operations have been performed in an unsafe manner.

17. **Official Qualifications:** Investigation into whether officials were adequately qualified for their respective roles, based on the standards set forth in 10A OS § 1-4-703, which discusses the necessary qualifications for child welfare agency personnel.

18. **Familial Supervision:** Inquiry into whether family members acted as supervisors to other family members within Oklahoma Human Services, potentially violating OAC 340:75-1-3, which addresses conflicts of interest in child welfare operations.

19. **Record Keeping Compliance:** Investigation into the maintenance of records by Oklahoma Human Services, OCCY, OJA, and the Tulsa Juvenile Center as required by 19 OS § 547, which mandates record-keeping standards for public agencies.

20. **Open Records Act Compliance:** An inquiry into any barriers imposed by Oklahoma Human Services, OCCY, OJA, and the Tulsa Juvenile Center that hinder compliance with the Open Records Act as established in 51 OS § 24A.1, which emphasizes the public's right to access governmental records.

21. **Ongoing Investigations:** Explore whether there have been any attempts by Oklahoma Human Services, the Tulsa County District Attorney's Office, Speaker of the House Charles McCall, and/or any other officials obstructed OSBI investigations regarding allegations of misconduct involving these agencies, as outlined in 10A OS § 1-1-106, which protects the integrity of child welfare investigations.

22. **The Power of Inquiry as set forth in Title 22 O.S. § 331.** In addition to the alleged criminal conduct specifically described above, a Tulsa County grand jury may investigate other instances of crimes alleged committed in Tulsa County.

C. ALLEGATIONS OF CRIMINAL CONDUCT

23. **Failure to Report Abuse:** Investigate allegations that Oklahoma Human Services administrative staff have neglected to report child abuse, in violation of 21 O.S. § 852.1 (Failure to Report Child Abuse). An investigation may warrant a bill of indictment or removal from employment for these Oklahoma Human Services employees.

24. **Falsification of Documents:** Investigate allegations that Employees of Oklahoma Human Services have falsified, altered, destroyed, or withheld documents that would reveal crimes against children. These actions are subject to prosecution under 21 O.S. § 463 (Tampering with Public Records). If confirmed, these actions could lead to indictments or dismissal of the implicated staff.

25. **Fraud and Perjury:** Investigate allegations that Oklahoma Human Services employees have allegedly committed fraud and perjury in Oklahoma courts to conceal crimes against children, in violation of 21 O.S. § 500 (Perjury) and 21 O.S. § 391 (False Pretenses or Statements). Such misconduct, if proven, could result in indictments or removal from office.

26. **Concealment of Evidence:** Investigate allegations that OCCY has collected evidence of crimes against children but has withheld this information to protect Oklahoma Human Services employees, a violation of 21 O.S. § 540A (Obstructing an Investigation). If confirmed, this dereliction of duty may result in indictment and removal of the OCCY Director.

27. **Allegations of Sexual Assault by Tulsa Juvenile Center Nurse, Mandi Lee Raymond:** Investigate allegations in the lawsuit filed in May 2024, in the United States District Court for the Eastern District of Oklahoma, alleging that Nurse Mandi Lee Raymond sexually abused a resident at the Tulsa Juvenile Center and the “abuse was never reported to law enforcement.” (*See Exhibit 3, Page 17*)

28. **Allegations of Sexual Batter by Detention Officer D’Quan Doyle:** Investigate allegations that on August 8, 2023, that detention officer D’Quan Doyle committed sexual battery against a Tulsa Juvenile Center resident. There are many other allegations regarding the conduct of DO Doyle and no charges have been filed. (*See Exhibit 3, page 19*)

29. **Misallocation of Public Funds:** Investigate allegations that OCCY has improperly utilized public funds meant for multi-disciplinary teams intended to help abused children. This failure to provide necessary services could constitute dereliction of duty under 74 O.S. § 85.10, warranting removal of the Director and further investigation.

30. Neglect of Post-Adjudication Services: Investigate allegations that OCCY has failed to provide the legally mandated services for children separated from their families, indicating dereliction of duty under 10A O.S. § 1-4-206 that could lead to the Director's removal.

31. Obstruction of Justice: Investigate allegations that the OSBI administration has violated the Constitution of Oklahoma, conspired with publicly elected officials, and obstructed appropriately requested investigations of law enforcement and a legislative body that would bring justice to abused children and vulnerable adults in Oklahoma. Obstruction of an investigation, a violation under 21 O.S. § 454 (Obstructing an Officer) and 51 O.S. § 93 (Removal for Cause). Violation of Oath of Office, and violation of the Oklahoma Constitution; if proven through investigation, would bring about a bill of indictment and/or removal of office for the aforementioned OSBI Director.

32. Failure to Protect Children: Investigate allegations that Oklahoma Human Services administrative staff have failed to protect children from abuse, constituting dereliction of duty under 21 O.S. § 843.1 (Neglect or Abuse by Caretaker). If proven, this may necessitate removal from office and/or indictment of implicated employees.

33. Improper Financial Actions: Investigate allegations that Oklahoma Human Services staff have allegedly seized and garnished child support without proper court authority, a violation of 56 O.S. § 240.1. If these actions are proven fraudulent, they could lead to removal and/or indictment of the staff involved.

34. Conspiracy and Collusion: Investigate allegations that the Tulsa County District Attorney's Office and local judges are alleged to have conspired with Oklahoma Human Services to introduce fraud and perjury into the courts, obstructing justice for children and families,

violating OKLA. STAT. tit. 21, § 421 (Conspiracy). If confirmed, this could result in removal and/or indictments.

35. Negligence by OJA Director: Investigate allegations that OJA Director Jeffrey Cartmell, failed to provide residents with adequate and safe housing, supervision, and security to protect them from known risk of serious physical harm, including but not limited to rape and/or sexual abuse. The OJA Director, who

“shall be responsible for the care and custody of a youthful offender who has been placed in the custody of the Office of Juvenile Affairs and shall have the duty and the authority to provide food, clothing, shelter, ordinary medical care, education, discipline and in an emergency to authorize surgery or other extraordinary care.” 10A O.S. § 2-5-212(D).

36. Allegations of Sexual Molestation: Investigate allegations that on March 9, 2024, “Detention Officer Hines sexually molested a child relative while babysitting.” The allegations include the officer taking “photos of the child’s genitalia,” which was reported to OJA. Yet, “Detention Officer Hines remained employed until late April 2024.” (*See Exhibit 3, page 24*)

37. Allegations of Sexual Misconduct by Detention Officer Hines: Investigate allegations against Detention Office Hines who is alleged to have committed many incidents of sexual misconduct while employed at the Tulsa Juvenile Center. (*See Exhibit 3, pages 21-22*)

38. Threats Against Victims: Investigate allegations that on April 19, 2024, a detention officer “allegedly threatened a child rape victim through the child’s legal counsel in the parking lot of the facility,” stating that the “child victim needed to ‘keep his mouth shut,’ and that ‘he got what he bargained for.’” (*See Exhibit 3, page 25*)

39. Failure to Address Threats: Investigate allegations that on April 24, 2024, Public Defender Juvenile Division Supervisor corresponded with key administrators about the “‘culture’ in the facility that puts the children in its custody in harm’s way.” (*See Exhibit 3, page 25*).

40. Judicial Acknowledgment of Abuse: Investigate allegations that Chief Judge Kevin Gray sent correspondence reminding key staff of their “obligations under the Prison Rape Elimination Act (PREA) and requesting the detention officers receive additional training.” The responses indicated that “At this point, Director Taylor knew the child resident had been raped two weeks before.” (*See Exhibit 3, page 25-26*)

41. Public Defender’s Urgent Requests: Investigate allegations that on April 25, 2024, the Tulsa County Public Defender’s Office corresponded with key administrators to take “immediate action regarding Tulsa County Juvenile Detention” and if no action taken, they “will ‘get the ball rolling’ on a federal lawsuit.” (*See Exhibit 3, page 25-26*)

42. Criminal Charges Against Hines: Investigate allegations that on April 26, 2024, Detention Officer Hines is charged with Child Trafficking, Carrying a Cellphone into a Detention Facility, and Destruction of Evidence by the Tulsa County District Attorney under CF-2024-1559. (*See Exhibit 3, page 21-22*)

43. Federal Lawsuit Filed: Investigate allegations that on May 23, 2024, a lawsuit was filed in the Federal District Court for the Eastern District of Oklahoma on behalf of twenty victims who were residents of the facility and suffered sexual abuses and neglect. (*See Exhibit 4 Case No: 4:24-cv-00380-SEH-JFJ*)

44. Indictment of Former Officer: Investigate allegations that on June 6, 2024, former detention officer Jonathan Hines was indicted for Soliciting a Minor for Indecent Exposure/Photographs, and Carrying a Cell Phone into a Detention Facility under Tulsa County case number CF-2024-2030. (*See Exhibit 3, page 27*)

IV. DISQUALIFICATION OF TULSA COUNTY DISTRICT ATTORNEY

Where a grand jury is impaneled, Oklahoma Statutes require that

"it shall be the duty of the district attorney of the district or his assistant or assistants, to attend them for the purpose of examining witnesses in their presence or of giving them advice in any legal matter, and to issue subpoenas and other process to enforce the attendance of witnesses, and to draw up bills or indictments when found by such grand jury..." 19 O.S. § 215.13.

The Citizen seeks the disqualification of the Office of the Tulsa County District Attorney from acting as County Attorney in all removal proceedings of the Tulsa Juvenile Center and request herein for the following reasons:

45. District Judge Kevin Gray, Chief Judge of the Juvenile Division, before his election worked at the pleasure of the Tulsa District Attorney's Office.

46. Should there be a finding that District Judge Kevin Gray or his and staff, were not properly trained and records were falsified, that could serve as a basis for multiple appeals in adjudicated criminal cases.

47. A recusal request for the Tulsa County District Attorney to recuse from current pending criminal proceedings surrounding the Tulsa Juvenile Center has already been denied by the Tulsa County District Attorney.⁵

48. A conflict of interest exists between the Office of the Tulsa County District Attorney and the District Judge Kevin Gray, Chief Judge of the Juvenile Division as set out herein. In *Arkansas Valley State Bank v. Phillips*, 2007 OK 78, 123, 171 P.3d 899, 910-11, the court adopted the ruling of *Towne v. Hubbard*, 2000 OK 30, 3 P.3d 154, stating that the "proper test for granting a motion to disqualify counsel is whether real harm to the integrity of the judicial process is likely to result if counsel is not disqualified." This court should disqualify the Tulsa County District

⁵<https://www.kjrh.com/news/local-news/town-hall-to-discuss-juvenile-detention-center-packed-with-citizens-but-not-leaders>

Attorney's Office from conducting those duties set out in 19 O.S. § 215.13 in order to preserve the integrity of the grand jury process.

V. PRAYER FOR RELIEF

WHEREFORE, Petitioner, a qualified elector of Tulsa County, Oklahoma, pursuant to Article 2, §18 of the Oklahoma Constitution and 38 O.S. §§ 101-108 of the Oklahoma Statutes, respectfully requests this Court for the following relief:

49. It is the request of the undersigned that a county grand jury having jurisdiction extending throughout Tulsa County be convened to investigate the areas and allegations presented herein and, upon a finding, make such necessary indictment and/or accusations for removal of Officials, his/her agent(s) and/or any other such person found to have violated the law.

50. The convening of an Tulsa County grand jury, having jurisdiction extending throughout Oklahoma County, is necessary because the crimes, public offenses, and grounds for removal as defined in Oklahoma Constitution Article: 2 § 18, in Oklahoma Statutes Title 21, Sections 421, 455, and 551, in the United States Code Title 18 Sections 241, 242, and 245, and in Oklahoma Statutes Title 22 Sections 1181 *et seq.* can be investigated more effectively through the use of those resources available to a Tulsa County grand jury. The investigative resources to be utilized by the proposed Tulsa County grand jury will include, inter alia, the following:

(a) The subpoena power available to a Tulsa County Grand jury under Oklahoma Statutes Title 22 section 333: Examination of case files, litigation records, and communication records of government agencies herein, such as the Office of the District Attorney, to discover and document illegal activity. The power to issue subpoena duces tecum and to compel the production of case files, litigation records, relevant documents, communication records, and other relevant evidence

is absolutely essential in order to effectively investigate organized crime or fraud in the government agencies herein.

(b) **The Power to Compel Testimony from those Witnesses Who Have Been Granted Immunity.** (Okla. Const. Art. 2, § 27 and 7.1 O.S. § 1367). Court Orders of immunity are necessary to compel testimony from reluctant witnesses such as victims, co-conspirators, employees, business associates, family members and others who are involved in criminal activities as defined in Okla. Const. Art. 2 § 18 and in 22 O.S. § 331 including, but not limited to, organized crime, homicides and fraud, who are legitimately concerned with self-incrimination. The power to request orders of immunity and thereby compel testimony enables a Tulsa County grand jury to effectively obtain testimony from said witnesses or other witnesses who are reluctant to cooperate and provide testimony to said grand jury.

51. Approval of Subject Matter and Inquiry Scope: An order finding that this petition adequately and sufficiently identifies the areas of inquiry, with reasonably specific allegations to justify an investigation into potential misconduct by officials, including Chief Judge of the Tulsa Juvenile Center Kevin Gray; Tulsa County District Attorney Steve Kunzweiler; the Director of Oklahoma Human Services; OJA Director Jeff Cartmell, and OCCY Executive Director. Petitioner asserts that this inquiry may lead to information that, if substantiated, could support removal from office or other appropriate actions (38 O.S. § 101).

52. Approval of Signature Page Form: An order approving the attached signature page as sufficient in form and content for collecting signatures, per statutory requirements. (*See Attachment A*)

53. Determination of Signature Validity: A finding that the number of qualified elector signatures, as certified by the Election Board, is sufficient to meet Article II, Section 18 of the

Oklahoma Constitution requirements. Petitioner requests an order for convening the grand jury within thirty (30) days after the certification is received by the Court Clerk from the Election Board.

54. Disqualification of Tulsa County District Attorney's Office: An order disqualifying the entire Tulsa County District Attorney's Office from serving as legal advisors to the grand jury, to maintain impartiality and prevent conflicts of interest.

55. Authorization to Investigate and Indict: An order authorizing the grand jury to investigate, and if warranted, to indict administrative staff and employees within Oklahoma Human Services, OCCY, OJA, Tulsa Juvenile Center, OSBI, and other agencies or private entities found to have willfully engaged in actions that compromise children's safety and rights to protection and due process. This includes those who may have participated in collusion or negligence.

56. Additional Orders for Reform Recommendations: An Order empowering the grand jury to make findings and recommendations for reform in child welfare practices and oversight, recognizing that while some agency officials are beyond the scope of impeachment, findings can prompt legislative action and policy reform.

57. Such Other Relief as Authorized by Law: Any other relief deemed appropriate to address these matters and prevent future harm to Oklahoma's children. Perform such duties as prescribed by Oklahoma Statutes Title 22 Sections 311 through 346 of Title 22 and/or Oklahoma Statutes Title 57 Section 59, and other relevant provisions of State law.

Petitioner prays this Court will approve this petition, authorize the collection of signatures, and order the convening of a grand jury for the purposes described above. This grand jury will

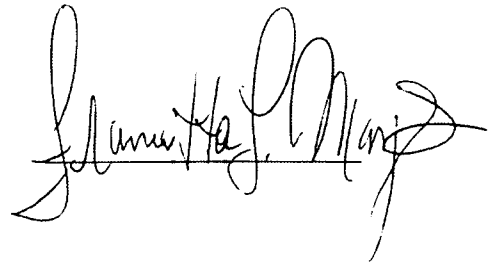
provide accountability, justice, and reform, ensuring Oklahoma's children are afforded dignity, safety, and lawful protection.

VERIFICATION

By her signature below, the undersigned swears and attests that she is informed as to the facts of the above information and that it is true and correct to the best of her knowledge and belief.

DATED this 31st day of October, 2024.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Francetta L. Mays", written over a horizontal line.

Francetta L. Mays
P.O. Box 481072
Tulsa, OK 74148-1072
Cell: (918) 812-9541
e-mail: nyodrmsevents@gmail.com

ATTACHMENT A

CITIZEN PETITION FOR GRAND JURY TO BE CONVENED IN TULSA COUNTY

This petition is presented by the citizens of Tulsa County to request the impaneling of a Grand Jury to investigate and potentially remove from office and/or indict various officials. We seek accountability for alleged crimes against children and families committed by those in positions of authority. The allegations include but are not limited to the following individuals for removal from office and/or indictment due to their actions against children and families in Tulsa County. Detailed allegations are documented in public filings with the District Court of Tulsa County as GJ-2024-1:

1. David Clifton, Tulsa County/Region 5 Deputy Director, and/or his staff:

WILLFUL NEGLECT OF DUTY, GROSS IMPARTIALITY IN OFFICE, FRAUD, PERJURY, UNLAWFUL DESTRUCTION OF DOCUMENTS, AND FAILURE TO REPORT CRIMES AGAINST CHILDREN

2. Annette Jacobi, Oklahoma Commission on Children and Youth Director:

FAILURE TO REPORT CRIMES AGAINST CHILDREN, CONSPIRING TO COVER UP CRIMES AGAINST CHILDREN, PUBLIC CORRUPTION, WILLFUL MALADMINISTRATION

3. Aungela Spurlock, Oklahoma State Bureau of Investigation Director:

OBSTRUCTION OF AN INVESTIGATION, VIOLATION OF OATH OF OFFICE, MALADMINISTRATION, WILLFUL NEGLECT OF DUTY

4. Steve Kunzweiler, Tulsa County District Attorney:

HABITUAL AND WILLFUL NEGLECT OF DUTY, GROSS PARTIALITY IN OFFICE, CORRUPTION IN OFFICE, WILLFUL MALADMINISTRATION, FRAUD, PERJURY

5. Judges Kevin Gray, Julie Doss, and Deborah Ludi-Leitch, Tulsa County:

HABITUAL AND WILLFUL NEGLECT OF DUTY, GROSS PARTIALITY IN OFFICE, CONSPIRING TO COMMIT CRIMES, CORRUPTION IN OFFICE

8. Oklahoma Juvenile Affairs

- a. Former Director Jeffrey Cartmell (current Director of Oklahoma Human Services)

HABITUAL AND WILLFUL NEGLECT OF DUTY, GROSS PARTIALITY IN OFFICE, CONSPIRING TO COMMIT CRIMES, CORRUPTION IN OFFICE

9. Detention Home of the Juvenile Bureau of the Tulsa County District Court (hereinafter "Tulsa Juvenile Center") Staff

HABITUAL AND WILLFUL NEGLECT OF DUTY, GROSS PARTIALITY IN OFFICE,
CONSPIRING TO COMMIT CRIMES, CORRUPTION IN OFFICE

WARNING: It is a felony for any person to sign a petition for the convening of a Grand Jury with any name other than his/her own, to knowingly sign his/her name more than once, or to sign such a petition when not a legal voter of the county (22 OS § 311.1).

By signing below, I affirm that I have personally signed this petition, that I am a legal voter of the State of Oklahoma, County of Tulsa, and that my residence is accurately stated after my name. I have read, understand, and support the attached petition submitted to the District Court of the County of Oklahoma, pursuant to the Oklahoma Constitution, Article 2, Section 18, and 38 O.S. § 101. I request the convening of a Grand Jury with jurisdiction in Oklahoma County to investigate the specified areas and allegations. If warranted, I ask that this Grand Jury issue indictments and/or present accusations for removal against agents of the County of Tulsa and/or their agents, as authorized by Oklahoma Statute, Title 22, §§ 1182, 1193.

TULSA COUNTY

WARNING: It is a felony for any person to sign a petition for the convening of a Grand Jury with any name other than his/her own, to knowingly sign his/her name more than once, or to sign such a petition when not a legal voter of the county (22 OS § 311.1).

Date (00/00/0000)	Legal Name (Last, First)	Date of Birth (00/00/0000)	Home Address	Zip Code	Oklahoma County Registered Voter (Fill Box)	Signature
					YES ☐ NO ☐	
					YES ☐ NO ☐	
					YES ☐ NO ☐	
					YES ☐ NO ☐	
					YES ☐ NO ☐	
					YES ☐ NO ☐	
					YES ☐ NO ☐	
					YES ☐ NO ☐	
					YES ☐ NO ☐	
					YES ☐ NO ☐	
					YES ☐ NO ☐	
					YES ☐ NO ☐	

STATE OF OKLAHOMA)
) ss.
COUNTY OF OKLAHOMA)

I, _____, being first duly sworn, say: That I am at least eighteen (18) years old and that all signatures on the signature sheet were signed in my presence; I believe that each has stated his or her name, home address, and date of birth associated with his or her Oklahoma voter registration record, and that each signer is a legal voter of the State of Oklahoma.

Subscribed and sworn to before me this ____ day of _____, 2024.

Circulator, original signature

Circulator, complete mailing address

Notary Public, signature

Notary Public address of record

Notary Commission

Notary Commission Number

Expiration Date:

Notary public seal impression here

EXHIBIT 1

Scan QR Code with smartphone to watch
House Committee Hearing



EXHIBIT 2



House of Representatives
STATE OF OKLAHOMA

September 25, 2024

Oklahoma State Bureau of Investigation
Aungela Spurlock, Director
6600 North Harvey Place
Oklahoma City, Oklahoma 73116

Director Spurlock:

On September 9, 2024, the Oklahoma House of Representatives Criminal Justice and Corrections Committee held an emergency hearing to determine whether the Department of Human Services (DHS), Oklahoma Juvenile Affairs (OJA), and the Oklahoma Commission on Children and Youth collectively received information that children under their care were being physically and sexually abused, yet these agencies failed to take appropriate action to stop the abuse. One witness, Appleseed, a respected 501(c)(3) community action group known for its thorough investigations, provided a comprehensive report confirming that the agencies were aware of abuse at the Tulsa Detention Center. Appleseed submitted this alarming report to all relevant government officials, but it was completely ignored. Following this, the Criminal Justice and Corrections Committee called for immediate and appropriate actions. The committee also heard from three other witnesses who reported and documented firsthand knowledge of criminal conduct within child welfare and the DHS administration.

As Chairman of the Criminal Justice and Corrections Committee, I have the authority granted under 74 O.S. § 150.5(d) to initiate an OSBI investigation by a majority vote of our committee. Article V, Section V-60 of the Oklahoma Constitution requires the Legislature to provide an efficient system of checks and balances among the officers of the Executive Department and all commissioners, superintendents, and boards of control of State institutions, as well as any other officers entrusted with the collection, receipt, custody, or disbursement of the state's revenue or funds. As members of the Criminal Justice and Corrections Committee, we do not take this duty lightly.

I am providing a formal directive signed by the majority of the Criminal Justice and Corrections Committee, instructing the Oklahoma State Bureau of Investigation to conduct an investigation into possible criminal actions by the Department of Human Services (DHS), Oklahoma Juvenile Affairs (OJA), and the Oklahoma Commission on Children and Youth. The document containing the committee members' signatures details the areas of concern that we believe warrant examination.

Since the September 9 committee hearing, news stations and my office have been inundated with reports of wrongdoing. I would like to include cases that have sufficient substantiation. Please contact Chairman Justin JJ Humphrey if you have any questions.

To the Distinguished Director of the Oklahoma State Bureau of Investigation,

Ms. Aungela Spurlock,

As Chairman of the Criminal Justice and Corrections Committee, I bring forth the initiation of an OSBI investigation into each of two critical and urgent matters. This authority is granted per 74 O.S. § 150.5(d) as our committee has subpoena powers by resolution, but we bring this initiation of an OSBI investigation by authorization of a vote by the majority of our committee. Article V Section V- 60 of the Oklahoma Constitution requires the Legislature to provide an efficient system of checks and balances between the officers of the Executive Department, and all commissioners and superintendents, and boards of control of State institutions, and all other officers entrusted with the collection, receipt, custody, or disbursement of the revenue or moneys of the state whatsoever. As members of the Criminal Justice and Corrections Committee, we do not take this duty lightly.

INVESTIGATION INITIATION NO.1 DETENTION and CARE FACILITIES

- a. Investigate abuse and neglect of all children and disabled adults in facilities.
- b. Investigate knowledge and reporting of abuse and complaints through all levels of oversight. Including but, not limited to: Managers, Administrators, OJA, OCCY, PARB, OKDHS, Judges(if acting in executive duties)
- c. Investigate violations of state and federal laws of required humane treatment of children and adults incarcerated or in care.
- d. Investigate electronic devices used to document, record or share abuse.
- e. Further investigation to all other appropriate caretakers or individuals identified in participation in abusive behaviors, exploitation, or extortion.
- f. Further investigation to all other appropriate facilities as evidence suggests.

Contact/Reporter Tulsa Juvenile Detention Facility: Sa-Tae Seth McIntosh seth@okappleseed.org

Contact/Reporter OKCYC Juvenile Detention Facility: Mandy Fisher-Reed mandyreed77@yahoo.com

Contact/Reporter Robert M Greer Center in Enid: Representative Ellen Hefner elleyh.hefner@okhouse.gov

INVESTIGATION INITIATION NO.2 OKDHS CHILDWELFARE AND CHILD PROTECTIVE SERVICES ON BEHALF OF 6 FAMILIES AND THEN FURTHER AS EVIDENCE WOULD SUGGEST

- a. Investigate allegations of abuse appropriately on behalf of children.
- b. Investigate negligent or fraudulent reporting by child welfare or CPS staff or case workers.
- c. Investigate knowledge of or reporting of mishandling of referrals through all levels of oversight including but no limited to: Case workers, Supervisors, District Directors, Deputy state directors, State Director, OCCY, PARB, and law enforcement.
- d. Appropriate engagement of professionals by the OKDHS through state law requiring Multidisciplinary child abuse teams as required by 10a O.S. § 1-9-102.
- e. Investigate reports and documents for integrity, negligence, fraud, retaliation, and deletion of records.-
- f. Investigate testimonies in court proceedings for fraud or perjury
- g. Investigate if/when law enforcement was notified and if correct reporting was provided to law enforcement agency
- h. Investigate judicial decisions and due process activity in accordance with state and federal law.

- i. Investigate possible collusion or inappropriate engagement between attorneys and or judges.
- j. Investigate any misrepresentation of a minor child, or disabled adults', testimony by a state employee, attorney, counselor, doctor, judge, etc.
- k. Investigate all child interviews for appropriateness of order, process, and reporting (notify and request intervention of FBI in regards to any appearance of illegal search and seizure actions that would constitute a violation of Federal law.
- l. Investigate all seizure of assets to determine appropriateness of order, process, and reporting.
- m. Investigate all violations of Oklahoma Constitutionally protected rights of all parties. Notify and request intervention of FBI in regards to any appearance of violations of Federally protected constitutional rights. Including, but not limited to, life, liberty and the pursuit of happiness, loss of familial contact, loss of fair opportunity in court, etc.
- n. Investigate electronic devices used to record, document or upload case information.
- o. Investigate contact between parents and OKDHS for determination of collusion, exploitation or extortion.
- p. Further investigations to other children or families as evidence suggests.

Contact/Advocate for minor child G.L.S., dob 7-24-13: Dr. Linh Stephens linhstephens7@gmail.com

Contact/Advocate for minor child A.K.W., dob 11-4-16, A.K.W., dob 11-4-16 Bri'Anne Wiland brinwal@icloud.com

Contact/Advocate for minor child M.N.R., dob 7-4-12: Shawn Reed maddiesdad2024@gmail.com

Contact/Advocate for minor child C.B.W.L., dob 7-12-12: Lisa Woolley whwoolley@gmail.com

Contact/Advocate for minor child D.E.D., dob 12-24-13: Darrell Dougherty dough890@gmail.com

Contact/Advocate for minor children A.R.V., dob 9-22-10; P.F.V., dob 9-25-15; H.S.V., dob 5-2-17: Rosario Chico chico.media.tv@gmail.com

We appreciate your expediency in these matters as these children and at-risk adults could be in pending danger or enduring ongoing permanent damage due to failures that are not of their own doing. We also respect your ability to tenderly deal with minor children or adults who will need gentle care.

Chairman Justin Humphrey

Date 09-18-2024

Representative David Hardin

Date 9-18-2024

Representative Kevin West

Date 9/18/24

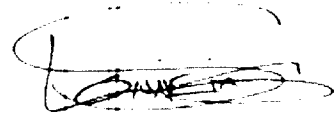
Representative Danny Williams

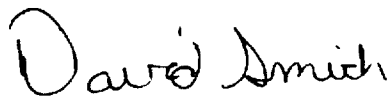
Date 09/18/24

We, the undersigned lawmakers, wish to express our strong support for the Criminal Justice and Corrections Committee's investigation of the Department of Human Services Oklahoma Commission on Children and Youth.



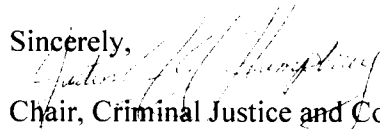








Sincerely,

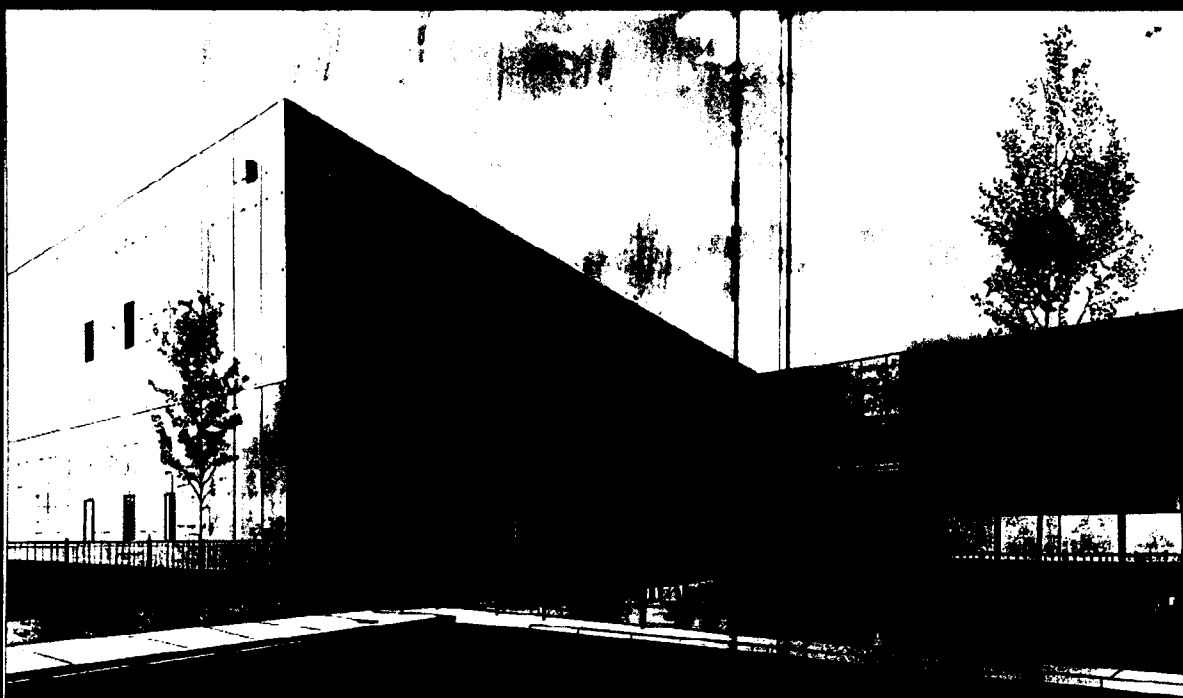


Chair, Criminal Justice and Corrections Committee

EXHIBIT 3



Heinous Allegations: *Abuses in Youth Custody in Tulsa County, Oklahoma*



June 2024

Written by:

Colleen McCarty, Esq.

Drafting Support:

Leslie Briggs, Esq.

www.okappleseed.org

PREAMBLE

The purpose of this report is to be a tool for the public and advocates to hold officials accountable for the alleged abuses occurring in the Tulsa County Family Center for Juvenile Justice (FCJJ). First, we provide an overview of the national landscape when it comes to abuses in youth detention, followed by a specific look at the history of abuses in youth detention facilities in Tulsa County. The final section combines several sources of public information into a comprehensive timeline of incidents between 2020 and 2024 regarding the FCJJ and its oversight, including the horrific abuses occurring presently to youth in the facility. This review will show that the FCJJ was consistently out of compliance in its operation of the facility across a wide range of performance standards over the entire four year period. The inspection reports of OJA found a pattern and practice of confining youth for extensive periods during the day, shortened or non-existent school days, insufficient grievance practices, and repeated incidents of escapes and facility mismanagement. The public deserves to know what is happening in our youth justice system. The youth justice system is a closed system predicated on protecting the records and privacy of the youth involved. Too often, we see these systems of secrecy weaponized against the very youth they are attempting to protect. We hope this report serves as a valuable resource as we come together as a community and demand better treatment for youth in the justice system.



Heinous Allegations: Abuses in Youth Custody in Tulsa County, Oklahoma

By Colleen McCarty, Esq.

Drafting Support: Leslie Briggs, Esq.

PART I: Youth Detention Centers are Causing Harm and Trauma to Detained Youth Across the Country as well as in Tulsa

Across the United States, numerous juvenile detention centers have faced allegations and confirmed instances of abuse, neglect, and systemic failures. Here in Tulsa County, Oklahoma, on April 25th, 2024, a juvenile detention officer was arrested for trafficking a juvenile resident of the facility, being in possession of child pornography, and destruction of evidence. This arrest has led to a widespread examination of allegations of abuse in the Tulsa County Family Center for Juvenile Justice. On May 23rd, 2024, a lawsuit brought by twenty victims of abuse during their time as residents in the facility was filed in the federal court for the Eastern District of Oklahoma. Despite calls for an independent investigation into the facility, Tulsa County authorities have refused additional accountability and corrective measures.

These all-too-prevalent abuses against youth in custody often involve physical violence, sexual misconduct, inadequate medical care, and psychological harm. Notable cases in states such as Illinois, Pennsylvania, and Maryland highlight a troubling pattern of mistreatment and call into question the efficacy and humanity of these facilities.

Illinois: Cook County Juvenile Temporary Detention Center

In Illinois, the Cook County Juvenile Temporary Detention Center (JTDC) has been the subject of multiple lawsuits and investigations. Reports from the early 2000s documented physical abuse by staff, including the use of excessive force, restraints, and isolation. A 2007 class-action lawsuit, *Jimmy Doe v. Cook County*, revealed that juveniles were subjected to violent conditions and denied proper medical and mental health care. The resulting consent decree mandated significant reforms, yet reports of abuse continued into the 2010s.

Pennsylvania: Luzerne County "Kids for Cash" Scandal

Pennsylvania witnessed one of the most egregious abuses of judicial power in the "Kids for Cash" scandal. Brought to light by a frantic call from a concerned parent, Luzerne County judges Mark Ciavarella and Michael Conahan were found guilty in 2008 of receiving kickbacks from private juvenile detention centers in exchange for imposing harsh sentences on minors for minor offenses.¹ This scandal

¹ Juvenile Law Center, Kids for Cash, <https://jlc.org/luzerne-kids-cash-scandal> (last visited June 11, 2024)

highlighted the profound impact of corruption on vulnerable youth and led to widespread legal and legislative changes in the state to prevent such abuses.

Maryland: Cheltenham Youth Facility

The Cheltenham Youth Facility in Maryland has a long history of reported abuses, dating back to the 1990s. Investigations have uncovered numerous incidents of physical and sexual abuse, as well as neglect. A 2015 report by the Maryland Juvenile Justice Monitoring Unit detailed ongoing issues, including inappropriate use of restraints, insufficient staffing, and poor living conditions. Despite efforts at reform, the facility has continued to face criticism for failing to protect the welfare of detained juveniles.

Oklahoma: Tulsa County Family Center for Juvenile Justice

The Tulsa County Family Center for Juvenile Justice, also known as the Tulsa County Juvenile Detention Center, has similarly faced allegations of abuse and systemic failures. This section examines documented abuses occurring between 2020 and 2024 at this facility, providing a detailed account based on public information.

Part II: Historical Context and Facility Overview

The Tulsa County Juvenile Detention Center (also called the Family Center for Juvenile Justice, herein also referred to as the “FCJJ”), located in Tulsa, Oklahoma, is responsible for detaining minors who are awaiting court proceedings or completing short-term treatment plans. The Center aims to provide a secure environment with appropriate educational, medical, and psychological services. However, numerous reports and investigations have revealed significant issues within the facility.

Tulsa County is no stranger to abuse allegations in youth custody. The lawsuit, *Terry D. et al. v. Rader et al.*, was a significant legal case involving the youth detention centers across the state and their unconstitutional practices regarding juvenile detention. In January 1978, this case brought attention to numerous issues within the juvenile detention system, focusing on the treatment and rights of detained youths.

The lawsuit was brought for violations of the childrens’ rights centering on the imposition of disciplinary measures, including solitary confinement and the suspension from school, without procedures comporting with due process of law as violative of the Fourteenth Amendment to the United States Constitution. Plaintiffs also challenged the use and conditions of solitary confinement as a punitive, control device violative of the Eighth and Fourteenth Amendments to the United States Constitution.

The lawsuit was filed on behalf of several youth in custody around the state, including Terry D., who were detained at several different facilities including: Boley School for Boys, Girl’s Town, and Oklahoma Childrens’ Center. Plaintiffs alleged that their constitutional rights were violated due to the conditions and treatment they experienced while in detention.

1. Allegations:

- **Inhumane Conditions:** The lawsuit claimed that the facilities were overcrowded, unsanitary, and lacked adequate medical and mental health care. Children were often hogtied or otherwise restrained unnecessarily and in violation of the Constitution. Some children were left in solitary confinement for periods of up to weeks, having no physical recreation or educational programming.
- **Abuse and Neglect:** There were allegations of physical and verbal abuse by staff, as well as neglect of the juveniles' basic needs.

- **Lack of Due Process:** The plaintiffs argued that they were often detained in solitary confinement without proper hearings and were denied their rights to legal representation and fair treatment under the law.

2. Legal Proceedings:

- The lawsuit sought to address these issues through systemic reforms, demanding improvements in detention conditions and the establishment of better oversight and accountability mechanisms.
- Due to the lawsuit, both the Office of Juvenile Affairs (OJA) and the Oklahoma Commission on Children and Youth (OCCY) were created and given oversight and accountability responsibility, including OJA's ability to investigate, monitor, and license youth detention facilities across the state. OCCY conducts similar accountability investigations, but does not have licensing authority. OCCY maintains an Office of Juvenile Oversight that is highly encouraged to make as many records public as possible of their investigations to increase transparency and citizen involvement.

3. Court Findings and Orders:

- The court found substantial evidence supporting the claims of the plaintiffs, leading to a series of court orders aimed at reforming the juvenile system statewide.
- These orders included mandates for reducing overcrowding, improving health care and sanitary conditions, providing better training for staff, and ensuring that juveniles' legal rights were upheld.

4. Impact and Reforms:

- As a result of the lawsuit, significant changes were implemented within the juvenile justice system statewide.
- The case also set a precedent for juvenile justice reform, highlighting the importance of transparency and protecting the rights and welfare of detained youths.

5. Follow-Up and Compliance:

- Regular monitoring and reporting were required to ensure compliance with the court's orders through 1999.
- Continuous efforts were made to improve the conditions and treatment of juveniles in detention, as well as to address systemic issues within the juvenile justice system.

The **Terry D. v. Rader** case remains a pivotal moment in the history of juvenile justice in Oklahoma, emphasizing the need for ongoing vigilance and advocacy to protect the rights of vulnerable youth populations. There have been many allegations and lawsuits following *Terry D.* that show the issues in the system are not yet resolved.² Cases of sexual abuse, neglect, and more have been filed against FCJJ but also the Tulsa County Jail, which was authorized to hold juveniles until 2021, when federal law prohibited youth from being held with adults.

New hope abounded in 2019-2020 because a new juvenile facility was on the horizon in Tulsa County. Championed by local youth advocates, and made possible by a surplus in funds from Tulsa's Vision 2025 plan, the Tulsa County Family Center for Juvenile Justice represented a huge investment in Tulsa's youth in custody and an opportunity for the staff to start fresh with new facilities and amenities. The \$38 million two story facility features a 100,000 square foot courthouse and administrative building as well as a 47,000 square foot detention center with 63 beds and full-size gymnasium.³

Systemic Failures and Institutional Response

The facility, although necessary for the safety of Tulsa's youth, is only as good as the people who run it and the policies they enforce.

The abuses at the Tulsa County Juvenile Detention Center point to broader systemic failures within the institution. When examining the detailed timeline below, it is obvious that compliance with regulations has been scant since the FCJJ opened in 2020. There has never been an inspection report from OJA that did not call for serious corrective action since the facility opened four years ago.

² Ziva Branstetter, *Group calls for criminal charges as tulsa jail civil lawsuit begins*, Feb. 19, 2016, The Frontier
<https://www.readfrontier.org/stories/group-calls-for-criminal-charges-as-tulsa-jail-civil-lawsuit-begins/>

³ Wallace Design Collective, *Tulca County Family Center for Juvenile Justice*,
<https://wallace.design/inspire/tulsa-county-family-center-for-juvenile-justice/> (last visited June 11, 2024).

Key issues identified include:

- ***Inadequate Staff Training and Supervision:*** Reports have consistently highlighted a lack of proper training for staff members on how to handle juveniles safely and humanely. The facility reportedly is short staffed, so it uses a “half and half” scheduling method which allows half the residents out of their rooms at a time, while the others stay confined. This method is not condoned by OJA because juveniles in custody are required to have twelve hours a day outside their rooms. Furthermore, inadequate supervision and accountability measures have allowed abusive behaviors to persist.
- ***Insufficient Oversight and Accountability:*** Despite multiple investigations and reports, there has been a lack of consistent and effective oversight to ensure the facility complies with state and federal regulations. This has allowed abuses to continue unchecked for extended periods.
- ***Failure to Implement Reforms:*** While some efforts have been made to address the identified issues, many of the recommended reforms from previous OJA inspections and corrective action plans have not been fully implemented or sustained. This has resulted in ongoing problems and repeated, preventable incidents of abuse and neglect.

The pattern of abuse and systemic failures at the Tulsa County Family Center for Juvenile Justice mirrors issues found in juvenile detention centers across the country. The documented physical and sexual abuse, inadequate medical care, and poor living conditions highlight the urgent need for comprehensive reforms to protect the rights and welfare of detained juveniles.

In late May, 2024, Oklahoma Appleseed conducted an open records research project to obtain available public records about current abuses and notifications to proper authorities. The records produced by the Tulsa County Sheriff’s Office, Tulsa Police Department, and Oklahoma Juvenile Authority have been compared with the complaint filed in a federal lawsuit by twenty victims of abuse in the facility on May 23, 2024. The timeline is an amalgamation of critical dates and incidents that occurred in the facility, and which public officials knew and were notified of the systemic abuses. Our hope is that this information will assist the public in advocating for accountability from all of those involved.

Oklahoma Commission on Children and Youth refused to comply with the Open Records Request citing a special provision of law that allows them to deny open records requests they deem investigatory. This is in spite of OCCY Office of

Juvenile Oversight's regulatory scheme, which encourages transparency of their records, even if redaction is necessary.⁴ The FCJJ has not complied with the open records request to date. The Tulsa Mayor's office stated there were no records responsive to the request, even though records from Tulsa Police Department indicate someone called the Mayor's Action Line three times in September 2022 with complaints about the facility.

The intent of the timeline below is to allow Tulsa constituents to understand which elected officials and public bodies knew about the abuses against Tulsa County youth, when they knew, and what they did about these abuses in the timelines that are publicly available.

⁴ Okla. Admin. Code 135:10-3-2

Part III: Detailed Combined Timeline of Incidents in Current Family Center for Juvenile Justice Allegations:

***The following timeline is created by combining dates and descriptions from documents produced in response to open records requests submitted by Oklahoma Appleseed. The documents in question are in the appendix as labeled exhibits.**

December 2019 - Tulsa County Family Center for Juvenile Justice ("FCJJ") opens the new youth detention facility.⁵

February 7, 2020 - Oklahoma Juvenile Authority (OJA) initial inspection of FCJJ..

The facility was cited for Areas of Concern including: the facility rules and grievance procedures were not posted publicly, the cold water button was not operational in one of the individual rooms for youth residents - leaving them with access only to hot water, and the intercom was not operational in another individual room. No corrective action plan was required by OJA. (OJA Records Exhibit 2, pp. 13-16)

July 28, 2020 - OJA inspection of the FCJJ.

The following was reported to OJA: During juvenile interviews it was revealed that the facility was using "special programs" for youth with continued disciplinary issues. Youth on Special Programs were **reportedly on room confinement**, but were brought out of their room for **two hours a day**, and then returned to their room regardless of whether they behaved well in their time out of their room. [Youth in custody are generally required to be out of confinement for twelve hours per day.] Office of Public Integrity (OPI) noted in the inspection that the FCJJ was potentially out of compliance with requirements that juveniles must be "released from separation when they can safely return."⁶ FCJJ staff confirmed the use of "special programs" to OPI. OPI ultimately rated the FCJJ as "compliant with areas of concern" regarding the use of special programs. (OJA Records Exhibit 2, pp 17-20)

The FCJJ was additionally rated as "non-compliant" concerning grievance requirements, personnel records, juvenile programs, and the facility tour, specifically the operation of Unit C. The OPI found FCJJ was not resolving juvenile

⁵ Dee Duren, *Tulsa County Opens New Juvenile Justice Center*, News on 6, (Nov. 2, 2019, 2:16 p.m.), <https://www.news6.com/story/5e36fc15d7e41726956133c8/oklahoma-city-bombing-victims>

⁶ Okla. Admin. Code 377:3-13-44

grievances as required; did not have required references for several staff; lacked required CPR/first aid certification for several staff; lacked adequate staffing for facility needs which led to youth being confined to their rooms during entire shifts; and the entire Unit C was non-operational due to bubbling/peeling of walls. The OPI further noted there was damage to many of the walls of the facility only 5 months after beginning to house youth in detention. (OJA Records Exhibit 2)

Facility directors were aware of staffing issues. Staffing problems had been raised to facility directors following critical incidents involving either serious assault or serious injury/illness. (OJA Records Exhibit 2)

A first corrective action plan was required for the facility.

After this inspection, OJA issued FCJJ a Provisional License to operate, allowing a maximum occupancy of 55 youths. This provisional license was set to expire November 2022. (OJA Records Exhibit 2)

August 9, 2020 – According to OJA records, three residents physically attacked another resident in the gym area. The assailants also assaulted staff that tried to intervene in the fight. Tulsa County Sheriff's Department and Tulsa Police Department were called to assist in the incident.

The records indicate residents were non-compliant by running up and down a hallway and using a staff walkie-talkie to break windows, pull fire alarms and cause other property damage.

Resident damaged a sprinkler head causing an alarm to be activated. (OJA Records Exhibit 2)

April 1, 2021 – OJA inspection of FCJJ.

The inspection found FCJJ non-compliant in two areas: institutional operations/security and control and facility tour. Regarding institutional operations/security and control, OJA found FCJJ was not following regulations regarding room confinement and room restriction. Room confinement is a tool used for major rule violations which risk the safety of the juvenile, other residents, staff or serious property damage.⁷ Room restriction is a tool designed to address

⁷ Okla. Admin. Code 377:3-13-44(c)(14)

lesser behavior issues and is designed to serve as a “cooling off” period for the youth involved.⁸ Room restriction should not exceed 60 minutes.⁹

OJA noted in their inspection that FCJJ staff were not adequately logging room confinement or restrictions. They were not conducting the required 15 minute visual checks when using either tool. They were not complying with the required 3-hour reauthorization for room confinement. They were using the tools to address behavior that did not warrant such restriction or confinement. (OJA Records Exhibit 2).

In sum, FCJJ was over-confining youth without following safety protocols and without appropriate justification.

The facility tour revealed broken windows, non-operation intercoms, broken glass, non-operation toilets, holes in the wall, beds on the ground, and peeling paint.

The facility had been in operation for detention purposes for 16 months..

The OJA inspection also detailed incidents of self-harm/suicidal ideation; serious assaults on other residents and staff requiring Tulsa County Sheriff and Tulsa Police Department assistance; residents obtaining a staff walkie talkie and using it to break windows; serious incidents requiring medical attention; and a catch-all category titled “Other Unexpected Occurrences.” The details of these incidents have been largely redacted by OJA.

The inspection also revealed four Oklahoma Health Department violations during an inspection conducted on January 6, 2021. The Oklahoma State Fire Marshall also noted one deficiency during an inspection conducted on November 24, 2020. Oklahoma Appleseed has requested these documents from the respective agencies and is awaiting a reply.

A second corrective action plan was issued following the inspection. This corrective action plan, if it exists, was not produced in the records requested. (OJA Records Exhibit 2)

April 2021 – OJA licenses FCJJ despite corrective action plan and deficient reviews

Despite a deficient review OJA granted FCJJ a license to operate the facility. The license was set to expire in April 2023. (OJA Records Exhibit 2)

⁸ Okla. Admin. Code 377:3-13-44(c)(13)

⁹ *Id.*

May 3, 2022 – OJA inspection of the FCJJ.

Two years after opening, the FCJJ was found to be non-compliant or compliant with areas of improvement identified in all but two of nine categories of review.

Specifically, OJA found FCJJ “compliant with areas of improvement identified” regarding juvenile records and admin/direct care staff interviews. Regarding juvenile records, among the issues identified were two cases where OJA found the FCJJ did not have court orders in case files which granted FCJJ authority to accept a juvenile currently in the facility. When OJA interviewed direct care staff the following issues were reported:

- Failure to properly conduct overnight resident checks
- Confusion by staff regarding the use of room restriction (referred to in the report as “time-out” and the process for moving a youth to room confinement if appropriate.
- Keeping youth in room restriction or confinement until staff received “Positive Statements,” rather than when the safety risk had dissipated.
- Staff felt “unsure of what to do during emergencies, such as attempted escapes” or actual escapes.
- Staff confirmed youth are overly confined to their rooms and not receiving the required 12-hours each day of time out of their rooms. Staff blamed being understaffed for the unlawful confinement of youth in the facility.
- Staff reported quality of staffing had declined “in favor of quantity.”

Teachers in the facility reported inconsistent schedules due to staffing which inhibited youth from being able to attend school. Only 15 of the 32 juveniles currently in FCJJ were enrolled in school.

OJA found FCJJ was “non-compliant” in the areas of institutional operations/security and control, grievance requirements, personnel records, juvenile interviews, and facility tour.

The areas of non-compliance reveal a total failure by FCJJ to adequately train and staff the facility. Youth were being overly confined to their rooms in isolation from their fellow residents without appropriate justification, documentation, visual checks, and in excess of allowed time – sometimes exceeding 48 hours. Facility administrators were not reviewing the use of confinement as required.

Youth filed as many as 192 grievances since the April 2021 inspection, revealing staffing and confinement as a major complaint for residents, many of which went unresolved or inadequately resolved, with documentation incomplete. The April 2021 inspection revealed 60 grievances, 49 uses of physical force, 99 uses of room confinement, and 82 uses of room restriction. By contrast, the May 2022 inspection showed significant increases to 192 grievances, 324 uses of physical force, 474 uses of room confinement, and 164 uses of room restriction. (OJA Records Exhibit 2).

Critically, OJA noted the presence of a restraint chair at FCJJ. Use of a restraint chair in a facility contracting with or operated by OJA is *prohibited by law*.¹⁰ Facility records and administrators represented to OJA that the restraint chair had not been used in several years. The facility had only been open 2 years and 5 months when the restraint chair was noticed, begging the question why the chair was brought into the facility to begin with..

OJA had no references for any temporary staff. There were no training records or records of policy review as required by regulations. OJA could not assess if staff were qualified to work in the facility because there were no records of educational attainment. FCJJ still failed to meet the requirements of CPR/first aid training for staff.

OJA noted FCJJ was not providing programming to youth. They were not attending school or only attending for 1-2 hours a day. They were not given time for physical activity. They were unable to file timely grievances due to being confined to their rooms. There were serious incidents of abuse requiring reports to the Department of Human Services Office of Client Advocacy (OCA). The details of these incidents have been redacted by OJA. (OJA Records Exhibit 2).

OJA noted new problems at the facility: unsecured beds, broken light fixtures, cracked, broken, or missing windows, sprinkler damage, clogged sinks, no shower curtains, damage to walls and ceilings. OJA noted that Unit C was still completely non-operational, a year after it was first reported as non-operational in April 2021.

Perhaps most shocking, the medication cabinet was left unlocked and unsecured. On a follow up visit the next week, the cabinet was *still* unlocked and unsecured. (OJA Records Exhibit 2).

¹⁰ Okla. Stat. ann. 10 § 2-7-604

There were recurring findings of failing to conduct 15 minute checks, overuse of room confinement/restriction, failing to get appropriate authorizations, and failing to appropriately document the use of room confinement/restriction.

There were 38 critical incidents documented including numerous emergency room visits, incidents of self-harm/suicidal ideation, and the mishandling of medications.

The Oklahoma Health Department had noted 4 violations during inspection on February 28, 2022. The Oklahoma Fire Marshall noted 6 violations during an inspection on February 10, 2022.

A third corrective action plan was issued.

May 6, 2022 – Letter from OJA General Counsel, Ben Brown, to all of the Tulsa County Commissioners outlining concerns with FCJJ.

In the letter Counsel Brown says, in sum, that the inspection revealed that FCJJ is improperly overly confining children to their rooms and they are not getting the needed hours of education required by the Department of Education. Counselor Brown called a meeting to discuss a corrective action plan to be held on May 9, 2022. (OJA Records Exhibit 2)

Cc'ed on the letter were the Juvenile Judge Martha Carter, Facility Director Anthony Taylor, District Attorney Steve Kunzweiler, and Corbin Brewster the Chief Public Defender in Tulsa County at the time.

May 9, 2022 - Meeting between OJA, FCJJ, and County Officials.

OJA, County officials, and detention personnel attended a meeting to discuss the deficiencies identified by OJA during the May 3, 2022 inspection. (OJA Records Exhibit 2) OJA agreed to monitor FCJJ and provide additional assistance to the facility “outside of the facilities [sic] CAP [corrective action plan]”(OJA Records Exhibit 2). OJA conducted this additional monitoring and assistance through May 2023. (Lawsuit Exhibit 1).

May 12, 2022 - OCCY inspection of FCCJ.

Although OCCY has elected *not* to redact and release the findings of their investigation to Oklahoma Appleseed, OJA's subsequent inspection in April 2023

reveals OCCY conducted an inspection of FCJJ on May 12, 2022 and documented two “concerns.”

April 4, 2023 – OJA inspection of FCJJ.

OJA found the FCJJ “non-compliant” in four categories and “compliant with areas of improvement identified” in one category. Surprisingly, OJA found the FCJJ “compliant” concerning juvenile records/rights, but noted “[p]lease ensure court orders with the authority to detain are in all juvenile case files.” The FCJJ had the same issue in May 2022, when they were rated “non-compliant” for juvenile records/rights.

The FCJJ was “compliant with areas of improvement identified” for administrative requirements. Specifically, the FCJJ had not conducted its annual Oklahoma State Fire Marshall inspection.

The FCJJ was “non-compliant” in the areas of: grievance requirements, admin/direct care staff interviews, juvenile interviews, and facility tour. FCJJ was still failing to appropriately document and address youth grievances. Youth reported still having no access to programming, not being allowed the required 12-hours of daily time out of their rooms, and not being provided adequate education. The facility tour revealed the entirety of Unit B was non-operational, clogged toilets, lack of cold water in one individual room, a broken glass door, and wall/door paint peeling.

The most striking violations were revealed during the interviews with direct care staff:

- Staff member on duty while intoxicated.
- Staff member had contraband (cigarettes) in the secure area.
- Grievance Log does not reflect an accurate number of the number of grievances filed by residents.
- OJA asked staff member if the residents were safe in the facility. Staff member said, “No! Not taking care of the residents by not following policies.”
- Residents are NOT out of their rooms for the required 12-hours per day. ½ schedules are still being used, where ½ of the unit would be let out of their rooms while the other half had to remain in their rooms. Staff said, “Not really short-staffed. Upper staff spends most of their time in the supervisor’s office which keeps the kids down.” “Supervisors are not held accountable, and they are the ones who decide what is going to happen on shift.”
- Staff said, “School is a joke! They watch movies and make slime. They also pick worksheets they want to do.”

- Staff said, “Poor leadership causes all the facility issues!”

There were 40 critical incidents reported to OJA during this inspection, including escapes, attempted suicides, emergency room visits, and serious destruction of the facility. OPI received 10 OCA referrals during the assessment period.

The Oklahoma Health Department noted five violations during their inspection on March 29, 2023. Although a new Oklahoma State Fire Marshall inspection was not completed at the time of the OJA inspection, the OJA noted that the issues identified during the February 2022 Fire Marshall inspection were observed as ongoing during the April 2023 OJA inspection.

A fourth corrective action plan was required.

May 3, 2023 – Meeting between OJA General Counsel, Ben Brown, and Tulsa County Public Defenders

On May 3, 2023, OJA Counsel, Ben Brown, met with Tulsa County Public Defender’s Office to address comprehensive concerns including:

- Youth not attending school
- Youth spending significant time on lockdown
- Restriction/Lock down for days at a time
- Discipline used for groups of juveniles instead of individuals
- No regular showers
- Staff intoxicated on illegal substances at work
- Staff smuggling vape pens to residents
- Medications not properly administered

(Lawsuit Exhibit 1)

May 5, 2023 - Letter from OJA General Counsel, Ben Brown, to Tulsa officials placing the facility on probation

General Counsel to OJA, Ben Brown, again notified county officials of the serious deficiencies occurring at FCJJ. **Counsel Brown refuses to re-license the facility and places FCJJ on a 90 day probationary period.** (OJA Records Exhibit 2). Counselor Brown informed county officials that OJA could revoke FCJJ’s license completely if the deficiencies were not adequately addressed. (OJA Records Exhibit 2)

Cc'ed on the letter were: Tulsa County Commissioners Karen Keith, Kelley Dunkerley, and Stan Sallee, Juvenile Judge Kevin Gray, District Attorney Steve Kunzweiler, 1st Assistant DA Erik Grayless, Juvenile Division Director for Tulsa County DA Kim Jantz, Chief Public Defender Corbin Brewster, 1st Assistant Public Defender Lora Howard, Juvenile Division Chief Tulsa County Public Defender Amanda Mims, Tulsa County Juvenile Bureau Director Anthony Taylor, Tulsa County Juvenile Detention Director Cortez Tunley.

***May 17, 2023* - Meeting between OJA, FCJJ, and county officials to address probationary status.**

On May 17, 2023, multiple county officials, the OJA, and FCJJ leadership met to address the deficiencies and the corrective action plan. (OJA Records Exhibit 2).

***May 19, 2023* – Corrective Action Plan established.**

The FCJJ was expected to draft and submit their own corrective action plan (CAP). Importantly, the plan includes admissions by FCJJ that:

1. A staff member was on duty while intoxicated, which resulted in discipline for the employee, but not termination;
2. A staff member brought contraband into the facility, which resulted in discipline for the employee. The employee was eventually terminated for further violations.

***June 2023 - March 2024* - Allegations of Sexual Assault by FCJJ Nurse, Mandi Lee Raymond**

In a lawsuit filed in the United States District Court for the Eastern District of Oklahoma in May 2024, a youth resident alleges they were raped and sexually assaulted by Nurse Mandi Lee Raymond at the FCJJ. Raymond would allegedly prescribe “heat treatments” for the youth victim in a one on one setting in order to engage in rape and sexual exploitation of the youth victim. Raymond would allegedly give youth victim vape pens in exchange for sex. This abuse was never reported to law enforcement. (Lawsuit Exhibit 1).

***June 22, 2023* – Email from OJA’s Licensing Specialist, Gene Carroll, to Tulsa Officials regarding the Corrective Action Plan**

Licensing Specialist for OJA, Gene Carroll, emails county officials acknowledging the corrective action plan. Carroll noted that since May 17, 2023, OJA has conducted multiple facility visits, juvenile interviews, meetings with facility administration, reviewed documents, and reviewed video footage.

Carroll alerted county officials to continued deficiencies at FCJJ including: continued failure to provide 12-hours daily of out of room time to residents; failure to report intoxicated employee to OJA or OCA as required; failure to complete Oklahoma State Fire Marshall inspection. Though, in this inspection report there were improvements noted regarding the grievance procedures and needed documentation.

Carroll then details a list of new deficiencies identified in the month since the CAP was established, including:

- Unequal time for programming for male and female residents;
- Unequal time out of room for male and female residents;
- Failure to conduct 15-minute visual checks;
- Failure to conduct 3-hour reauthorization for room confinement;
- Failure to redirect youth engaged in physical activity such as “mock fighting, pushing, shoving, holding, grabbing, slapping, chasing, etc.” One such incident was allowed to escalate to a multi-person physical fight between residents and staff. Staff used a “possible unapproved method of restraint” to break up the altercation. The incident was not reported to OCA as required. The incident was not reported to OJA as a critical incident;
- Video of residents assisting in the restraint of other residents, even though staff were available, but failed to intervene.

Carroll then reminded the county officials that OJA could reduce the licensed capacity of the facility from 63 beds to 20 beds, which would reduce the amount of contract pay from OJA to FCJJ by “\$987.00 per day.”

Carroll then requested that the FCJJ create and implement a “point-based level system” to provide positive reinforcement for good behavior and provide staff with a tool *other than* isolation through room confinement/restriction to redirect negative behavior. (OJA Records Exhibit 2).

Cc'd on the letter were: County Commissioners Karen Keith, Kelley Dunkerley, and Stan Saltee, Juvenile Judge Kevin Gray, District Attorney Steve Kunzweiler, 1st Assistant DA Erik Grayless, Juvenile Division Director for Tulsa County DA Kim Jantz, Chief Public Defender Corbin Brewster, 1st Assistant Public Defender Lora

Howard, Juvenile Division Chief Tulsa County Public Defender Amanda Mims, Tulsa County Juvenile Bureau Director Anthony Taylor, Tulsa County Juvenile Detention Director Cortez Tunley.

June 2023-August 2023 - Detention Officer DQuan Doyle allegedly engaged in sexual misconduct, trafficking, and bringing contraband into FCJJ

Two youth residents allege they were repeatedly sexually assaulted and harassed by Detention Officer DQuan Doyle.

The youth allege Detention Officer DQuan Doyle provided marijuana gummies to multiple juveniles in the facility.

It is further alleged that Detention Officer DQuan Doyle sent images of his penis and other sexual messages to a former detainee in the facility when she was released.

The youth have also alleged Detention Officer DQuan Doyle made repeated sexually explicit remarks and verbal advances to both youth victims, and allowed them to use his cell phone, use of the computer facilities, and unauthorized freedoms in the facility. (Lawsuit Exhibit 1)

It is also alleged that Detention Officer DQuan Doyle licked one of the female detainees, choked one of the detainees in a sexual manner, grabbed his penis in front of a female detainee, repeatedly tried to get a female detainee to touch him sexually, showed a female detainee a photo of his penis, told a female detainee to lift her shirt and expose her breasts to him, to which she complied. The youth also allege that various other employees of FCJJ, including fellow detention officers, witnessed Detention Officer Doyle's sexual advances and inappropriate conduct toward residents, and encouraged his behaviors. (Lawsuit Exhibit 1)

Finally, it is alleged that Detention Officer DQuan Doyle regularly allowed his victims to have additional privileges like using his cell phone, use of computers, and additional freedoms. (Lawsuit Exhibit 1)

In August 2023, a youth reported sexual abuse by Dquan Doyle in writing and in an interview to FCJJ administrators and staff, in the presence of their attorney. The resident was being interviewed because Detention Officer DQuan Doyle had provided the residents marijuana gummies and multiple residents had tested positive for Marijuana. (Lawsuit Exhibit 1).

June 2023-August 2023 – Detention Officer Cindy Treadway allegedly maintains an inappropriate relationship with a youth resident

As part of her inappropriate contact with the youth resident, it is alleged that Detention Officer Cindy Treadway asked a female detainee to pass romantic notes to another male juvenile detainee with whom she was having an ongoing romantic relationship. She enlisted the female detainee so as to remain undetected. (Lawsuit Exhibit 1)

July 27, 2023 – OJA inspection of FCJJ.

One month after the June 22, 2023 email from Gene Carroll, in which he identifies numerous new deficiencies, the OJA finds that FCJJ has corrected all issues that led to its probation. (OJA Records Exhibit 2).

August 2, 2023 – OJA Licensing Specialist, Gene Carroll email to Tulsa Officials regarding the facility's improvement

Gene Carroll emailed the Tulsa County Commissioners detailing the areas that FCJJ has improved yet says it will take more time to turn the facility around. The probationary license status is extended for an additional 90 days beginning August 4, 2023. He announces that OJA will make monthly visits to the facility starting August 18, 2023. (OJA Records Exhibit 2)

Cc'ed were the County Commissioners Karen Keith, Kelley Dunkerley, and Stan Sallee, Juvenile Judge Kevin Gray, District Attorney Steve Kunzweiler, 1st Assistant DA Erik Grayless, Juvenile Division Director for Tulsa County DA Kim Jantz, Chief Public Defender Corbin Brewster, 1st Assistant Public Defender Lora Howard, Juvenile Division Chief Tulsa County Public Defender Amanda Mims, Tulsa County Juvenile Bureau Director Anthony Taylor, Tulsa County Juvenile Detention Director Cortez Tunley.

August 8, 2023 – D'Quan Doyle Reported for Sexual Battery Against Juvenile Victims

On August 8, 2023, the Tulsa County Sheriff's Office received a report about a detention officer sexually battering a female resident of the FCJJ. Offender named is DQuan Doyle. The report states he was suspended at the time of the disclosure for bringing contraband into the facility. To date, no charges have been filed on

DQuan Doyle for sexual battery or bringing contraband into detention. (Tulsa County Sheriff's Reports Exhibit 3)

August 15, 2023 - Two Juveniles Escape FCJJ.

On August 15, 2023, two teenagers escaped FCJJ. One teen was facing murder charges. The other was facing several charges including assault and battery with a deadly weapon.¹¹

August 23, 2023 – Unannounced visit to FCJJ from OJA.

OJA assessment report of an unannounced visit to FCJJ indicates the residents are out of their rooms for appropriate hours per day, and that the new curriculum is working for the education portion. OJA inspected the outdoor facilities and the fence that two juvenile residents used to escape the facility earlier in the month. FCJJ staff told OJA “some forms of preventive measures are going to be done to the gate area to help eliminate any possible chance” of another escape.

No corrective action is required by OJA, despite two juveniles escaping the facility 9 days earlier. (OJA Records Exhibit 2)

November 2023-May 2024 – Detention Officer Jonathan Hines allegedly engages in serious misconduct including rape, sexual assault, sexual harassment, human trafficking, and molestation

Detention Officer Jonathan Hines has allegedly engaged in an ongoing and prolonged pattern of serious misconduct and sexual violence against youth residents at FCJJ and in the community at-large. The allegations against Hines include:

- Sexually assaulting a child resident of the FCJJ
- Sexually harassing another child resident of the FCJJ by telling a third child resident to tell a fellow resident to “put vaseline on his butt to make sure it didn’t hurt” when Hines had sex with him.
- Showing child residents videos of him having sex with another juvenile facility employee and him raping another child detainee in the facility.

¹¹ Kaitlyn Deggs, *2 Juveniles Escape from Tulsa County Detention Center*, News on 6, (Aug. 15, 2023, 7:26 a.m.), <https://www.newson6.com/story/64da9f7576e4f007292abdca/2-juveniles-escape-from-tulsa-county-detention-center>

- Sexually harassing a child resident by telling him that his “dick looked big today.”
- Propositions a child resident and touching his leg at least once.
- Providing vape pens to residents.
- Requiring one resident to take his pants off before bed, asserting that this was facility policy.
- Touching a child resident’s behind at least once.
- Calling a juvenile resident “cute” while he was allowing the resident to facetime shirtless with his girlfriend.
- Disclosing to a child resident that he was paying other residents to have sex with him.
- Attempted to touch another child resident’s genitals.
- Keeping naked photos of yet another child resident on his phone.

(Lawsuit Exhibit 1)

***November 2, 2023* - OJA inspection of FCJJ.**

OJA again found the FCJJ was still not adequately training its staff on use of room confinement/restriction. OJA noted that FCJJ staff are using the term “population control.” The term refers to a procedure at FCJJ during a major incident or when understaffed. OJA also found that residents were not consistently receiving 12 hours of daily time out of their rooms. OJA reminded the FCJJ administrators that over-confining and over-isolating youth “were some of the initial concerns of OJA in the beginning of the probationary period, so addressing this with staff needs to be done immediately.” OJA then elected to rate FCJJ as “compliant with areas of improvement identified” for this issue.

***November 7, 2023* – Gene Carroll letter to OJA General Counsel Ben Brown**

Carroll sent a letter to General Counsel for OJA, Ben Brown, stating that the facility should receive a full 2 year permanent license to operate beginning on November 8, 2023. (OJA Records Exhibit 2)

***December 6, 2023* – OJA General Counsel Ben Brown letter to Tulsa Officials denying licensure due to continued failings**

Ben Brown, General Counsel to OJA, notified Tulsa County Commissioners and other county officials that, against the recommendation of his inspector, he is not recommending a permanent license and is instead extending the probationary

period for another 90 days due to FCJJ continued noncompliance with specific concerns. (OJA Records Exhibit 2)

Cc'ed to the letter were: County Commissioners Karen Keith, Kelley Dunkerley, and Stan Sallee, Juvenile Judge Kevin Gray, District Attorney Steve Kunzweiler, 1st Assistant DA Erik Grayless, Juvenile Division Director for Tulsa County DA Kim Jantz, Chief Public Defender Corbin Brewster, 1st Assistant Public Defender Lora Howard, Juvenile Division Chief Tulsa County Public Defender Amanda Mims, Tulsa County Juvenile Bureau Director Anthony Taylor, Tulsa County Juvenile Detention Director Cortez Tunley.

January 30, 2024 – OJA inspection of FCJJ

OJA found FCJJ “non-compliant” concerning the use of room confinement/restriction and failing to notify OJA of the use of 48-hour room confinement.

The report indicates FCJJ still is not allowing juveniles the proper number of hours outside confinement. There was also concern whether the juveniles were receiving enough food. There was significant damage to the facility. A note in the report states this damage was done by residents who qualify for in-patient services but due to “lack of beds” they remained in detention. The inspector notes that “short staffing” continues to be the reason juveniles are not let out of their rooms for the proper number of hours. OJA again requires a corrective action plan. (OJA Records Exhibit 2)

FCJJ reported staffing as a continuing problem for the facility. FCJJ largely blamed the lack of adequate staff as a reason for the failure to ensure programming and over-using isolation tools to control behavior.

OJA required a fifth corrective action plan.

February 16, 2024 - OJA Monthly Detention Facility Monitor Report

OJA noted in its February 2024 Facility Monitor Report that a broken camera had been reported in January 2024, though that report does not appear in the January 2024 OJA inspection. The Monitor Report does not identify the location of the broken camera. The broken camera was still not operational as of February 29, 2024. (OJA Records, Exhibit 2).¹²

¹² The lawsuit brought by multiple juvenile residents alleges that cameras on Unit B are inoperable and have been since June 2023. (Lawsuit Exhibit 1)

February 2024 – FCJJ Permanent License

FCJJ receives a permanent license to operate from OJA which will expire February 2026. (OJA Records Exhibit 2)

March 9, 2024 – DO Hines allegedly molested a child relative

Detention Officer Hines sexually molested a child relative while babysitting. Hines took photos of the child's genitalia. A police report was filed March 9, 2024. The report was allegedly disclosed and disseminated to the facility and to OJA. Despite the police report of sexual molestation, Detention Officer Hines remained employed until late April 2024. (Lawsuit Exhibit 1)

March 12, 2024 - DO Hines allegedly perpetrated a sexual battery on an FCJJ resident

TCSO received a report of an incident with another FCJJ resident detailing DO Hines offer of "a phone and vape pen" if the child would allow Hines to touch his buttocks. The child reported DO Hines did in fact touch his buttocks and made lewd comments to the child.

April 6th, 2024 – DO Hines raped one of the FCJJ residents a subsequent time

The youth victim alleges Detention Officer Hines raped the child a second time, this time the act was witnessed by several other residents. (Lawsuit Exhibit 1)

April 16th, 2024 - FCJJ learns of DO Hines April 6, 2024 conduct

Curtice Williams, FCJJ Assistant Superintendent, reported to TCSO that he learned about Hines conduct on April 16, 2024. TCSO were not called until April 17, 2024. (PC Affidavit, CF-24-1559 Exhibit 4).

April 17th, 2024 – Hines April 6, 2024 rape was reported by FCJJ to TCSO

Upon learning of the rape, FCJJ initiated an internal investigation was initiated. Currington sent an email to multiple parties including various personnel at OJA, however Currington did not notify the child's attorney of the disclosure. (Lawsuit Exhibit 1)

Tulsa County Sheriff's Officers responded to FCJJ and began a report on the rape investigation. Hines admitted to bringing candy and snacks into FCJJ. The investigation reveals DO Hines began deleting content from his phone during his initial interview with TCSO.

The report details that Hines was bringing in snacks and candy for the residents. It discusses the fact that Hines was known on the unit to bring in items like gummies and vape pens in exchange for sex. The report alleges that the child victim was going to be paid for sex with Hines and he was "taking one for the team," so that Hines would continue to smuggle contraband into the detention center. (Lawsuit Exhibit 1, Tulsa County Sheriff's Reports Exhibit 3, PC Affidavit Exhibit 4)

April 19, 2024 – FCJJ unidentified DO allegedly threatened child rape victim through child's attorney

A female detention officer working for FCJJ allegedly threatened the child rape victim through the child's legal counsel in the parking lot of the facility. The Detention Officer approached the child's attorney and told the attorney that the child victim needed to "keep his mouth shut," and that "he got what he bargained for." (Lawsuit Exhibit 1)

April 24th, 2024 – Public Defender disclosed DO threats to FCJJ and OJA

Public Defender Juvenile Division Supervisor emailed OJA and FCJJ administrators notified including: Director Anthony Taylor, Superintendent Doug Currington, and OJA Director Jeffrey Cartmell about the threat in the parking lot, and the "culture" in the facility that puts the children in its custody in harm's way. (Lawsuit Exhibit 1)

April 24th, 2024 – Tulsa County Judge Kevin Gray emailed OJA and FCJJ regarding the events coming to light at FCJJ

Judge Kevin Gray issued correspondence to Director Anthony Taylor, Superintendent Doug Currington, and OJA General Counsel Ben Brown acknowledging the report from the Public Defender regarding the DO's statements to the child victim's attorney. Judge Gray reminded them of their obligations under the Prison Rape Elimination Act (PREA) and requesting the detention officers receive additional training. Director Taylor responded to this email claiming that "the facility's continued improvement is evident in the increased confidence of employees when working with complex and hostile residents." At this point, Director Taylor knew the child resident had been raped two weeks before.

He stated, the facility “continues to receive accolades from our state licensing agency (OJA), which monitors our facility monthly.” (Lawsuit Exhibit 1)

April 25, 2024 – Tulsa County Public Defender requested OJA take action regarding FCJJ

Tulsa County Public Defender’s Office again sent an email to OJA Counsel Ben Brown, OJA Director Jeff Cartmell, Judge Kevin Gray, and Judge Dawn Moody requesting immediate action regarding the facility. The public defenders inform the judges and OJA that they will “get the ball rolling” on a federal lawsuit if action is not taken. (Lawsuit Exhibit 1)

April 26, 2024 - DO Hines charged in Tulsa County District Court

Detention Officer Hines is charged with Child Trafficking, Carrying a Cellphone into a Detention Facility, and Destruction of Evidence by the Tulsa County District Attorney. He is arraigned on April 29th, 2024. (Tulsa County CF-2024-1559) (OSCN.net)

April 29, 2024 – OJA issues monthly monitor report for April 2024.

Monthly detention monitor report wherein the inspector states, “Detention admin continue to be very transparent and open with monitor, providing easy access to any requested information or video. Questions are answered readily and admin is very honest about struggles within the facility. Monitor receives weekly reports of all incidence reports and grievances filed, as well as emails regarding any critical incidents.” (OJA Records Exhibit 2)

May 1, 2024 – The public first learns of the heinous allegations surrounding FCJJ

This story broke to the public on Channel 8 in Tulsa. Oklahoma Appleseed Center for Law and Justice released a statement calling for an independent investigation and for the Tulsa County District Attorney to recuse to eliminate a conflict of interest. Both requests were denied.

May 6, 2024 – FCJJ undergoes leadership change

Director Taylor is terminated from his position. Alondo Edwards was installed as interim director. (Lawsuit, Exhibit 1)

May 23, 2024 – Litigation filed against FCJJ, OJA, and individual actors

Lawsuit filed in the Federal District Court for the Eastern District of Oklahoma on behalf of twenty victims who were residents of the facility and suffered sexual abuses and neglect.

June 6, 2024 – Hines received additional charges

Former detention officer Jonathan Hines is indicted for Soliciting a Minor for Indecent Exposure/Photographs, and Carrying a Cell Phone into a Detention Facility. (Tulsa County CF-2024-2030). (OSCN.net)

EXHIBIT 1 – FEDERAL CIVIL RIGHTS LAWSUIT COMPLAINT FILED MAY 23, 2024 ON BEHALF OF 20 VICTIMS HELD IN FCJJ CUSTODY

EXHIBIT 2 - DOCUMENTS PRODUCED BY OKLAHOMA JUVENILE
AUTHORITY IN RESPONSE TO OPEN RECORDS REQUEST

EXHIBIT 3 - DOCUMENTS PRODUCED BY TULSA COUNTY SHERIFF'S
OFFICE IN RESPONSE TO OPEN RECORDS REQUEST

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF OKLAHOMA

(1) CHILD DOE 1, a minor, by and through
parent and next friend, PARENT DOE 1;

(2) CHILD DOE 2, a minor, by and through
parent and next friend, PARENT DOE 2;

(3) CHILD DOE 3, a minor, by and through
parent and next friend, PARENT DOE 3;

(4) JANE DOE 1;

(5) CHILD DOES 4-20;

Plaintiffs,

v.

(1) TULSA COUNTY, ex. rel. JUVENILE
BUREAU OF THE TULSA COUNTY
DISTRICT COURT;

(2) ANTHONY TAYLOR; as former Director
of the Juvenile Bureau;

(3) ALONDO EDWARDS, as Acting
Director of the Juvenile Bureau;

(4) DOUGLAS CURRINGTON, as
Superintendent of the Juvenile Bureau;

(5) CORTEZ TUNLEY, as former
Superintendent of the Juvenile Bureau;

(6) JONATHAN HINES, former detention
officer of the Juvenile Bureau;

(7) AUSTIN ZENZEN, former detention
officer of the Juvenile Bureau;

(8) DQUAN DOYLE, former detention
officer of the Juvenile Bureau, aka "DQ;"

FILED

MAY 23 2024

BONNIE HACKLER
Clerk, U.S. District Court

By _____
Deputy Clerk

Case No: CIV 24-182-JAR

ATTORNEY LIEN CLAIMED
JURY TRIAL DEMANDED

EXHIBIT 1

- (9) MANDI LEE RAYMOND, former employee of the Juvenile Bureau;
- (10) CINDY TREADWAY, former employee of the Juvenile Bureau;
- (11) JANE DOE 1, aka "DO Shalonda," current or former detention officer of the Juvenile Bureau;
- (12) JANE DOE 2, aka "DO Kelly," current or former detention officer of the Juvenile Bureau;
- (13) JANE DOE 3, aka "Miss Carrie," current or former detention officer of the Juvenile Bureau;
- (14) JANE DOE 4, aka "Miss Torrie," current or former detention officer of the Juvenile Bureau;
- (15) JOHN DOES 1-10, current and former detention officers of the Juvenile Bureau;
- (16) JANE DOES 5-14, current and former detention officers of the Juvenile Bureau;
- (17) STATE OF OKLAHOMA, ex rel. OFFICE OF JUVENILE AFFAIRS;
- (18) JEFFREY CARTMELL, as Director for the Office of Juvenile Affairs;
- (19) RACHEL HOLT, as former Director for the Office of Juvenile Affairs;
- (20) BEN BROWN, as General Counsel for the Office of Juvenile Affairs; and,
- (21) BOARD OF COUNTY COMMISSIONERS OF TULSA COUNTY;

Defendants.

COMPLAINT

COMES NOW the Plaintiffs, CHILD DOE 1, a minor, by and through parent and next friend, PARENT DOE 1; CHILD DOE 2, a minor, by and through parent and next friend, PARENT DOE 2; CHILD DOE 3, a minor, by and through parent and next friend, PARENT DOE 3; JANE DOE 1; and, CHILD DOES 4-20 (collectively “Plaintiffs”), by and through their attorneys of record, and for their causes of action against the Defendants, alleges and states as follows:

INTRODUCTORY STATEMENT

1. Plaintiff CHILD DOE 1, a minor, was incarcerated at the Detention Home of the Juvenile Bureau of the Tulsa County District Court (hereinafter “Juvenile Detention Center”) for the period including April 2024.
2. Plaintiff CHILD DOE 2, a minor, was incarcerated at the Juvenile Detention Center for the period of November 2023 to May 2024.
3. Plaintiff CHILD DOE 3, a minor, was incarcerated at the Juvenile Detention Center for the period of February 2024 to May 2024.
4. Plaintiff JANE DOE 1, an adult, was incarcerated at the Juvenile Detention Center for the period of June 2023 to August 2023.
5. For the length of Plaintiffs’ detentions, Defendants failed to provide Plaintiffs with adequate and safe housing, supervision, and security in order to protect them from the known risk of serious physical harm, including but not limited to rape and/or sexual abuse.
6. Over the course of Plaintiffs’ detentions at the Juvenile Detention Center, each was sexually assaulted, harassed, and/or raped by detention officers or other staff at the Juvenile

Detention Center, to-wit, including but not limited to, Defendant Jonathan Hines; Defendant Austin Zenzen; Defendant Dquan Doyle; Defendant Cindy Treadway; Defendant Raymond; Defendants John Does; and Defendant Jane Does. As detention officers and other employees, it was Defendants duty to protect Plaintiffs from harm. However, rather than protect them, these Defendants preyed on Plaintiffs. Knowing the deficiencies in safety and security within the Juvenile Detention Center where their actions would be unmonitored and knowing of the persistent inadequate staffing, these Defendants had total control over juvenile detainees like Plaintiffs. In an utter betrayal of public trust and duty, these Defendants exploited their positions of power to rape and sexually assault defenseless minor children.

7. The rapes and sexual assaults and harassments upon Plaintiffs were eminently preventable. These heinous crimes were the foreseeable result of Defendants' policies, practices and/or customs of inadequate housing, supervision, and security. In sum, Defendants' deliberate indifference toward Plaintiffs' health and safety was a direct and proximate cause of their injuries and damages.

JURISDICTION AND VENUE

8. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1343 to secure protection of and to redress deprivations of rights secured by the Eighth Amendment and Fourteenth Amendment to the United States Constitution as enforced by 42 U.S.C. § 1983, which provides for the protection of all persons in their civil rights and the redress of deprivation of rights under color of law.

9. The jurisdiction of this Court is also invoked under 28 U.S.C. § 1331 to resolve a controversy arising under the Constitution and laws of the United States, particularly the Eighth and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983.

10. Venue is proper under 28 U.S.C. § 1391(b)(1) because one or more Defendant(s) are subject to this court's personal jurisdiction with respect to the civil action in question. Defendant Dquan Doyle is a resident of Wagoner County, which is in the Eastern District of Oklahoma.

11. Venue is also proper under 28 U.S.C. § 1391(e)(1)(C) because one or more Defendant(s) are subject to this court's personal jurisdiction with respect to the civil action in question. Defendant State of Oklahoma ex. rel. Office of Juvenile Affairs ("OJA") is subject to this Court's personal jurisdiction.

12. Venue is proper under 28 U.S.C. § 1391(c)(2) because this action does not involve real property and at least one or more of the Plaintiffs, CHILD DOES 8-30 is believed to be a resident of Muskogee County.

PARTIES

13. Plaintiffs are residents of Tulsa County, Oklahoma.

14. Defendant Tulsa County ex. rel. Juvenile Bureau of the Tulsa County District Court ("Juvenile Bureau") is an agency within Tulsa County, which is incorporated as a county under the law of the State of Oklahoma and is located in Tulsa County, State of Oklahoma. Defendant Juvenile Bureau contracts, through Defendant Board of County Commissioners of Tulsa County ("Tulsa County Commissioners"), with Defendant OJA, "for secure detention services." The Juvenile Bureau's mission is "to provide the necessary programming to address the criminal justice needs of Tulsa County youth and families."

15. Defendant Anthony Taylor is the former Director of the Juvenile Bureau, who was, in part, responsible, during the relevant timeframes for this lawsuit, for overseeing Plaintiffs' health and well-being, and assuring that housing and security needs of Plaintiffs and other

juveniles were met, during the time they were in the custody of the Juvenile Detention Center.

16. Defendant Alondo Edwards is the Acting Director of the Juvenile Bureau, who was, in part, responsible, during the relevant timeframes for this lawsuit, for overseeing Plaintiffs' health and well-being, and assuring that housing and security needs of Plaintiffs and other juveniles were met, during the time they were in the custody of the Juvenile Detention Center.

17. Defendant Douglas Currington is the Superintendent of the Juvenile Bureau, who was, in part, responsible, during the relevant timeframes for this lawsuit, for overseeing Plaintiffs' health and well-being, and assuring that housing and security needs of Plaintiffs and other juveniles were met, during the time they were in the custody of the Juvenile Detention Center.

18. Defendant Cortez Tunley is the former Superintendent of the Juvenile Bureau, who was, in part, responsible, during the relevant timeframes for this lawsuit, for overseeing Plaintiffs' health and well-being, and assuring that housing and security needs of Plaintiffs and other juveniles were met, during the time they were in the custody of the Juvenile Detention Center.

19. Defendant Jonthan Hines is a former detention officer of the Juvenile Bureau, who raped and sexually assaulted and harassed multiple Plaintiffs and other juveniles, during the time they were in the custody of the Juvenile Detention Center.

20. Defendant Austin Zenzen is a former detention officer of the Juvenile Bureau, who sexually assaulted and abused at least one juvenile, possibly others, during the time they were in the custody of the Juvenile Detention Center.

21. Defendant Dquan Doyle is a former detention officer of the Juvenile Bureau, who sexually assaulted and abused multiple Plaintiffs and other juveniles, during the time they were in the custody of the Juvenile Detention Center.

22. Defendant Mandi Lee Raymond is a former nurse of the Juvenile Bureau, who raped and sexually assaulted and harassed at least one Plaintiff and other juveniles, during the time they were in the custody of the Juvenile Detention Center.

23. Defendant Cindy Treadway is a detention officer, either current or former, of the Juvenile Bureau, who knowingly and intentionally allowed the sexual assault and harassment of multiple Plaintiffs and other juveniles to occur, both at the hands of Juvenile Bureau detention officers and staff as well as other detainees, during the time they were in the custody of the Juvenile Detention Center.

24. Defendant JANE DOE 1, aka "DO Shalonda" is a detention officer, either current or former, of the Juvenile Bureau, who knowingly and intentionally allowed the sexual assault and harassment of multiple Plaintiffs and other juveniles to occur, both at the hands of Juvenile Bureau detention officers and staff as well as other detainees, during the time they were in the custody of the Juvenile Detention Center.

25. Defendant JANE DOE 2, aka "DO Kelly" is a detention officer, either current or former, of the Juvenile Bureau, who knowingly and intentionally allowed the sexual assault and harassment of multiple Plaintiffs and other juveniles to occur, both at the hands of Juvenile Bureau detention officers and staff as well as other detainees, during the time they were in the custody of the Juvenile Detention Center.

26. Defendant JANE DOE 3, aka "Miss Carrie" is an employee, either current or former, of the Juvenile Bureau, who knowingly and intentionally allowed the sexual assault and harassment of multiple Plaintiffs and other juveniles to occur, both at the hands of Juvenile Bureau detention officers and staff as well as other detainees, during the time they were in the custody of the Juvenile Detention Center.

27. Defendant JANE DOE 4, aka “Miss Torrie” is an employee, either current or former, of the Juvenile Bureau, who knowingly and intentionally allowed the sexual assault and harassment of multiple Plaintiffs and other juveniles to occur, both at the hands of Juvenile Bureau detention officers and staff as well as other detainees, during the time they were in the custody of the Juvenile Detention Center.

28. Defendants JOHN DOES 1-10 and JANE DOES 5-14 are employees, either current or former, of the Juvenile Bureau, who either sexually abused and assaulted, or knowingly and intentionally allowed the sexual assault and harassment of, multiple Plaintiffs and other juveniles to occur, both at the hands of Juvenile Bureau detention officers and staff as well as other detainees, during the time they were in the custody of the Juvenile Detention Center.

29. Defendant State of Oklahoma ex. rel. Office of Juvenile Affairs is an agency within the State of Oklahoma, which is subject to this court's personal jurisdiction with respect to the civil action in question and is located across the State of Oklahoma. Defendant OJA contracted with the Defendant Tulsa County Commissioners and the Defendant Juvenile Bureau regarding the Juvenile Detention Center. Additionally, Defendant OJA was given the management of the State of Oklahoma's juvenile affairs, including providing justice for serious and habitual juvenile offenders.

30. Defendant Jeffrey Cartmell is the Director for Defendant OJA, who “shall be responsible for the care and custody of a youthful offender who has been placed in the custody of the Office of Juvenile Affairs and shall have the duty and the authority to provide food, clothing, shelter, ordinary medical care, education, discipline and in an emergency to authorize surgery or other extraordinary care.” OKLA. STAT. tit. 10A, § 2-5-212(D). This includes responsibility for the Plaintiffs and other juveniles in the Juvenile Detention Center.

31. Defendant Rachel Holt is the former Director for Defendant OJA, until October 2023, who was “responsible for the care and custody of a youthful offender who has been placed in the custody of the Office of Juvenile Affairs and shall have the duty and the authority to provide food, clothing, shelter, ordinary medical care, education, discipline and in an emergency to authorize surgery or other extraordinary care.” OKLA. STAT. tit. 10A, § 2-5-212(D). This includes responsibility for the Plaintiffs and other juveniles in the Juvenile Detention Center.

32. Defendant Ben Brown is the General Counsel for Defendant OJA, who “shall be responsible for the care and custody of a youthful offender who has been placed in the custody of the Office of Juvenile Affairs and shall have the duty and the authority to provide food, clothing, shelter, ordinary medical care, education, discipline and in an emergency to authorize surgery or other extraordinary care.” OKLA. STAT. tit. 10A, § 2-5-212(D). This includes responsibility for the Plaintiffs and other juveniles in the Juvenile Detention Center.

33. Defendant Board of County Commissioners of Tulsa County is an administrative and business management entity, within Tulsa County, which is incorporated as a county under the law of the State of Oklahoma and is located in Tulsa County, State of Oklahoma. Defendant Tulsa County Commissioners are responsible for the execution of a wide range of legal and fiscal responsibilities, including oversight of the Juvenile Bureau. Defendant Tulsa County Commissioners contracted with Defendant OJA regarding the Juvenile Detention Center. Defendant Tulsa County Commissioners approved a \$13,070,125.00 budget for “juvenile detention” expenses, out of a \$17.5 million budget total for “court related” items for the 2023-2024 fiscal year.

FACTUAL ALLEGATIONS

34. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 33, as

though fully set forth herein.

35. Plaintiffs were in the custody of the Juvenile Detention Center at various period of time from June 2023 to the present. During these periods of custody, Plaintiffs were all minors.

36. On May 9, 2022, representatives of Defendant OJA met with Tulsa County representatives and stakeholders to discuss concerns that were raised as a result of the 2022 [OJA] Office of Public Integrity (OPI) licensing and certification assessment for [the Juvenile Detention Center].

37. Between May 9, 2022 and May 5, 2023, Defendant OJA continued to monitor developments at the Juvenile Detention Center, making unannounced visits regularly to address these concerns.

38. On May 3, 2023, Defendant Brown met with the Tulsa County Public Defender's Office to address comprehensive concerns about the Juvenile Detention Center. At that meeting, Defendant Brown acknowledged the public defender's following concerns:

- a. The juvenile resident did not go to school regularly;
- b. The juvenile residents spent significant amounts of time on lockdown, during all hours of the day and on weekends;
- c. The juvenile residents stayed on restriction/lockdown for days at a time, as opposed to hours;
- d. Discipline was utilized for groups of juvenile residents, as opposed to individuals;
- e. Juvenile residents were not allowed to take regular showers;
- f. Juvenile Detention Center staff was intoxicated on illegal substances while at work;
- g. Juvenile residents were getting "vape pens" in the Juvenile Detention Center; and,
- h. Medications were not being properly dispensed, administered or monitored

for compliance.

39. On May 5, 2023, Defendant OJA placed the Juvenile Detention Center on probation. In a letter to Defendant Tulsa County Commissioners, Defendant Brown noted that issues that “have remained out of compliance for the past 11 months,” included “youth being kept in their rooms/isolated, education concerns, and problems handling grievances and their resolutions.”

40. On May 17, 2023, a meeting was held to address a corrective plan, due to the Juvenile Detention Center’s probationary status. In attendance at this meeting, among others, were Defendant Holt, Defendant Brown, Defendant Taylor, Defendant Edwards, Defendant Tunley, as well as various representative from the Tulsa County District Attorney’s office, the Tulsa County Public Defender’s office, and a Tulsa County Commissioner.

41. Despite the purpose of the meeting being the formation of a corrective plan, Defendant Juvenile Bureau denied issues at the Juvenile Detention Center. At least one member of the Tulsa County Public Defender’s office advised the Defendant Tulsa County Commissioners, at that time, that it was subjecting itself to a federal civil rights lawsuit if it did not correct the conditions within the Juvenile Detention Center.

42. The Juvenile Detention Center policies and procedures state that “[s]exual abuse of an inmate, detainee, or resident by another inmate, detainee, or resident includes any of the following acts, with or without consent of the detainee or resident, is coerced into such act by overt or implied threats of violence, or is unable to consent or refuse. **No juvenile in custody can legally consent to sexual behavior.**” Policy 00-01, PREA Compliance Requirement at IV(C). Tulsa County Juvenile Detention Home, Policy and Procedure Manual (“Manual”), Policy 00-01, PREA Compliance Requirement at IV(C) (emphasis in original).

43. The Manual further provides that the “Tulsa County Juvenile Detention Home (TCJDH) in accordance with State Statute 10A O.S., § 1-2-101 and the Oklahoma Office of Juvenile Affairs Policy, has a ZERO TOLERANCE stance towards all forms of sexual abuse and sexual harassment. TCJDH will take appropriate action to prevent, detect, and respond to all forms of sexual abuse and sexual harassment in compliance with the Prison Rape Elimination Act (PREA) of 2003.” Manual at Policy 00-02, Prison Rape Elimination Act (PREA) of 2003, PREA Compliance, Coordinated Facility Response at I.

44. From June 2023 to March 2024, JUVENILE VICTIM 1 was in custody at the Juvenile Detention Center. During this period of detention, JUVENILE VICTIM 1 was raped and sexually assaulted, multiple times, by Defendant Raymond, who was a nurse at the Juvenile Detention Center during that time.

45. Defendant Raymond would proscribe “heat treatments” for JUVENILE VICTIM 1 and provide said treatments in a one-on-one setting, in order to engage in sexual relations with JUVENILE VICTIM 1.

46. The Juvenile Detention Center policies and procedures states that “Employees will not provide any juvenile/client with any item(s) of contraband, i.e., any item(s) prohibited for all juveniles/clients by Juvenile Bureau or department/facility policy or prohibited for a specific juvenile/client or group of juveniles/clients by administrative or supervisory directive.” Tulsa County, Juvenile Bureau of the District Court/Administration & Management/Personnel Policies, Policy File Number JBDC 0005, Policy Code of Conduct (“Code of Conduct”) at ¶ 11.

47. Defendant Raymond would provide JUVENILE VICTIM 1 with “vape pens” or e-cigarettes in exchange for JUVENILE VICTIM 1 having sex with Defendant Raymond.

48. The Juvenile Detention Center policies state that “[a]ny staff member with a

substantiated allegation of the sexual abuse or harassment of a resident shall be terminated and reported to local authorities for legal prosecution.” Manual at Policy 00-01, PREA Compliance Requirement at IV(D).

49. By the end of 2023, JUVENILE VICTIM 1’S parent reported that her child had received “vape pens” to Defendant Currington.

50. Defendant Raymond was never terminated but was merely transferred from Juvenile Detention Center to David L. Moss Correctional Center; however, upon information and belief, to date, none of the Defendants, including Defendant Juvenile Bureau or Defendant OJA, nor any of their personnel or representatives, ever made a child abuse referral pursuant to OKLA. STAT. tit. 10A, § 1-2-201.

51. Plaintiff JANE DOE 1 and Plaintiff ADULT VICTIM 1 were both in custody at the Juvenile Detention Center from June 2023 to August 2023. During this period of time both JANE DOE 1 and ADULT VICTIM 1 were repeatedly sexually assaulted and harassed by Defendant Doyle.

52. The Code of Conduct states that “Employees will not bring or cooperate with others in bringing illegal drugs, unauthorized weapons or ammunition, beverages containing alcohol, or other dangerous items into or upon any Juvenile Bureau or other Tulsa County facility, building or vehicle, or onto any surrounding grounds, parking area or property.” Code of Conduct at ¶ 12.

53. At least from June 2023 to August 2023, Defendant Doyle provided marijuana gummies and other marijuana-based products to multiple juveniles in the Juvenile Detention Center, including JANE DOE 1 and ADULT VICTIM 1.

54. Under the Code of Conduct, “Employees will avoid contact with current and

former clients outside the context of professional interaction. NOTE: Contact with current and former clients is unacceptable if such contact is nonprofessional, social, and/or otherwise inappropriate, unless approval of the interaction has been obtained in advance from the department supervisor or facility director. (Department supervisors and facility directors may have differing levels of tolerance in this regard. Employees are thus encouraged not to violate the contact prohibition without first obtaining guidance concerning the department/facility's specific contact policies.)” Code of Conduct at ¶ 47(a).

55. At some point between June 2023 and August 2023, ADULT VICTIM 1 was released for a period of time from custody. During her period of release, Defendant Doyle sent ADULT VICTIM 1 unprovoked messages requesting sex and sending a picture of Defendant Doyle’s penis.

56. Between June 2023 and August 2023, among other things, Defendant Doyle:

- a. entered JANE DOE 1’s cell, to “snake” her toilet and licked her;
- b. choked JANE DOE 1 in a sexual manner;
- c. grabbed his penis in front of JANE DOE 1;
- d. repeatedly attempted to get JANE DOE 1 to grab and touch him in a sexual manner;
- e. showed JANE DOE 1 a picture of his penis; and,
- f. told JANE DOE 1 to “lift” her shirt and expose her breasts to him, to which she complied.

57. Between June 2023 and August 2023, Defendant Doyle stated to ADULT VICTIM 1 that he “found” ADULT VICTIM 1’s friend on Facebook, while ADULT VICTIM 1 was using the women’s restroom.

58. Between June 2023 and August 2023, Defendant Doyle repeatedly made sexually-explicit remarks and verbal advances to both JANE DOE 1 and ADULT VICTIM 1.

59. Between June 2023 and August 2023, Defendant Doyle regularly gave JANE DOE 1 and ADULT VICTIM 1 unauthorized privileges, such as use of his cellphone, use of the

computer facilities in the Juvenile Detention Center, and unauthorized freedoms within the physical spaces of the Juvenile Detention Center.

60. From June 2023 to the present, the cameras in Unit B, JANE DOE 1's and ADULT VICTIM 1's unit, of the Juvenile Detention Center have been inoperable. Upon information and belief, Unit B was originally a male unit but the female residents were transferred there, due to the camera issues. The inoperable camera situation was made known to the residents in the Juvenile Detention Center and provided the ability for multiple policy violations and resident abuses.

61. Between June 2023 and August 2023, Defendant Treadway recruited JANE DOE 1 to write and pass romantic notes to a male juvenile resident, with whom Defendant Treadway was engaged in an ongoing relationship.

62. The Manual States that "It is the responsibility of every staff member to report possible sexual abuse or sexual harassment or residents or any person in our environment. Manual at Policy 00-02, Prison Rape Elimination Act (PREA) of 2003, PREA Compliance, Coordinated Facility Response at IV(C).

63. From June 2023 to August 2023, Defendant Treadway, Defendant JANE DOE 1, aka "DO Shalonda," Defendant JANE DOE 2, aka "DO Kelly," Defendant JANE DOE 3, aka "Miss Carrie," and Defendant JANE DOE 4, aka "Miss Torrie," all witnessed and personally observed Defendant Doyle's sexually inappropriate behavior and other inappropriate conduct, regarding JANE DOE 1 and ADULT VICTIM 1, as well as other juvenile residents of the Juvenile Detention Center, and not only failed to intervene, but actually encouraged Defendant Doyle's behaviors.

64. Prior to their release from the Juvenile Detention Center, both JANE DOE 1 and

ADULT VICTIM 1 where interviewed, in the presence of their lawyers, after multiple juvenile residents tested positive for marijuana, because Defendant Doyle had provided several residents gummies.

65. During her interview, JANE DOE 1 disclosed Defendant Doyle's sexual assaults and harassments, as well as the various improprieties from multiple Defendants, directly to Defendant Juvenile Bureau personnel, including Defendant Taylor and Defendant Currington, among others. JANE DOE 1 also provided a written statement as a part of this interview.

66. During her interview, ADULT VICTIM 1 also disclosed multiple improprieties regarding Juvenile Detention Center personnel, including Defendant Doyle and specifically disclosed the inoperable cameras in "Unit B." ADULT VICTIM 1's interview was recorded.

67. From November 2023 to May 2024, CHILD DOE 2 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 2 was sexually assaulted and harassed by Defendant Hines, who was a detention officer at the Juvenile Detention Center during that time.

68. From November 2023 to May 2024, Defendant Hines told CHILD DOE 2 to tell CHILD DOE 1 to put "Vaseline" on CHILD DOE 1's butt to make sure it did not hurt when Defendant Hines had sex with CHILD DOE 1.

69. CHILD DOE 2 witnessed Defendant Hines rape of CHILD DOE 1.

70. From November 2023 to May 2024, Defendant Hines showed CHILD DOE 2 pornography, including videos of Defendant Hines having sex with other Juvenile Detention Center personnel and videos of Defendant Hines raping other juvenile detainees at the Juvenile Detention Center.

71. Between November 2023 and May 2024, Defendant Hines told CHILD DOE 2

that “your dick is big today.”

72. Between November 2024 and May 2024, Defendant Hines propositioned CHILD DOE 2 on multiple occasions and CHILD DOE 2 touched Defendant Hines’ leg at least once.

73. From January 2024 to March 2024, JUVENILE VICTIM 3 was in custody at the Juvenile Detention Center. During this period of detention, JUVENILE VICTIM 3 was sexually assaulted and harassed by Defendant Hines.

74. From January 2024 to March 2024, Defendant Hines would show pornographic images and videos to JUVENILE VICTIM 3 on his Apple Watch. These videos would include Defendant Hines having sex with other individuals.

75. From January 2024 to March 2024, Defendant Hines would supply JUVENILE VICTIM 3 with marijuana-based products.

76. Between January 2024 to March 2024, Defendant Hines made sexually inappropriate comments to JUVENILE VICTIM 3, such as “Goodnight, Honey Buns” as JUVENILE VICTIM 3 was going to bed.

77. From February 2024 to the present, JUVENILE VICTIM 2 was in custody at the Juvenile Detention Center. During this period of detention, JUVENILE VICTIM 2 was sexually assaulted and harassed by Defendant Hines.

78. From February 2024 to the present, Defendant Hines would require JUVENILE VICTIM 2 to take his pants off to go to bed, inferring to JUVENILE VICTIM 2 that this was Juvenile Detention Center policy.

79. From February 2024 to the present, Defendant Hines provided “vape pens” and sodas to JUVENILE VICTIM 2, multiple times.

80. From February 2024 to the present, Defendant Hines would allow JUVENILE

VICTIM 2 to use his personal cellphone to have videoconference calls with his girlfriend. JUVENILE VICTIM 2 was shirtless for one or more of these calls.

81. Between February 2024 to the present, Defendant Hines called JUVENILE VICTIM 2 “cute” while JUVENILE VICTIM 2 was on a FaceTime call with his girlfriend, who observed the interaction.

82. Between February 2024 to the present, Defendant Hines touched JUVENILE VICTIM 2’s butt on at least one occasion.

83. From February 2024 to the present, Defendant Hines disclosed to JUVENILE VICTIM 2 that he was paying other juvenile residents money in exchange for performing sex acts with those resident.

84. From February 2024 to April 2024, JUVENILE VICTIM 4 was in custody at the Juvenile Detention Center. During this period of detention, JUVENILE VICTIM 4 was sexually assaulted and harassed by Defendant Hines.

85. Between February 2024 and April 2024, Defendant Hines attempted to sexually touch JUVENILE VICTIM 4 while he was alone in his cell, including attempting to touch JUVENILE VICTIM 4’s genitals.

86. Upon information and belief, inappropriate photographs of JUVENILE VICTIM 4 were found on Defendant Hines’ phone.

87. Between February 2024 and April 2024, Defendant Hines propositioned JUVENILE VICTIM 4 on multiple occasions.

88. Between February 2024 and April 2024, Defendant Hines provided JUVENILE VICTIM 4 with marijuana-based products.

89. Upon information and belief, Defendant Hines attempted to contact JUVENILE

VICTIM 4 after being released from custody in the Juvenile Detention Center.

90. From February 2024 to May 2024, CHILD DOE 3 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 3 was sexually assaulted and harassed by other juvenile residents in the presence of Juvenile Detention Center personnel, who failed to intervene or prevent said abuses.

91. Between February 2024 and May 2024, CHILD DOE 3 was sexually threatened by a group of juvenile residents and disclosed the harassment/threats to Juvenile Detention Center staff.

92. At no point did Defendant Juvenile Bureau address or rectify CHILD DOE 3's disclosures or follow up on the allegations of harassment.

93. From February 2024 to May 2024, the Juvenile Detention Center was personally aware of CHILD DOE 3's diagnoses of Attention Deficit/Hyperactivity Disorder, Oppositional Defiant Disorder and Intellectual Development and Disability; however, Defendant Juvenile Bureau never gave CHILD DOE 3 correct prescription dosages for various medications.

94. The Manual does not contain any provision that allows the Juvenile Detention Center to mandate a haircut for a juvenile resident. Further, the Manual specifically states that "[h]air style will be limited only to a shorter cut of the 'existing style cut' that the resident has. No 'buzz cut' or drastic departure from that style cut may be made. Such as long hair to a 'Bald Cut.' Only conservative modification of the hair is acceptable, whether male or female resident." Manual at Policy 04-07, Hair Care Services at IV(B)(3).

95. Between February 2024 to May 2024, the Juvenile Detention Center forced CHILD DOE 3 to cut off all their hair, from long to short, in direct violation of the Manual.

96. On March 9, 2024, Defendant Hines molested his stepsister's child, while

babysitting for her. Defendant Hines previously took pictures of the child's genitalia. A contemporaneous police report of the March 9, 2024 incident was prepared and, presumably, disclosed and disseminated to the Defendant Juvenile Bureau and Defendant OJA, respectively. Defendant Hines remained employed well into April 2024.

97. From March 2024 to April 2024, CHILD DOE 1 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 1 was raped by Defendant Hines.

98. On April 6, 2024, Defendant Hines physically raped CHILD DOE 1. This rape was witness by multiple juvenile resident at the Juvenile Detention Center, including one or more of the Plaintiffs.

99. Upon information and belief, the April 6, 2024 incident is not the only instance of sexual abuse perpetrated by Defendant Hines upon CHILD DOE 1 during CHILD DOE 1's detention at the Juvenile Detention Center.

100. The discovery of CHILD DOE 1's rape resulted in the Tulsa County criminal felony case, styled *State of Oklahoma v. Jonathan Michael Hines*, CF-2024-1559. Defendant Hines remains in custody on charges of human trafficking, possession of a cellphone in jail, and destroying evidence.

101. As of April 16, 2024, the Defendant Juvenile Bureau was aware of CHILD DOE 1's rape and had not disclosed the incident to CHILD DOE 1's legal counsel.

102. On April 17, 2024, Defendant Currington disclosed the April 6, 2024 rape and noted that an "internal investigation" was initiated. Defendant Currington's email was sent to multiple parties, including various personnel with Defendant OJA; however, Defendant Currington excluded CHILD DOE 1's legal counsel from said disclosures.

103. On April 19, 2024, at approximately 6:30 p.m., a Juvenile Detention Center female

detention officer threatened CHILD DOE 1, through counsel, into silence regarding the April 6, 2024 rape. Specifically,

- a. The female detention officer approached a Tulsa County public defender in the parking lot of the Juvenile Detention Center;
- b. The detention officer stated to counsel that “you need to tell your client to keep his mouth shut.”
- c. The detention officer also disclosed that the Juvenile Detention Center employees were instructing the juvenile residents that if any of them discuss the April 6, 2024 incident, “detention will get shut down and all of the kids will be sent to [David L. Moss], and you know what happens to kids at DLM.”
- d. The detention officer stated that “what happened” between CHILD DOE 1 and Defendant Hines was agreed upon and between them, so everyone should just let it go.
- e. The detention officer stated that CHILD DOE 1 got what he bargained for.

104. On April 24, 2024, at 11:03 a.m., Tulsa County Public Defender Juvenile Division Supervisor notified various personnel with Defendant OJA and Defendant Juvenile Bureau, specifically including Defendant Taylor, Defendant Currington, and Defendant Cartmell, about the April 19, 2024 incident regarding a female detention officer and noting a “culture” within the Juvenile Detention Center that promotes harm to the juvenile detainees.

105. On April 24, 2024 at 11:27 a.m., Judge Kevin Gray issued correspondence to Defendant Taylor, copying Defendant Currington and Defendant Brown, noting his receipt of the correspondence sent earlier that morning by the Tulsa County Public Defender’s office and further noting his concerns. Judge Gray stated:

AT,
I'm sure you read the email from Ms. Feldhake that she sent a short while ago. They brought the detention officer's conversation to my attention yesterday, and it is quite disturbing. I do agree that it worries me that this exemplifies a culture that might not understand the magnitude of the responsibility that detention officers carry with them as they care for some of our most vulnerable young citizens. I would ask that there be a mandatory meeting and training done as soon as possible to discuss issues surrounding inappropriate contact with detainees, specifically sexual contact. I know that you know this, but it appears that some of the staff either does not know or simply disagrees with the reality that it is a crime to engage in ANY sexual

contact with a detainee, even if that contact is initiated by or done willingly by a detainee. Not only is it a crime, but a conviction of such a crime will place an offender on the Sex Offenders Registry. Additionally, I would like for a part of that training to make clear to the detention officers that it is absolutely inappropriate for them to encourage the detainees not to talk about incidents, not to report incidents, or to otherwise share information they have about incidents. It is astonishing to me that someone would make such comments to our detainees. The detainees should ABSOLUTELY be reporting such contact to supervisors and/or their attorneys, and detention leadership should address the issues appropriately. The staff also needs to be informed (because clearly this particular detention officer does not know) that federal and state law would not allow our detainees to be simply transferred to DLM if our detention facility were to either close or lose its license. If they don't know, they need to be educated about the law. It appears to me that any mention of DLM to the detainees would be designed to frighten or otherwise intimidate the detainees into silence. That is also unacceptable and inappropriate.

Additionally, I would like to review our detention center's policies regarding the reporting of critical incidents such as the one that occurred the other day, to take into account the related but particular needs of both a personnel investigation and a criminal investigation. I understand the need to make sure that detention ascertains quickly what, if any, incident occurred so as to take proactive action regarding suspending or otherwise reassigning personnel until a thorough investigation is completed. That said, we must ensure that a personnel investigation neither hampers nor harms any subsequent criminal investigation. We also need to ensure that all detention leadership is clear on who needs to be informed about such an incident, when they need to be informed, and what law enforcement agency should take the lead on any criminal investigation. It is my position that as soon as any safety or security issues are quickly resolved, that law enforcement needs to be IMMEDIATELY called to initiate a criminal investigation. The delay in engaging law enforcement should not be measured in days, but likely in minutes or an hour. Coupled with that should be immediate notification to a detainee's parents and attorney, not as an afterthought but as a quick response to the incident. I would like to ensure that our policies and procedures reflect these positions. If not, they need to be updated and/or changed.

106. At 3:55 p.m. that same day, Defendant Taylor responded to Judge Gray's email noting that he had identified the female detention officer from the April 19th interaction with the public defender and that she denied making those comments. In that same email, Defendant Taylor noted that "[o]ur continued improvement is reflected in *the increased confidence of employees* when working with complex and hostile residents." To be clear Defendant Taylor was undisputedly aware that Defendant Hines, his employee, raped CHILD DOE 1 approximately

two weeks earlier.

107. In that same communication, Defendant Taylor also touted that the Juvenile Detention Center “continue to receive accolades from our state licensing agency, which monitors our facility monthly.” Defendant OJA is that “licensing agency.”

108. On April 25, 2024, correspondence was sent from the Tulsa County Public Defender’s Office to Defendant Brown, copying Defendant Cartmell and Tulsa County District Judges Kevin Gray and Dawn Moody, requesting “immediate action regarding Tulsa County Juvenile Detention.” The correspondence outlined:

- a. the April 6, 2024 rape incident;
- b. past incidents of sexual assault that had occurred within the confines of the Juvenile Detention Center in the past eighteen (18) months; and
- c. The April 19, 2024 physical threats made by a female detention officer to the Tulsa County public defender in an attempt to bully CHILD DOE 1 into silence.

The correspondence concluded noting “[i]f immediate action is not taken to ensure the safety of these children, [the Tulsa County Public Defender’s Office] will not hesitate to get the ball rolling so that a federal lawsuit may be brought.”

109. On May 6, 2024 Defendant Taylor was fired as Director of Defendant Juvenile Bureau. Defendant Edwards, who was the First Deputy Director at the time, replaced Defendant Taylor as Acting Director.

110. To date, no publicly-available corrective action, by either Defendant Juvenile Bureau or Defendant OJA, has occurred to protect the children held within the confines of the Juvenile Detention Center.

111. Relative to juvenile rights, the Manual states as follows:

The Oklahoma Juvenile Code (10 O.S. 7302-6.3) defines the rights of a juvenile in

custody. This policy is not intended to infringe on the stated rights of any juvenile, but put in place an organized predictable system of discipline that is consistent with the goals and mission of the Detention Home. This system is designed to utilize positive approaches that encourage the juvenile to be personally responsible for his or her actions. The degree of disciplinary actions, sanctions, or related restrictions initiated on a resident shall be directly related to the severity of the rule broken as detailed in the resident orientation form and disciplinary guidelines. The objective of disciplinary sanctions shall be to hold residents accountable and encourage responsible behavior within the program.

Manual at Policy 03-28, Disciplinary Guidelines at I. Even juvenile residents under “room confinement” per the Juvenile Detention Center policy “shall be afforded living conditions, essential services and privileges approximating those available in the program. No resident will be denied access to mail, daily exercise, regular phone calls, *visitation*, access to attorney or worker due to disciplinary sanction.” *Id.* at 5(c) (emphasis added).

112. Furthermore, “A denial of visitation privileges shall be based on the safety, security, and order of the facility and the safety of the individuals involved. The resident shall be notified in writing the Supervisor of a denial of visitation that includes the name of the restricted or prohibited visitor, the name of the person making the decision, and the resident’s right to appeal the decision.” Manual at Policy 05-10, Resident Visitor Program at B(1).

113. At the latest, by May 2023, Defendant Juvenile Bureau and Defendant OJA were put on notice that swaths of juvenile residents were being placed on “lockdown” during all hours of the day, in clear violation of policy.

114. It is the visitation policy within the Juvenile Detention Center that juvenile residents can only have visitation, even with family members, during the weekends.

115. During their periods of detainment, multiple juvenile Plaintiffs reported having their rights to visitation with their family members revoked, even for infractions as minor as having “two books” in their cell. These infractions and restrictions often came in tandem with those same

juveniles declining to perform specific sexual acts with various detention officers and/or personnel within the Juvenile Detention Center, including but not limited to multiple Defendants.

116. Defendant Juvenile Bureau and Defendant OJA have exhibited a clear culture of weaponizing a disciplinary system into not only retaliating against juvenile residents who refuse to comply with the sexual advances of the detention officers and other personnel within the Juvenile Detention Center, but also to cut off those juvenile residents from any means of contemporaneously reporting sexual abuse, even rape, to their family members, instead becoming wholly reliant on the reporting system within the very administration that allowed the abuses in the first place.

117. There is extraordinary vulnerability of any persons who are detainees of an incarceration facility to be preyed upon by the detention personnel; however, these vulnerabilities are compounded for juvenile detainees. For this reason, the law of the State of Oklahoma specifically protects such persons. Under Oklahoma criminal statutes, any state, federal, county, municipal or political subdivision employee who has sexual intercourse with a person under the supervision of a sheriff is guilty of the crime of rape. OKLA STAT. tit. 21, § 1111(A)(7). These same laws protect minors even further. *Id.* at § 1111(A)(1) and (8).

118. Various Defendants' acts of depravity and crimes were facilitated by a total breakdown in supervision, security and housing within the Juvenile Detention Center.

119. Despite the Juvenile Detention Center being placed on probation in May 2023 for documented May 2022 violations, Defendant Juvenile Bureau, Defendant OJA and Defendant Tulsa County Commissioners, as well as individual Defendants, Taylor, Edwards, Currington, Tunley, Cartmell, Holt, and Brown did nothing to change the policies, procedures, or culture of the Juvenile Detention Center.

120. Upon learning of the May 2023 legitimate concerns from the Tulsa County Public Defenders' Office, Defendant Juvenile Bureau, Defendant OJA and Defendant Tulsa County Commissioners, as well as individual Defendants, Taylor, Edwards, Currington, Tunley, Cartmell, Holt, and Brown did nothing to change the policies, procedures, or culture of the Juvenile Detention Center.

121. Upon learning that JUVENILE VICTIM 2 was raped by Defendant Raymond in mid- to late-2023, Defendant Juvenile Bureau, Defendant OJA and Defendant Tulsa County Commissioners, as well as individual Defendants, Taylor, Edwards, Currington, Tunley, Cartmell, Holt, and Brown did nothing to change the policies, procedures, or culture of the Juvenile Detention Center.

122. Upon learning of the that JANE DOE 1 and ADULT VICTIM 1 were sexually assaulted and harassed by Defendant Doyle by August 2023, Defendant Juvenile Bureau, Defendant OJA and Defendant Tulsa County Commissioners, as well as individual Defendants, Taylor, Edwards, Currington, Tunley, Cartmell, Holt, and Brown did nothing to change the policies, procedures or culture of the Juvenile Detention Center.

123. Despite receiving definitive proof that CHILD DOE 1 was raped by Defendant Hines in April 2024, Defendant Juvenile Bureau, Defendant OJA and Defendant Tulsa County Commissioners, as well as individual Defendants, Taylor, Edwards, Currington, Tunley, Cartmell, Holt, and Brown did nothing to change the policies, procedures, or culture of the Juvenile Detention Center.

124. The Juvenile Detention Center promotes rape culture within its walls and each and every one of the Defendants is culpable, in some fashion, for committing said act, promoting said culture or for turning a blind eye, despite overwhelming information, evidence, and

documented proof that said depravities were occurring to children, for years.

125. Defendants failed to provide adequate housing, supervision, and security for Plaintiffs as juvenile detainees.

126. Defendants' deliberate indifference to the clear and present risks to Plaintiffs' safety, as well as the deliberate indifference to the incontrovertible proof of rape incidents, was a direct and proximate cause of each of Plaintiffs' serious injuries and damages.

127. Defendants' deliberate indifference to the safety and welfare of Plaintiffs is evinced by their persistent violation of numerous provisions of the Manual, listed above, as well as the Prison Rape Elimination Act ("PREA"), adopted by Defendant OJA in December 2019. In fact the PREA states at the very beginning:

The Office of Juvenile Affairs (OJA) has a ZERO-TOLERANCE toward all forms of sexual abuse and sexual harassment. OJA will take appropriate action to prevent, detect, and respond to all forms of sexual abuse and sexual harassment in compliance with the Prison Rape Elimination Act (PREA) of 2003. (115.311 (a))

128. Among other provisions, the PREA further states:

- Retaliation - An act of vengeance, covert or overt action, or threat of action, taken against a juvenile in response to the juvenile's complaint of sexual misconduct, in the reporting or investigation of sexual misconduct, regardless of the merits or the disposition of the complaint is prohibited. Examples of acts of retaliation are unnecessary discipline, intimidation, unnecessary changes in work or program assignments, unjustified transfers or placements and unjustified denials of privileges or services.
- Institutional Superintendents shall ensure that facility staff discourage and prevent sexual misconduct by providing clear definitions of prohibited conduct, establishing uniform methods for the prompt reporting and investigation of allegations of misconduct, and prescribing sanctions for both substantiated misconduct and false allegations. Sexual misconduct between staff and juveniles, volunteers or contract personnel and juveniles, regardless of consensual status, is prohibited and subject to administrative and criminal disciplinary sanctions.
- Institutional Superintendents shall develop, implement, and document a staffing plan that provides for adequate levels of staffing, and, where

applicable, video monitoring, to protect juveniles against sexual abuse. (115.313 (a))

- When designing or acquiring new facilities and in planning any substantial expansion or modification of existing facilities, OJA shall consider the effect of the design, acquisition, expansion, or modification upon OJA's ability to protect juveniles from sexual abuse. (115.318 (a)) D.
- When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, OJA shall consider how such technology may enhance OJA's ability to protect juveniles from sexual abuse. (115.318 (b))
- OAC 377:3-1-25. Abuse, neglect, and caretaker misconduct of a child in OJA custody and placed in a secure facility or other facility operated by or through contract with OJA
 - (a) Requirements for reporting incidents of abuse and neglect. Title 10A O.S. § 1-2-101 requires every person who, in good faith and exercising due care, has reason to believe that a child under the age of eighteen (18) is a victim of abuse or neglect to report the condition or incident to the appropriate office for investigation through the DHS statewide centralized hotline. For the purposes of the reporting requirements for this subchapter, abuse shall include sexual abuse and sexual harassment. An employee who, in good faith and exercising due care, has reason to believe that a child is a victim of abuse or neglect shall make an immediate, verbal or email report, as required by 10A O.S. § 1-2-101 and to the supervisor who shall ensure a report is made to the OJA Office of Advocate General, or as required by 10A O.S. § 1-2-102 to the DHS hotline, when: (1) the employee has reason to believe such child has been the victim of abuse or neglect; (2) a child, parent, guardian, or other person makes an allegation of abuse or neglect of such child. ...
- All OJA staff shall report immediately any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency; retaliation against juveniles or staff who reported such an incident; and any staff neglect or violations of responsibilities that may have contributed to an incident or retaliation. (115.361 (a))
- All allegations of sexual abuse or sexual harassment are referred for administrative or criminal investigation. (115.322 (a)(b))

Each of these provisions states widely accepted minimum standards for the operation of

Oklahoma juvenile detention facilities. The failure to uniformly and consistently observe such standards evidences deliberate indifference to the safety and security of juvenile detainees, generally, and Plaintiffs specifically. These standards were clearly and flagrantly violated. The sexual rapes, abuses, harassment, etc., of Plaintiffs resulted from a total and complete breakdown in the minimum supervision, security, and housing practices that Defendants, across the board, are required to provide and/or ensure are followed.

129. Defendants' deliberate indifference to Plaintiffs' health and safety was in furtherance of and consistent with: (a) policies which Defendant Juvenile Bureau and Defendant OJA, as well as the individual Defendants Taylor, Taylor, Edwards, Currington, Tunley, Cartmell Holt, and Brown, promulgated, created, implemented, or possessed responsibility for the Juvenile Detention Center's operation; and (b) established procedures, customs, and/or patterns and practices.

130. Defendant Juvenile Bureau failed to promulgate and implement adequate housing and supervision policies responsive to the specific needs of juvenile detainees at the Juvenile Detention Center. Defendant Juvenile Bureau has long been aware of instances of inappropriate and improper sexual contact at the Juvenile Detention Center, including rape and sexual abuses between staff members/detention officers and juvenile detainees, which can qualify as felony rape under Oklahoma law. Consistent with past practices, in the present case, when Defendant Juvenile Bureau was on notice of sexual contact between staff and juveniles, nobody notified the District Attorney's office, the Public Defender's office, or the Oklahoma Department of Human Safety. Defendant Juvenile Bureau failed to take adequate corrective action to prevent additional instances and harm.

131. Despite knowledge of inappropriate sexual contact, Defendants Taylor, Edwards,

Currington, and Tunley failed to provide adequate facilities or promulgate and implement adequate policies, training, procedures, and guidelines to ensure the safety of juvenile detainees. The lack of adequate and appropriate supervision for juvenile detainees and the utter lack of guidance for employees to follow at the Juvenile Detention Center as to the standard of supervision, security and care for juvenile detainees demonstrates a failure to train, failure to supervise, and deliberate indifference toward known risks to the health and safety of detainees like Plaintiffs.

132. Defendant Juvenile Bureau, as well as individual Defendants Taylor, Edwards, Currington and Tunley, have promulgated, and in fact profited, off perpetuating rape culture. Through their deliberate indifference and conscious choices, these Defendants have knowingly allowed juvenile detainees, including Plaintiffs, to be raped, sexually abused, exploited, and harassed by multiple staff and personnel within the Juvenile Detention Center. Indeed, Defendants have been aware of these facts and circumstances since mid-2023, likely before, and have elected to do nothing to change the policies, practices, procedures, or supervision within the Juvenile Detention Center. Such action, and intentional inaction, amounts to deliberate indifference toward known risks to the health and safety of detainees like Plaintiffs.

133. “The Office of Juvenile Affairs shall be responsible for the care and custody of a youthful offender who has been placed in the Office of Juvenile Affairs and shall have the duty and the authority to provide food, clothing, shelter, ordinary medical care, education, discipline and in an emergency to authorized surgery or other extraordinary care.” OKLA. STAT. tit. 10A, § 2-5-212(D).

134. Despite their statutory responsibility, Defendant OJA, as well as individual Defendants Cartmell, Holt, and Brown, failed to promulgate and implement adequate safety

measures to address the needs of the juvenile detainees at the Juvenile Detention Center. Despite Defendant OJA's "ZERO-TOLERANCE policy" for sexual abuse, these Defendants' not only deferred their statutory responsibilities to Plaintiffs to Defendant Juvenile Bureau but also undisputed evidence that juvenile detainees were being raped, sexually abused and harassed and physically abused by the personnel, detention officers and staff at the Juvenile Detention Center for a considerable amount of time. Indeed, Defendants have been aware of these facts and circumstances since mid-2023, likely before, and have chosen to do nothing to intervene in the pervasive culture within the Juvenile Detention Center. Such action, and intentional inaction, amounts to deliberate indifference toward known risks to the health and safety of juvenile detainees like Plaintiffs.

135. Among other things, Defendant Tulsa County Commissioners is responsible for approving an annual budget for Defendant Juvenile Bureau, which includes the day-to-day operation of the Juvenile Detention Center. In this regard, Defendant Tulsa County Commissioners were aware of Defendant Juvenile Bureau's non-compliance in the operation of the Juvenile Detention Center in May 2022 and received formal, written, documentation of the continued non-compliance in May 2023. Defendant Tulsa County Commissioners were further made personally aware of the continued deficiencies at the Juvenile Detention Center at a multi-agency meeting on May 17, 2023. Defendant Tulsa County Commissioners were well aware that these deficiencies, over the span of at least two (2) years, perpetuated an undue and preventable risk to juvenile detainees at the Juvenile Detention Center, for rape, sexual abuse and harassment. Despite this knowledge, Defendant Tulsa County Commissioners approved a more than \$13 million budget for "juvenile detention" for the 2023-2024 fiscal year, thereby intentionally allowing a deficient Juvenile Detention Center to continue its ongoing operation and, by proxy,

perpetuate the ongoing rape culture within its confines. Such action, and intentional inaction, amounts to deliberate indifference toward known risks to the health and safety of juvenile detainees like Plaintiffs.

136. Defendants Hines, Zenzen, Doyle, Treadway, and Raymond each, individually and separately, committed one or more sexual abuses on juvenile detainees, including but not limited to Plaintiffs, during their periods of employment at the Juvenile Detention Center. Such action clearly amounts to deliberate indifference toward known risks to the health and safety of juvenile detainees like Plaintiffs.

137. Defendants Treadway, JANE DOE 1, aka “DO Shalonda,” JANE DOE 2, aka “DO Kelly,” JANE DOE 3, aka “Miss Carrie,” and JANE DOE 4, aka “Miss Torrie,” each witnessed, and maintained personal knowledge of, one or more sexual abuses on juvenile detainees, including but not limited to Plaintiffs, during their periods of employment at the Juvenile Detention Center. Despite this personal knowledge, each of these Defendants not only elected not to report these abuses but conspired to further allow these abuses to continue within the Juvenile Detention Center. Such action clearly amounts to deliberate indifference toward known risks to the health and safety of juvenile detainees like Plaintiffs.

138. Upon information and belief, Defendants JOHN DOES 1-10 and JANE DOES 5-14 each either committed one or more sexual abuses on juvenile detainees, or witnessed or had personal knowledge of such abuses, including but not limited to Plaintiffs, during their periods of employment at the Juvenile Detention Center. Such action clearly amounts to deliberate indifference toward known risks to the health and safety of juvenile detainees like Plaintiffs.

CLAIMS FOR RELIEF

I. CRUEL AND UNUSUAL PUNISHMENT IN VIOLATION OF THE EIGHTH AND FOURTEENTH AMENDMENTS TO THE CONSTITUTION OF THE UNITED STATES

STATES (42 U.S.C. § 1983)

- A. Allegations Applicable to:**
- i. Defendant Juvenile Bureau;**
 - ii. Defendant OJA;**
 - iii. Defendant Tulsa County Commissioners;**
 - iv. Defendant Taylor;**
 - v. Defendant Edwards;**
 - vi. Defendant Currington;**
 - vii. Defendant Tunley;**
 - viii. Defendant Cartmell;**
 - ix. Defendant Holt; and,**
 - x. Defendant Brown**

139. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 138, as though fully set forth herein.

140. Each of these Defendants knew of the potential for harm to Plaintiffs as juvenile detainees within the Juvenile Detention Center because of the lack of adequate and appropriate facilities, supervision and/or security for such juvenile detainees.

141. By May 2023, each of these Defendants possessed actual knowledge, in writing, of the inadequate facilities, supervision and security within the Juvenile Detention Center, which gave rise to the heightened risks of sexual abuses and harassment, including rape, to the juvenile detainees, including Plaintiffs.

142. By May 17, 2023, each of these Defendants was placed on actual notice, at a multi-agency meeting involving each of these Defendants, of the abuses suffered by multiple juvenile detainees within the Juvenile Detention Center.

143. Each of these Defendants failed to provide adequate facilities, supervision and/or security to Plaintiffs while each was detained at the Juvenile Detention Center.

144. Each of these Defendants' acts and/or omissions as alleged herein, including, but not limited to, their failure to provide Plaintiffs with adequate and appropriate housing, adequate

supervision, adequate security and/or to take other measures to protect them from sexual abuses, constitute deliberate indifference to Plaintiffs' needs, health and safety.

145. As a direct and proximate result of each of these Defendants' conduct, Plaintiffs experienced and continue to experience pain and suffering, severe emotional distress, mental anguish, and the damages alleged herein.

B. Allegations Applicable to:
i. Defendant Taylor;
ii. Defendant Edwards;
iii. Defendant Currington;
iv. Defendant Tunley;
v. Defendant Cartmell;
vi. Defendant Holt; and,
vii. Defendant Brown

146. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 145, as though fully set forth herein.

147. Each of these Defendants knew of the actual harms being sustained by the Plaintiffs as juvenile detainees within the Juvenile Detention Center because of the lack of adequate and appropriate facilities, supervision and/or security for such juvenile detainees.

148. By at least May 17, 2023, Defendants Holt, Brown, Taylor, Edwards and Tunley were individually placed on actual notice, at a multi-agency meeting involving attended by each of these Defendants, of the abuses suffered by multiple juvenile detainees within the Juvenile Detention Center.

149. By at least the end of August 2023, JANE DOE 1 and ADULT VICTIM 1 each disclosed Defendant Doyle's sexual abuse and other abuses, upon both themselves and other juvenile detainees within the Juvenile Detention Center, directly to Defendants Taylor and Currington.

150. By the end of 2023, JUVENILE VICTIM 1's parent reported that Defendant

Raymond provided JUVENILE VICTIM 1 with “vape pens,” directly to Defendant Currington.

151. By at least April 17, 2024, Defendant Currington admitted actual knowledge of the April 6, 2024 rape incident between CHILD DOE 1 and Defendant Hines, which occurred at the Juvenile Detention Center.

152. By at least April 18, 2024, Defendant Brown was placed on written notice of the April 6, 2024 rape incident.

153. By April 24, 2024, Defendants Taylor, Currington and Brown were all placed on written notice of the incident on April 19, 2024, wherein a female detention officer with the Juvenile Detention Center threatened CHILD DOE 1 to keep silent on the rape incident involving Defendant Hines and confessed to similarly threatening all the juvenile detainees to keep silent, all in the presence of a juvenile Tulsa County Public Defender. In response, Defendant Taylor summarily denied the interaction to Judge Kevin Gray and touted the Juvenile Detention Center’s recent accolades, provided by Defendant OJA, as proof of the “safe environment for the youth in our care.”

154. By April 25, 2024, the Tulsa County Public Defender specifically pleaded with Defendant Brown, including Defendant Currington in the correspondence, to shut down the Juvenile Detention Center, to prevent children from being raped and sexually abused. The correspondence noted that federal litigation was likely imminent if Defendant OJA and/or Defendant Juvenile Bureau refused to act.

155. Each of these Defendants failed to provide adequate facilities, supervision, and/or security to Plaintiffs while each was detained at the Juvenile Detention Center, specifically after being made aware of the specific abuses sustained by the Plaintiffs, as well as other juvenile detainees.

156. Each of these Defendants' acts and/or omissions alleged herein including, but not limited to, their failure to provide Plaintiffs with adequate and appropriate housing, adequate supervision, adequate security and/or to take other measures to protect them from sexual and other abuses, constitute deliberate indifference to Plaintiffs' needs, health, and safety.

157. As a direct and proximate result of each of these Defendants' conduct, Plaintiffs experienced and continue to experience pain and suffering, severe emotional distress, mental anguish, and the damages alleged herein.

- C. Allegations Applicable to:**
- i. Defendant Hines;**
 - ii. Defendant Zenzen;**
 - iii. Defendant Doyle;**
 - iv. Defendant Treadway; and,**
 - v. Defendant Raymond**

158. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 157, as though fully set forth herein.

159. Each of these Defendants sexually abused one or more of the juvenile detainees within the Juvenile Detention Center, between June 2023 and the present.

160. On April 30, 2024, Defendant Currington disclosed that Defendant Zenzen sexually abused a male juvenile detainee, by grabbing his genitals, while said detainee was using the restroom.

161. Between June 2023 and May 2024, Defendant Raymond raped JUVENILE VICTIM 1. Defendant Raymond would exchange "vape pens" for sex with JUVENILE VICTIM 1. Defendant Juvenile Bureau and Defendant OJA were made aware of this relationship, sometime in 2023, and transferred Defendant Raymond to David L. Moss as a corrective measure.

162. Between June 2023 and August 2023, Defendant Doyle repeatedly sexually abused JANE DOE 1 and ADULT VICTIM 1 and further abused an unknown number of juvenile

detainees within the Juvenile Detention Center, resulting in the widespread dissemination of marijuana-based products through the Juvenile Detention Center.

163. By August 2023, Defendant Treadway was involved in a romantic relationship with at least one male juvenile detainee at the Juvenile Detention Center and used JANE DOE 1 and ADULT VICTIM 1 to exploit this vulnerable male juvenile detainee by sending correspondence to the detainee through JANE DOE 1 and ADULT VICTIM 1.

164. In April 2024, Defendant Hines raped CHILD DOE 1. Due to pornographic videos and photographs Defendant Hines showed other juvenile detainees at the Juvenile Detention Center, including JUVENILE VICTIM 3 and CHILD DOE 2, the disclosure of money-for-sex to JUVENILE VICTIM 2, as well as the fact that an inappropriate photograph of JUVENILE VICTIM 4 is believed to have been found on Defendant Hines' phone, it is believed that Defendant Hines also raped more juvenile detainees while employed at the Juvenile Detention Center.

165. Each of these Defendants' acts alleged herein constitute deliberate indifference to Plaintiffs' needs, health and safety.

166. As a direct and proximate result of each of these Defendants' conduct, Plaintiffs experienced and continue to experience pain and suffering, severe emotional distress, mental anguish, and the damages alleged herein.

- D. Allegations Applicable to:**
- i. Defendant Treadway;**
 - ii. Defendant JANE DOE 1, aka "DO Shalonda;"**
 - iii. JANE DOE 2, aka "DO Kelly;"**
 - iv. JANE DOE 3, aka "Miss Carrie;" and**
 - v. JANE DOE 4, aka "Miss Torrie,"**

167. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 166, as though fully set forth herein.

168. Between June 2023 and August 2023, each of these Defendants witnessed, and maintained personal knowledge of, one or more sexual abuses on juvenile detainees, including JANE DOE 1 and ADULT VICTIM 1, by Defendant Doyle.

169. Between June 2023 and August 2023, each of these Defendants witnessed or otherwise had personal knowledge that Defendant Doyle was supplying marijuana-based products to multiple juvenile detainees within the Juvenile Detention Center, including JANE DOE 1 and ADULT VICTIM 1, which resulted in widespread overdoses on marijuana by multiple juvenile detainees.

170. Despite this personal knowledge, each of these Defendants conspired to further these abuses within the Juvenile Detention Center.

171. Each of these Defendants' acts and/or omissions alleged herein constitute deliberate indifference to Plaintiffs' needs, health, and safety.

172. As a direct and proximate result of each of these Defendants' conduct, Plaintiffs experienced and continues to experience physical pain, severe emotional distress, mental anguish, and the damages alleged herein.

II. PUNITIVE DAMAGES

173. Plaintiffs re-alleges and incorporates by reference paragraphs 1 through 172, as though fully set forth herein.

174. Plaintiffs are entitled to punitive damages on their claims brought pursuant to 42 U.S.C. § 1983 as each Defendants' conduct, acts, and omissions alleged herein constitute malicious and/or reckless or callous indifference to Plaintiffs' federally protected rights.

WHEREFORE, based on the foregoing, Plaintiffs prays that this Court grant the relief sought, including, but not limited to, actual damages in excess of Seventy-Five Thousand Dollars

(\$75,000.00), with interest accruing from the date of filing of suit, punitive damages in excess of Seventy-Five Thousand Dollars (\$75,000.00), reasonable attorney fees, and all other relief deemed appropriate by this Court.

Respectfully submitted,

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JUVENILE DETENTION POLICIES & PROCEDURES MANUAL

UPDATES SUMMARY

For Policy and Procedure Updates with Approval Dates 05/17/2019 through 07/08/2020

EXHIBIT 2

JDC 01-01 Legal Establishment

Immediate prior approval date: 07/01/2011

Current (new) approval date: 05/17/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statutory and regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The enclosure was replaced with a more legible and more recent image of the statutory language.

JDC 01-02 Licensing Requirements

Immediate prior approval date: 07/01/2011

Current (new) approval date: 05/17/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statutory and regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.

JDC 01-03 Agency Mission and Philosophy

Immediate prior approval date: 07/01/2011

Current (new) approval date: 05/17/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The three enclosures were replaced with digitally improved images of the displayed posters/flyers.

JDC 01-04 Setting Agency Goals

Immediate prior approval date: 07/01/2011

Current (new) approval date: 05/17/2019

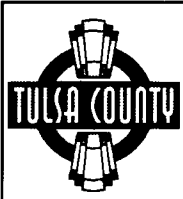
- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.

JDC 01-05 Staff and Resident Communications

Immediate prior approval date: 07/01/2011

Current (new) approval date: 05/17/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- Enclosure 1 was replaced with the newest version of the displayed form. Enclosure 2 was replaced with a digitally improved image of the displayed form.



JUVENILE DETENTION POLICIES & PROCEDURES MANUAL UPDATES SUMMARY

For Policy and Procedure Updates with Approval Dates 05/17/2019 through 07/08/2020

JDC 01-06 Supervision of Non-Facility Staff

Immediate prior approval date: 07/01/2011

Current (new) approval date: 06/14/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The enclosure illustrating the Visitor Registration Log (Form 2392) was added.

JDC 01-07 Superintendent's Report to Court

Immediate prior approval date: 07/01/2011

Current (new) approval date: 06/14/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.

JDC 01-08 Annual Review

Immediate prior approval date: 07/01/2011

Current (new) approval date: 06/14/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- A reference to the County Employee Handbook was added as an additional resource regarding employment-related topics.
- Regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.

JDC 01-09 Staff Participation in Goals

Immediate prior approval date: 07/01/2011

Current (new) approval date: 06/14/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The enclosure was replaced with a digitally improved and date-flexible image of the displayed form.

JDC 01-10 Staff Meetings

Immediate prior approval date: 07/01/2011

Current (new) approval date: 06/14/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- A reference to a specified standard form, now discontinued, was deleted.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.



JUVENILE DETENTION POLICIES & PROCEDURES MANUAL UPDATES SUMMARY

For Policy and Procedure Updates with Approval Dates 05/17/2019 through 07/08/2020

JDC 01-11 Conflict of Interest

Immediate prior approval date: 01/01/2011

Current (new) approval date: 07/30/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- The County Employee Handbook, and JBDC 100 adopting the Handbook in general matters of employment at the Juvenile Bureau/FCJJ, were referenced regarding code of conduct and conflict of interest policies.
- Regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- Outdated former enclosures were deleted.

JDC 01-12 Political Activities

Immediate prior approval date: 07/01/2011

Current (new) approval date: 07/30/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- The County Employee Handbook was referenced regarding ethical personal and professional behavior, use of County resources and political activity.
- The definition of prohibited political activity was clarified based on the Employee Handbook and Oklahoma Ethics Commission guidelines.
- Regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.

JDC 01-13 Contract Services Personnel

Immediate prior approval date: 03/30/2012

Current (new) approval date: 07/30/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The enclosure illustrating the Visitor Registration Log (Form 2392) was added.

JDC 01-13-2 Accountability of Outside Personnel

Immediate prior approval date: 01/01/2011

Current (new) approval date: 07/30/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The enclosure illustrating the Visitor Registration Log (Form 2392) was added.



JUVENILE DETENTION POLICIES & PROCEDURES MANUAL UPDATES SUMMARY

For Policy and Procedure Updates with Approval Dates 05/17/2019 through 07/08/2020

JDC 01-14 Facility Tours

Immediate prior approval date: 01/01/2011

Current (new) approval date: 07/30/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Provisions were added regarding the Authorized Visitor Log and Authorized Visitor Badges, for improved consistency with other Detention policies regarding facility visitors.
- Regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- Enclosure 1 was replaced with a digitally improved image of the Letter of Agreement form. Enclosure 2 illustrating the Visitor Registration Log (Form 2392) was added.

JDC 01-15 Media Access

Immediate prior approval date: 07/01/2011

Current (new) approval date: 09/18/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The enclosure was replaced with a digitally improved image of the Letter of Agreement form.

JDC 01-16 Requesting Office Supplies

Immediate prior approval date: 07/01/2011

Current (new) approval date: 09/18/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statutory and regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.

JDC 01-18 Chief Administrative Officer

Immediate prior approval date: 07/01/2011

Current (new) approval date: 09/20/2019

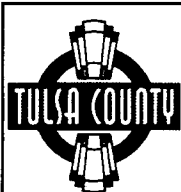
- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statutory and regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- Enclosure 1 was updated.

JDC 01-20 FCJJ (Bureau) Detention Relations

Immediate prior approval date: 7/01/2011

Current (new) approval date: 09/18/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- An outdated former enclosure was deleted.



JUVENILE DETENTION POLICIES & PROCEDURES MANUAL UPDATES SUMMARY

For Policy and Procedure Updates with Approval Dates 05/17/2019 through 07/08/2020

JDC 01-21 Facility Policy & Procedure Manuals

Immediate prior approval date: 03/30/2012

Current (new) approval date: 09/18/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statutory and regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- Descriptions of processes for adopting FCJJ and Detention policies and procedures were updated.

JDC 01-21-1 Employee Dress Code

Immediate prior approval date: 07/01/2011

Current (new) approval date: 09/23/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The enclosure was updated with the most recently approved version of the Juvenile Bureau/FCJJ Dress Code policy (JBDC 104).

JDC 01-21-2 Post-Hire Process

Immediate prior approval date: 07/31/2015

Current (new) approval date: 09/23/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- Orientation period and evaluation provisions were updated for consistency with the current Tulsa County Employee Handbook and approved County Human Resources policies.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.

JDC 01-22 Employee Leave

Immediate prior approval date: 07/01/2011

Current (new) approval date: 09/23/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- Provisions regarding leave benefits and leave requests were updated for consistency with the current Tulsa County Employee Handbook and approved County Human Resources policies and practices.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The enclosure (Juvenile Request for Leave Form 6147) was added.



JUVENILE DETENTION POLICIES & PROCEDURES MANUAL UPDATES SUMMARY

For Policy and Procedure Updates with Approval Dates 05/17/2019 through 07/08/2020

JDC 01-23 Interstate Compact Participation

Immediate prior approval date: 07/01/2011

Current (new) approval date: 09/23/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statutory and regulatory references were updated where necessary or appropriate.
- A cross-reference was added to the FCJJ policy for "Intake Division Interstate Compacts" (JBDC 120).
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.

JDC 01-24 Resident Funds and Valuables

Immediate prior approval date: 03/30/2012

Current (new) approval date: 09/23/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- A cross-reference was added to the Detention policy for "Release of Resident Property" (JDC 01-26).
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- Enclosure 1 was replaced with a digitally improved image of the displayed form; and Enclosure 2, illustrating the Detention Reception Sheet (Form 760), was added.

JDC 01-25 Releasing Juvenile Funds (in Custody)

Immediate prior approval date: 03/30/2012

Current (new) approval date: 10/03/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency, including greater alignment with the related Detention policy 05-01, "Releasing Resident's Money."
- The enclosure was replaced with a digitally improved image of the displayed form.

JDC 01-26 Release of Resident Property

Immediate prior approval date: 03/30/2012

Current (new) approval date: 10/03/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- Cross references were added to JDC 01-24, "Resident Funds and Valuables" and JDC 01-25, "Releasing Juvenile Funds (in Custody)."
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency, including greater alignment with the related Detention policy 05-02, "Resident Property Release Form."
- The enclosure was replaced with a digitally improved image of the displayed form.



JUVENILE DETENTION POLICIES & PROCEDURES MANUAL UPDATES SUMMARY

For Policy and Procedure Updates with Approval Dates 05/17/2019 through 07/08/2020

JDC 01-27 Wages for a Partial Month

Immediate prior approval date: 07/01/2011

Current (new) approval date: 10/10/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- A second sample scenario was deleted.

JDC 01-28 Requisitioning Supplies

Immediate prior approval date: 03/30/2012

Current (new) approval date: 10/03/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- An outdated former enclosure was deleted.

JDC 01-29 Inventory Control

Immediate prior approval date: 07/01/2011

Current (new) approval date: 10/03/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- The brief expendable items list was moved from the Enclosures section (formerly VI, now G) into E-3b (where such items are discussed).
- Various other phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The enclosure was replaced with a digitally improved image of the displayed form.

JDC 01-30 Budget Preparation

Immediate prior approval date: 03/30/2012

Current (new) approval date: 10/29/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- A reference to Tulsa County's 5-year capital improvement plan was added.
- Various other phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- Two outdated former enclosures were deleted. The remaining two enclosures were replaced with digitally improved images of the displayed forms.



JUVENILE DETENTION POLICIES & PROCEDURES MANUAL UPDATES SUMMARY

For Policy and Procedure Updates with Approval Dates 05/17/2019 through 07/08/2020

JDC 01-31 Fiscal Control

Immediate prior approval date: 07/02/2011

Current (new) approval date: 07/08/2020

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- References to Facility Administrator were revised to specify Facility Superintendent.
- Statutory, County Purchasing Department and regulatory references were updated where necessary or appropriate.
- The facility's bed capacity was updated from former 55 to current 63 total beds. (The 10 beds designated for regional contract use is unchanged.)
- Various other phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The enclosure was updated with a more recent and digitally improved image of the displayed Regional Detention Services Contract.

JDC 01-32 Policy and Procedure Manuals

Immediate prior approval date: 07/01/2011

Current (new) approval date: 10/29/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statutory and regulatory references were updated where necessary or appropriate.
- References to Tulsa County's Employee Handbook were reinforced.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The enclosure was replaced with a digitally improved image of the displayed form.

JDC 01-33 Staffing Requirements

Immediate prior approval date: 03/30/2012

Current (new) approval date: 10/29/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statutory and regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.

JDC 01-34 Equal Employment Opportunity

Immediate prior approval date: 07/01/2011

Current (new) approval date: 10/29/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statutory and regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The Tulsa County Commission Chair's annual letter (as of 2019) detailing the County's EEO commitments was added as a new enclosure image.



JUVENILE DETENTION POLICIES & PROCEDURES MANUAL UPDATES SUMMARY

For Policy and Procedure Updates with Approval Dates 05/17/2019 through 07/08/2020

JDC 01-35 At-Will Employment

Immediate prior approval date: 03/30/2012

Current (new) approval date: 10/31/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statutory and regulatory references were updated where necessary or appropriate.
- Relevant provisions were added or updated for improved consistency with the County Employee Handbook.
- Various other phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The Review and Revision subsection was added to Section H. Action(s).

JDC 01-36 Criminal Record Searches

Immediate prior approval date: 02/28/2015

Current (new) approval date: 10/31/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statutory and regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The Compliance Monitoring subsection was added to Section H. Action(s).
- The enclosure was replaced with a digitally enhanced and newer version of the Applicant Release of Information form.

JDC 01-37 Physical Examination

Immediate prior approval date: 03/30/2012

Current (new) approval date: 10/31/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statutory and regulatory references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The Review and Revision subsection was added to Section H. Action(s).

JDC 01-38 Performance Reviews

Immediate prior approval date: 11/06/2010

Current (new) approval date: 10/31/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Tulsa County Personnel references were updated to the Tulsa County Human Resources Department or HR.
- Statutory, regulatory and County policy references were updated where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The Review and Revision subsection was added to Section H. Action(s).



JUVENILE DETENTION POLICIES & PROCEDURES MANUAL

UPDATES SUMMARY

For Policy and Procedure Updates with Approval Dates 05/17/2019 through 07/08/2020

JDC 01-39 Attendance and Tardiness

Immediate prior approval date: 11/06/2010

Current (new) approval date: 10/31/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statutory and regulatory references were updated where necessary or appropriate.
- Exceptions were noted for certain reasons for absence with limited legal protections (FMLA, Workers' Compensation or U.S. Military Service Leave).
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.

JDC 01-42 Information System

Immediate prior approval date: 11/06/2010

Current (new) approval date: 07/08/2020

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- References to Facility Administrator were revised to specify Facility Superintendent.
- The Applicable To section was updated to mention outside research applicants and approved researchers.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The enclosure name was changed in the text list (Section G, formerly Sec. VI) and the enclosure image was replaced with a digitally enhanced copy of the Performance Monitoring Procedures Review Forms.

JDC 01-43 Daily Detention Log

Immediate prior approval date: 11/06/2010

Current (new) approval date: 07/08/2020

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Regulatory references were updated where necessary or appropriate.
- References to Facility Administrator were revised to specify Facility Superintendent.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.

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JUVENILE DETENTION POLICIES & PROCEDURES MANUAL UPDATES SUMMARY

For Policy and Procedure Updates with Approval Dates 05/17/2019 through 07/08/2020

JDC 00-01 PREA Compliance Requirement/Zero Tolerance

Immediate prior approval date: 06/01/2016

Current (new) approval date: 12/04/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statement of applicability was adjusted to encompass employees, contractors, volunteers, interns and residents.
- Several definitions were adjusted, and various other phrasing and formatting updates were made, for improved readability, clarity and/or consistency.

JDC 00-02 Coordinated Facility Response(PREA)

Immediate prior approval date: 06/01/2016

Current (new) approval date: 12/04/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statement of applicability was adjusted to encompass employees, contractors, volunteers, interns and residents.
- The Definitions section was added (adapted from existing procedural text, with additions and adjustments), and various other phrasing and formatting updates were made, for improved readability, clarity and/or consistency.
- The third page of Enclosure 2 was digitally improved.

JDC 00-03 Data Collection & Reporting (PREA)

Immediate prior approval date: 06/01/2016

Current (new) approval date: 12/04/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statement of applicability was adjusted to encompass employees, contractors, volunteers, interns and residents.
- Several definitions were adjusted, and various other phrasing and formatting updates were made, for improved readability, clarity and/or consistency.
- Regulatory references were updated or clarified where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.
- The 5-page enclosure, previously referenced but not displayed, was added.



JUVENILE DETENTION POLICIES & PROCEDURES MANUAL UPDATES SUMMARY

For Policy and Procedure Updates with Approval Dates 05/17/2019 through 07/08/2020

JDC 00-04 Internal Review Process (PREA)

Immediate prior approval date: 10/05/2016

Current (new) approval date: 12/04/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statement of applicability was adjusted to encompass employees, contractors, volunteers, interns and residents.
- Several definitions were added or adjusted, and various other phrasing and formatting updates were made, for improved readability, clarity and/or consistency.
- Regulatory references were updated or clarified where necessary or appropriate.
- Various phrasing and formatting updates were made for improved readability, clarity and/or consistency.

JDC 00-05 Prison Rape Elimination Act (PREA)

Immediate prior approval date: 10/05/2016

Current (new) approval date: 12/04/2019

- Juvenile Bureau references were updated or cross-referenced to the Family Center for Juvenile Justice or FCJJ.
- Statement of applicability was added for consistency with other PREA policies.
- Review and Revision section was added for consistency with other PREA policies.
- Regulatory, policy and phone number references were updated where necessary or appropriate.
- Several definitions were adjusted, and various other phrasing and formatting updates were made, for improved readability, clarity and/or consistency.
- The enclosure form, previously referenced but not displayed, was added.

Office of Juvenile Affairs



OFFICE OF PUBLIC INTEGRITY

Name of Facility:	Tulsa County Juvenile Detention Center	Facility Address:	500 W. Archer Tulsa, OK 74103
		Telephone #	918-596-5960
Subcontractor:	N/A	Subcontractor Address:	N/A
Date of Assessment:	2/7/2020	Date of Report:	2/17/2020
Director/Administrator:	Interim- Cortez Tunley	License Expires:	May, 2020
Facility Staff Present during the Assessment:	Justin Jones; Brent McQuarters; Doug Currington		

Initial Certification Report- Secure Juvenile Detention Center

Number of Current Contracted Beds:	Facility Approved Licensing Capacity:	Health Department Inspection Date/Concerns:	Fire Marshal Inspection Date/Concerns:
55	63	01/06/20: Concerns: 0	12/31/19: Concerns: 0

Facility Summary: Tulsa County initially notified the Office of Public Integrity with their intent to build a new facility and submitted blue prints with the renderings and specifications for review and approval in May of 2017. The plans were reviewed by OPI Programs Field Representative, Darryl Fields, and the submitted plans were determined to conform to the requirements as set forth in Oklahoma Administrative Code (OAC).

OPI visited Tulsa County Juvenile Detention Centers new facility on 02/07/2020 for the purpose of conducting an initial certification assessment, per Oklahoma Administrative Code, 377: 3-13-6 and to ensure all space requirements met the proposed plans.

OPI assessors present for the visit included Licensing Supervisor, Jaremy Andrews, and Programs Field Representative, Gene Carroll.

The assessment team met with Tulsa County Detention Staff, reviewed necessary documentation, toured the physical plant and verified all required square footages were being met in the living areas. Acting Director, Cortez Tunley, as well as Executive Director, Justin Jones, ACA Coordinator, Brent McQuarters and their Training Coordinator, Doug Currington were present throughout the course of the inspection.

It is a newly built facility, set up with three separate units, Units A, B and C, which are coordinated with different colors. Each unit contains two separate pods, housing 10- single occupancy sleeping rooms respectively. Each of the single occupancy rooms contains a sink and toilet assembly for the residents use. An additional, ADA-single occupancy sleeping room is contained just outside the pods, exiting directly into the day room. Every unit has a separate dayroom along with two bathrooms, each with two shower stalls, and another bathroom with a toilet and sink.

The units also have separate laundry/linen supply closets, as well as a multi-purpose room for visitation and/or counseling sessions.

All doors on the unit, each pod, as well as the individual rooms and restrooms could be secured and required an authorized access badge, or physical key to open. Doors could also be accessed remotely via the control room. Each unit has a separate control area, with a master control over the entire facility.

Measurements were taken for all of the single occupancy sleeping rooms, each day room, the indoor recreation space, as well as the kitchen and dining area to ensure the facility conformed to the following required square footages:

- Juvenile Single Occupancy Sleeping room- 70 square feet
- Dayroom/Living Room (per juvenile)- 35 square feet
- Dining Area (per juvenile)- 15 square feet
- Indoor Activity Area (per juvenile)- 100 square feet
- Kitchen- 200 square feet
- Classroom- Conforms to State Board of Education Requirements

Measurements taken in each of the rooms and areas above met all current requirements of secure juvenile detention facilities.

The actual measurements taken for each room are included below:

Unit A: Dayroom- 33.91 x 27.66- 937.95 SF: 44.66 SF/per resident

Pod 1

Pod 2

Room A1- 7.46 x 10.28- 76.69 SF

Room A11- 7.48 x 10.24- 76.60 SF

Room A2- 7.57 x 10.27- 77.74 SF

Room A12- 7.56 x 10.24- 77.41 SF

Room A3- 7.47 x 10.24- 76.49 SF

Room A13- 7.48 x 10.24- 76.60 SF

Room A4- 7.47 x 10.20- 76.19 SF

Room A14- 7.47 x 10.23- 76.42 SF

Room A5- 7.48 x 10.18- 76.15 SF

Room A15- 7.47 x 10.22- 76.34 SF

Room A6- 7.46 x 10.27- 76.61 SF

Room A16- 7.49 x 10.24- 76.70 SF

Room A7- 7.48 x 10.26- 76.74 SF

Room A17- 7.47 x 10.23- 76.70 SF

Room A8- 7.48 x 10.28- 76.89 SF

Room A18- 7.49 x 10.25- 76.77 SF

Room A9- 7.59 x 10.30- 78.18 SF

Room A19- 7.56 x 10.25- 77.49 SF

Room A10- 7.45 x 10.32- 76.88 SF

Room A 20- 7.47 x 10.26- 76.64 SF

ADA Single Occupancy Room A21- 9.39 x 8.87- 83.29 SF

Unit B: Dayroom- 27.40 x 34.01- 931.88 SF: 44.37 SF/per resident

Pod 1

Pod 2

Room B1- 7.48 x 10.20- 76.30 SF

Room B11- 7.46 x 10.21- 76.10 SF

Room B2- 7.56 x 10.21- 77.19 SF

Room B12- 7.60 x 10.21- 77.60 SF

Room B3- 7.48 x 10.21- 76.37 SF

Room B13- 7.50 x 10.24- 76.80 SF

Room B4- 7.48 x 10.23- 76.52 SF

Room B14- 7.47 x 10.22- 76.34 SF

Room B5- 7.50 x 10.21- 76.58 SF

Room B15- 7.50 x 10.24- 76.80 SF

Room B6- 7.51 x 10.21- 76.58 SF	Room B16- 7.47 x 10.23- 76.42 SF
Room B7- 7.48 x 10.23- 76.52 SF	Room B17- 7.50 x 10.23- 76.73 SF
Room B8- 7.47 x 10.23- 76.42 SF	Room B18- 7.47 x 10.24- 76.49 SF
Room B9- 7.56 x 10.24- 77.41 SF	Room B19- 7.58 x 10.21- 77.39 SF
Room B10- 7.46 x 10.24- 76.39 SF	Room B 20- 7.47 x 10.24- 76.49 SF
ADA Single Occupancy Room B21- 9.37 x 8.81- 82.56 SF	

Unit C: Dayroom- 33.95 x 27.46- 932.27 SF: 44.39 SF/per resident

Pod 1

Room C1- 7.44 x 10.09- 75.07 SF
Room C2- 7.57 x 10.08- 76.31 SF
Room C3- 7.47 x 10.07- 75.22 SF
Room C4- 7.49 x 10.09- 75.57 SF
Room C5- 7.48 x 10.08- 75.40 SF
Room C6- 7.42 x 10.22- 76.34 SF
Room C7- 7.49 x 10.22- 76.55 SF
Room C8- 7.47 x 10.25- 76.57 SF
Room C9- 7.58 x 10.23- 77.54 SF
Room C10- 7.46 x 10.22- 76.24 SF

Pod 2

Room C11- 7.47 x 10.25- 76.57 SF
Room C12- 7.55 x 10.22- 77.16 SF
Room C13- 7.49 x 10.22- 76.56 SF
Room C14- 7.46 x 10.25- 76.47 SF
Room C15- 7.47 x 10.23- 76.42 SF
Room C16- 7.48 x 10.20- 76.30 SF
Room C17- 7.47 x 10.21- 76.27 SF
Room C18- 7.46 x 10.20- 76.10 SF
Room C19- 7.58 x 10.21- 77.39 SF
Room C20- 7.44 x 10.21- 75.96 SF

ADA Single Occupancy Room C21- 9.37 x 8.81- 82.56 SF

The indoor activity area was also measured and the measurements are as follows:

85.01 x 55.62- 4,728.25 SF: this space allows for 47 residents at a time.

The facility indicated it would be utilizing an alternating schedule for the indoor activity area to ensure they did not exceed the number of residents in the area at a given time.

The kitchen and dining room were measured, and found to be in compliance as well.

There were three areas designated for school/classroom use. At the time of the assessment, it appears the classrooms meet all State Board of Education Requirements.

The Oklahoma Health Department inspected the facility on 01/06/2020. The facility was issued a food service permit and recorded no violations. An Oklahoma State Fire Marshal inspection was also conducted on 12/31/19, certifying the building for occupation with no deficiencies or current violations.

As the detention center has continued to be in operation at another location, all policy and procedure manuals, necessary logs, and records are in place and being maintained at the previous location awaiting to be transferred to the new location.

Section 2- Comments/Concerns: Emergency Evacuation Routes had not yet been posted at the time of the assessment. In addition, the facility had not yet put up the necessary signage detailing the facility rules, disciplinary policy, or the residents' rights and grievance procedures at the time of the assessment. Concerns were noted to facility staff at the time of the assessment and they reported it would be completed prior to any occupancy by the residents. There were also two rooms, located on Unit B, where issues were noted. Room B-11- the cold water was not operation, and Room- B-14 the intercom was not working correctly. Both rooms were identified to staff to be corrected.

OPI also requested the facility ensure they completed a final walk-through and ensure that each room was clean of litter and all building materials prior to any juvenile occupation.

Summary of Findings/Concerns:

☐ Findings ☐ No Findings ☒ Areas of Concern

The following concerns were identified and noted as a result of the facility inspection:

- The facility rules and grievance policy, nor were the emergency evacuation routes, posted, in conspicuous places in each area/level of the facility at the time of the assessment.

As noted above, the following issues were identified in the rooms:

- Room # B-11- the cold water button was not operational.
- Room # B- 14- the intercom was not operational

While no corrective action plan will be required, the above mentioned issues will be reviewed prior to the expiration of the 90- day provisional license to ensure all areas have been corrected.

Office of Juvenile Affairs



OFFICE OF PUBLIC INTEGRITY

Name of Facility:	Tulsa County Juvenile Detention Center	Facility Address:	500 W. Archer Tulsa, OK 74103
		Telephone #	918-596-5960
Subcontractor:	N/A	Subcontractor Address:	N/A
		Telephone #	
Date of Assessment:	7/28/2020	Date of Report:	9/3/2020
Time Period Reviewed:	02/20/19- 07/28/20	License Expires:	August, 2020
Director/Administrator:	Cortez Tunley	Executive Director	Justin Jones
Facility Staff Present at Time of Assessment:	Doug Currington, Deputy Superintendent; Brent McQuarters, ACA Coordinator; Shaylonda Powell		

Assessment Report- Secure Juvenile Detention Center

Total # of Staff (Full time/Part time):	Current Juvenile Population:	Facility total Licensing Capacity:	Utilization Rate for Time Period:	ACA Accreditation Date:
46(Ft-40/PT-6)	19	63	53.03	N/A
Total # of Admissions	Total In-County Admissions:	OJA Contracted Beds:	Average Length of Stay:	Total OCA Referrals:
788	734	40	19 Days	21
Total Number of Grievances:	Total Uses of Physical Force:	Number of Room Confinement:	Total # of Room/Wing Restriction:	Total Confirmed OCA Referrals:
75	72	186	0	2
Total Critical Incidents:	AWOLS/Alt. Escapes:	ER Visit for Injury/Illness :	Improper Admissions:	
6	0	4	0	
	Self-Harm/Suicidal:	Serious Assaultive Act:	Serious Destructive Act:	
	0	1	0	
	Other unexpected Events:			
	1			
Inspection Dates/Concerns noted:	Health Inspection: 01/06/20	Fire Marshal Inspection : 12/31/19	OCCY Inspection:	N/A
	Concerns: 0	Concerns: 0	Concerns:	0

Sections Reviewed

Section #	Compliant/ Non-Compliant
Section 1- Policy and Procedure: There were no issues or concerns.	Compliant

Section 2- Juvenile Records/Rights: There were no issues or concerns.	Total Records Reviewed: 5	Compliant
Section 3- Institutional Operations/Security and Control: It was reported during juvenile interviews, the facility was using "special programs" for youth with continued disciplinary issues. Youth on Special Programs were reportedly on room confinement, but were brought out of their room for two hours a day, and then returned to their room despite their behavior when out of their room. There were no youth on special program during the assessment so OPI could not review the room confinement records and verify all of the reported issues, however, staff did confirm special programs were being used. Oklahoma Administrative Code specifies juveniles shall be released from separation when they can safely return to the group or general population. If a juvenile is released back to the general population they should not be re-confined to their room unless charged with a new major rule violation requiring confinement for their safety/the safety of others. OAC 377:3-13-44		Compliant with Areas of Concern
Section 4- Grievance Requirements: In five (5) of the records reviewed, the juveniles were released from the detention center without addressing or resolving their grievance. Three grievances did not have a signature accepting the resolution of the grievance. OAC 377:3-13-41 OAC 377:3-1-28	Total Records Reviewed: 25	Non-Compliant
Section 5- Personnel Records: In two of the records reviewed, staff did not have the required three references in their personnel record and one staff was missing a copy or proof of a high school diploma or equivalent. In five of the records reviewed there was no CPR/First Aid training/certification completed within 90 days of employment. OAC 377:3-13-43	Total Records Reviewed: 11	Non-Compliant
Section 6- Admin/Direct Care Staff Interviews: There were no issues or concerns.	# of Staff Interviewed: 2	Compliant
Section 7- Juvenile Interviews: During juvenile interviews it was reported they were not involved in programs outside of their rooms for twelve hours each day due. It was reported they have had issues with not enough staff during the weekend and had to be kept in their rooms for an entire shift. Note: Staffing issues and being short-staffed, specifically on the weekends was confirmed during interviews with staff, as well. OAC 377:3-13-45	# of Juveniles Interviewed: 3	Non-Compliant
Section 8- Administrative Requirements: There were no issues or concerns.		Compliant
Section 9- Facility Tour: At the time of the assessment, Unit C was completely shut down while undergoing construction and repairs. It was reported there was an issue with the walls and they had bubbling/peeling that had to be corrected. It was reported once the issue is corrected and Unit C can be reopened, Unit A will have to be shut down and corrected. Note: it was observed during the facility tour there was damage to many of the walls. OAC 377:3-13-48		Non-Compliant

Section 10- Reoccurring Findings: There were reoccurring findings for Section 5- Personnel Records, regarding CPR/First Aid training.	Date of Last Assessment: 02/27/19	Reoccurring Findings
Section 11- Additional Comments/Concerns:		

Additional Information Collected

OCA Referrals: There were two OCA referrals reported during this assessment period. A brief synopsis is included below:

Total OCA Referrals: 21

[Redacted]
 [Redacted]
 [Redacted]
 [Redacted]
 [Redacted]
 [Redacted]
 [Redacted]

Critical Incidents: There were six (6) critical incidents reported during this assessment period. A brief description of each are included below:

Total: 6

Serious Assaultive Acts:

[Redacted]
 [Redacted]

Illness/Injuries Requiring Medical Attention:

[Redacted]
 [Redacted]
 [Redacted]
 [Redacted]
 [Redacted]

Other Unexpected Occurrences:

[Redacted]
 [Redacted]

Oklahoma State Department of Health:

An Oklahoma Health Department Inspection was completed on 01/06/20. There were no violations cited on the report.

Number of Concerns: 0

Oklahoma State Fire Marshal:

A Fire Marshal inspection occurred on 12/31/19. There were no deficiencies noted on the report

Number of Concerns: 0

Uses of Physical Force:

Total: 72

There were 72 reported uses of physical force during this assessment period. Of the reports reviewed, they appear to meet the criteria for use of force and did not appear to be excessive.

JOLTS ENTRY:

It appears the facility is entering in all JOLTS information as required.

Comments/Concerns relative to OJA/JSU: None.

OJA Contracted Facility☒ **Yes**☐ **No**

Contract Number: CRL- 2020-315

Comments/Concerns- OJA Program Manager☒ **Yes**☐ **No**

It was reported following a critical incident they had been facing understaffing issues, but were maintaining staffing ratios on each shift.

Findings/Areas of Concern Identified**Findings:**

- Section 4- Grievance Requirements
- Section 5- Personnel Records
- Section 7- Juvenile Interviews
- Section 9- Facility Tour

Noted Areas of Concern:

- Section 3- Security and Control

Will a Corrective Action Plan be Required? ☒ **Yes** ☐ **No**

OJA Staff/OPI Assessors

OPI- Assessment Lead/Preparer of Report: [REDACTED]

OPI Assessors: [REDACTED]

OFFICE of JUVENILE AFFAIRS

Tulsa County Board of Commissioners

Has met all applicable standards and is hereby issued a

Provisional

For the operation of a Juvenile Detention Center at:

500 W. Archer

Tulsa, Oklahoma 74103

Pursuant to: 10A O.S. § 2-3-103

Robert C. Holt
Executive Director

D-72-01

Certificate Number

James A. ...
Office of Public Integrity

November 2022

Month and Year of Expiration



Maximum Juvenile Occupancy: 55



Office of Juvenile Affairs



OFFICE OF PUBLIC INTEGRITY

Name of Facility: Tulsa County Juvenile Detention Center **Facility Address:** 500 W. Archer
Tulsa, OK 74103
Telephone # 918-596-5960

Subcontractor: N/A **Subcontractor Address:** N/A
Telephone #

Date of Assessment: 4/1/2021 **Date of Report:** 5/24/2021

Time Period Reviewed: 07/29/20-04/01/21 **License Expires:** August, 2020

Director/Administrator: Cortez Tunley **Executive Director** Justin Jones

Facility Staff Present at Time of Assessment: Doug Currington, Deputy Superintendent; Brent McQuarters, ACA Coordinator; Shaylonda Powell, Mike Davis, Tito Monroe, Sahim Smith, Emmanuel Ezechinonso, Kelly Lavine, Tonja Hurd, Tyesha Darnell, Christina Marruffo and Cabrena Mims.

Assessment Report- Secure Juvenile Detention Center

Total # of Staff (Full time/Part time):	Current Juvenile Population:	Facility total Licensing Capacity:	Utilization Rate for Time Period:	ACA Accreditation Date:
54 (FT-48/PT-6)	15	63	40.55%	N/A
Total # of Admissions	Total In-County Admissions:	OJA Contracted Beds:	Average Length of Stay:	Total OCA Referrals:
226	199	40	20 Days	7
Total Number of Grievances:	Total Uses of Physical Force:	Number of Room Confinement:	Total # of Room/Wing Restriction:	Total Confirmed OCA Referrals:
60	49	99	82	1
Total Critical Incidents:	AWOLS/Att. Escapes:	ER Visit for Injury/Illness :	Improper Admissions:	
10				
Involving Juveniles	Self-Harm/Suicidal Ideations:	Serious Assaultive Act:	Serious Destructive Act:	
13				
		Other unexpected Events:		
Inspection Dates/Concerns noted:	Health Inspection: 01/06/21	Fire Marshal Inspection : 11/24/20	OCCY Inspection:	N/A
	Concerns: 4	Concerns: 1	Concerns:	0

Sections Reviewed

Section #	Compliant/ Non-Compliant
Section 1- Policy and Procedure: The facility completed an annual review of the Policy and Procedure manual in December of 2020. There were fifty-seven (57) revisions made during the assessment period.	Compliant

Section 2- Juvenile Records/Rights: No issues or concerns.	Total Records Reviewed: 4	Compliant
Section 3- Institutional Operations/Security and Control: In review of the Room Confinement Logs and Room Restriction Logs, OPI observed the logs failed to adequately document the time in and/or the time out for when a youth was placed/removed from room confinement. In review of the room restriction logs, it appears all of the room restrictions were not documented on the logs. Room Restrictions were also reviewed that exceeded 60 minutes, and OPI could not determine the reasons for extension of the room restriction. Several instances observed where there was a documented room supervision/15-minute check, without indicating the youth was on room restriction or room confinement. During the review of 15-minute visual observations- OPI observed documented checks that appear to indicate checks were completed via the intercom and not completed visually. Several logs appear to show 15-minute checks were no completed or were not signed off on. Room Confinement- 3-hour reauthorization checks were observed to be late and not always completed promptly. Also, some did not adequately document behaviors that would constitute the need for continued room confinement. OAC 377: 3-13-43		Non-Compliant
Section 4- Grievance Requirements: No issues or concerns.	Total Records Reviewed: 17	Compliant
Section 5- Personnel Records: No issues or concerns.	Total Records Reviewed: 9	Compliant
Section 6- Admin/Direct Care Staff Interviews: No issues or concerns.	# of Staff Interviewed: 2	Compliant
Section 7- Juvenile Interviews: No issues or concerns.	# of Juveniles Interviewed: 2	Compliant
Section 8- Administrative Requirements: No issues or concerns.		Compliant
Section 9- Facility Tour: During the facility tour, the following issues were observed and need to be corrected: - Unit B: Hole in the wall in the dayroom. - Unit B-5: Wall paint peeling. - Unit B-11: No elevated bed. - Unit B -14 & B-16: OPI observed damaged windows. - Unit C- Intercoms were not operational at the time of the assessment. - Unit C-3: Broken Glass - Unit C-16: Broken Glass Window - Unit C-14 and C-16: Toilets were not operational at the time of the assessment. - Courtyard- a window appeared to be broken.		Non-Compliant
Section 10- Reoccurring Findings: There were no reoccurring findings.	Date of Last Assessment: 01/28/20	Corrected
Section 11- Additional Comments/Concerns: None.		

Additional Information Collected

██████████ OCA Referrals: One (1) ██████████ OCA referral reported during this assessment period. A brief synopsis is included below:

Total OCA Referrals: 1

██████████
██
██

Critical Incidents: There were ten (10) critical incidents involving thirteen (13) juveniles reported during this assessment period. A brief description of each are included below:

Total: 10

Self-Harm or Suicidal Ideations:

██
██
██
██
██
██
██
██

Serious Assaultive Acts:

08/09/20- Allegedly, ██████████ residents physically attacked another resident in the gym area. The three (3) residents also assaulted staff that tried to intervene in the fight. Tulsa County Sheriff's Department and Tulsa Police Department called to assist in the incident.

Serious Destructive Acts:

08/09/20- Allegedly, ██████████ residents were non-compliant by running up and down a hallway and using a staff walkie-talkie to break windows, pull fire alarm and cause other property damage.

08/09/20- Resident damaged sprinkler head causing alarm to be activated.

Illness/Injuries Requiring Medical Attention:

██
██
██
██

Other Unexpected Occurrences:

██
██
██

Oklahoma State Department of Health:

Number of Concerns: 4

An Oklahoma Health Department inspection completed on 01/06/21. There were four (4) violations cited on the report.

Oklahoma State Fire Marshal:

Number of Concerns: 1

A Fire Marshal inspection occurred on 11/24/20. There was one deficiencies noted on the report.

Uses of Physical Force:

Total: 49

There were forty-nine (49) reported uses of Physical Force, of which eleven (11) were the Use of Mechanical Restraints. Of the reports reviewed, they appear to meet the criteria for use of force and did not appear to be excessive.

JOLTS ENTRY:

It appears the facility is entering in all JOLTS information as required.

OJA Contracted Facility☒ Yes☐ No

Contract Number: CRL- 2021-315

Comments/Concerns- OJA Program Manager☐ Yes☒ No**Findings/Areas of Concern Identified****Findings:**

- Section 3- Institutional Operations/Security and Control
- Section 9- Facility Tour

Noted Areas of Improvement Identified: None.

Will a Corrective Action Plan be Required? ☒ Yes ☐ No

OJA Staff/OPI Assessors

OPI- Assessment Lead/Preparer of Report: [REDACTED]

OPI Assessors: [REDACTED]

May 6, 2022

Electronic Delivery

Tulsa County Board of County Commissioners
Commissioner Stan Sallee, District 1
ssallee@tulsacounty.org

Commissioner Karen Keith, District 2
kkeith@tulsacounty.org

Interim Commissioner Vicki Adams, District 3
vadams@tulsacounty.org

Re: Tulsa County Juvenile Detention Center

Dear County Commissioners,

The Office of Juvenile Affairs (OJA) Office of Public Integrity (OPI) conducted the annual scheduled certification assessment for Secure Juvenile Detention Centers on May 3 - May 4, 2022, at the Tulsa County Juvenile Detention Center. OPI Licensing Administrator, Jeremy Andrews, identified several major issues specific to room confinement/isolations, education, medical storage, staff training, and grievance resolutions.

Interviews with residents, staff, and administrators revealed the use of long term, unwarranted room confinement in violation of OAC 377: 3-13-44. These reports included frequent instances of locking children in rooms for most of the day in violation of program requirements in OAC 377:3-13-45, requiring youth be involved in programming at a minimum of twelve (12) hours per day. This practice of keeping children locked in their rooms reduced the educational hours far below the mandatory required hours set forth by the State Department of Education.

We have serious concerns about how these conditions are affecting the health and wellbeing of the children in your care. OJA staff will be at the Tulsa County Juvenile Detention Center on **Monday, May 9, 2022 at 1:00 p.m.** Our goal is to discuss the status of your Secure Juvenile Detention Certification and the need for an immediate corrective action plan to become compliant.

Thank you,



Benjamin C. Brown
General Counsel

cc: The Honorable Martha Rupp Carter, Chief Judge Tulsa County Juvenile Court, martha.carter@oscn.net
Anthony Taylor, Director of the Tulsa County Juvenile Bureau, ataylor@tulsacounty.org
The Honorable Steven Kunzweiler, Tulsa County District Attorney, stevekunzweiler@tulsacounty.org
Corbin Brewster, Public Defender of Tulsa County, Corbin.Brewster@oscn.net

May 13, 2022

Electronic Delivery

Tulsa County Board of County Commissioners
Commissioner Stan Sallee, District 1
ssallee@tulsacounty.org

Commissioner Karen Keith, District 2
kkeith@tulsacounty.org

Interim Commissioner Vicki Adams, District 3
vadams@tulsacounty.org

Re: Tulsa County Juvenile Detention Center

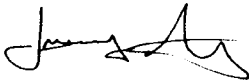
Dear County Commissioners,

Attached is the Office of Juvenile Affairs (OJA) Office of Public Integrity (OPI) report referenced in the letter you received on May 06, 2022, from OJA General Counsel, Ben Brown. The report details the areas found to be out of compliance or deficient pursuant to Oklahoma Administrative Code (OAC) "Requirements for Secure Juvenile Detention Centers" following the recent certification assessment conducted on May 3 - May 4, 2022.

The report details the items the Tulsa County Detention Facility is currently out of compliance with under OAC and Contract requirements. Attached is a letter sent to Director Taylor detailing the report findings and the next steps. As discussed, at the May 9th meeting with OJA, detention personnel, and county officials, OJA will be providing additional assistance outside of the facilities CAP. We look forward to continuing to work with you and Tulsa County Juvenile Detention staff in not only correcting these issues, but also ensuring the best possible care for the youth entrusted to us.

If you have any questions or concerns, please feel free to contact me at (405) 602-3695 or by email at Jeremy.Andrews@oja.ok.gov.

Thank You,



Jeremy Andrews
Administrative Programs Officer
Office of Public Integrity- Licensing Administrator

cc: The Honorable Martha Rupp Carter, Chief Judge Tulsa County Juvenile Court, martha.carter@oscn.net The Honorable Steven Kunzweiler, Tulsa County District Attorney, stevekunzweiler@tulsacounty.org Corbin Brewster, Public Defender of Tulsa County, Corbin.Brewster@oscn.net

May 13, 2022

Electronic Delivery

Mr. Anthony Taylor, Director
Tulsa County Juvenile Bureau
ataylor@tulsacounty.org

Mr. Taylor:

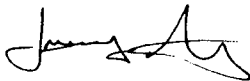
Attached is the Tulsa County Juvenile Detention Center Assessment Report, prepared following the Office of Juvenile Affairs Office of Public Integrity licensing assessment conducted at the Tulsa County Juvenile Detention Center on May 03 - May 04, 2022. The report details significant areas found to be out of compliance or deficient pursuant to Oklahoma Administrative Code (OAC) "Requirements for Secure Juvenile Detention Centers" There were findings in the following area(s):

- Section 3- Security and Control- ***Reoccurring Findings***
- Section 4- Grievance Requirements
- Section 5- Personnel Records
- Section 7- Juvenile Records
- Section 9- Facility Tour

As a result, corrective measures need to immediately take place and Corrective Action Plan (CAP) is required. The CAP should address the facilities plan to regain compliance in all areas, the time frame for which they believe it will take to regain compliance, as well as measures put in place to prevent such areas of noncompliance from reoccurring. Please complete and submit this CAP to Jeremy Andrews at Jeremy.Andrews@oja.ok.gov for approval no later than, **May 27, 2022**. Also, please review the report and address any noted concerns or areas identified with room for improvement with your staff as needed. Please note, a copy of the results of your assessment and this letter will be sent to the Tulsa County Commissioner.

If you have any questions or concerns, please feel free to contact me at (405) 530-2821, or by email at Jeremy.Andrews@oja.ok.gov.

Thank You,



Jeremy Andrews
Administrative Programs Officer
Licensing Administrator- Office of Public Integrity

Cc: Cortez Tunley, Tulsa Detention Program Administrator, ctunley@tulsacounty.org



-OFFICE OF PUBLIC INTEGRITY-

Name of Facility:	Tulsa County Juvenile Detention Center	Facility Address:	500 W. Archer Tulsa, OK 74103
		Telephone #	918-596-5960
Subcontractor:	N/A	Subcontractor Address:	N/A
		Telephone #	
Date of Assessment:	5/3/2022	Date of Report:	5/13/2022
Time Period Reviewed:	04/01/21- 04/31/22	License Expires:	April 2023
Director/Administrator:	Cortez Tunley	Executive Director	Anthony Taylor
Facility Staff Present at Time of Exit Conference:	Doug Currington, Deputy Superintendent; Brent McQuarters, ACA Coordinator		

Assessment Report- Secure Juvenile Detention Center

Total # of Staff (Full time/Part time):	Current Juvenile Population:	Facility total Licensing Capacity:	Utilization Rate for Time Period:	ACA Accreditation Date:
50 (41-Ft/ 9-Pt)	32	63	74.46%	N/A
Total # of Admissions	Total In-County Admissions:	OJA Contracted Beds:	Average Length of Stay:	Total OCA Referrals:
606	422	40	22	17
Total Number of Grievances:	Total Uses of Physical Force:	Number of Room Confinement:	Total # of Room/Wing Restriction:	Total Confirmed OCA/CCR Referrals:
192	324	474	164	6
Total Critical Incidents:	AWOLS/Att. Escapes:	ER Visit for Injury/Illness:	Mishandling Medication:	
37	0	25	2	
	Self-Harm/Suicidal Ideations:	Serious Assaultive Act:	Serious Destructive Act:	
	9	0	0	
		Other unexpected Events:		
		1		
Inspection Dates/Concerns noted:	Health Inspection: 02/28/22	Fire Marshal Inspection: 02/10/22	OCCY Inspection:	N/A
	Concerns: 3	Concerns: 5	Concerns:	0

Sections Reviewed

Section #	Compliant/ Non-Compliant
Section 1 - Policy and Procedure: There was one reported change to the policy and procedure manual during this assessment period as of 03/10/2022. Note: please ensure all policy changes are submitted to OPI prior to implementation per OAC 377:3-13-38(a).	Compliant

Section 2- Juvenile Records/Rights: In one (1) of the cases reviewed there were no documentation/indication the facility provided the two required intake calls, nor was place of birth, last known address notated. OAC 377:3-13-39 & 377:3-13-40 In two (2) cases reviewed there was no legal order for detention granting authority to accept a juvenile currently held in the case file. OAC 377:3-13-40(b) In one of the cases reviewed there was no education history notated. OAC 377:3-13-40(a) Please ensure all forms are being addressed and dates are correct. In review of the admission forms and juvenile records there were several instances observed by OPI of discrepancies between dates on each form and areas that were blank and not filled in.	Total Records Reviewed: 6	Compliant with areas of improvement identified
Section 3- Institutional Operations/Security and Control: Facility does not appear to be completing room checks on each resident a minimum of every 30 minutes during sleeping hours. Logs indicate unless youth is on "special supervision" unit checks are only being completed every hour from 23:00- 7:00AM. OAC 377:3-13-43(4)(C) (ii-iii) Facility does not appear to be completing a report and submitting it to OJA for residents who are being held in room confinement in excess of 48 hours. OAC 377: 3-13-43(c)(14)(C) In four (4) cases reviewed, 15- mins observation logs were missing from the file and/or not completed. OPI also observed circumstances where the 15-minute checks were documented as being completed through the intercom, and not through a visual observation as required. OAC 377: 3-13-43(c)(15) In one (1) case reviewed, documents show resident was released from confinement on [REDACTED], but the log showed release to be on [REDACTED]. In one (1) case reviewed, a resident spent three (3) days in confinement, waiting on a program plan approval instead of utilizing authorized procedure and justification for continued room confinement. In review of confinement records, it appears that 3-hour reauthorizations were not always completed timely, or at all in other cases. There were also instances where 24- administrative reviews were not being completed by an uninvolved administrator and 3-hour reauthorizations did not adequately document reasons or justifications for continued confinement. OAC 377: 3-13-43(c)(14) On the room restriction log, there were (3) three instances observed where there was no time out listed on the log. OAC 377: 3-13-43(c)(15) During the assessment facility tour OPI observed a restraint chair maintained by the facility. Title 10A O.S., § 2-7-604 in conjunction with OAC 377:10-01-04, states the use of a restraint chair is prohibited in institutions or other facilities operated by or contracted with OJA. <i>Note: facility records, and administrators reported the chair had not been used in several years.</i>		Non-Compliant
Section 4- Grievance Requirements: Many grievances reviewed throughout the assessment period referenced complaints that youth were being held in their rooms due to staffing shortage. Thirteen (13) of the grievances reviewed were not signed by the youth accepting the resolution.	Total Records Reviewed: 50	Non-Compliant

Five (5) grievances reviewed were not marked as accepted or appealed. OPI was unable to determine if multiple grievances were resolved within the time frames as dates were missing or not filled in by juveniles and staff. Note: Several other anonymous grievances were filed and unable to be resolved/signed by the resident. OAC 377: 3-1-28	
Section 5- Personnel Records: Total Records Reviewed: 19 In review of the temporary employee records, all of them appeared to be missing references, and did not have record of mandatory training/orientation on facility policies and procedures. OPI was also unable to determine if they met qualifications to work as direct care staff as the facility had no record of their high school diploma or GED equivalent. One of the employees also did not have CPR/First Aid within 90 days of employment [REDACTED] In two (2) other personnel records reviewed, employees were missing CPR/First Aid Certification. [REDACTED] In one (1) record reviewed, CPR/First Aid not completed within 90 days of employment. [REDACTED] In one of the records reviewed the employee was missing orientation and CPR/First Aid Certification. [REDACTED] OAC 377:3-13-43	Non-Compliant
Section 6- Admin/Direct Care Staff Interviews: During the interviews with direct care staff, the following concerns/violations were reported: • Overnight resident checks are being done every hour, and not as required by OAC. • There was confusion by staff regarding the use of room restriction (Time-Out), and the process for extension and moving to youth to room confinement if appropriate. • Removal from restriction or confinement was reported as depending on staff receiving "Positive Statements." As opposed to when the youth no longer is demonstrating a safety risk to themselves or others. OAC 377:3-13-44(c)(15)(D) • Staff reported to not being sure of what to do during emergencies such as attempted escapes/escapes from the facility. • Staff confirmed residents are often not out of their rooms for a minimum of 12-hours each day, often due to staffing issues. OAC 377:3-13-45 • Staff reported the quality of some of facility staff had declined in favor of quantity. Note: OPI also interviewed two on-site teachers (Mr. Paul and Ms. Tracy). Both acknowledged the lack of staffing at the facility, the split of juveniles going to class from 12 to 6, lack of schedule consistency due to staffing, and some days not having any students in class. Mr. Paul stated that only 15 residents have been enrolled in school, which could be for several reasons, however, new residents are only enrolled when brought to classroom.	Compliant with areas of improvement identified
Section 7- Juvenile Interviews: # of Juveniles Interviewed: 4 During juvenile interviews it was reported that residents are normally not involved in programming, out of their rooms for a minimum of 12 hours each day. All of the residents interviewed indicated they had been on ½ schedules, where ½ of the unit would be let out of their rooms while the other half had to remain in their rooms. This half/half schedule was confirmed by staff and documentation at the facility. Note: this was confirmed by staff interviewed at the facility as well as in reviewing staffing notes and grievances. OAC 377:3-13-45(a) Residents reported that due to being on the half/half schedule and because they often were not allowed out of their rooms due to staffing, they often only went to school for 1-2 hours each day if they were taking to school at all. This was confirmed in interviews with the teachers.	Non-Compliant

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Section 8- Administrative Requirements: There were no findings, however, it does not appear the facility is documenting and/or reporting all critical incidents to OJA per their contract requirements- CRL2021/23-299(IV)(G)	Compliant
Section 9- Facility Tour: A facility tour was completed, and the following issues or concerns were observed: Admissions Area: • HC-01- Broken window light fixtures • Shower curtain missing/standing water Unit-A • A-11 window missing/door damaged/bed unsecured • A-14 Window cracked • A-8 window missing • A-3 Sprinkler damaged • A-21 sink not draining Unit B: During the assessment, a sprinkler head was damaged by residents and flooded parts of Unit B. • Shower Room 1- no shower curtain • B-1, B-3, B-5, B-7, B-9 broken windows • B-12, 13, 14 windows cracked • B-12- Ceiling/wall damaged • B=17 & 18 sink clogged • B-19 broken window/ceiling damage • b-21 Sink assembly broken needs to be replaced Unit C: All of Unit C is currently down for repairs • C-9 intercom • C-21 sink not working	Non-Compliant

Gym: Bathrooms were out of order and skylights were damaged. OAC 377:3-13-46 & 377:3-13-47 Medical: The medication cabinet was left unlocked and unsecured. Note: on the subsequent visit the following week, the cabinet was again left unlocked and unsecured. OAC 377:3-13-45(7)(D)	
Section 10- Reoccurring Findings: There were reoccurring findings in Section 3- Security and Control specific to room confinement. During the previous assessment there were also instances observed where 15-minute visual observations were not documented or completed, 15-minute visual observations were completed via intercom and not through an actual visual observation, 3-hour reauthorizations were late or not completed, and room confinement/room restriction logs failed to adequately document the time in/out for when a youth was placed/removed from isolation.	Date of Last Assessment: 07/28/20 Reoccurring Findings
Section 11- Additional Comments/Concerns: The following staff, Ms. T. Darnell, Mr. E. Ezechinoso, Kevin, Dre and Travis were all complimented by residents as doing a good job and making time/treating the residents with respect. _____ _____ would like a grievance form at the time of the assessment.	

Additional Information Collected

_____ OCA Referrals: There were six (6) _____ referrals reported during this assessment period. A brief synopsis is included below:

Total OCA Referrals: 17

Critical Incidents: There were thirty-eight (38) critical incidents reported during this assessment period. A brief description of each is included below:

Total: 38

Emergency Room Visit for Illness/injury:

[REDACTED]

Attempted Suicide/Suicidal Ideation:

[REDACTED]

[REDACTED]

Mishandling of Medications:

[REDACTED]

Other unexpected occurrences:

[REDACTED]

Oklahoma State Department of Health:

Number of 4
Concerns:

A health department inspection was completed on 02/28/2022 and the following violations were noted:

- Clean dishes were observed being stored with a scoop dirty with food waste.
- Gaskets on the bottom of two, four-door coolers were dirty with buildup
- Floor under the shelving in the walk-in freezer was dirty with buildup
- Wet mops and dust mops were stored on the floor in the corner of the mop closet and no on a hanger rack.

These issues appeared to have been corrected at the time of OPI's assessment.

Oklahoma State Fire Marshal:

Number of 6
Concerns:

A state fire marshal inspection was completed on 02/10/2022, and the following violations/concerns were noted:

- At the time of the inspection there was an alarm noted for water flow on the fire alarm system, and the facility had an active fire watch on site.
- No lockout device was installed on the fire alarm breaker.
- Smoke control system was not currently operational, the system was in trouble in "A block area"
- The housing sprinkler system was shut down due to residents tampering with the sprinkler heads.
- One exit light was inoperative at the time of the inspection
- Fire drills do not appear to have been documented properly

Note: facility was required and submitted a corrective action plan to the fire marshal to address the issues, however, some of the issues were still ongoing at the time of the OPI assessment.

OJA Contracted Facility

☒ Yes

☐ No

Contract Number: CRL- 2023-229

Additional Comments/Concerns- OJA Program Manager

☐ Yes

☒ No

Findings/Areas of Concern Identified

Findings:

- Section 3- Security and Control- **Reoccurring Findings**
- Section 4- Grievance Requirements
- Section 5- Personnel Records
- Section 7- Juvenile Records
- Section 9- Facility Tour

Noted Areas of Improvement Identified:

- Section 2- Juvenile Records
- Section 6- Staff Interviews

Will a Corrective Action Plan be Required? ☒ Yes ☐ No

OJA Staff/OPI Assessors

OPI- Assessment Lead/Preparer of Report: [REDACTED]

OPI Assessors: [REDACTED]

May 13, 2022

Electronic Delivery

Mr. Anthony Taylor, Director
Tulsa County Juvenile Bureau
ataylor@tulsacounty.org

Mr. Taylor:

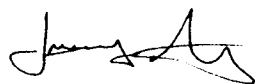
Attached is the Tulsa County Juvenile Detention Center Assessment Report, prepared following the Office of Juvenile Affairs Office of Public Integrity licensing assessment conducted at the Tulsa County Juvenile Detention Center on May 03 - May 04, 2022. The report details significant areas found to be out of compliance or deficient pursuant to Oklahoma Administrative Code (OAC) "Requirements for Secure Juvenile Detention Centers" There were findings in the following area(s):

- Section 3- Security and Control- ***Reoccurring Findings***
- Section 4- Grievance Requirements
- Section 5- Personnel Records
- Section 7- Juvenile Records
- Section 9- Facility Tour

As a result, corrective measures need to immediately take place and Corrective Action Plan (CAP) is required. The CAP should address the facilities plan to regain compliance in all areas, the time frame for which they believe it will take to regain compliance, as well as measures put in place to prevent such areas of noncompliance from reoccurring. Please complete and submit this CAP to Jeremy Andrews at Jeremy.Andrews@oja.ok.gov for approval no later than, **May 27, 2022**. Also, please review the report and address any noted concerns or areas identified with room for improvement with your staff as needed. Please note, a copy of the results of your assessment and this letter will be sent to the Tulsa County Commissioner.

If you have any questions or concerns, please feel free to contact me at (405) 530-2821, or by email at Jeremy.Andrews@oja.ok.gov.

Thank You,



Jeremy Andrews
Administrative Programs Officer
Licensing Administrator- Office of Public Integrity

Cc: Cortez Tunley, Tulsa Detention Program Administrator, ctunley@tulsacounty.org



-OFFICE OF PUBLIC INTEGRITY-

Name of Facility:	Tulsa County Juvenile Detention Center	Facility Address:	500 W. Archer Tulsa, OK 74103
		Telephone #	918-596-5960
Subcontractor:	N/A	Subcontractor Address:	N/A
		Telephone #	
Date of Assessment:	5/3/2022	Date of Report:	5/13/2022
Time Period Reviewed:	04/01/21- 04/31/22	License Expires:	April 2023
Director/Administrator:	Cortez Tunley	Executive Director	Anthony Taylor
Facility Staff Present at Time of Exit Conference:	Doug Currington, Deputy Superintendent; Brent McQuarters, ACA Coordinator		

Assessment Report- Secure Juvenile Detention Center

Total # of Staff (Full time/Part time):	Current Juvenile Population:	Facility total Licensing Capacity:	Utilization Rate for Time Period:	ACA Accreditation Date:
50 (41-Ft/ 9-Pt)	32	63	74.46%	N/A
Total # of Admissions	Total In-County Admissions:	OJA Contracted Beds:	Average Length of Stay:	Total OCA Referrals:
606	422	40	22	17
Total Number of Grievances:	Total Uses of Physical Force:	Number of Room Confinement:	Total # of Room/Wing Restriction:	Total Confirmed OCA/CCR Referrals:
192	324	474	164	6
Total Critical Incidents:	AWOLS/Att. Escapes:	ER Visit for Injury/Illness:	Mishandling Medication:	
37	0	25	2	
	Self-Harm/Suicidal Ideations:	Serious Assaultive Act:	Serious Destructive Act:	
	9	0	0	
		Other unexpected Events:		
		1		
Inspection Dates/Concerns noted:	Health Inspection: 02/28/22	Fire Marshal Inspection: 02/10/22	OCCY Inspection:	N/A
	Concerns: 3	Concerns: 5	Concerns:	0

Sections Reviewed

Section #	Compliant/ Non-Compliant
Section 1 - Policy and Procedure: There was one reported change to the policy and procedure manual during this assessment period as of 03/10/2022. Note: please ensure all policy changes are submitted to OPI prior to implementation per OAC 377:3-13-38(a).	Compliant

Section 2- Juvenile Records/Rights: In one (1) of the cases reviewed there were no documentation/indication the facility provided the two required intake calls, nor was place of birth, last known address notated. OAC 377:3-13-39 & 377:3-13-40 In two (2) cases reviewed there was no legal order for detention granting authority to accept a juvenile currently held in the case file. OAC 377:3-13-40(b) In one of the cases reviewed there was no education history notated. OAC 377:3-13-40(a) Please ensure all forms are being addressed and dates are correct. In review of the admission forms and juvenile records there were several instances observed by OPI of discrepancies between dates on each form and areas that were blank and not filled in.	Total Records Reviewed: 6	Compliant with areas of improvement identified
Section 3- Institutional Operations/Security and Control: Facility does not appear to be completing room checks on each resident a minimum of every 30 minutes during sleeping hours. Logs indicate unless youth is on "special supervision" unit checks are only being completed every hour from 23:00- 7:00AM. OAC 377:3-13-43(4)(C) (ii-iii) Facility does not appear to be completing a report and submitting it to OJA for residents who are being held in room confinement in excess of 48 hours. OAC 377: 3-13-43(c)(14)(C) In four (4) cases reviewed, 15- mins observation logs were missing from the file and/or not completed. OPI also observed circumstances where the 15-minute checks were documented as being completed through the intercom, and not through a visual observation as required. OAC 377: 3-13-43(c)(15) In one (1) case reviewed, documents show resident was released from confinement on [REDACTED], but the log showed release to be on [REDACTED]. In one (1) case reviewed, a resident spent three (3) days in confinement, waiting on a program plan approval instead of utilizing authorized procedure and justification for continued room confinement. In review of confinement records, it appears that 3-hour reauthorizations were not always completed timely, or at all in other cases. There were also instances where 24- administrative reviews were not being completed by an uninvolved administrator and 3-hour reauthorizations did not adequately document reasons or justifications for continued confinement. OAC 377: 3-13-43(c)(14) On the room restriction log, there were (3) three instances observed where there was no time out listed on the log. OAC 377: 3-13-43(c)(15) During the assessment facility tour OPI observed a restraint chair maintained by the facility. Title 10A O.S., § 2-7-604 in conjunction with OAC 377:10-01-04, states the use of a restraint chair is prohibited in institutions or other facilities operated by or contracted with OJA. <i>Note: facility records, and administrators reported the chair had not been used in several years.</i>		Non-Compliant
Section 4- Grievance Requirements: Many grievances reviewed throughout the assessment period referenced complaints that youth were being held in their rooms due to staffing shortage. Thirteen (13) of the grievances reviewed were not signed by the youth accepting the resolution.	Total Records Reviewed: 50	Non-Compliant

Five (5) grievances reviewed were not marked as accepted or appealed. OPI was unable to determine if multiple grievances were resolved within the time frames as dates were missing or not filled in by juveniles and staff. Note: Several other anonymous grievances were filed and unable to be resolved/signed by the resident. OAC 377:3-1-28	
Section 5- Personnel Records: Total Records Reviewed: 19 In review of the temporary employee records, all of them appeared to be missing references, and did not have record of mandatory training/orientation on facility policies and procedures. OPI was also unable to determine if they met qualifications to work as direct care staff as the facility had no record of their high school diploma or GED equivalent. One of the employees also did not have CPR/First Aid within 90 days of employment [REDACTED] In two (2) other personnel records reviewed, employees were missing CPR/First Aid Certification. [REDACTED] In one (1) record reviewed, CPR/First Aid not completed within 90 days of employment. [REDACTED] In one of the records reviewed the employee was missing orientation and CPR/First Aid Certification. [REDACTED] OAC 377:3-13-43	Non-Compliant
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- Fire drills do not appear to have been documented properly

Note: facility was required and submitted a corrective action plan to the fire marshal to address the issues, however, some of the issues were still ongoing at the time of the OPI assessment.

OJA Contracted Facility

☒ Yes | ☐ No

Contract Number: CRL- 2023-229

Additional Comments/Concerns- OJA Program Manager

☐ Yes

☒ No

Findings/Areas of Concern Identified

Findings:

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Will a Corrective Action Plan be Required? ☒ Yes ☐ No

OJA Staff/OPI Assessors

OPI- Assessment Lead/Preparer of Report: [REDACTED]

OPI Assessors: [REDACTED]



-OFFICE OF PUBLIC INTEGRITY-

Name of Facility:	Tulsa County Juvenile Detention Center	Facility Address:	500 W. Archer Tulsa, OK 74103
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		Telephone #	
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Time Period Reviewed:	04/01/21- 04/31/22	License Expires:	April 2023
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		1		
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Five (5) grievances reviewed were not marked as accepted or appealed. OPI was unable to determine if multiple grievances were resolved within the time frames as dates were missing or not filled in by juveniles and staff. Note: Several other anonymous grievances were filed and unable to be resolved/signed by the resident. OAC 377: 3-1-28	
Section 5- Personnel Records: Total Records Reviewed: 19 In review of the temporary employee records, all of them appeared to be missing references, and did not have record of mandatory training/orientation on facility policies and procedures. OPI was also unable to determine if they met qualifications to work as direct care staff as the facility had no record of their high school diploma or GED equivalent. One of the employees also did not have CPR/First Aid within 90 days of employment [REDACTED] In two (2) other personnel records reviewed, employees were missing CPR/First Aid Certification. [REDACTED] In one (1) record reviewed, CPR/First Aid not completed within 90 days of employment. [REDACTED] In one of the records reviewed the employee was missing orientation and CPR/First Aid Certification. [REDACTED] OAC 377:3-13-43	Non-Compliant
Section 6- Admin/Direct Care Staff Interviews: During the interviews with direct care staff, the following concerns/violations were reported: • Overnight resident checks are being done every hour, and not as required by OAC. • There was confusion by staff regarding the use of room restriction (Time-Out), and the process for extension and moving to youth to room confinement if appropriate. • Removal from restriction or confinement was reported as depending on staff receiving "Positive Statements." As opposed to when the youth no longer is demonstrating a safety risk to themselves or others. OAC 377:3-13-44(c)(15)(D) • Staff reported to not being sure of what to do during emergencies such as attempted escapes/escapes from the facility. • Staff confirmed residents are often not out of their rooms for a minimum of 12-hours each day, often due to staffing issues. OAC 377:3-13-45 • Staff reported the quality of some of facility staff had declined in favor of quantity. Note: OPI also interviewed two on-site teachers (Mr. Paul and Ms. Tracy). Both acknowledged the lack of staffing at the facility, the split of juveniles going to class from 12 to 6, lack of schedule consistency due to staffing, and some days not having any students in class. Mr. Paul stated that only 15 residents have been enrolled in school, which could be for several reasons, however, new residents are only enrolled when brought to classroom.	Compliant with areas of improvement identified
Section 7- Juvenile Interviews: # of Juveniles Interviewed: 4 During juvenile interviews it was reported that residents are normally not involved in programming, out of their rooms for a minimum of 12 hours each day. All of the residents interviewed indicated they had been on ½ schedules, where ½ of the unit would be let out of their rooms while the other half had to remain in their rooms. This half/half schedule was confirmed by staff and documentation at the facility. Note: this was confirmed by staff interviewed at the facility as well as in reviewing staffing notes and grievances. OAC 377:3-13-45(a) Residents reported that due to being on the half/half schedule and because they often were not allowed out of their rooms due to staffing, they often only went to school for 1-2 hours each day if they were taking to school at all. This was confirmed in interviews with the teachers.	Non-Compliant

OAC 377:3-13-45(a)(1) In addition to reduced time in education, residents reported they were not always given one (1) hour per day of large muscle activity and one hour of structured recreational activities. OAC 377:3-13-42(14) & 377:3-13-45(a)(4) Residents reported times when, due to staff not showing up, they were not released from their rooms all day. They stated this most often occurred on the weekends but could happen any day. It appears that during these instances of modified scheduling (1/2 residents in their room, while ½ are involved in the programming) the facility is not appropriately documenting and/or completing visual observation checks as required per OAC 377:3-13-44(c)(4)(C)(i-iii). Residents also reported to OPI they were unable to file grievances at times due to being held in their rooms. It was reported they are instructed by staff to file their grievances during free time on the unit, however they are in their rooms more often than not. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] an OCA referral was made by OPI. The following reference number was provided: [REDACTED]	
Section 8- Administrative Requirements: There were no findings, however, it does not appear the facility is documenting and/or reporting all critical incidents to OJA per their contract requirements- CRL2021/23-299(IV)(G)	Compliant
Section 9- Facility Tour: A facility tour was completed, and the following issues or concerns were observed: Admissions Area: • HC-01- Broken window light fixtures • Shower curtain missing/standing water Unit-A • A-11 window missing/door damaged/bed unsecured • A-14 Window cracked • A-8 window missing • A-3 Sprinkler damaged • A-21 sink not draining Unit B: During the assessment, a sprinkler head was damaged by residents and flooded parts of Unit B. • Shower Room 1- no shower curtain • B-1, B-3, B-5, B-7, B-9 broken windows • B-12, 13, 14 windows cracked • B-12- Ceiling/wall damaged • B=17 & 18 sink clogged • B-19 broken window/ceiling damage • b-21 Sink assembly broken needs to be replaced Unit C: All of Unit C is currently down for repairs • C-9 intercom • C-21 sink not working	Non-Compliant

Gym: Bathrooms were out of order and skylights were damaged. (DAC 37723 13 46 & 37723 13 47) Medical: The medication cabinet was left unlocked and unsecured. Note: on the subsequent visit the following week, the cabinet was again left unlocked and unsecured. (DAC 37723 13 45(7)(D))	
Section 10- Reoccurring Findings: There were reoccurring findings in Section 3- Security and Control specific to room confinement. During the previous assessment there were also instances observed where 15-minute visual observations were not documented or completed, 15-minute visual observations were completed via intercom and not through an actual visual observation, 3-hour reauthorizations were late or not completed, and room confinement/room restriction logs failed to adequately document the time in/out for when a youth was placed/removed from isolation.	Date of Last Assessment: 07/25/20 Reoccurring Findings
Section 11- Additional Comments/Concerns: The following staff, Ms. T. Darnell, Mr. E. Ezechinoso, Kevin, Dre and Travis were all complimented by residents as doing a good job and making time/treating the residents with respect. _____ _____ would like a grievance form at the time of the assessment.	

Additional Information Collected

_____ OCA Referrals: There were six (6) _____ referrals reported during this assessment period. A brief synopsis is included below: Total OCA Referrals: 17

Critical Incidents: There were thirty-eight (38) critical incidents reported during this assessment period. A brief description of each is included below: Total: 38

Emergency Room Visit for Illness/injury:

[REDACTED]

Attempted Suicide/Suicidal Ideation:

[REDACTED]

[REDACTED]

Mishandling of Medications:

[REDACTED]

Other unexpected occurrences:

[REDACTED]

Oklahoma State Department of Health:

Number of 4
Concerns:

A health department inspection was completed on 02/28/2022 and the following violations were noted:

- Clean dishes were observed being stored with a scoop dirty with food waste.
- Gaskets on the bottom of two, four-door coolers were dirty with buildup
- Floor under the shelving in the walk-in freezer was dirty with buildup
- Wet mops and dust mops were stored on the floor in the corner of the mop closet and no on a hanger rack.

These issues appeared to have been corrected at the time of OPI's assessment.

Oklahoma State Fire Marshal:

Number of 6
Concerns:

A state fire marshal inspection was completed on 02/10/2022, and the following violations/concerns were noted:

- At the time of the inspection there was an alarm noted for water flow on the fire alarm system, and the facility had an active fire watch on site.
- No lockout device was installed on the fire alarm breaker.
- Smoke control system was not currently operational, the system was in trouble in "A block area"
- The housing sprinkler system was shut down due to residents tampering with the sprinkler heads.
- One exit light was inoperative at the time of the inspection
- Fire drills do not appear to have been documented properly

Note: facility was required and submitted a corrective action plan to the fire marshal to address the issues, however, some of the issues were still ongoing at the time of the OPI assessment.

OJA Contracted Facility

☒ Yes ☐ No

Contract Number: CRL- 2023-229

Additional Comments/Concerns- OJA Program Manager

☐ Yes

☒ No

Findings/Areas of Concern Identified

Findings:

- Section 3- Security and Control- **Reoccurring Findings**
- Section 4- Grievance Requirements
- Section 5- Personnel Records
- Section 7- Juvenile Records
- Section 9- Facility Tour

Noted Areas of Improvement Identified:

- Section 2- Juvenile Records
- Section 6- Staff Interviews

Will a Corrective Action Plan be Required? ☒ Yes ☐ No

OJA Staff/OPI Assessors

OPI- Assessment Lead/Preparer of Report: [REDACTED]

OPI Assessors: [REDACTED]

OFFICE of JUVENILE AFFAIRS

Tulsa County Board of Commissioners

Has met all applicable standards and is hereby issued a

License

For the operation of a Juvenile Detention Center at:

500 W. Archer

Tulsa, Oklahoma 74103

Pursuant to: 10A O.S. § 2-3-103

Rachel C Holt

Executive Director

D-72-04

Certificate Number

April 2023

Month and Year of Expiration

[Signature]

Office of Public Integrity



Maximum Juvenile Occupancy: 63





-OFFICE OF PUBLIC INTEGRITY-

Name of Facility:	Tulsa County Juvenile Detention Center	Facility Address:	500 W. Archer Tulsa, OK 74103
		Telephone #	918-596-5960
Subcontractor:	N/A	Subcontractor Address:	N/A
		Telephone #	
Date of Assessment:	4/4/2023	Date of Report:	5/12/2023
Time Period Reviewed:	05/11/22 - 04/06/2023	License Expires:	July 2023 (Probationary Certificate)
Director/Administrator:	Cortez Tunley		
Facility Staff Present at Time of Assessment:	Doug Currington, Deputy Superintendent; Brent McQuarters, ACA Coordinator		

Assessment Report- Secure Juvenile Detention Center

Total # of Staff (Full time/Part time):	Current Juvenile Population:	Facility total Licensing Capacity:	Utilization Rate for Time Period:	ACA Accreditation Date:
42 (41-FT /1-PT)	35	63	101 %	N/A
Total # of Admissions	Total In-County Admissions:	OJA Contracted Beds:	Average Length of Stay:	Total OCA Referrals:
600	340	30	37 Days	10
Total Number of Grievances:	Total Uses of Physical Force:	Number of Room Confinement:	Total # of Room/Wing Restriction:	Total Confirmed OCA Referrals:
58	232 (83-Mechanical)	253	233	4
Total Critical Incidents:	AWOLS/AH. Escapes:	ER Visit for Injury/Illness:	Improper Admissions:	
39	3	17	0	
Total Juveniles Involved:	Self-Harm/Suicidal:	Serious Assaultive Act:	Serious Destructive Act:	
40	12	1	3	
	Other unexpected Events:			
	3			
Inspection Dates/Concerns noted:	Health Inspection: 03/29/23	Fire Marshal Inspection: 02/10/22	OCCY Inspection: 05/12/22	
	Concerns: 5	Concerns: 6	Concerns: 2	

Sections Reviewed

Section #	Compliant/ Non-Compliant
Section 1- Policy and Procedure: There were seven (7) reported changes to the policy and procedure manual during this assessment period. Review done on 04/28/2022 and the changes are listed below:	Compliant

1. JDC 02-01 Fire Safety Codes 2. JDC 02-02 Fire Rated Interior Finishing Materials 3. JDC 02-03 Facility Service Areas 4. JDC 02-04 Remodeling and New Construction 5. JDC 03-10 Use of Force 6. JDC 04-22 Suicide Prevention and Intervention 7. JDC 09-09 Resident Showers	
Section 2- Juvenile Records/Rights: Please ensure court orders with the authority to detain are in all juvenile case files.	Total Records Reviewed: 6 Compliant
Section 3- Institutional Operations/Security and Control: No issues or concerns. <u>Note:</u> Please include observation log to incident report. As of assessment the facility kept them in the resident's file. Overnight checks are currently in resident folder. OPI recommended that a copy of all overnight checks be placed in a binder instead of just the resident file.	Compliant
Section 4- Grievance Requirements: Grievance # 22-008 appeared to have no signatures by resident or staff. The date was included but not signed. Grievances between 22-043-22-054 were not numbered on grievance log. Grievance # 22-054 was missing. There were four (4) Grievance Forms in the binder but not logged in grievance log. Grievance # 22-042 was not completed within time frame. Grievance 22-048 showed the grievance to be both accepted and appealed, yet there was no appeal documented. In Grievance # 22-025 the grievance was not completed before resident discharge. OPI also received reports during staff and juvenile interviews that additional grievances had been filed but they were not reflected on the log nor were the grievances found in the file. OAC 377: 3-1-28	Total Records Reviewed: 58 Non-Compliant
Section 5- Personnel Records: No issues or concerns.	Total Records Reviewed: 9 Compliant
Section 6- Admin/Direct Care Staff Interviews: During the interviews with direct care staff by phone, the following concerns/violations were reported: - Staff member on duty while intoxicated. - Staff member had contraband (cigarettes) in the secure area. - Grievance Log does not reflect an accurate number of the number of grievances filed by residents. - Staff member was asked if the residents were safe in the facility, said, "No! Not taking care of the residents by not following policies." - Residents are NOT out of their rooms for the required 12-hours per day. ½ schedules are still being used, where ½ of the unit would be let out of their rooms while the other half had to remain in their rooms. Staff said, "Not really short-staffed. Upper staff spends most of their time in the supervisor's office which keeps the kids down." "Supervisors are not held accountable, and they are the ones who decide what is going to happen on shift." - Staff said, "School is a joke! They watch movies and make slime. They also pick worksheets they want to do." - Staff said, "Poor leadership causes all the facility issues!"	# Of Staff Interviewed: 2 Non-Compliant

OAC 377:3-13-45(a); OAC 277:3-13-43(7)(E)		
Section 7- Juvenile Interviews: It was reported that residents are not involved in programming, out of their rooms for a minimum of 12 hours each day, especially during the weekends. All of the residents interviewed indicated they had been on ½ schedules, where ½ of the unit would be let out of their rooms while the other half had to remain in their rooms. This half/half schedule was confirmed by staff at the facility. OAC 377:3-13-45(a) It was reported during school, residents are allowed to choose the worksheet they want to complete even though it is not within their grade level. This activity was confirmed by staff at the facility. OAC 377:3-12-45(a)(1)	# Of Juveniles Interviewed: 2	Non-Compliant
Section 8- Administrative Requirements: The annual Oklahoma State Fire Marshal inspection has not been completed at the time of this report. The last inspection was completed on 02/10/2022.		Compliant with Areas of Improvement Identified
Section 9- Facility Tour: During the facility tour, the following issues/areas of concern were observed: - Room C-1, C-9, and C-12 Door glass broken. - Room C-3 Wall and door paint chipping onto floor in room and hallway. - Room C-4 Cold water button not working. - Room A-8 Toilet stopped-up. - Intercom system was down for the units. Note: Unit B was under construction during assessment and offline. Administration advised the work will take approximately three (3) weeks to complete. OAC 377:3-13-47(a)(4)		Non-Compliant
Section 10- Reoccurring Findings: <u>Section 4- Grievance Requirements</u> Thirteen (13) of the grievances reviewed were not signed by the youth accepting the resolution. OAC 377:3-13-28 <u>Section 7- Juvenile Interviews</u> During juvenile interviews it was reported that residents are normally not involved in programming, out of their rooms for a minimum of 12 hours each day. All the residents interviewed indicated they had been on ½ schedules, where ½ of the unit would be let out of their rooms while the other half had to remain in their rooms. This half/half schedule was confirmed by staff and documentation at the facility. OAC 377:3-13-45(a)	Date of Last Assessment: 05-03/22	Reoccurring Findings
Section 11- Additional Comments/Concerns: 		

Additional Information Collected

Total OCA 10
Referrals:

[illegible]

Emergency Room Visit for Illness/injury:

[illegible]

[REDACTED]

Serious Destructive Acts:

[REDACTED]

Serious Assaultive Acts:

[REDACTED]

Attempted Suicide/Suicidal Ideation:

[REDACTED]

[REDACTED]

AWOLS/Attempted Escapes:

[REDACTED]

Other Unexpected Occurrences:

Oklahoma State Department of Health:

Number of 5
Concerns:

An Oklahoma Health Department inspection was completed on 03/29/23. There were five (5) violations cited on the report. A brief description of each violation below:

1. Dented can observed in the storage area. Corrected on day of assessment.
2. Unknown white powder container by microwave and unknown clear liquid squeeze bottle not properly labeled.
3. Sanitizer bucket was low in concentration. Corrected on day of assessment.
4. Vent guards in storage area dirty with buildup.
5. Floor under single services items shelving dirty with debris. Floor under dish machine dirty with debris.

Oklahoma State Fire Marshal:

Number of 6
Concerns:

A state fire marshal inspection was completed on 02/10/2022, and the following violations/concerns were noted:

- At the time of the inspection there was an alarm noted for water flow on the fire alarm system, and the facility had an active fire watch on site.
- No lockout device was installed on the fire alarm breaker.
- Smoke control system was not currently operational; the system was in trouble in "A block area"

- The housing sprinkler system was shut down due to residents tampering with the sprinkler heads.
- One exit light was inoperative at the time of the inspection
- Fire drills do not appear to have been documented properly

Note: facility was required and submitted a corrective action plan to the fire marshal to address the issues, however, some of the issues were still ongoing at the time of the OPI assessment.

Note: A new inspection is required.

Uses of Physical Force:

Total: 232

There were two hundred thirty-two (232) cases of Uses of Physical Force reported during assessment period, and eighty-three (83) were mechanical restraints. All uses of force reviewed appear to meet the criteria for use of force.

JOLTS ENTRY:

It appears the facility is entering in all JOLTS information as required.

Comments/Concerns relative to OJA/JSU: None**OJA Contracted Facility**☒ **Yes**☐ **No**

Contract Number: CRL- 2023-229

Comments/Concerns- OJA Program Manager☐ **Yes**☐ **No**

Findings/Areas of Concern Identified**Findings:**

- Section 4- Grievance Requirements (Reoccurring Finding)
- Section 6- Admin/Direct Care Staff Interviews
- Section 7- Juvenile Interviews (Reoccurring Finding)

Noted Areas of Improvement Identified:

- Section 8- Administrative Requirements

Will a Corrective Action Plan be Required? ☒ **Yes** ☐ **No**

OJA Staff/OPI Assessors

OPI- Assessment Lead/Preparer of Report: [REDACTED]

OPI- [REDACTED]

Assisting: [REDACTED]

May 5, 2022

Electronic Delivery

Tulsa County Board of County Commissioners
Commissioner Stan Sallee, District 1
ssallee@tulsacounty.org

Commissioner Karen Keith, District 2
kkeith@tulsacounty.org

Commissioner Kelly Dunkerley, District 3
kdunkerley@tulsacounty.org

Re: Tulsa County Juvenile Detention Center

Dear County Commissioners,

We met with your representatives and other stakeholders from Tulsa County on May 09, 2022, to discuss the concerns that were raised as a result of the 2022 Office of Juvenile Affairs (OJA) Office of Public Integrity (OPI) licensing and certification assessment for Tulsa County Juvenile Detention Center. Since our meeting last year, our staff have talked to other stakeholders and continued to make unannounced visits to monitor the facility and the concerns we identified. On April 04, 2023, Gene Carroll our OPI Licensing Specialist, along with OJA representatives, conducted the annual recertification assessment for The Tulsa County Juvenile Detention Center. Attached is the OPI report from the assessment. The report details the areas found to be out of compliance or deficient pursuant to Oklahoma Administrative Code (OAC) "Requirements for Secure Juvenile Detention Centers". We identified significant issues, several of which were previously identified as non-compliant from the assessment conducted in May of 2022. These included youth being kept in their rooms/isolated, education concerns, and problems handling grievances and their resolutions. These areas have remained out of compliance for the past 11 months and any corrective action taken by Tulsa County Juvenile Detention Center does not appear to have adequately addressed and/or resolved the issues in order to come back into compliance with licensing standards. As a result of the most recent Licensing Certification Assessment, and the reoccurring areas out of compliance, the Office of Juvenile Affairs, pursuant to OAC 377:3-13-6, has made the decision to place your facility on a Probationary Certificate for a period of 90 days, effective May 05, 2023. Should the facility fail to regain compliance during this time, OJA may make the determination to revoke the license for operating a secure juvenile detention center per OAC 377:3-13-6(d).

A written Corrective Action Plan will need to be developed and submitted to OJA no later than Friday, May 19, 2023, with the specific measures and plans to address the reoccurring issues and

all other areas identified for correction in the attached report. During the period the certificate remains on probationary status, OJA will be making unannounced visits to measure progress toward correcting the identified violations and may require additional safety plans or measures to be adopted.

We are working with Director Taylor to schedule a meeting on Thursday, May 17th to discuss the reported violations and the need for an immediate corrective action plan to regain compliance. Should you have any questions you may contact me at 405-651-5735 or by email at ben.brown@oja.ok.gov.

Thank you,



Benjamin C. Brown
General Counsel

Attachment

CC: Judge Kevin Gray, Chief Judge of Tulsa County Juvenile Court, kevin.gray@oscn.net; District Attorney Steven Kunzweiler, Tulsa County District Attorney, stevekunzweiler@tulsacounty.org; Mr. Erik Grayless, 1st Assistant District Attorney, ergrayless@tulsacounty.org; Ms. Kim Jantz, Juvenile Division Director for Tulsa County District Attorneys Office, kjantz@tulsacounty.org; Mr. Corbin Brewster, Tulsa County Public Defender, corbin.brewster@oscn.net; Ms. Lora Howard, 1st Assistant Public Defender lora.howard@oscn.net; Ms. Amanda Mims, Juvenile Division Chief Tulsa County Public Defender's Office, amanda.mims@oscn.net; Mr. Anthony Taylor, Tulsa County Juvenile Bureau Director, ataylor@tulsacounty.org; Mr. Cortez Tunley, Tulsa County Juvenile Detention Director, ctunley@tulsacounty.org



-OFFICE OF PUBLIC INTEGRITY-

Name of Facility: Tulsa County Juvenile Detention Center **Facility Address:** 500 W. Archer
Tulsa, OK 74103
Telephone # 918-596-5960
Subcontractor: N/A **Subcontractor Address:** N/A
Telephone #

Date of Assessment: 4/4/2023 **Date of Report:** 5/12/2023
Time Period Reviewed: 05/11/22 - 04/06/2023 **License Expires:** April, 2023
Director/Administrator: Cortez Tunley

Facility Staff Present at Time of Assessment: Doug Currington, Deputy Superintendent; Brent McQuarters, ACA Coordinator

Assessment Report- Secure Juvenile Detention Center

Total # of Staff (Full time/Part time): 42 (41-FT /1-PT)	Current Juvenile Population: 35	Facility total Licensing Capacity: 63	Utilization Rate for Time Period: 101 %	ACA Accreditation Date: N/A
Total # of Admissions 600	Total In-County Admissions: 340	OJA Contracted Beds: 30	Average Length of Stay: 37 Days	Total OCA Referrals: 10
Total Number of Grievances: 58	Total Uses of Physical Force: 232 (83-Mechanical)	Number of Room Confinement: 253	Total # of Room/Wing Restriction: 233	Total Confirmed OCA Referrals: 4
Total Critical Incidents: 39	AWOLS/Ath. Escapes: 3	ER Visit for Injury/Illness: 17	Improper Admissions: 0	
Total Juveniles Involved: 40	Self-Harm/Suicidal: 12	Serious Assaultive Act: 1	Serious Destructive Act: 3	
	Other unexpected Events: 3			
Inspection Dates/Concerns noted:	Health Inspection: 03/29/23	Fire Marshal Inspection: 02/10/22	OCCY Inspection: 05/12/22	
	Concerns: 5	Concerns: 6	Concerns: 2	

Sections Reviewed

Section #	Compliant/ Non-Compliant
Section 1- Policy and Procedure: There were seven (7) reported changes to the policy and procedure manual during this assessment period. Review done on 04/28/2022 and the changes are listed below: 1. JDC 02-01 Fire Safety Codes	Compliant

2. JDC 02-02 Fire Rated Interior Finishing Materials 3. JDC 02-03 Facility Service Areas 4. JDC 02-04 Remodeling and New Construction 5. JDC 03-10 Use of Force 6. JDC 04-22 Suicide Prevention and Intervention 7. JDC 09-09 Resident Showers	
Section 2- Juvenile Records/Rights: Total Records Reviewed: 6 Please ensure court orders with the authority to detain are in all juvenile case files.	Compliant
Section 3- Institutional Operations/Security and Control: No issues or concerns. <u>Note:</u> Please include observation log to incident report. As of assessment the facility kept them in the resident's file. Overnight checks are currently in resident folder. OPI recommended that a copy of all overnight checks be placed in a binder instead of just the resident file.	Compliant
Section 4- Grievance Requirements: Total Records Reviewed: 58 Grievance # 22-008 appeared to have no signatures by resident or staff. The date was included but not signed. Grievances between 22-043-22-054 were not numbered on grievance log. Grievance # 22-054 was missing. There were four (4) Grievance Forms in the binder but not logged in grievance log. Grievance # 22-042 was not completed within time frame. Grievance 22-048 showed the grievance to be both accepted and appealed, yet there was no appeal documented. In Grievance # 22-025 the grievance was not completed before resident discharge. OPI also received reports during staff and juvenile interviews that additional grievances had been filed but they were not reflected on the log nor were the grievances found in the file. OAC 377: 3-1-28	Non-Compliant
Section 5- Personnel Records: Total Records Reviewed: 9 No issues or concerns.	Compliant
Section 6- Admin/Direct Care Staff Interviews: # Of Staff Interviewed: 2 During the interviews with direct care staff by phone, the following concerns/violations were reported: • Staff member on duty while intoxicated. • Staff member had contraband (cigarettes) in the secure area. • Grievance Log does not reflect an accurate number of the number of grievances filed by residents. • Staff member was asked if the residents were safe in the facility, said, "No! Not taking care of the residents by not following policies." • Residents are NOT out of their rooms for the required 12-hours per day. ½ schedules are still being used, where ½ of the unit would be let out of their rooms while the other half had to remain in their rooms. Staff said, "Not really short-staffed. Upper staff spends most of their time in the supervisor's office which keeps the kids down." "Supervisors are not held accountable, and they are the ones who decide what is going to happen on shift." • Staff said, "School is a joke! They watch movies and make slime. They also pick worksheets they want to do." • Staff said, "Poor leadership causes all the facility issues!" OAC 377:3-13-45(a); OAC 277: 3-13-43(7)(E)	Non-Compliant

Section 7- Juvenile Interviews: # Of Juveniles Interviewed: 2 It was reported that residents are not involved in programming, out of their rooms for a minimum of 12 hours each day, especially during the weekends. All of the residents interviewed indicated they had been on ½ schedules, where ½ of the unit would be let out of their rooms while the other half had to remain in their rooms. This half/half schedule was confirmed by staff at the facility. OAC 377:3-13-45(a) It was reported during school, residents are allowed to choose the worksheet they want to complete even though it is not within their grade level. This activity was confirmed by staff at the facility. OAC 377:3-12-45(a)(1)	Non-Compliant
Section 8- Administrative Requirements: The annual Oklahoma State Fire Marshal inspection has not been completed at the time of this report. The last inspection was completed on 02/10/2022.	Compliant with Areas of Improvement Identified
Section 9- Facility Tour: During the facility tour, the following issues/areas of concern were observed: • Room C-1, C-9, and C-12 Door glass broken. • Room C-3 Wall and door paint chipping onto floor in room and hallway. • Room C-4 Cold water button not working. • Room A-8 Toilet stopped-up. • Intercom system was down for the units. Note: Unit B was under construction during assessment and offline. Administration advised the work will take approximately three (3) weeks to complete. OAC 377:3-13-47(a)(4)	Non-Compliant
Section 10- Reoccurring Findings: <u>Section 4- Grievance Requirements</u> Thirteen (13) of the grievances reviewed were not signed by the youth accepting the resolution. OAC 377: 3-1-28 <u>Section 7- Juvenile Interviews</u> During juvenile interviews it was reported that residents are normally not involved in programming, out of their rooms for a minimum of 12 hours each day. All the residents interviewed indicated they had been on ½ schedules, where ½ of the unit would be let out of their rooms while the other half had to remain in their rooms. This half/half schedule was confirmed by staff and documentation at the facility. OAC 377:3-13-45(a)	Reoccurring Findings
Section 11- Additional Comments/Concerns: [REDACTED] [REDACTED] [REDACTED]	

Additional Information Collected

There were ten (10) OCA Referrals reported to OPI during this assessment period, [REDACTED]
[REDACTED] A brief description of the incidents below:

Total OCA Referrals: 10

[REDACTED]

Critical Incidents: There were forty (40) critical incidents reported during this assessment period. A brief description of each below: Total: 40

Emergency Room Visit for Illness/injury:

[REDACTED]

[REDACTED]

Serious Destructive Acts:

[REDACTED]

Serious Assaultive Acts:

[REDACTED]

Attempted Suicide/Suicidal Ideation:

[REDACTED]

[REDACTED]

AWOLS/Attempted Escapes:

[REDACTED]

Other Unexpected Occurrences:

Oklahoma State Department of Health:

Number of 5
Concerns:

An Oklahoma Health Department inspection was completed on 03/29/23. There were five (5) violations cited on the report. A brief description of each violation below:

1. Dented can observed in the storage area. Corrected on day of assessment.
2. Unknown white powder container by microwave and unknown clear liquid squeeze bottle not properly labeled.
3. Sanitizer bucket was low in concentration. Corrected on day of assessment.
4. Vent guards in storage area dirty with buildup.
5. Floor under single services items shelving dirty with debris. Floor under dish machine dirty with debris.

Oklahoma State Fire Marshal:

Number of 6
Concerns:

A state fire marshal inspection was completed on 02/10/2022, and the following violations/concerns were noted:

- At the time of the inspection there was an alarm noted for water flow on the fire alarm system, and the facility had an active fire watch on site.
- No lockout device was installed on the fire alarm breaker.
- Smoke control system was not currently operational; the system was in trouble in "A block area"
- The housing sprinkler system was shut down due to residents tampering with the sprinkler heads.

- One exit light was inoperative at the time of the inspection
- Fire drills do not appear to have been documented properly

Note: facility was required and submitted a corrective action plan to the fire marshal to address the issues, however, some of the issues were still ongoing at the time of the OPI assessment.

Note: A new inspection is required.

Uses of Physical Force:

Total: 232

There were two hundred thirty-two (232) cases of Uses of Physical Force reported during assessment period, and eighty-three (83) were mechanical restraints. All uses of force reviewed appear to meet the criteria for use of force.

JOLTS ENTRY:

It appears the facility is entering in all JOLTS information as required.

Comments/Concerns relative to OJA/JSU: None

OJA Contracted Facility

☒ Yes ☐ No

Contract Number: CRL- 2023-229

Comments/Concerns- OJA Program Manager

☐ Yes ☐ No

Findings/Areas of Concern Identified

Findings:

- Section 4- Grievance Requirements (Reoccurring Finding)
- Section 6- Admin/Direct Care Staff Interviews
- Section 7- Juvenile Interviews (Reoccurring Finding)

Noted Areas of Improvement Identified:

- Section 8- Administrative Requirements

Will a Corrective Action Plan be Required? ☒ Yes ☐ No

OJA Staff/OPI Assessors

OPI- Assessment Lead/Preparer of Report: [REDACTED]

OPI- [REDACTED]

Assisting: [REDACTED]

Revised Corrective Action Plan (CAP)

Date: 05/19/23

Facility Name: Tulsa County Juvenile Detention Center

Administrator's Name: [REDACTED]

Findings Noted in OPI Assessment Dated 04/05/23

1. Section 4 – Grievance Requirements (Concerns and Findings):

- Grievance #22-008 appeared to have no signatures by resident or staff. The date was included but not signed.
- Grievances between 22-043 – 22-054 were not numbered on grievance log.
- Grievance # 22-054 was missing.
- There were four (4) Grievance Forms in the binder but not logged in the grievance log.
- Grievance # 22-042 was not completed within the time frame.
- Grievance # 22-0048 showed the grievance to be both accepted and appealed, yet there was no appeal documented.
- In Grievance # 22-025 the grievance was not completed before resident discharged.
- OPI also received reports during staff and juvenile interviews that additional grievances had been filed but they were not reflected on the log nor were the grievances found in the file. All reports violations of **OAC 377: 3-1-28**.

2. Section 6 – Admin/Direct Care Staff Interviews (Concerns and Findings):

- Staff member on duty while intoxicated.
- Staff member had contraband (cigarettes) in the secure area.
- Grievance Log does not reflect an accurate number of the grievances filed by residents.
- Staff member was asked if the residents were safe in the facility, said, "No! Not taking care of the residents by not following policies."
- Residents are not out of their rooms for the required 12-hours per day. ½ and ½ schedules are still being used, were ½ of the unit would be let out of their rooms while the other half had to remain in their rooms.

- Staff said, "School is a joke! They watch movies and make slime. They also pick worksheets they want to do."
- Staff said, "Poor leadership causes all the facility issues!"

Violations of OAC 377: 3-13-45(a); OAC 377: 3-13-43 (7) (E)

3. Section 7 – Juvenile Interviews (Concerns and Findings):

- It was reported that residents are not involved in programming, out of their rooms for a minimum of 12 hours each day, especially during the weekends.
- All of the residents interviewed indicated they had been on ½ and ½ schedules, where ½ of the unit would be let out of their rooms while the other half had to remain in their rooms. This half/half schedule was confirmed by staff at the facility.

OAC 377: 3-13-45(a)

- It was reported during school, residents are allowed to choose the worksheet they want to complete even though it is not within their grade level. This activity was confirmed by staff at the facility.

OAC 377: 3-13-45(a) (1)

4. Section 9 – Facility Tour (Concerns and Findings):

During the facility tour, the following issues/areas of concern were observed:

- Room C-1, C-9, and C-12 door glass was broken.
- Room C-3 Wall and door paint chipping onto floor in room and hallway.
- Room C-4 Cold water button not working.

***It should be noted, Section 4 and Section 7 contained reoccurring findings from the previous assessment.**

Plan to Address Findings:

Please ensure in your CAP you explain your plan to address each finding listed above, the time frame in which you plan to have it completely corrected, and any strategy to ensure the issue will remain corrected and in compliance.

If you have already addressed the finding(s), please specify this below, including how they were fixed. Please include any supplemental information, or pictures of corrected area as applicable.

(Continued on Next Page)

Please consider this communication to serve as our facility's Corrective Action Plan to the deficiencies that were cited by OPI, as a result of their annual contract monitoring visit on 4-4-2023.

1. Section 4 – Grievance Requirements (OAC 377: 3-13-28 (a) 3:

This agency strives for 100% compliance, but also recognizes mistakes can be made. Continued corrective action to address better oversights on receipt, assignment, oversight, and logging of grievances will include readdressing policies to include the Operations Manager opening and reviewing grievance boxes Monday – Friday daily. The Operations Manager will be responsible for attaching the proper documentation form to the initial grievance and assigning the proper personnel to follow up on the grievance with the resident. The Operations Manager will assess deadlines for compliance and upon receiving the completed grievance response, verify all documentation points are included and proper, assign the appropriate grievance numbers and log and store as appropriate. The Operations Manager will be assigned to submit (via email) copies of the completed grievances to the OPI Lead Auditor while cc'ing the Assistant Superintendent on a monthly basis. This will allow for swift identification of deficiencies and corrective action conversations. The Superintendent will field an Operational Audit Meeting (monthly initially) to address operational documentation and compliance. However, as adherence to standards can be regularly demonstrated, the Operational Audit Meeting will be moved to quarterly.

2. Section 6 – Admin/Direct Care Staff Interviews (OAC 377: 3-13-45 (a), and OAC 377:3-13-43 (7) (E)):

The facility seriously considers any concerns/findings made by OJA. It is always our goal to comply with OJA Rules for secure juvenile detention facilities and any expectations regarding the treatment of juveniles while in our custody. To that end the following plan of action is designed to meet the requirements defined in OAC 377:3-13-45(a), as it regards activities and services that are available to juveniles outside their rooms at least 12 hours a day. The facility will accomplish this by executing the following:

1. The Superintendent will meet with TCJDC administrators and supervisors on 5/22/23 to advise them of our current Provisionary Status and review the OPI Audit Report received 5/5/23 and the OPI expectations received 5/19/23. The following changes will go into effect as of that meeting:
 - a. Ratio Compliance - Staffing schedules will be adjusted to ensure they meet required ratio for waking hours of 1:7 every day for every relevant shift. All necessary overtime pay is approved by the JBDC Director.

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- b. The Superintendent, Assistant Superintendent, JBDC Director and JBDC Assistant Director will meet in person at least once every thirty days to review staffing numbers, new hires, and separations in the form of a monthly turn-over report. The purpose of the meeting is to improve retention and recruiting practices by:
 - (1) Review hiring practices
 - (2) Examine separations and exit interviews
 - (3) Apply information to retention and recruiting practices
- C. Increase the use of Special Behavior Management Plans for those identified as frequent disturbances to the milieu. If non-responsive to SBMP, those youth will face program limitations. Any youth not in full programming will also have the proper documentation identifying the rationale for restrictions as appropriate per OAC 377: 3-13-44 (14) Security and Control (Room Confinement). Inclusion of increased contact with therapeutic personnel will be sought.
- D. Discontinue the use of broad-sweep ½ and ½ programming and allow those residents willing to follow the programming regimen more time up in the program as sustainable (stated and implemented 5/17/23 during All Staff Meeting at 1515 hours; Followed by email to administrators and supervisory teams 5/17/23 at 18:38 hours; email attached).
- E. This administrator will continue to discuss and implement positive reinforcement opportunities for youth in compliance.
- F. Staff Maintenance – The facility recognizes that the adjustments identified in this section will place a greater strain on staff and could lead to higher turnover. To mitigate the effects on staff the facility will:
 - (1) Rotate duties to allow staff variance in their daily workplace experience.
 - (2) Provide staff with on-site training on Compassion Fatigue through the EAP
 - (3) Continue to improve training efforts
 - (4) Work with JBDC Director to facilitate monthly staff surveys
 - (5) Require every staff member to meet with their immediate supervisor for a “stay” meeting.
 - (6) Supervisors to conduct monthly supervision discussions with staff in their direct line to address improvement needs, reinforce observed expected behavior, and address concerns regarding experiences. This will be documented in an unofficial employee folder and used to help inform necessary evaluations.

Other factors to address the staff compliment and support for programming will be ongoingly discussed between Detention leadership and OJA leadership, and implemented as appropriate.

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OAC 377: 3-13-43 (7) (E) which states: No employee of the facility shall use or be under the influence of alcohol or illegal drugs during hours of work nor shall any employee use or possess illegal drugs at any time.

After review, this administrator denotes that there was an instance of a staff member being intoxicated on duty. There was a history of concerns noted by this administration and using County Policy regarding "Drug and Alcohol (Anti-Substance Abuse Program), Policy TCP 111" appropriate actions were taken. The employee passed previous screening attempts and protocols. When the employee could not pass screening, verified through testing, members of administration immediately removed the employee from duty, transported home safely, utilized the appropriate accountability measures as provided by both County policy on Drug and Alcohol as well as JBDC policy 123 "Employee Disciplinary Actions." This administrator can provide a detailed account of appropriate follow through regarding this complaint. *This is information that would not be openly shared with employees not in the need to know regarding disciplinary measures.*

Regarding contraband in a secure area of Detention, this, too, was addressed by this administrator via the appropriate County Policy, JBDC 123 "Employee Disciplinary Actions". This administrator can provide a detailed disciplinary follow-up and eventual termination of the employee for various continued violations of employment protocols. *Again, this is information that would not be openly shared with employees not in the need to know.*

This administrator can demonstrate that these actions took place prior to any reporting to OPI/OJA/OCA and continue to be monitored per County, FCJJ, Detention, and OAC standards.

- Leadership staff were trained on the detection and responsibility to report and act regarding maintaining a drug/alcohol free workplace on Thursday, May 4th, 2023. This is documented in training folders and will annually be retrained.

3. Section 7 – Juvenile Interviews (Concerns/Findings):

* Program and Services OAC 377: 3-13-45 (a) has been addressed in non-compliance section 6 – Admin/Direct Care Staff Interviews.

Education OAC 377: 3-13-45 (a) (1), which states the facility shall provide educational opportunities in compliance with federal and state laws, State Department of Education requirements, and applicable local school district requirements, and OJA Contract requirements. Facilities shall provide or make provisions for an educational program, which includes space for education, necessary equipment and supplies, and supervision.

In order to comply with OAC 377: 3-13-45 (a) (1) the facility will continue to partner with Tulsa Public Schools (TPS) by virtue of an annually updated and agreed to Memorandum of Understanding (MOU). This MOU to outline the number of TPS personnel to be provided and provisions and needs

(Continued on the Next Page)

for the operation of school at the TCJDC location, and will include continued efforts of:

- Work with TPS personnel to address teacher curriculum adherence. This administrator will request a report towards that goal by the TPS assigned Principal of Alternative Schools, and will be provided to the OPI Lead Auditor once received.
- School personnel will be here and present and ready to address school needs for those who are behaviorally able to attend. Those with behaviors inappropriate for attendance on the educational hall will be outlined via the MOU and the School Disciplinary Referral Process.
- This department consistently operates a school year consistent with Tulsa Public School's calendar year. We also conduct enrichment during the summer months to help augment the school's calendar year and provide a broader range of educational experiences.
- We will continue efforts to work with the TPS Principal to develop a curriculum that best fits the needs of the youth detained, while including supports from a multi-disciplined group to address programming growth.
- This administrator will continue regular meetings with educational personnel assigned to Detention. Added personnel and documentation of meetings will be a priority.
- Use of flexible teaching locations will be addressed to respond when transport to the education hall is deemed unsafe or difficult.
- If TPS reports failure to meet state and or federal educational requirements at any time it will be reported to the JBDC Director and reported to OJA as a critical incident by the Superintendent.
- Also, considerations are being addressed to alter the time school is conducted in an effort to reduce distractions that affect the educational process.
- The TPS school year ends 5/25/23 and begins 8/15/23. Any changes or adjustments will be submitted to OPI for review and approval within 15 days, and will be adjusted to accommodate the required 4.12 hours of daily educational time and meet OAC 377:3-13-45 standards.

Section 9 – Facility Tour (Concerns and Findings):

This administration strives to have a living environment conducive with health and hygiene standards as outlined by OAC 377: 3-13-47 (a) (4) and OAC 377: 3-13-48 (e). Corrective action would be to:

- continue to utilize the current process for reporting maintenance issues and documenting resolutions through the agency's Request for Repair process.
- Supervisors are required to do regular room walk throughs to assess cleanliness and maintenance needs, and respond as appropriate.
- Assistance in helping to recognize and address issues is also a responsibility of direct care staff when room checks are completed.

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It should be noted that plans and vendor selection has also been discussed to address sprinkler system reinstall that would limit resident's ability to pop a sprinkler head and cause programming down times and costly repairs.

Plan of Action compliance – The specific supervision individuals identified as responsible for this plan of action are as follows:

- a. Cortez Tunley, Superintendent is responsible for the general supervision and execution of the plan as indicated and documenting redirection and discipline should any staff member fail to comply.
- b. Douglas Currington, Assistant Superintendent, shall be responsible for executing the plan as indicated, the retention/hiring process, staff schedule compliance and documenting any required staff discipline.
- c. Brent McQuarters, Operations Manager shall be responsible for executing the plan as indicated, maintaining and providing compliance documentation as requested by OPI.
- d. Shaylonda Powell, Program Manager shall be responsible for executing the plan as indicated, and tasked with supervision of the daily resident program schedule.
- e. Anthony Taylor, JBDC Director is responsible for ensuring all necessary financial resources are in place to support the successful executioner this plan and document discipline if any administrator fails to execute their assigned tasks.

Required Outcome Measures – In order to comply with OAC 377: 13-36-45(a) the facility will determine success by the following outcomes:

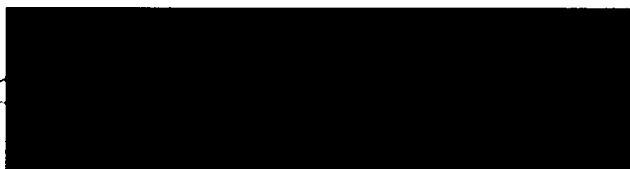
- a. The facility will be able to demonstrate through documentation on the weekly program hours report that no less than 12 hours of programming for juveniles has occurred in a fashion that would demonstrate substantial compliance to OPI program staff in 90 days or less.
- b. The facility will be able to document TPS Efforts to comply with Oklahoma state Educational requirements through written agreement within 90 days.
- c. During the Provisional Period of 90 days the Superintendent will meet with OPI staff at least once every thirty days.
- d. During the Probationary Period of 90 days, a weekly report will be sent to the Chief Judge of the Family Center for Juvenile Justice (FCJJ), Judge Kevin Gray outlining:
 - The amount of program time residents are up in the facility,
 - The amount of educational time residents are engaged in, and any rationale for reduced educational programming, and

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- A report on hygiene schedule and any deviations.
- e. The Superintendent will contact the OPI Licensing Specialist between 5/22/23 and 5/26/23 to set a bi-monthly meeting schedule. Meeting may be on-site or virtual. Once the schedule is agreed upon it will be published to all interested parties. The purpose of the meeting will be to obtain real-time feedback and discussion with OPI Licensing staff concerning facility progress, compliance measures and any needed adjustments to demonstrate clear compliance. During each meeting TCJDH will review the following:
- Critical Incident Reports (Operation Manager)
 - Weekly Disciplinary Summary Reports (Program Manager)
 - Grievance Reports Log
 - Resident Weekly Program Schedule (Program Manager)
 - Overall status of TCJDC (Superintendent)
 - Educational Assessment Report (Program Manager)
 - Any need for any change in operational policies (Operations Manager)

As always it is our goal to meet established OJA standards and we thank you for your objective review of our facility operations. Hopefully, the action plans listed demonstrate our desire to comply with licensing requirements and provide the highest level of care welfare safety and security for juveniles placed in the Tulsa County Juvenile Detention Home. If you have any questions or concerns, please do not hesitate to contact me by telephone at (918) 631-6722.

Submitted by:



Date: May 19, 202

Signature:



June 22, 2023

Electronic Delivery

The Honorable Stan Sallee, Commissioner
Tulsa County Board of County Commissioners – District 1
ssallee@tulsacounty.org

The Honorable Karen Keith, Commissioner
Tulsa County Board of County Commissioners – District 2
kkeith@tulsacounty.org

The Honorable Kelly Dunkerley, Commissioner
Tulsa County Board of County Commissioners – District 3
kdunkerley@tulsacounty.org

Re: Tulsa County Juvenile Detention Center

Dear County Commissioners,

On May 5, 2023, the Tulsa County Juvenile Detention Center, pursuant to Oklahoma Administrative Code (OAC) 377:3-13-6(c), was placed on a 90-day Probationary Certificate by the Office of Juvenile Affairs (OJA)- Office of Public Integrity (OPI). The OPI assessment completed on April 4, 2023, indicated the facilities failure to meet/comply with the requirements for certification. On May 17, 2023, a meeting between OJA, Tulsa County Juvenile Detention Center, and other stakeholders was held to discuss the probationary status and how the facility could demonstrate its ability to regain compliance during this time.

Since that meeting, OJA has conducted onsite facility visits, juvenile interviews, meetings with facility administration, reviewed documents provided by the facility, and reviewed video footage. Those reviews show improvement on Hygiene and Grievance Requirements. However, OJA is still seeing the concerns that prompted the probationary license, see below.

Grievance Requirements. Grievances were not being appropriately logged or numbered correctly, missing signatures by staff or residents, missing appropriate resolutions, nor were grievances that were appealed appropriately handled through the appeal process as laid out in OAC 377: 3-1-28.

In response to this finding, Tulsa County Juvenile Detention reassigned the grievances to the facility Operations Manager who was given the responsibility to review and ensure grievances are completed to standard and within time frames. They also reportedly set up a monthly operational audit meeting to address operational documentation and compliance. For the last 45 days, OJA requested the facility to submit grievances filed weekly to ensure they were being addressed and adequately logged. Resident interviews were also conducted to verify they had access and ability to file grievances. At this time, based on the information reviewed, the facility has shown improvement addressing and documenting grievances and their resolutions.

Education- Residents and Staff reports indicated that school/education being completed at Tulsa County Juvenile Detention was not in compliance with OAC 377: 3-12-45(a)(1)

As a corrective action to this finding, Tulsa County Juvenile Detention reported they would work with Tulsa Public Schools to ensure teach curriculum adherence and will conduct regular meetings with educational personnel. OPI has been unable to follow up on adherence to educational requirements due to school being out for the summer. The Tulsa Public School year ended May 25, 2023 and will not resume until August 15, 2023. At this time, Tulsa County Juvenile Detention has youth completing “educational enrichment” but no schooling for credit hours is occurring.

Juvenile Programming. It was reported by staff and residents that juveniles are not being provided with activities and services outside of their room for at least (12) hours every day in compliance with OAC 377: 3-13-45. It was reported that only ½ of the units were being let out of their rooms at a time, and far below the minimum of 12 hours per day.

In response to this area of noncompliance, Tulsa County Juvenile Detention reported they would cease the broad sweeping ½ and ½ programming and allow residents, “willing to follow programming regimen more time up in the program.” Detention administrators also indicated they would ensure they had staff to meet a ratio of 1:7 during waking hours, authorize all overtime as necessary, and review hiring practices to improve retention and recruiting. Tulsa Detention also stated they would discuss and implement positive reinforcement opportunities and implement policies to assist with any additional strain placed on staff due adherence to the requirements in Oklahoma Administrative Code. In the last 45 days, OJA has been receiving weekly updates from the facility on the number of hours juveniles are in reportedly involved in programming. OJA is still receiving reports from most residents interviewed, that they are not out of their rooms for 12 hours a day. This was verified when OJA conducted viewed video footage from various days during the reported period. It appears there is a discrepancy regarding the initial number of hours involved in programming being reported by Tulsa County Juvenile Detention and what is being reported during interviews with juveniles and observed during reviews of video footage. It should be noted the facility reported they had been counting hygiene hours where on average only four residents were out their rooms towards their 12-hour calculations. OAC 377:3-13-45, establishes that services should be available for each juvenile out of their rooms for 12 hours a day and further establishes seven categories to be considered in the minimum services and programs to be provided. The following subsections are provided: Education, Visitation, Social Services, Recreation, Food Service, Medical and Health Care, and Medication.

Mandatory Reporting. It was reported that a staff member on duty was intoxicated or under the influence of a mind-altering substance during the shift and there was no record that an OCA referral was made by the facility.

An OKDHS Office of Client Advocacy (OCA) referral was made by OJA following the assessment regarding the personnel that was reportedly intoxicated during their shift/while on duty. Tulsa County Detention reported the facility adhered to policy requirements regarding drug and alcohol (anti-substance abuse program) and appropriate actions were taken. They stated the employee in question was immediately removed from duty and transported home, however, it was not reported to OCA, per Oklahoma’s Mandated Reporting requirements, 10A O.S. § 1-2-101, nor was it reported to OJA pursuant to contractual requirements for reporting critical incidents.

At the time of the assessment an annual Oklahoma State Fire Marshall inspection had not been completed. The last inspection occurred on February 10, 2022.

OPI received an annual inspection and testing report from Cherokee Fire protection professionals regarding the fire alarm, and a report where Indian Nation Fire Sprinkler completed inspections in November of 2022, however, at the time of this report have still not received the inspection report from the Oklahoma State Fire Marshall.

In addition, during the process of our review to monitor compliance during the probationary status, other issues have arisen and brought to our attention that need to be addressed, see below.

- e and female residents are not receiving equitable time in programming. It is reported that girls are provided with additional time outside then male residents. OJA observed through review of video footage times where female residents were placed in their rooms/the hallway adjacent to the dayroom for periods of time during the day while male residents were allowed to stay out of their rooms. This resulted in discrepancies in the total length of time males and females were allowed out of their rooms involved in programming. OAC 377: 3-13-42(2) specifies male and female juveniles shall have equal access to all programs and services offered in a detention facility.
- During video review, staff were failed to document 15-minute checks and 3-hour reauthorizations during an OJA visit. OJA also observed video surveillance footage where it appears that the mandatory checks are not being completed at a minimum of every 30 minutes as documented. Note: OJA received a call that the night in question the checks were completed, however due to play back speed at which OJA reviewed the specified footage it was not apparent.
- Several instances were observed during onsite visits and while reviewing video footage where residents were engaging in "horseplay" to include mock fighting, pushing, shoving, holding, grabbing, slapping, chasing, etc. without apparent redirection from staff and at times with staff also engaging in the behaviors. In one such occasion, OJA observed staff engaging in apparent horseplay, along with residents, which resulting in a fight between multiple residents and staff. Staff ended up being assaulted and performed a possible unapproved method of restraint. OJA instructed detention administrator that the incident needed to be reported to OCA. Note: this also should have been documented as a critical incident to OJA.
- Video surveillance was observed where residents appeared to be assisting in restraints of other residents while other staff members were both available and failed to intervene.

Pursuant to OAC 377: 3-13-6, OJA's Office of Public Integrity has the ability to reduce licensed capacity of a facility and implement additional safety plans and measures to help the facility regain compliance. Due to the facilities continued noncompliance with rules and requirements of secure Juvenile Detention Facilities, we are providing notice that the facility, will have an additional 15 days (until July 7, 2023) to come into substantial compliance or OJA will temporarily reduce the licensed capacity of Tulsa County Juvenile Detention Center from 63 to 20 licensed beds. This would allow for additional staff training and development to be implemented within the facility to regain compliance. As a result, this will also affect the number of beds contracted by OJA. This will

reduce the contract amount paid by OJA according to the rates and standards established, in this case it would amount to a daily reduction of around nine hundred and eight seven (\$987.00) dollars per day. We are asking the following measures to be put in place, all direct care staff and detention administrators will complete training on Oklahoma's Mandatory Reporting Requirements with a representative through the DHS's Office of Client Advocacy and for all shift supervisors and administrators to complete training with OJA Program Manager, Jeremy Evans regarding reporting of Critical Incidents to OJA.

Tulsa County Detention indicated in their Corrective Action Plan (CAP) they were discussing methods of implementing positive reinforcement for youth compliance. To assist with this OJA is asking the facility to develop and implement a points-based level system which will not only provide positive reinforcement for good behavior, but also allow a secondary method for staff redirection beyond resorting to isolation/seclusion.

The Office of Juvenile Affairs will continue to monitor Tulsa County Juvenile Detention Center and provide ongoing feedback regarding the facilities steps to regain compliance.

If there are any questions or concerns regarding any of the above information please contact Gene Carroll, Licensing Specialist with the Office of Public Integrity at Gene.Carroll@oja.ok.gov or by phone at 405-385-2693.

Thank You,



Gene Carroll

CC: Judge Kevin Gray, Chief Judge of Tulsa County Juvenile Court, kevin.gray@oscn.net; District Attorney Steven Kunzweiler, Tulsa County District Attorney, stevekunzweiler@tulsacounty.org; Mr. Erik Grayless, 1st Assistant District Attorney, ergrayless@tulsacounty.org; Ms. Kim Jantz, Juvenile Division Director for Tulsa County District Attorneys Office, kjantz@tulsacounty.org; Mr. Corbin Brewster, Tulsa County Public Defender, corbin.brewster@oscn.net; Ms. Lora Howard, 1st Assistant Public Defender lora.howard@oscn.net; Ms. Amanda Mims, Juvenile Division Chief Tulsa County Public Defender's Office, amanda.mims@oscn.net; Mr. Anthony Taylor, Tulsa County Juvenile Bureau Director, ataylor@tulsacounty.org; Mr. Cortez Tunley, Tulsa County Juvenile Detention Director, ctunley@tulsacounty.org



OFFICE OF PUBLIC INTEGRITY

Facility Information

Detention Facility Tulsa County Juvenile
Detention Center

Facility Administrator: Cortez Tunley

Review of Video Surveillance- Time in program/out of room Tracking

Date Reviewed	Reviewers	Unit Reviewed	# of Hours out in Programing
06/08/23	OJA reviewers: Jaremy Andrews Tulsa County: Cortez Tunley	A	Girls- 9 Hours, 48 mins Boys- 9 Hours, 54 mins
06/10/23	OJA reviewers: Jeremy Evans Tulsa County: Doug Currington	C	8 Hours, 43 mins
06/11/23	OJA reviewers: Jaremy Andrews Tulsa County: Cortez Tunley	C	7 Hours, 35 mins
06/22/23	OJA reviewers: Greg Delaney, Rex Boutwell Tulsa County: Cortez Tunley	C	11 Hours, 21 mins.
06/24/23	OJA reviewers: Jaremy Andrews Tulsa County: Cortez Tunley	C	11 hours, 39 mins
06/25/23	OJA reviewers: Greg Delaney, Jeremy Evans Tulsa County: Cortez Tunley	C	11 hours, 15 mins
06/26/23	OJA reviewers: Jaremy Andrews Tulsa County: Cortez Tunley	A	14 hours, 14 mins

Concerns

It appears six of the seven days video review showed non compliance with OAC 377: 3-13-45(a)



-OFFICE OF PUBLIC INTEGRITY-

Name of Facility:	Tulsa County Juvenile Detention Center	Facility Address:	500 W. Archer Tulsa, OK 74103
		Telephone #	918-596-5960
Subcontractor:	N/A	Subcontractor Address:	N/A
		Telephone #	
Date of Assessment:	7/27/2023	Date of Report:	7/31/2023
Time Period Reviewed:	05/05/23 - 07/27/2023	License Expires:	Probationary Certificate August 5, 2023
Director/Administrator:	Cortez Tunley		
Facility Staff Present at Time of Assessment:	Doug Currington, Deputy Superintendent; Brent McQuarters, ACA/Grievance Coordinator;		

Assessment Report- Secure Juvenile Detention Center

Total # of Staff (Full time/Part time):	Current Juvenile Population:	Facility total Licensing Capacity:	Utilization Rate for Time Period:	ACA Accreditation Date:
42 (41-FT /1-PT)	39	63	125.68 %	N/A
Total # of Admissions	Total In-County Admissions:	OJA Contracted Beds:	Average Length of Stay:	Total OCA Referrals:
95		30	30 Days	3
Total Number of Grievances:	Total Uses of Physical Force:	Number of Room Confinement:	Total # of Room/Wing Restriction:	Total Confirmed OCA Referrals:
53	108(36-Mechanical)		76	3-Pending
Total Critical Incidents:	AWOLS/Aft. Escapes:	ER Visit for Injury/Illness:	Improper Admissions:	
14	0	4	0	
Total Juveniles Involved:	Self-Harm/Suicidal:	Serious Assaultive Act:	Serious Destructive Act:	
14	5	1	1	
	Other unexpected Events:			
	3			
Inspection Dates/Concerns noted:	Health Inspection: 03/29/23	Fire Marshal Inspection: 06/07/23	OCCY Inspection: 05/12/22	
	Concerns: 5	Concerns: 0	Concerns: 2	

Sections Reviewed

Section #	Compliant/ Non-Compliant
Section 1- Policy and Procedure: Not reviewed during assessment.	-

Section 2- Juvenile Records/Rights: Not reviewed during assessment.	Total Records Reviewed: -	-
Section 3- Institutional Operations/Security and Control: There were no issues or concerns.		Compliant
Section 4- Grievance Requirements: There were no issues or concerns.	Total Records Reviewed: 35	Compliant
Section 5- Personnel Records: Not reviewed during assessment.	Total Records Reviewed: -	-
Section 6- Admin/Direct Care Staff Interviews: There were no issues or concerns.	# Of Staff Interviewed: 2	Compliant
Section 7- Juvenile Interviews: There were no issues or concerns. Both residents interviewed indicated that they were in programming and outside their rooms for more than 12-hours per day, and that they were allowed to go outside, but did not really want too because of the heat. Both said that the grievance process was fair and seemed to work and they had filed grievances that were resolved.	# Of Juveniles Interviewed: 2	Compliant
Section 8- Administrative Requirements: Administrative staff confirmed a points system has been implemented by the facility as a start for giving the residents more incentives for positive behavior. Staff advised the program will evolve and improve over time.		Compliant
Section 9- Facility Tour: During the facility tour, the following issues/areas of concern were observed: Room C-1, C-5, C-12, C-14, C-15, C-16, C-19, and C-20 door glass were damaged. Note: Unit B was in use during assessment. All intercoms were operational on the units. Administrative staff advised the issues during the last assessment had been repaired, however, windows in Rooms C-1 and C-12 were damaged by residents after the windows were replaced.		Compliant with Areas of Improvement Identified
Section 10- Reoccurring Findings: No reoccurring findings.	Date of Last Assessment: 04/04/23	Corrected
Section 11- Additional Comments/Concerns: During the assessment, OPI reviewed video footage of Unit C for Sunday, July 23, 2023, and Wednesday, July 26, 2023. On both days reviewed, the residents were outside their rooms 13 hours and 35 minutes and 13 hours and 51 minutes respectfully.		

Additional Information Collected

There were three (3) OCA Referrals reported to OPI during this assessment period. All three (3) are pending investigation results.

Total OCA Referrals: 3

Critical Incidents: There were fourteen (14) critical incidents reported during this assessment period. A brief description of each below:

Total: 14

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Serious Destructive Acts:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Oklahoma State Department of Health:

Number of 5
Concerns:

An Oklahoma Health Department Inspection was completed on 03/29/23. There were five (5) violations cited on the report. A brief description of each violation below:

1. Dented can observed in the storage area. Corrected on day of assessment.
2. Unknown white powder container by microwave and unknown clear liquid squeeze bottle not properly labeled.
3. Sanitizer bucket was low in concentration. Corrected on day of assessment.
4. Vent guards in storage area dirty with buildup.
5. Floor under single services items shelving dirty with debris. Floor under dish machine dirty with debris.

Oklahoma State Fire Marshal:Number of 0
Concerns:

A state fire marshal inspection was completed on 06/07/2023 and no violations/concerns were noted.

Uses of Physical Force:

Total: 108

There were one hundred eight (108) cases of Uses of Physical Force reported during assessment period, and thirty-six (36) were mechanical restraints. All uses of force reviewed appear to meet the criteria for use of force.

JOLTS ENTRY:

It appears the facility is entering in all JOLTS information as required.

Comments/Concerns relative to OJA/JSU: None

OJA Contracted Facility☒ Yes☐ No

Contract Number: CRL- 2023-229

Comments/Concerns- OJA Program Manager☐ Yes☒ No**Findings/Areas of Concern Identified**

Findings: None

Noted Areas of Improvement Identified:

- Section 9- Facility Tour

Will a Corrective Action Plan be Required? ☐ Yes ☒ No

OJA Staff/OPI Assessors

OPI- Assessment Lead/Preparer of Report: [REDACTED]

OPI-

Assisting:

August 2, 2023

Electronic Delivery

Tulsa County Board of County Commissioners
Commissioner Stan Sallee, District 1
ssallee@tulsacounty.org

Commissioner Karen Keith, District 2
kkeith@tulsacounty.org

Commissioner Kelly Dunkerley, District 3
kdunkerley@tulsacounty.org

Re: Tulsa County Juvenile Detention Center

Dear County Commissioners,

On June 20, 2023, the Tulsa County Juvenile Detention Center received a progress report letter about correcting the identified violations and regaining compliance during the 90-Day probationary period placed on the facility by the Office of Juvenile Affairs (OJA)-Office of Public Integrity (OPI). The letter documented some improvements made by the facility but pointed out obvious issues and concerns that needed immediate improvement going forward.

Since that letter, OJA has continued to conduct onsite facility visits, juvenile interviews, meetings with facility administration, review documents provided by the facility, and review video footage. Also on July 27, 2023, OPI conducted an onsite assessment which covered the areas of concern. During onsite visits, the residents interviewed are saying they are out of their rooms for more than the minimum required 12-hours per day in programming, and video footage reviewed has confirmed that. Residents also shared they are offered the opportunity to go outside, but most of the time they would refuse due to the weather conditions (excessive temperatures) and go to the gym for the required exercise.

Over the last 90-days it appears that adequate improvements have been made by the facility that demonstrate its ability to regain compliance if the progress continues going forward. Below is a detailed look at the areas that appear to indicate improvement and what steps that were taken by the Tulsa County Juvenile Detention Center to comply with Oklahoma Administrative Code (OAC) Requirements for Secure Juvenile Facilities and OJA/OPI requests, at the time of this letter:

Areas of Improvement:

- Grievance Requirements (OAC 377:3-1-28)- In reviewing the Grievances provided by the facility, resident interviews, and by conducting an onsite assessment, it appears the corrective measures taken by the facility administration has shown steady improvement in this findings area.
- Juvenile Programming (OAC 377:3-13-45)- During the last 45-days, OJA-OPI has continued to examine this findings area very closely by meeting with facility administration, review documents provided by the

facility, review video footage, and conducting resident and staff interviews. Facility Administration has provided a new programming schedule that appears to have eliminated the half and half schedule which allows for the residents willing to follow the programming regimen more time up in the program, and video footage has confirmed that. The daily practice of placing the residents in their rooms for shift change has also been eliminated.

- Mandatory Reporting- In the 45-day review letter, OJA-OPI requested the Tulsa County Juvenile Detention Center staff to complete training with OJA Program Manager, Jeremy Evans regarding reporting of Critical Incidents to OJA and contact a representative through the DHS's Office of Client Advocacy for additional training in reference to OCA Referrals. OPI is aware of the completed training by Program Manager Evans, but unaware of the status involving OCA training from DHS's Office of Client Advocacy for the facility staff.
- Oklahoma State Fire Marshal Inspection- During the OPI Assessment on April 4, 2023, and at the time of the 45-day progress letter OPI had not received an inspection report from the Oklahoma State Fire Marshal's Office. On June 25, 2023, OPI received a copy of the Oklahoma State Fire Marshal's Report which was conducted on June 7, 2023, with no violations noted.
- Points-Based Level System- Tulsa County Detention indicated in their Corrective Action Plan (CAP) they were discussing methods of implementing positive reinforcement for youth compliance. OJA asked the facility to develop and put in place a points-based level system which would not only provide positive reinforcement for good behavior, but also allow a secondary method for staff redirection beyond resorting to isolation/seclusion. In an all-staff memorandum on July 19, 2023, called Facility Programming Update – Daily Recognition the facility implemented a new level system which it hopes will reward positive behavior for the residents. This program being new will take time to fully develop and provide the success that both the residents and staff will benefit from in the future.
- OPI Onsite Assessment- A facility assessment was conducted by OPI on July 27, 2023, to review the previous findings during the initial assessment on April 4, 2023, and the additional concerns mentioned in the 45-day progress letter. OPI looked at Institutional Operations/Security and Control, Grievance Requirements, Administrative Requirements, Facility Tour, conducted Staff and Resident interviews, and reviewed video footage. Except for the facility tour, which was noted as "Compliant with Areas of Improvement Identified" due to recent door window damage, all the other areas reviewed were in compliance. Video footage reviewed showed the residents being outside their rooms for over 13 hours each of the two days reviewed, and it was confirmed by the residents interviewed.

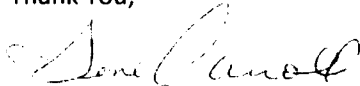
Although improvements have been made during the last 90-days, it appears the improvements and the requested implemented measures by OJA-OPI have just started to become effective and in use by the facility. For example, the Points-Based Level System has only been in place for approximately two weeks. This program will take more time to develop and become an asset for the residents, staff, and the facility. Also making sure the new programming schedule, which is a focus of the probationary license status, is understood and followed by staff to ensure compliance with Oklahoma Administrative Code. It is with this OJA-OPI will be extending the probationary license status for an additional 90-days starting on August 4, 2023. During this time, OJA-OPI will be able to follow up with the facility administration about the Education Requirements according to OAC 377:3-12-45(a)(1) which was a concern identified by the initial OPI Assessment on April 4, 2023 but has not been addressed due to officials from Tulsa Public Schools being out for the summer months. In addition, this will give needed time for the Points-Based Level System and new Programming Schedule to be become fully functional and will allow OJA/OPI to gather feedback on the progress of the new programs. The noted improvement in this

report certainly shows the effort made by the facility, but more time is needed to ensure that all concerns including the education findings are addressed and the programs implemented continue to be a positive change for the next 90-days.

The Office of Juvenile Affairs will continue to monitor the Tulsa County Juvenile Detention Center by meetings with facility administration once a month starting on August 18, 2023, at 10:00 AM, facility visits, juvenile interviews, reviewing video footage, and review documents provided by the facility.

If there are any questions or concerns regarding any of the above information please contact Gene Carroll, Licensing Specialist with the Office of Public Integrity at Gene.Carroll@oja.ok.gov or by phone at 405-385-2693.

Thank You,



Gene Carroll

Office of Public Integrity-Licensing Specialist
Programs Field Representative
Office of Juvenile Affairs

cc: Judge Kevin Gray, Chief Judge of Tulsa County Juvenile Court, kevin.gray@oscn.net; District Attorney Steven Kunzweiler, Tulsa County District Attorney, stevekunzweiler@tulsacounty.org; Mr. Erik Grayless, 1st Assistant District Attorney, ergrayless@tulsacounty.org; Ms. Kim Jantz, Juvenile Division Director for Tulsa County District Attorney's Office, kjantz@tulsacounty.org; Mr. Corbin Brewster, Tulsa County Public Defender, corbin.brewster@oscn.net; Ms. Lora Howard, 1st Assistant Public Defender, lora.howard@oscn.net; Ms. Amanda Mims, Juvenile Division Chief Tulsa County Public Defender's Office, amanda.mims@oscn.net; Mr. Anthony Taylor, Tulsa County Juvenile Bureau Director, ataylor@tulsacounty.org; Mr. Cortez Tunley, Tulsa County Juvenile Detention Director, ctunley@tulsacounty.org

Name of Facility:	Tulsa County Juvenile Detention Center	500 W Archer Tulsa, OK 74801 405-273-6531
Date of Assessment:	8/23/2023	License Expires 11/1/2023
Facility Staff Present at Time of Assessment:	Cortez Tunley, Brent McQuarters, Doug Currington and Shaylonda Powell	

Assessment Report- Secure Juvenile Detention Center

Current Juvenile Population:	Facility Licensing Capacity	Critical Incidents Since Last Assessment	Total Confirmed OCA Referrals:	Total Number of Grievances:
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Summary of Visit:

OPI conducted an unannounced visit on 08/23/23. OPI interviewed facility head teacher, one (1) resident, and reviewed video footage.

Resident [REDACTED] was interviewed. [REDACTED]

Head Teacher of the facility from Tulsa Public Schools Paul Sunday was interviewed. During the interview, he reported that the teacher was present in a meeting with the facility administration to discuss the issues found during the last assessment and they were aware of the expectations going forward from OPI/OJA. He mentioned how difficult the age ranges and the grade levels of the residents were but was confident the curriculum being used was working. He did say that a focus on less movie and TV time were discussed.

OPI reviewed video footage of Saturday, 08/19/23 on Unit C from 7:00 AM to 11:00 PM. The video indicated the residents were out of their rooms from 7:40 AM to 9:46 PM. Also reviewed Tuesday, 09/22/23 on Unit C from 7:00 AM to 11:00 PM. The video indicated the residents were out of their rooms from 7:55 AM to 9:12 PM. Both days the residents were out longer than the required 12-hours.

Facility Tour:

OPI looked at the outside recreation yard and gate that two (2) residents scaled to escape. In speaking to facility officials, some forms of preventive measures are going to be done to the gate area to help eliminate any possible chance to have that incident happen in the future.

Reoccurring Findings:	Date of Last Assessment:	-

Requiring Corrective Action Plan

☐ **Corrective Action Required**

Findings/Areas of Concern Identified:

OPI- Assessment Lead/Preparer of Report: [REDACTED]



-OFFICE OF PUBLIC INTEGRITY-

Name of Facility:	Tulsa County Juvenile Detention Center	Facility Address:	500 W. Archer Tulsa, OK 74103
		Telephone #	918-596-5960
Subcontractor:	N/A	Subcontractor Address:	N/A
		Telephone #	
Date of Assessment:	11/2/2023	Date of Report:	11/10/2023
Time Period Reviewed:	07/27/2023-11/02/23	License Expires:	Probationary Certificate November 5, 2023
Director/Administrator:	Cortez Tunley		
Facility Staff Present at Time of Assessment:	Doug Currington, Deputy Superintendent; Brent McQuarters, ACA/Grievance Coordinator; Shaylonda Powell; Brianna Rosas; Terrance Henderson; Curtis Hale; Torie Gray; Jeremy Williams		

Assessment Report- Secure Juvenile Detention Center

Total # of Staff (Full time/Part time):	Current Juvenile Population:	Facility total Licensing Capacity:	Utilization Rate for Time Period:	ACA Accreditation Date:
54 (49-FT /5-PT)	49	63		N/A
Total # of Admissions	Total In-County Admissions:	OJA Contracted Beds:	Average Length of Stay:	Total OCA Referrals:
160	157	40	25 Days	6
Total Number of Grievances:	Total Uses of Physical Force:	Number of Room Confinement:	Total # of Room/Wing Restriction:	Total Confirmed OCA Referrals:
35	128 (47-Mechanical)	628		4
Total Critical Incidents:	AWOLS/Att. Escapes:	ER Visit for Injury/Illness:	Improper Admissions:	
11	1	1	0	
Total Juveniles Involved:	Self-Harm/Suicidal:	Serious Assaultive Act:	Serious Destructive Act:	
13	6	0	1	
	Other unexpected Events:			
	2			
Inspection Dates/Concerns noted:	Health Inspection: 03/29/23	Fire Marshal Inspection: 06/07/23	OCCY Inspection: 05/12/22	
	Concerns: 5	Concerns: 0	Concerns: 2	

Sections Reviewed

Section #	Compliant/ Non-Compliant
Section 1- Policy and Procedure: Not reviewed during assessment.	-

OPI recommends that that procedure be addressed immediately with the supervisors and reminded the administration that a critical incident should be forwarded to Programs Manager to inform him of why the procedure was needed. Finally, OPI discussed the video footage reviewed for the dates mentioned in Section-11 of this report which indicated that in two of the three days reviewed the residents were not outside their rooms in programming for the minimum of 12-hours per day, excessive touching by residents on other residents, horseplay, and staff leaving residents unsupervised when performing other duties. OPI reminded the administration that these areas were some of the initial concerns of OJA in the beginning of the probationary period, so addressing this with staff needs to be done immediately.		
Section 9- Facility Tour: During the facility tour, the following issues/areas of concern were observed: - Room C-1, C-6, and C-10 were down due to damaged light fixtures. (Just occurred over the weekend) - Room A-12 toilet not flushing. Maintenance was working on it during the assessment.		Compliant
Section 10- Reoccurring Findings: No reoccurring findings.	<u>Date of Last Assessment:</u> 07/27/23	No Reoccurring Findings
Section 11- Additional Comments/Concerns: During the assessment, OPI reviewed video footage of Unit C for Monday, October 23, 2023, which showed the residents getting out of their rooms at 7:53 AM and brought back and placed inside their rooms at 12:30 PM and remained in their rooms until 3:54 PM. The residents were then outside their rooms until 9:40 PM for a total of 9.83 hours, which is below the 12-hour minimum standard. Also observed during the review, was staff leaving the residents inside the dayroom while they performed other functions, which allowed for the lack of direct sight of the residents. Horseplay by some the residents was observed along with chest bumping and excessive touching by residents on other residents. OPI also reviewed video footage of Unit A for Saturday, November 4, 2023, which showed the residents getting out of their rooms at 8:15 AM and remaining outside their rooms until 9:09 PM for a total of 12.09 hours. Finally, OPI reviewed video footage of Unit A for Sunday, November 5, 2023, which showed the residents not getting out of their rooms for the entirety of the morning shift, except for a couple of residents performing some cleaning on the unit area. The next shift released the kids from their rooms at 5:26 PM and they remained out until 9:09 PM for a total of 3.83 hours, which is way below the minimum standard of 12-hours.		

Additional Information Collected

There were six (6) OCA Referrals reported to OPI during this assessment period. [REDACTED] Total OCA Referrals: 6

[REDACTED] A synopsis of the confirmed cases is below:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Critical Incidents: There were eleven (11) critical incidents reported during this assessment period. A brief description of each below:

Total: 11

AWOL/Escape:

[REDACTED]

Emergency Room Visit for Illness/injury:

[REDACTED]

Serious Destructive Acts:

[REDACTED]

Attempted Suicide/Suicidal Ideation:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Other Unexpected Occurrences:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Oklahoma State Department of Health:

Number of 5
Concerns:

An Oklahoma Health Department Inspection was completed on 03/29/23. There were five (5) violations cited on the report. A brief description of each violation below:

1. Dented can observed in the storage area. Corrected on day of assessment.

2. Unknown white powder container by microwave and unknown clear liquid squeeze bottle not properly labeled.
3. Sanitizer bucket was low in concentration. Corrected on day of assessment.
4. Vent guards in storage area dirty with buildup.
5. Floor under single services items shelving dirty with debris. Floor under dish machine dirty with debris.

Oklahoma State Fire Marshal:Number of
Concerns: 0

A state fire marshal inspection was completed on 06/07/2023 and no violations/concerns were noted.

Uses of Physical Force:

Total: 128

There were one hundred twenty-eight (128) cases of Uses of Physical Force reported during assessment period, and forty-seven (47) were mechanical restraints. All uses of force reviewed appear to meet the criteria for use of force.

JOLTS ENTRY:

It appears the facility is entering in all JOLTS information as required.

Comments/Concerns relative to OJA/JSU: None

OJA Contracted Facility☒ Yes ☐ No

Contract Number: CRL- 2023-229

Comments/Concerns- OJA Program Manager☐ Yes ☒ No

None

Findings/Areas of Concern Identified

Findings: None

Noted Areas of Improvement Identified:

- Section 6- Admin/Direct Care Staff Interviews
- Section 8- Administrative Requirements

Will a Corrective Action Plan be Required? ☐ Yes ☒ No

OJA Staff/OPI Assessors

OPI- Assessment Lead/Preparer of Report: [REDACTED]

OPI-

Assisting:



Tulsa County Board of Commissioners

Pursuant to 10A O.S. § 2-3-103, has met all applicable standards and is
hereby issued a

Probationary Certificate

for the operation of a Secure Juvenile Detention Center at:

500 West Archer

Tulsa, OK 74103

Maximum Juvenile Occupancy: 63

Rachel C. Holt
Executive Director

D-72-04
Certificate Number

Office of Public Integrity

November 2023
Month and Year of Expiration

Electronic Delivery

November 7, 2023

Ben Brown, General Counsel
2501 N. Lincoln Boulevard
Oklahoma City, OK 73105

Mr. Brown,

Attached is the report prepared following the OPI assessment conducted at the Tulsa County Juvenile Detention Center on November 7, 2023. The assessment indicated compliance with OJA Rules, contract mandates and licensing standards, however, there were two (2) areas identified with room for improvement listed in the report:

- **Section 6- Admin/Direct Care Staff Interviews**
- **Section 8- Administrative Requirements**

The above-mentioned areas of improvements are fully described in the report for review.

I would be my recommendation that a Full 2-Year Permanent License be granted to the Tulsa County Juvenile Detention Center beginning on November 8, 2023. The only caveat would be that if it is discovered that the original concerns laid out in the last 180-days of the Probationary License Status period become evident by future OPI Assessments, Liaison Visits, and Monitoring Reports then they need to be made aware that it could result in putting the facility back on a provisional or probationary certificate again. I would also like to keep getting the reports that are being forwarded to OPI. This would be extremely helpful for future assessments and general information needed going forward. Although we have seen some hiccups during the last 180-days, I really believe the facility has made steady progress and it appears our actions have got the attention of all involved.

If you have any questions or concerns, please contact at (405) 385-2693 or by email at gene.carroll@oja.ok.gov.

Respectfully submitted,



Gene Carroll
Programs Manager

December 6, 2023

Electronic Delivery

Tulsa County Board of County Commissioners
Commissioner Stan Sallee, District 1
ssallee@tulsacounty.org

Commissioner Karen Keith, District 2
kkeith@tulsacounty.org

Commissioner Kelly Dunkerley, District 3
Kdunkerley@tulsacounty.org

Re: Tulsa County Juvenile Detention Center

Dear County Commissioners,

The Office of Juvenile Affairs ("OJA") first met with your representatives and other stakeholders from Tulsa County on May 9, 2022, to discuss the concerns that were raised as a result of the 2022 OJA Office of Public Integrity ("OPI") licensing and certification assessment for Tulsa County Juvenile Detention Center ("Detention Center"). On May 5, 2023, OJA made the determination, pursuant to Oklahoma Administrative Code ("OAC") 377:3-13-6(c), to place the Detention Center on a ninety (90) day Probationary Certificate. Following that determination, a subsequent meeting was held on May 17, 2023, to discuss the Probationary Certificate and the continued findings of noncompliance with the requirements of secure juvenile detention facilities, as defined in the OAC, identified during the annual OPI Licensing Assessment.

In June, after being on a Probationary Certificate for forty-five (45) days, it was determined the Detention Center had not made necessary strides to begin correcting the areas identified in May, and during OJA's visits where additional areas of concern were observed to be out of compliance. At this time OJA asked for the facility to initiate several measures to include additional training for all staff, create a level system that would add positive reinforcement for youth behavior and the immediate compliance with OAC 377:3-13-45 to allow all residents programming outside of their rooms for a minimum of twelve (12) hours a day. We allowed fifteen (15) days to make meaningful strides to this end or OJA would consider a reduction in their bed licensure and contract.

As a result of this meeting, it was agreed to hold biweekly meetings between OJA and Tulsa County Juvenile Detention Administration to discuss issues and follow-up on the progress of corrective action to address areas of noncompliance.

At the end of the original ninety (90) day Probationary Certificate, the decision was made, while the facility had made progress towards compliance, that it had only been within the last forty-five (45) days and OJA opted to extend the probationary period for an additional ninety (90) days.

During the second ninety (90) day probationary period, the Detention Center was successful in the requested implementation of a new level system and staff training. However, there continued to be issues relative to youth being involved in programming and subsequent allegations and circumstances of noncompliance due to lack of staffing.

The second Probationary Certificate expired on November 2, 2023. After careful review, OJA has decided to continue the probationary period for an additional ninety (90) days, this third Probationary Certificate will expire on February 1, 2024. The purpose of the continuation is to allow OJA to continue to access and monitor the areas of concern and determine what, if any, additional measures will be needed. This will also ensure the Detention Center continues to make improvements and sustained progress towards regaining compliance with the Requirements of Secure Juvenile Detention Facilities.

Should you have any questions you may contact me at 405-651-5735 or by email at ben.brown@oja.ok.gov.

Thank you,



Benjamin C. Brown
OJA General Counsel

CC: The Honorable Kevin Gray, Chief Judge of Tulsa County Juvenile Court, kevin.gray@oscn.net, The Honorable Steven Kunzweiler, Tulsa County District Attorney, stevekunzweiler@tulsacounty.org Erik Grayless, 1st Assistant District Attorney, EGrayless@tulsacounty.org, Kim Jantz, Juvenile Division Director for Tulsa County District Attorneys Office, KJantz@tulsacounty.org, Corbin Brewster, Public Defender of Tulsa County, Corbin.Brewster@oscn.net, Lora Howard, 1st Assistant Public defender lora.howard@oscn.net, Amanda Mims, Juvenile Division Chief Tulsa County Public Defender's Office, Amanda.mims@oscn.net, Anthony Taylor, Tulsa County Juvenile Bureau Director, Atyalor@tulsacounty.org, Cortez Tunley, Tulsa County Juvenile Detention Director, CTunley@tulsacounty.org



-OFFICE OF PUBLIC INTEGRITY-

Name of Facility:	Tulsa County Juvenile Detention Center	Facility Address:	500 W. Archer Tulsa, Ok 74103
		Telephone #	918-596-5960
Subcontractor:	N/A	Subcontractor Address:	N/A
		Telephone #	
Date of Assessment:	1/30/2024	Date of Report:	02/01/24
Time Period Reviewed:	11/06/2023 -1/30/2024	License Expires:	Probationary Certificate
Director/Administrator:	Anthony Taylor	Interim Superintendent:	Douglas Currington
Facility Staff Present at Time of Assessment:	Rillar Blocker, Emmanuel Ezechinonso, Carrie Loyd, Andres Perez, Derek Tillis, Kalesha Young Zameeka Collins, Jennifer Ibarra, Ceirra Manning, Amber Pritchard, Mark Wimberly, Kelly Lavine, Keenan Rodgers, Yolanda Arnold, Roxana Bernal, Douglas Currington, Brent McQuarters, Shaylonda Powell, John Olu, Jackie Busch		

Assessment Report- Secure Juvenile Detention Center

Total # of Staff (Full time/Part time): (57FT – 2PT)	Current Juvenile Population: 48	Facility total Licensing Capacity: 63	Utilization Rate for Time Period: 123.79%	ACA Accreditation Date: N/A
Total # of Admissions 119	Total In-County Admissions: 160	OJA Contracted Beds: 40	Average Length of Stay: 40 Days	Total OCA Referrals: 7
Total Number of Grievances: 28	Total Uses of Physical Force: 82(30 mechanical)	Number of Room Confinement: 169(17 over 48 hours)	Total # of Room/Wing Restriction: 177	Total Confirmed OCA Referrals: 0
Total Critical Incidents: 14	AWOLS/Aff. Escapes: 0	ER Visit for Injury/Illness: 0	Medication mlsmanagement: 1	
Total Juveniles Involved: 15	Self-Harm/Suicidal: 5	Serious Assaultive Act: 3	Serious Destructive Act: 0	
Other unexpected Events: 5				
Inspection Dates/Concerns noted:	Health Inspection: 01/06/24	Fire Marshal Inspection: 10/26/23	OCCY Inspection: N/A	
	Concerns: 2	Concerns: 0	Concerns:	

Sections Reviewed

Section #	Compliant/ Non-Compliant
Section 1- Policy and Procedure:	Compliant

The Tulsa County Juvenile Detention provided their latest policy and procedure manual to OPI. This manual showed the dates, 08/14/2023 through 02/04/2024 as being approved. Per administrative code 377:3-13-38 the policy and procedure should be reviewed annually.		
Section 2- Juvenile Records/Rights: Total Records Reviewed: 5 [REDACTED]		Compliant
Section 3- Institutional Operations/Security and Control: Per administrative code 377:3-13-44(140)(B) the reauthorization documentation for a room confinement to continue past 3 hours requires the approval of a supervisor who is uninvolved in the original incident or an on-call administrator. During this assessment, the confinement log was reviewed and showed that there were 169 room confinements. Nine of the forms were reviewed and one form was missing the 3-hour review documentation for juvenile [REDACTED]. [REDACTED] The file showed observation log but lacked a 3-hour log. Further the log for room confinement/restrictions reported seventeen (17) 48-hour room confinements. However, only five (5) of the required notifications had been sent as critical incidents to OJA. Per administrative code 377:3-13-44 (c)(14) detention staff is required to notify OJA within 24 hours of a 48-hour room restriction. During the assessment Doug, the interim director, had contacted the previous director and asked that any emails notifying OJA be forwarded to OPI. As of the date of this report OPI has not received any emails from the previous director. <i>A review of the records provided by TCJDC to the court and OJA and the interviews with detention staff/youth demonstrated TCJDC has continued to struggle over the last ninety (90) days to maintain the necessary staff ratios to provide proper programming. While TCJDC has clearly improved in this area and are providing a minimum of 12 hours of programming on many days, the continued use locking down residents due to staff shortages prevents OPI from finding that TCJDC is compliant in this area. [See notes regarding this practice in Section four (4), six (6), seven (7), eleven (11), and the critical incident dated [REDACTED].</i>		Non-Compliant
Section 4- Grievance Requirements: Total Records Reviewed: 28 During this assessment OPI reviewed all 28 grievances, the documentation and number followed administrative code 377:3-1-28(a) correctly. However, the following grievances [REDACTED] [REDACTED] [REDACTED]		Compliant with Areas of Improvement Identified

During the exit interview the topic of the continued struggle to maintain staff at the detention center was discussed. Doug Currington stated that they have 8 interviews this week that are aimed at solely covering weekends where they sometimes have trouble meeting ratio.	
Section 5- Personnel Records: All document requested were provided and there were no issues with regards to personnel records.	Total Records Reviewed: 5 Compliant
Section 6- Admin/Direct Care Staff Interviews: OPI interviewed two direct care staff members, one staff started in November and works from 7:00am to 1:30pm during the weekday M-F. This staff stated that she had heard that half and half scheduling was occurring on Sundays when they are short staffed. OPI reviewed video from Sunday, January 21st, 2024, as well as the weekly program logs provided by TJDC. The review of the video tape and the log showed the 50 youth detained in detention that day were not out the required 12 hours of programming and received only 7.2 hours of programming for this day. The male staff member interviewed has worked there for six years and stated that he was glad to see that they have moved away from half and half programming schedules. He stated it was hard on everyone being short staffed and that they have not had to do half and half programming in a long time. He further stated that it has been a benefit in having OJA involved in improving their program over the last nine months. He further stated that sometimes the portions given to the children, especially at breakfast are not sufficient. This was discussed in the exit interview. Doug Currington stated he will take a look at looking at the calorie count verses the serving size to perhaps adjust the size of the meals in order to better meet the needs of the residents.	Staff Interviewed: 2 Compliant with Areas of Improvement Identified
Section 7- Juvenile Interviews: [REDACTED] [REDACTED] [REDACTED]	Juveniles Interviewed: 2 Compliant
Section 8- Administrative Requirements: OPI has requested the documentation of educational requirements for interim Director Doug Currington. The director has sent these and there are no issues observed in this section.	Compliant
Section 9- Facility Tour: During the facility tour the following issues were documented. Work orders for all of the following issues have been sent to OPI. - Unit C- The lock on north hallway door broken. - HoldingCell-1 the water fountain is not working. - Unit B- The is damage to north wall and ceiling. The south hall door is jamming on the strike plate.	Compliant with Areas of Improvement Identified

- Unit A- A10 window is damaged, they have received replacement glass, they are just waiting to get it fixed.
- Unit A -The phone room had ceiling pulled down. There was a previous work order, it was determined a new grid for the ceiling is being ordered.

It is important to note that the most recent damage listed above was from residents that met criteria for inpatient services but, due to no available beds, they remained in detention.

Section 10- Reoccurring Findings:

Date of Last Assessment: 11/06/23

Corrected

No reoccurring findings.

Section 11- Additional Comments/Concerns:

Per a previous court order TJDC, is required to report the number of hours each youth is in programming each day. Per the administrative code, youth are required to be involved in twelve hours of programming each day. Listed below are the results of the review of the documentation for January 21st through January 24th.

Sunday January 21st, 2024, Total Detention Population 56

Number of Residents	Hours in programming	Reason
50	7.2	Staff Shortage
4	4.2	Room Confinement
1	5.2	Room Confinement
1	0.2	Room Confinement

***The video reviewed on the date above shows residents on Unit C getting out of their rooms at 9:40 AM. Seven (7) of the residents were returned in their rooms at 3:25 PM, and then only released again for a shower, for a total of 6.15 hours. Nine (9) residents on the same Unit, remained outside of their rooms from 9:40 AM until 9:15 PM for a total of 11.25 hours. The review of the video is inconsistent with report and records provided to the court and OJA.*

Monday January 22, 2024, Total Detention Population 55

Number of Residents	Hours in programming	Reason
51	6.2	Staff Shortage
1	5.5	Room Confinement
3	0.2	Room Confinement

***The video reviewed on date of shows ten (10) residents on Unit A getting out of their rooms at 9:00 AM. Those ten (10) residents were taken back to their rooms at 12:05 PM to eat lunch. At 12:06 PM the other ten (10) residents were released from their room and ate lunch in the dayroom. At 3:28 PM the ten (10) residents out were taken back to their room where they ate dinner at 4:30 PM. At 4:38 PM the other ten (10) residents were released from their room and ate dinner in the dayroom. At 6:27 PM the ten (10) residents out were taken back to their room. The ten (10) residents that were taken to their room at 3:28 PM were released to the dayroom at 6:30 PM and remained out until 8:30 PM. This is an example of half and half programming.*

Tuesday January 23rd, 2024, Total Detention Population 53

Number of Residents	Hours in programming	Reason
1	11.5	Resident Request
2	11.3	Resident Request
1	11.05	Resident Request
1	10.05	Resident Request

***The video reviewed for the date above shows all residents on Unit C getting out of their rooms at 7:45 AM and remaining out until 8:45 PM for a total of 13 hours. The reports provided to the court and OJA reflected that 45 of 53 residents were in programing for at least 12 hours on this day.*

Number of Residents	Hours in programming	Reason
3	11.5	Resident Request
1	10.2	Resident Request
1	10.15	Resident Request
8	8.5	Room Confinement
2	7.5	Room Confinement
1	6.35	Room Confinement
1	5.5	Room Confinement
2	0.5	Room Confinement

****Only one unit was reviewed for each of the above dates during the assessment. The information obtained from the video review differed from the records provided by TCJD on January 21, 2024.**

OCA Referrals:	Total OCA Referrals:	6
There were six (6) OCA referrals reported to OPI during this assessment period. There are two (2) referrals pending the completion of an investigation. The other four (4) referrals were screened out by OCA.		

There were fourteen (14) critical incidents involving fifteen (15) juveniles reported during this assessment period. A brief description of each is included below:

[REDACTED]

[REDACTED]

Self-harm/Suicidal:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Medication mismanagement:

[REDACTED]

Other Unexpected Events:

[REDACTED]

[REDACTED]

Oklahoma State Department of Health:

Number of 2
Concerns:

The Tulsa County Department of Health conducted an annual inspection on 01/06/24, there were two concerns listed as described below:

- A cup was being used to scoop sugar without a proper handle.
- There appeared to be three different dates labeled on food that was sitting in the walk-in fridge. This is cause confusion on when the food was prepped. There were other food items that were not dated, food kept 7 days past the prep date that needed to be discarded.

Oklahoma State Fire Marshal:

Number of 0
Concerns:

A Fire Marshal inspection occurred on 10/26/2023, there were no concerns noted.

JOLTS ENTRY:

It appears the facility is entering in all JOLTS information as required.

Comments/Concerns relative to OJA/JSU:

OJA Contracted Facility

☒ Yes ☐ No

Contract Number: CRL- 2024-315

Comments/Concerns- OJA Program Manager

☒ Yes ☐ No

OPI still has concerns regarding programming hours and the struggle that TDJC continues to face with maintaining enough staff to meet ratio. While OPI acknowledges there is a need for understanding that this in some sense is out of the administrations control, we see a need to require a corrective action plan to help continue to monitor this issue. Further while comparing the information gathered in video review, we discovered some discrepancy with the log sent of staff reporting each youths programming hours.

Findings/Areas of Concern Identified

Findings:

- Section 3- Institutional Operations/Security and Control

Noted Areas of Improvement Identified:

- Section 4-Greivance Requirements
- Section 6- Admin/Direct Care Staff Interviews
- Section 9-Facility Tour

Will a Corrective Action Plan be Required? ☒ Yes ☐ No

OJA Staff/OPI Assessors

OPI- Assessment Lead/Preparer of Report: [REDACTED]

Assisting: [REDACTED]



OKLAHOMA
OFFICE OF JUVENILE AFFAIRS

MONTHLY LIAISON REPORT

Facility Information

Facility Name:	Tulsa County Juvenile Detention	Month/Year of report:	February 9, 2024
JSU Liaison:	[REDACTED]	Number of onsite visits:	2
Number of Critical Incidents:	5	Number of Grievances:	16

Liaison Visits

In each box below, please list the date(s) of each liaison visit during the reporting period, the number of youth met with/interviewed along with a summary from the visit:	
Date of Visit: 1/17/2024	Total Juvenile Population: 57
Met with [REDACTED]	
Date of Visit: 1/26/2024	Total Juvenile Population: 51
Met with all three units and did an Inservice with them on my service dog and what she is for. All the kids were very respectful overall, and attentive. Did speak with staff about their language, whereas when I was not directly speaking with them, I could overhear them yelling and speaking to each other and staff, using gang slurs, and refusing to follow directives. When this worker would redirect, youth were overall receptive, but clearly seemed to lack the same respect for detention staff.	
Date of Visit:	Total Juvenile Population:
Date of Visit:	Total Juvenile Population:
Date of Visit:	Total Juvenile Population:
Was any information reported requiring a child welfare referral to DHS OCA?	
Yes	
If so, please include provided OCA referral(s) reference number(s):	[REDACTED]
Any visible issues with the facility or offline/inoperable beds reported:	No. Everything looked in working order from what this worker observed.

Additional Comments/Concerns:

[REDACTED]

Reporter Information

Signature of Liaison: [REDACTED]

Date: 02/09/24

District Supervisor:

2/12/24

Signed/completed report should be submitted to the OJA Program Manager by the 10th of each month.

February 2024 Tulsa County Juvenile Detention

Staff Interview:

Emanuel Ezechinonso

6+ years on staff

Emanuel states he is very impressed with Interim Director Doug Currington's recent efforts to improve things at the detention center. He reports the biggest issue he currently sees is staff turnover and keeping quality staff for good lengths of time. He feels it is hard to get good staff to stay for very long with the lower pay rates and youth that are increasingly difficult to deal with. Emanuel enjoys his job immensely and says even when it is not easy he loves coming to work. He feels that the youth understand that he is firm but fair and seem to respect him. He states they come to him frequently with their problems and feel they can trust him. He reports feeling he can come to administration with any issue at any time and knows staff safety is a big concern for them.

Youth Interview:

[REDACTED]

[REDACTED]



OKLAHOMA
OFFICE OF JUVENILE AFFAIRS

MONTHLY DETENTION FACILITY MONITOR REPORT

Facility Information

Facility Name:	Tulsa County Juvenile Detention Center	Month/Year of Report:	February 2024
JSU Facility Monitor:	[REDACTED]	Number of Onsite Visits:	2
Number of Critical Incidents:	35	Number of Grievances:	24

Monitoring Visits

In each box below, please list the date(s) of each Monitoring visit during the reporting period, a summary from the visit, and any areas of concern or needed follow up:

Date of Visit: 2/16/2024

Total Juvenile Population: 47

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Assessed situational awareness of teacher and staff, need for students to be appropriately seated at all times, need for teacher to keep students out of his personal space at desk, removal of additional chairs in classroom. Director intends to address all with staff immediately.

Follow-up on broken camera that was reported during January visit. IT company came to detention center on 2/15/24 and is currently working to switch contracted IT equipment out to detention center's own IT group.

Date of Visit: 2/29/2024

Total Juvenile Population: 46

Met new Superintendent Curtis Williams and discussed new situation that has recently arisen in several units with group of youth calling themselves "Show No Love". Director Currington heard about it first two weeks ago from staff on unit who noticed youth talking about "SNL" and youth drawing clowns / jokers on skin and papers. Director reports it is all [REDACTED] youth and they are calling it a brotherhood, not a gang. He states it started in [REDACTED] but has now spread to [REDACTED] as well. They appear to be jumping one another in with a "magic trick" of choking one another out. Director reported two critical incidents of youth being choked out that he believes are tied to this group. He has pulled 4 boys into cafeteria to speak with them and all denied involvement. [REDACTED].

Follow-up on IT program changes: Out of state company has come in and is nearing completion of switching over. New IT personnel states they are running into minor issues with AT&T and should have everything completed within the next few days.

Follow-up on classroom modifications after [REDACTED]: Viewed classrooms to see if modifications were going well, all classrooms were nicely organized and well monitored. All students were in assigned seating with nobody up wandering. Student was at desk discussing grades with teacher and was at appropriate distance from teacher. There were no excess chairs in the room, students were quiet and attentive, and 2nd staff member was at classroom window monitoring as required.

Updated 2-2024

Review of Video Surveillance- Time in program/out of room Tracking

Date Reviewed	Time reviewed	Observations/concerns	Unit Reviewed	# of Hours out in Programing
2/4/24	Approx. 0930	[REDACTED]	Gym	N/A
2/15/24	Approx. 1030	C-Unit in classroom w/ teacher Paul Clancy, approx. 15 youth in room with only teacher. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] *Concerns: Teacher never addresses youth moving about the classroom. [REDACTED] [REDACTED] [REDACTED] Teacher is allowing too much movement of multiple students around the room and allowing students to remove things from his desk. [REDACTED] [REDACTED] [REDACTED] Discussed why 2nd staff member was not in room monitoring students. Also discussed excess chairs in room and why students were not at assigned desks.	Classroom	N/A
2/26/24	1227	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	A-Unit	12+

Date Reviewed Time reviewed Observations/concerns

Unit
Reviewed

of Hours out in
Programming

2/26/24

1401

A-Unit 12+

OCA/Contract Concerns

Was any information reported requiring a child welfare referral to DHS (OCA)?	Yes
If so, please include provided OCA referral(s) reference number(s):	

Additional Comments/Concerns:

Continue to be impressed with Director Currington's efforts in making progress at Tulsa County. Staffing continues to be a struggle but the program improvements he is implementing are working. I appreciate the open communication between his team and myself and their willingness to listen to input. Changes are noted with each visit and the staff is quick to adjust.

Units are out for programming well beyond required hours each day and center has a very streamline system for moving units to and from for school. Director has new evening education program as well.

Reporter Information

Signature of Facility Monitor:

Date: 3/7/2024

District Supervisor:

Jeff Linde for Blaine Bowers

Signed/completed reports should be emailed to Greg Delaney, Jeremy Evans, Gene Carroll, Natascha Ferguson, Alyssa Devine, Timothy Miller, and Ben Brown by the 10th of each month.



Tulsa County Board of Commissioners

Pursuant to 10A O.S. § 2-3-103, has met all applicable standards and is
hereby issued a

License

for the operation of a Secure Juvenile Detention Center at:

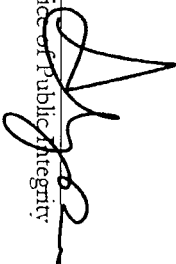
500 W. Archer

Tulsa, OK 74103

Maximum Juvenile Occupancy: 63


Executive Director

CRL-2024-315
Certificate Number


Office of Public Integrity

February 2026
Month and Year of Expiration



0

LETTER OF CORRECTIVE ACTION (OFFICIAL)

(Tulsa County Juvenile Detention Center)

Date: March 15, 2024
To: Office of Public Integrity
Submitted Through: Curtice Williams, Superintendent
Re: Tulsa County Juvenile Detention Center's Assessment FY-24

On January 30, 2024, OPI completed its annual licensing audit of the Tulsa County Juvenile Detention Center (TCJDC). During this announced audit, Tulsa Area Community Intervention Center (TACIC) was not assessed. Prior to the assessment, Interim Superintendent Douglas Currington communicated with OPI Lead Auditor Alyssa Devine for the scheduled 90-Day Review.

On February 16, 2024, this administrator received an email from OPI Lead Auditor Alyssa Devine which included the OPI Assessment Summary Report. The Assessment Summary identified 1 section of non-compliance out of 11 sections assessed, three noted areas of improvement, with concerns:

- Section 3 – Institutional Operations/Security and Control

Noted Areas of Improvement Identified

- Section 4 - Grievance Requirements
- Section 6 – Administrative/Staff Interviews
- Section 9 – Facility Tour

Reported violation(s) with corrections/proposed correction plan:

Section 3 – Institutional Operations/Security and Control:

Non-Compliant

Per administrative code 377:3-13-44(140(B) the reauthorization documentation for a room confinement to continue past 3 hours requires the approval of a supervisor who is uninvolved in the original incident or an on-call administrator. During this assessment, the confinement log was reviewed and showed that there were 169 room confinements. Nine of the forms were reviewed and one form was missing the 3-hour review documentation for juvenile [REDACTED]. The confinement was due to an attempted escape on [REDACTED]. The file showed observation log but lacked a 3-hour log. Further the log for room confinement/restrictions reported seventeen (17) 48-hour room

confinements. However, only five (5) of the required notifications had been sent as critical incidents to OJA. Per administrative code 377:3-13-13-44 (c)(14) detention staff is required to notify OJA within 24 hours of a 48-hour room restriction.

This administrator agrees to the finding, that Administrative Code 377:3-13-44 (c) (14), Reauthorization documented every 3 waking hours by uninvolved supervisor/on call administrator was in violation.

***The incident cited in the summary involved the resident being confined at 8:00pm, due to an attempted escape, one hour prior to lights out. The supervisor on duty failed to document an evening administrative review on the proper form.**

***Documented training on Resident Room Confinement Review has been conducted since this assessment.**

The finding noted seventeen (17), 48-hour room confinements, with only 5 being reported as critical incidents to OJA. This is in violation of Administrative Code 377:3-13-13-44 (c)(14) detention staff is required to notify OJA within 24 hours of a 48-hour room restriction.

This administrator reviewed room confinements for the period of 11-06-23 thru 01-30-24, which shows reportable critical incidents of room confinements, that exceeded 48-hours of residents being confined. Reporting processes had been to give telephonic notification to OJA Program Manager, followed up with a written report. This administrator cannot confirm prior telephonic reports, nor access any additional written reports.

The dates and number of resident(s) exceeding 48-hours of room confinement were as follows:

11/07/23 (1) – Unconfirmed notification (Incident Report # 2023-677)
11/27/23 (1) – Unconfirmed notification (Incident Report # 2023-734)
12/02/23 (1) – Unconfirmed notification (Incident Report # 2023-741)
12/03/23 (5) – Reported as [REDACTED] (Incident Report # 2023-744)
12/16/23 (5) – Unconfirmed notification (Incident Report # 2023-770)
12/24/23 (3) – Reported (Incident Report # 2023-786)
12/28/23 (1) – Unconfirmed notification (Incident Report # 2023-792)
01/05/24 (1) – Unconfirmed notification (Incident Report # 2024-04)

On January 30, 2024, this administrator requested copies of emailed Critical Incident Notifications from former Superintendent Cortez Tunley. On February 1, 2024, this administrator forwarded three (3) emailed notifications from former Superintendent Cortez Tunley, to OPI Lead Auditor Alyssa Devine, with one report being out of the date range.

Plan of Action in Identified Improvements:

This administration has developed ongoing weekly training for Supervisors and Lead Detention Specialists, that addresses the detention home's paper flow, reporting and notification processes. This administration has put in place methods for early reporting of residents confined by assigning Unit Secretaries to conduct morning reviews of residents' folders, and will submit daily a list of residents confined and number of hours to the Superintendent or his designee. Administrators will identify residents approaching administrative reviews at 24-hours and receive detailed briefings on residents exceeding 24-

hours and excessive hours of confinement. The Administrator-on-Call (AOC) for the week, will have duties of conducting morning reviews of residents' folders that are on room confinement, and evaluating morning administrative review, on the 3-hour Resident Room Confinement Review. Supervisors and Lead Detention Specialists are required to calculate each residents' hours of confinement and document in the electronic shift briefings at the end of shift. These actions will assist the oncoming shift in conducting quick assessments of residents' status. These processes will enhance communications within the chain-of-command, ensuring all supports are utilized/ exhausted in returning residents to programming, and reducing overall hours of residents' room confinement. It is the goal of this administration to implement the use of Restorative Justice Practices in efforts to reduce the number of room confinements, hours of room confinements and improve overall behavior management.

These implemented steps will provide close monitoring by Supervisors and this Administration in preventing failure to notify. This is ongoing and the procedures will be written into policy.

Noted Areas of Concern and Findings proposed correction plan

Section 4 – Grievance Requirements:

Compliant with Areas of Improvement

During the assessment OPI reviewed 28 grievances, the documentation and numbering followed administrative code 377:3-1-28(a) correctly. However, the following grievances discussed [REDACTED]

[REDACTED]

[REDACTED]

During the exit interview, the attrition standing within the Tulsa County Juvenile Detention Center was discussed with the Assistant Superintendent, Doug Currington, with a staffing interview plan in place. The focus of the interview planning was to ensure the increase of available staff during critical times of need and with compatible residents. The time that has been identified based on interviews conducted with residents during the OPI assessment is weekends. The weekend coverage mentioned due to one of the grievances using the language of 'half and half' regarding resident programming time. The increase of both male and female staff members for weekend programming being mentioned, was due to facility need of housing both males and females on a single unit, due to the increase in resident population.

Plan of Action in Identified Improvements:

It should be noted the Detention Center has conducted nineteen (19) interviews since the assessment date, with the hiring of nine (9) additional staff positions. Within the facilities hiring matrix, all new staff members are assigned weekend duties, assisting in meeting the need of identified improvements in this section. With the implementation of monthly onsite facility reviews, conducted by OJA monitors and liaisons, and due to the fluent nature of the current hiring climate, this is an immediate reviewable item that can be coordinated due to OJA considerations in the process for compliance.

Section 6 – Admin/Direct Care Staff Interviews:

Compliant with Areas of Improvement

OPI interviewed two direct care staff members, one staff started in November and works from 7:00am to 1:30pm during the weekday M-F. This staff stated that she had heard that half and half scheduling was occurring on Sundays when they are short staffed.

OPI reviewed video from Sunday, January 21st, 2024, as well as the weekly program logs provided by TJDC. The review of the video tape and the log showed the 50-youth detained in detention that day were not out the required 12 hours of programing and received only 7.2 hours of programming for this day.

The male staff member interviewed has worked there for six years and stated that he was glad to see that they have moved away from half and half programming schedules. He stated it was hard on everyone being short staffed and that they have not had to do half and half programming in a long time. He further stated that it has been a benefit in having OJA involved in improving their program over the last nine months. He further stated that sometimes the portions given to the children, especially at breakfast are not sufficient.

This was discussed in the exit interview, Doug Currington stated he will take a look at looking at the calorie count verses the serving size to perhaps adjust the size of the meals in order to better meet the needs of the residents.

It is the opinion of this administrator, upon review of the staff members' comments during interviews, were seen as contradictory. One staff member, that was a part-time employee, having been employed less than 90-days, working 30-hours per week, only Monday thru Friday, stated that "she had heard half and half scheduling was occurring." This statement was in direct contradiction to the other staff member interviewed, which has been employed as a full-time employee for five years, working weekends on his assigned shift. This employee acknowledged that, "the use of half and half programming hasn't been used in a long time."

*The overall programming for the Detention Home has improved and concerted efforts from this administration have been focused on continual improvement. One step has been focused on conducting weekly interviews and assigning new hires to shift coverages on the weekends, which has been a solution to resolving the shortage of staff on the weekend shifts.

This staff member also addressed the breakfast portions as being insufficient. This administrator, along with the Program Manager researched the Schools Nutrition Programs Compliance Handbook, and found the following:

Under Child Nutrition Regulations, breakfast and lunch meal patterns are as follows:

Portion size for breakfast: Fruit 1 cup daily, and grains 2 oz. daily.

Portion size for lunch: Vegetables 1 cup daily, fruit 1 cup daily to include ½ cup fruit ½ juice (4 oz.), meat 2 oz., grains 1 oz. daily (rice or bread), and milk ½ pint daily.

Note: Due to this facility funding and providing dinners meals, in which we do not have to follow Child Nutrition Rules, those meals are heartier and we increase the meat size by double in size, from the lunch meal.

Plan of Action in Identified Improvements:

It is the continued efforts of this administration to provide a safe and secure environment at all times, which includes health and nutrition. Our incentive program has increased, with consideration of large and healthy snack portions for residents. This is ongoing.

Section 9 – Facility Tour:

Compliant with Areas of Improvement

During the facility tour, the following issues/areas of concern were observed:

- Unit C – The lock on north hallway door broken.
- Holding Cell #1, the water fountain is not working.
- Unit B – There is damage to the north wall and ceiling. The south hall door is jamming on the strike plate.
- Unit A, room A-10 window is damaged, they have received replacement glass, they are just waiting to get it fixed.
- Unit A – The phone room had ceiling pulled down. There was a previous work order, it was determined a new grid for the ceiling is being ordered.

Corrective Action: This administrator submitted repair requests on each discrepancy noted during the walk-through assessment on January 30, 2024 to the Facility Maintenance Team. Copies of the repair request were forwarded to OPI Lead Auditor Alyssa Devine on January 30, 2024.

This administration is committed to utilizing the current process for reporting maintenance issues and documenting resolutions. Supervisors are required to do regular room walk throughs to assess cleanliness and maintenance needs, and respond as appropriate. Assistance in helping to recognize and address issues comes from direct care staff when room checks are completed

Section 11- Additional Comments/Concerns:

The additional concerns outlined in this section addressed the review of documentation and video reviews of programming beginning January 21, 2024 through January 24, 2024. Discrepancies were found in some of the documentation and video review, which showed residents on certain days not being out of their rooms for the minimum of 12 hours per day, and one 'example of half and half programming'.

This administrator received requests from supervisors on shifts to operate 'modified programming', due to staff shortages and severe weather. The modified programming was conducted to provide safe and secure programming for staff and residents, during those dates. Critical Incident reports were submitted to OJA.

Beginning January 21, 2024, the population count was at fifty- six (56) residents, which was seven (7) short of being full capacity, when contracted at forty (40) bed spaces through OJA.

On January 22nd and 23rd were severe weather days, which resulted in some employees being unable to get to work, due to car accidents. This affected shift coverage for two days, due to dangerous roadways. Three employees experienced car accidents, with one resulting in injuries. Therefore, this administrator would challenge these days, as examples of 'half and half' programming, due to uncontrollable circumstances.

* It is of note: this administration made continuous efforts, by phone calls to evaluate employees' conditions and abilities to make shifts. Supervisors made efforts that are noteworthy to make programming happen, without shutting down the entire program, keeping safety and security minded.

Plan of Action in Identified Improvements:

This administration is continuing diligent efforts in identifying coverage issues in advance, that steps may be taken to provide adequate coverage and program operations that provide staffing compliments that meets or exceeds the quotient required by OAC 377: 3-13-44 (4); staff ratios 1:7 during waking hours, 1:16 during sleep hours.

Likewise, this administration's efforts in its interview and hiring process is noteworthy. This is ongoing, and has increased since the Superintendent's position has been filled. The new superintendent Curtice Williams has made this a priority.

In closing, this administrator acknowledges the need for resident involvement in programming and desires for continued compliancy. I strongly believe that staffing, training, facility strengthening, and resident adherence to security regulations will improve programming compliance. Given the overall growth and efforts the department has made from May 2023 to present is to be taken as a commitment to providing the best environment for residents and staff members in compliance to the Oklahoma Administrative Code for a Secure Detention Facility.

Appreciatively submitted for review,

Douglas Currington –
Interim Superintendent during Assessment Period

MONTHLY LIAISON REPORT

Facility Information

Facility Name: Tulsa Detention

Month/Year of report: March 2024

JSU Liaison: Kelley Arbeene

Number of onsite visits: 10

Number of Critical Incidents:

Number of Grievances:

Liaison Visits

In each box below, please list the date(s) of each liaison visit during the reporting period, the number of youth met with/interviewed along with a summary from the visit. Attach copies of the completed Detention Interview Guide for each juvenile interviewed to this form.

Date of Visit: 3/4/2024

Total Juvenile Population: 49

Date of Visit: 3/8/2024

Total Juvenile Population: 53

Date of Visit: 3/12/2024

Total Juvenile Population: 45

Date of Visit: 3/22/2024

Total Juvenile Population: 45

Date of Visit: 3/27/2024

Total Juvenile Population: 51

Was any information reported requiring a child welfare referral to DHS-OCA?

If so, please include provided OCA referral(s) reference number(s):

Does the facility have any detention beds which are closed or offline?

If yes when was the bed closed or go offline and has the closed/offline bed been reported to the Jeremy Evans or Gene Carroll?

On 3/27/24 B-4 shut down due to toilet not working. B-19 lock on door was broken and C-7 and A2 toilets causing issue. It is unknown if this was reported to anyone aside from this worker.

Are there any maintenance/remodeling projects currently completed which require a detention bed(s) to be taken offline?

Worker saw gang graffiti all up and down the main hallway. Done so by removing paint (could have been anything used whereas paint easily wipes off and leaves markings). Also noted that the door on B South hall is sticking shut, causing issue. Notified Brent McQuarters of the graffiti whereas staff seemed unaware when this worker brought it up.

--	--

Additional Comments/Concerns:

Did not receive the monthly update of Grievances and critical incident reports as I had in the past. Will reach out to Doug and inquire whereas he is usually really good about sending these.

Reporter Information

Signature of Liaison:

Kelley Arbeene

04/15/24

Date:

District Supervisor: Blaine Bowers 4/15/24

Signed/completed reports should be emailed to Greg Delaney, Jeremy Evans, Gene Carroll, Natascha Ferguson, Alyssa Devine, Timothy Miller, and Ben Brown by the 10th of each month.



OKLAHOMA
OFFICE OF JUVENILE AFFAIRS

MONTHLY DETENTION FACILITY MONITOR REPORT

Facility Information

Facility Name:	Tulsa Co. Juvenile Detention	Month/Year of Report:	March 2024
JSU Facility Monitor:	[REDACTED]	Number of Onsite Visits:	1
Number of Critical Incidents:	28	Number of Grievances:	24

Monitoring Visits

In each box below, please list the date(s) of each Monitoring visit during the reporting period, a summary from the visit, and any areas of concern or needed follow up:

Date of Visit: 3/19/2024

Total Juvenile Population: 52

Date of Visit:

Total Juvenile Population:

Review of Video Surveillance- Time in program/out of room Tracking

Date Reviewed	Time reviewed	Observations/Concerns	Unit Reviewed	# of Hours out in Programming
3/3/2024	Approx 340pm	[REDACTED]	Unit C	N/A
3/17/2024	Approx 120pm	[REDACTED]	Rec Yard	N/A

Report Month: 3/2024

Administration has order in for new wire to be placed above fencing on recreational yard, to minimize escape effectiveness and hopefully discourage escape attempts. Wire should arrive to facility by April 8th.

Reporter Information

Signature of Facility Monitor



Date: 4/1/2024

District Supervisor:

Signed/completed reports should be emailed to Greg Delaney, Jeremy Evans, Gene Carroll, Natascha Ferguson, Alyssa Devine, Timothy Miller, and Ben Brown by the 10th of each month.

Detention Interview Guide

Youth's Name: [REDACTED]

JOLTS Number: [REDACTED]

Detention Center: Tulsa Co.

Date 3/19/24

Time: 1035am

Hi, _____, my name is _____ and I am with the Office of Juvenile Affairs. Part of my job is to make sure kids that are in detentions are being treated as they are supposed by law. I would like to ask you a few questions about your time here to see how things are going. If you agree, I am going to write down your answers and give this information to a group providing oversight to detentions. Their job is to make sure the rules are being followed in detention. The information you share with me will go to that group that is reviewing what happens in detentions. They will create a report that will be given to detention leadership and others, your name will not be included in that report. May I ask you a few questions?

1. How long have you been here in detention? [REDACTED]
 - How have things been going for you? [REDACTED]
2. Are you charged as a delinquent or as a youthful offender? yo (Skip this question for juveniles in Tribal or Federal custody)
3. ~~What tribal court is your case out of?~~ _____ (For tribal jurisdiction juveniles only)
4. Are you getting enough to eat? [REDACTED]
 - Is the food good? [REDACTED]
 - What could make the food better? [REDACTED]
 - Have you filed a grievance regarding the food? [REDACTED]
5. Are you taking any medication while you are here? [REDACTED]
 - What medication are you taking? [REDACTED]
 - Who gives you your medication? [REDACTED]
 - Does the nurse/staff give you the medication on the same schedule every day? yes Why does the schedule change? [REDACTED]
 - Have you been on suicide watch while in this facility? [REDACTED] (Ask for follow-up information if youth answer yes)
6. Does everything in the facility work properly (water, heat, air, locks, etc.)? [REDACTED]
 - What is broken? [REDACTED]
 - How long has that been broken? [REDACTED]
 - Are any of the rooms in the detention center not being used to hold another juvenile because something is broken in the room? [REDACTED] If yes, which room(s)? [REDACTED]
7. Are you attending school? [REDACTED]
 - How often do you get to go to school? [REDACTED]
 - Are there ever times when you don't get to go? [REDACTED]
 - Are you attending school in the classrooms or are you attending somewhere else? [REDACTED]
 - Have you ever been given packet of work to do rather than going to school with a teacher? [REDACTED]
 - When were you give the packet? [REDACTED]
 - If you are not in the classroom and are doing schoolwork and you have a question/don't know how to do something there anyone there who can help you? [REDACTED] Who? [REDACTED]
8. When is the last time that you spoke to your family on the phone? [REDACTED]
 - How often do you get to call your family? [REDACTED]
 - Who helps you make those phone calls? [REDACTED]
 - Do you ever get to see your family during visitation? [REDACTED]
9. Are you able to speak with your attorney upon request? [REDACTED]
 - What is your attorney's name? [REDACTED]

- If you ask to speak to your attorney, are you allowed to call them?
 - When was the last time you spoke with your attorney?
 - How often, if ever, do they come and see you in detention?
10. Are you able to speak to your caseworker (JB/ISU/Tribe)?
- What is your caseworker's name?
 - If you ask to speak to your caseworker, are you allowed to call them?
 - When was the last time you spoke with your caseworker?
11. Where do you spend most of your day?
- How many hours a day are you out of your room on weekdays/weekends?
 - Around what time do you get to come out of your room during the week?
 - Is that the same during the weekends?
 - Do you ever get put in your room during the middle of the day? If so, how long?
 - How often do you get to go outside for activities/recreation?
 - Is there a level system in this facility? What level are you on?
 - Can you request to voluntarily stay in your room?
12. Have you ever gotten in trouble for violating a rule in detention? What for?
- What was your punishment?
 - Was the punishment fair?
 - Have you ever been punished as part of a group for something someone else did? If so, how?
 - Aside from room confinement are you ever separated from the group for a certain period for disciplinary reasons?
13. How often do you get to take a shower?
14. How often do you get clean clothes?
15. Can you tell me how you would go about filing a grievance?
- Have you ever filed a grievance?
 - Do you have any pending grievances now?
 - How was/were your grievance resolved?
 - Have you been unfairly punished or disciplined while at this facility? How?
16. Do you feel safe here in detention? Why or why not?
- Do you feel staff is in control of this facility? Why?
 - Are there any staff members who you feel like you can talk to if you have a problem? Why?
 - Are there any staff who you do not get along with? Why?
 - Have you ever witnessed a staff member harass, bully or assault a resident? (Ask for follow-up information if youth answer yes)
17. Is there anything good or bad happening in here that you think I need to know about that I have not asked you about? What?

Liaison and/or Monitor Notes



OKLAHOMA
OFFICE OF JUVENILE AFFAIRS

MONTHLY LIAISON REPORT

Facility Information

Facility Name:	Tulsa Detention	Month/Year of report:	April 2024
JSU Liaison:		Number of onsite visits:	9
Number of Critical Incidents:	8	Number of Grievances:	26

Liaison Visits

In each box below, please list the date(s) of each liaison visit during the reporting period, the number of youth met with/interviewed along with a summary from the visit. Attach copies of the completed Detention Interview Guide for each juvenile interviewed to this form.	
Date of Visit: 4/3/2024	Total Juvenile Population: 53
Date of Visit: 4/12/2024	Total Juvenile Population: 53
Date of Visit: 4/17/2024	Total Juvenile Population: 52
Date of Visit: 4/19/2024	Total Juvenile Population: 49
Date of Visit: 4/26/2024	Total Juvenile Population: 54
Was any information reported requiring a child welfare referral to DHS-OCA?	
yes	
If so, please include provided OCA referral(s) reference number(s):	Yes- #2398807
Does the facility have any detention beds which are closed or offline? If yes when was the bed closed or go offline and has the closed/offline bed been reported to the Jeremy Evans or Gene Carroll?	C-07 Light broken. Replace glass in Unit C multipurpose room. Lock still broken in B-19 Graffiti on walls of Unit C Multipurpose room. Main hall wall opposite staff break room still has graffiti on it. Tiles in ceiling off Unit A interview room still broken. Unit A shower #2, staff bathroom sink and water fountain broken.

Are there any maintenance/remodeling projects currently completed which require a detention bed(s) to be taken offline?

Worker still is able to see significant gang graffiti all up and down the main hallway. Done so by removing paint (could have been anything used whereas paint easily wipes off and leaves markings).

Additional Comments/Concerns:

Attached is all updates on grievances and critical incident reports.

Reporter Information

Signature of Liaison:

[Redacted Signature]

04/16/24

Date:

District Supervisor:

[Redacted Signature]

4/29/24

Signed/completed reports should be emailed to

[Redacted Email Address]

by the 10th of each month.

[REDACTED]

From:

Sent:

[REDACTED]
Thursday, April 11, 2024 4:49 PM

To:

Cc:

Subject:

[REDACTED]
[EXTERNAL] Notification of Critical Incident-Resident Hospitalization

Importance:

High

[REDACTED]

[REDACTED]

The information in this e-mail message (including any information contained in attachments hereto) is intended only for use of the addressee. This e-mail message may contain confidential or privileged information. If you receive this e-mail message unintentionally, please notify the sender promptly and then delete this message. E-mail transmission is not guaranteed to be secured or error free. The sender is in no way liable for any errors or omissions in the content of this e-mail message, which may arise as a result of e-mail transmission. E-mails, text messages, and other electronic communications made or received in connection with the conducting of public business, the expenditure of public funds, or the administration of public property are subject to the Oklahoma Open Records Act and the Records Management Act.



TULSA COUNTY JUVENILE DETENTION HOME

IRN: _____

INCIDENT REPORT

Incident Report Title Modified Program

Location: Unit C

Date: 04/08/24 Time 1630p

(1) Subject/Victim: NA Position: Resident

Race: NA Sex: NA Age: NA Date of Birth: NA JOLTS ID NA

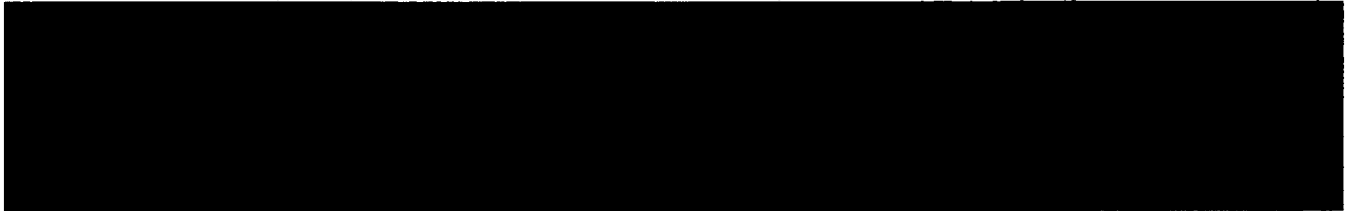
(2) Subject/Victim: NA Position: NA

Race: NA Sex: NA Age: NA Date of Birth: NA JOLTS ID NA

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code	Name	Position	Telephone
E	Derrick Harris	USS	918-596-5960

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)



Reporting Staff Name (Print) _____ Date _____

Signature of Reporting Person _____ Date _____

[Redacted] 04/08/24
Supervisor Name (Print) _____ Date _____
[Redacted] 4/8/24
Signature of Reporting Person _____ Date _____

Details of Incident/Complaint: (continued)

Resolution:

Program Modified residents counseled on their behavior

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):

N/A

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

N/A

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) [REDACTED] 4) N/A
2) N/A 5) N/A
3) N/A 6) N/A

Enclosures (list all attached Statements, Receipts, and Related Documents):

1) N/A 4) N/A
2) N/A 5) N/A
3) N/A 6) N/A

Was Use of Force Required: Yes ☐ No ☒

Was Medical Attention Required: Yes ☐ No ☒ First Aid N/A Nurse N/A Hospital N/A

Disciplinary Action Taken: Yes ☐ No ☒ (Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative File, OJA, District Attorney's Office, Judicial, DHS, Other (Specify))

Administrative File [REDACTED] OJA [REDACTED] District Attorney's Office [REDACTED]

Judicial [REDACTED] DHS [REDACTED] Other (Specify) [REDACTED]

Administrator's Review [REDACTED] 4-9-2024
Date

TULSA COUNTY JUVENILE DETENTION HOME

IRN: _____

OC

INCIDENT REPORT

Incident Report Title Suicide Attempt

Location: Unit B Room B7

Date: _____ Time 17:13 PM

(1) Subject/Victim: _____ Position: Resident

Race: _____ Sex: _____ Age: _____ Date of Birth: _____ JOLTS ID: _____

(2) Subject/Victim: N/A Position: N/A

Race: N/A Sex: N/A Age: N/A Date of Birth: N/A JOLTS ID: N/A

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code _____ Name _____ Position _____ Telephone _____

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

Reporting Staff Name (Print) _____ Date 4/8/2024

Signature of Reporting Person _____ Date 4/8/2024

Supervisor Name (Print) _____ Date _____

Signature of Reporting Person _____ Date _____

Details of Incident/Complaint: (continued)

Resolution:

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, Is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) PROGRAM MANAGER ☐ 4) N/A
2) N/A 5) N/A
3) N/A 6) N/A

Enclosures (list all attached Statements, Receipts, and Related Documents):

1) COPEs SAFETY PLAN 4) N/A
2) N/A 5) N/A
3) N/A 6) N/A

Was Use of Force Required: Yes ☐ No ☒

Was Medical Attention Required: Yes ☒ No ☐

First Aid _____ Nurse ☒ Hospital _____

Disciplinary Action Taken: Yes ☐ No ☒

(Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File _____ Assigned Counselor _____ OJA _____ District Attorney's Office _____

Judicial _____ TPD _____ TCSO _____ DHS _____ Other (Specify) _____

Administrator's Review _____

Date

COPEs

Intervention Report

Client: [REDACTED] DOB: [REDACTED]

1. Suicidal Ideation/ Plan: [REDACTED]

2. Hx of Suicide Attempts/ Self Harm: [REDACTED]

3. Homicidal/Hx of Violence: [REDACTED]

4. Psychotic or Delusional: [REDACTED]

5. Substance Use/ Hx: [REDACTED]

6. Decompensation/ Hx: [REDACTED]

7. Hx of Mental Illness: [REDACTED]

8. Medical Condition/Current Medication/ Compliance: [REDACTED]

9. Other Info: [REDACTED]

Staff Providing Report: [REDACTED]

Staff Accepting Report: [REDACTED] Date: [REDACTED]

TULSA COUNTY JUVENILE DETENTION HOME

IRN: _____

INCIDENT REPORT

Incident Report Title Medical: Resident Transport

Location: Detention Clinic

Date: 04/08/24 Time 10:45

(1) Subject/Victim: _____ Position: Resident

Race: _____ Sex: _____ Age: _____ Date of Birth: _____ JOLTS ID: _____

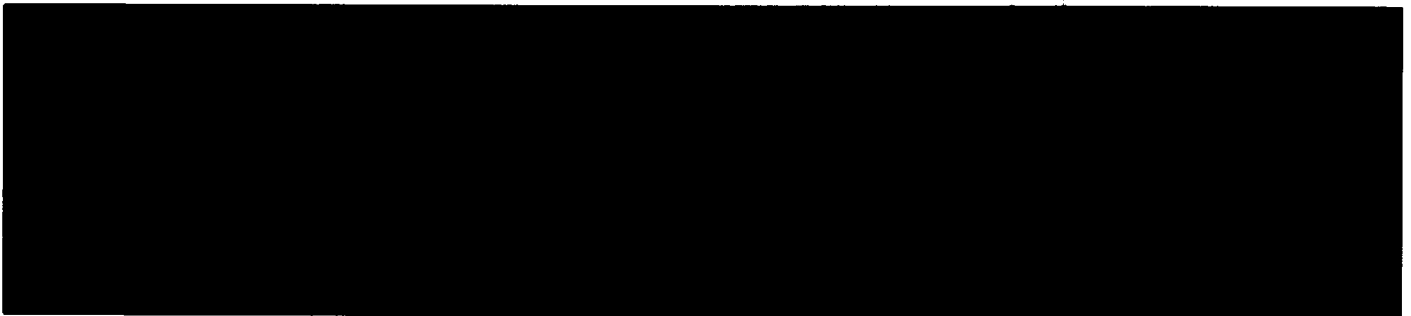
(2) Subject/Victim: N/A Position: N/A

Race: N/A Sex: N/A Age: N/A Date of Birth: N/A JOLTS ID: N/A

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code	Name	Position	Telephone
E	Douglas Curtington	Assistant Superintendent	918-598-5935
E	John Olu	Training Supervisor	918-598-5828

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)



04/08/24

Date

Supervisor Name (Print) _____ Date _____

04/08/24

Date

Signature of Reporting Person _____ Date _____

Details of Incident/Complaint: (continued)

[REDACTED]

Resolution:

[REDACTED]

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):

N/A

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

N/A

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) Superintendent [REDACTED] @ 10:30am 4) N/A

2) Program Manager [REDACTED] @ 10:30am 5) N/A

3) N/A 6) N/A

Enclosures (list all attached Statements, Receipts, and Related Documents):

1) Juvenile Profile 4) N/A

2) Medical Summary 5) N/A

3) N/A 6) N/A

Was Use of Force Required: Yes ☐ No ☒

Was Medical Attention Required: Yes ☒ No ☐ First Aid N/A Nurse yes Hospital yes

Disciplinary Action Taken: Yes ☐ No ☒ (Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File _____ Assigned Counselor _____ OJA _____ District Attorney's Office _____

Judicial [REDACTED] O _____ DHS _____ Other (Specify) _____

Administrator's Review [REDACTED] 4/8/2034

Date

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn, Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc., T/O	Dinner	Visit	Shower	Groups	Total Hours	# Resident
[REDACTED]	[REDACTED]	[REDACTED]	7:30	21:00	no	Yes	Yes	3	yes	Yes	no	0	Yes	no	yes	yes	13.5	[REDACTED]
			7:30	21:00	Yes	no	no	0	no	Yes	no	0	Yes	no	yes	no	4.55	
			7:30	21:00	Yes	Yes	Yes	4	yes	yes	no	4.3	Yes	no	yes	yes	9.2	
			7:30	21:00	no	Yes	Yes	3	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	3	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	Yes	Yes	Yes	0	yes	Yes	no	2.05	Yes	no	yes	yes	11.45	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	3	yes	Yes	no	1.3	Yes	no	yes	yes	12.2	
			7:30	21:00	no	Yes	Yes	3	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	Yes	no	no	0	no	Yes	no	0	Yes	no	yes	no	8.3	
			7:30	21:00	Yes	Yes	Yes	1	yes	Yes	no	8	Yes	no	yes	yes	5.5	
			7:30	21:00	Yes	Yes	Yes	4	yes	Yes	no	6	Yes	no	yes	yes	7.5	
			7:30	21:00	no	Yes	Yes	3	yes	Yes	no	1.3	Yes	no	yes	yes	12.2	
			7:30	21:00	Yes	Yes	Yes	4	yes	Yes	no	4.35	Yes	no	yes	yes	9.15	
			7:30	21:00	Yes	Yes	Yes	0	no	Yes	no	0	no	no	no	yes	6.2	
			7:30	21:00	no	Yes	Yes	3	yes	Yes	no	0	Yes	no	yes	yes	13.5	
					Yes												0	
					Yes												0	

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn, Hyg,	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc., T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resident	
			7:30	21:00		no	Yes	Yes	3	yes	Yes	no	0.35	Yes	no	Yes	yes	13.15	
			7:30	21:00		no	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	yes		Yes	Yes	4	yes	Yes	no	4.3	Yes	no	Yes	yes	9.2	
			7:30	21:00		No	Yes	Yes	3	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00		No	Yes	Yes	3	yes	Yes	no	1.3	Yes	no	Yes	yes	12.2	
			7:30	21:00		No	Yes	Yes	3	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	yes		Yes	Yes	4	yes	Yes	no	4.3	Yes	no	Yes	yes	9.2	
			7:30	21:00		No	Yes	Yes	3	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00		No	Yes	Yes	3	yes	Yes	no	0.35	Yes	no	Yes	yes	13.15	
			7:30	21:00	yes		Yes	Yes	4	yes	Yes	no	2.3	Yes	no	Yes	yes	11.2	
7:30	21:00		No	Yes	Yes	3	yes	Yes	no	1.3	Yes	no	Yes	yes	12.2				
7:30	21:00	yes		Yes	Yes	0	no	Yes	no	9	Yes	no	Yes	yes	4.5				
7:30	21:00	yes		Yes	Yes	1	yes	Yes	no	3.15	Yes	no	Yes	yes	10.35				
7:30	21:00	yes		Yes	Yes	1	no	Yes	no	5.3	Yes	no	Yes	yes	8.2				
					Yes	No											0		
					Yes	No											0		
					Yes	No											0		
					Yes	No											0		

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time	Time End	Attended Full Day?	Morn. Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc., T/O	Dinner	Visit	Shower	Groups	Total Hours	if Res
[REDACTED]				21:00	No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	[REDACTED]
				21:00	No	Yes	Yes	4	yes	Yes	no	0.15	Yes	no	Yes	yes	13.35	
				21:00	No	Yes	Yes	3	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
				21:00	Yes	Yes	Yes	0	no	Yes	no	12	Yes	no	Yes	no	1.5	
				21:00	Yes	no	no	0	no	Yes	no	0	Yes	no	Yes	yes	9.3	
				21:00	Yes	Yes	Yes	4	no	Yes	no	5.35	Yes	no	Yes	yes	8.15	
				21:00	No	Yes	Yes	3	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
				21:00	No	Yes	Yes	3.5	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
				21:00	No	Yes	Yes	4	yes	Yes	no	0.25	Yes	no	Yes	yes	13.25	
				21:00	Yes	Yes	Yes	3	yes	Yes	no	4	Yes	no	Yes	yes	9.5	
[REDACTED]				21:00	No	Yes	Yes	3	yes	Yes	no	0	Yes	no	Yes	yes	13.5	[REDACTED]
				21:00	No	Yes	Yes	4	yes	yes	no	0.45	Yes	no	Yes	yes	13.05	
				21:00	No	Yes	Yes	4	yes	Yes	no	0.25	Yes	no	Yes	yes	13.25	
				21:00	No	Yes	Yes	3	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn, Hyg,	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc., T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resident
			7:30	21:00	No	Yes	Yes	3	no	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0.25	Yes	no	Yes	yes	13.25	
			7:30	21:00	Yes	Yes	Yes	0	no	Yes	no	8.15	Yes	no	Yes	yes	5.35	
			7:30	21:00	No	Yes	Yes	3	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	3	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	

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Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn, Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc., T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resident
			7:30	21:00	Yes	Yes	Yes	0	yes	Yes	no	4.15	Yes	no	yes	yes	9.35	
			7:30	21:00	no	yes	Yes	0	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	Yes	Yes	Yes	0	yes	yes	no	7.45	Yes	no	yes	yes	6.05	
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	0	no	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	Yes	Yes	Yes	0	yes	Yes	no	2.45	Yes	no	yes	yes	11.05	
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	0	no	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	1	Yes	no	yes	yes	12.5	
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	0	Yes	yes	yes	yes	13.5	
			7:30	21:00	Yes	Yes	Yes	0	yes	Yes	no	2.45	Yes	no	yes	yes	11.05	
			7:30	21:00	Yes	Yes	Yes	0	yes	Yes	no	4.2	Yes	no	yes	yes	9.3	
			7:30	21:00	no	Yes	Yes	0	no	Yes	no	0.15	Yes	no	yes	yes	13.35	
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	Yes	Yes	Yes	0	yes	Yes	no	4	Yes	yes	yes	yes	9.5	
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	0	Yes	no	yes	yes	13.5	
					Yes												0	
					Yes												0	
					Yes												0	

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn, Hyg,	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc., T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resident
[REDACTED]			7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	1.1	Yes	no	Yes	yes	12.4	[REDACTED]
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	7.3	Yes	no	Yes	no	6.2	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	1	Yes	yes	Yes	yes	12.5	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	0	Yes	yes	Yes	yes	13.5	
			7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	2.45	Yes	no	Yes	yes	11.05	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	1.15	Yes	no	Yes	yes	12.35	
			7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	2	Yes	no	Yes	yes	11.5	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	yes	Yes	Yes	0	no	Yes	no	2.1	Yes	no	Yes	yes	11.4	
[REDACTED]			7:30	21:00	No	Yes	Yes	0	no	Yes	no	0	Yes	no	Yes	yes	13.5	[REDACTED]
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	0.2	Yes	no	Yes	yes	13.3	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	1.1	Yes	no	Yes	yes	12.4	
			7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	5	Yes	no	Yes	yes	8.5	
			7:30	21:00	Yes	Yes											0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	

Page 149 of 243

06/0

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Mom, Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc. T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resident
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	1.1	Yes	no	Yes	yes	12.4	
			7:30	21:00	Yes	Yes	Yes	0	yes	Yes	no	3.2	Yes	no	Yes	yes	10.3	
			7:30	21:00	Yes	Yes	Yes	0	no	Yes	no	9	Yes	no	Yes	yes	4.5	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	Yes	Yes	Yes	0	yes	Yes	no	4.15	Yes	no	Yes	yes	9.35	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	

Page 151 of 243

06/0

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn, Hyg,	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc, T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resident
[REDACTED]	[REDACTED]	[REDACTED]	7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	1.15	Yes	yes	Yes	yes	12.30	[REDACTED]
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	2.15	Yes	no	Yes	yes	11.30	
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	1.15	Yes	no	Yes	yes	12.30	
			7:30	21:00	yes	Yes	Yes	0	no	Yes	no	3.3	Yes	no	Yes	yes	10.2	
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	1.45	Yes	no	Yes	yes	12.0	
			7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	2	Yes	no	Yes	yes	11.5	
			7:30	21:00	yes	Yes	Yes	0	no	Yes	no	6.3	Yes	no	Yes	yes	7.2	
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	4.45	Yes	no	Yes	yes	9.05	
[REDACTED]	[REDACTED]	[REDACTED]	7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	5.25	Yes	no	Yes	yes	8.25	[REDACTED]
			7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	4.15	Yes	no	Yes	yes	9.35	
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	0	
			7:30	21:00	no	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	0	
[REDACTED]	[REDACTED]	[REDACTED]	7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	0	[REDACTED]
			7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	0	
			7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	0	
[REDACTED]	[REDACTED]	[REDACTED]	7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	0	[REDACTED]
			7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	0	
			7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	0	
[REDACTED]	[REDACTED]	[REDACTED]	7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	0	[REDACTED]
			7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	0	
			7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	0	

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn. Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc. T/O	Dinner	Visit	Shower	Groups	Total Hours	If Re:
			7:30	21:00	Yes	Yes	Yes	0	yes	Yes	no	4.15	Yes	yes	Yes	yes	9.35	
			7:30	21:00	No	Yes	Yes	0	no	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	Yes	Yes	Yes	0	yes	Yes	no	3.05	Yes	no	Yes	yes	10.45	
			7:30	21:00	Yes	Yes	Yes	0	yes	Yes	no	4.45	Yes	no	Yes	yes	9.05	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	Yes	Yes	Yes	0	no	Yes	no	10.45	Yes	no	Yes	no	3.05	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	0	no	Yes	no	1.3	Yes	no	Yes	yes	12.2	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	0	no	yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn, Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc., T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resident
			7:30	21:00	Yes	Yes	Yes	0	no	Yes	no	13.3	Yes	no	Yes	no	0.2	
			7:30	21:00	Yes	Yes	Yes	0	yes	Yes	no	5.45	Yes	no	Yes	yes	8.05	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	Yes	Yes	Yes	0	yes	Yes	no	5	Yes	no	Yes	yes	8.5	
			7:30	21:00	No	Yes	Yes	0	yes	Yes	no	1	Yes	no	Yes	yes	12.5	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn. Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc. T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resident
[REDACTED]			7:30	21:00	Yes	Yes	Yes	4	yes	Yes	no	2.4	Yes	no	yes	yes	11.1	[REDACTED]
			7:30	21:00	Yes	yes	Yes	2.5	yes	Yes	no	3.15	Yes	no	yes	yes	10.35	
			7:30	21:00		yes	Yes	4	yes	Yes	no	1	Yes	no	yes	yes	12.5	
			7:30	21:00		Yes	Yes	4	yes	yes	no	1	Yes	no	yes	yes	12.5	
			7:30	21:00	Yes	Yes	Yes	4	yes	Yes	no	2.05	Yes	no	yes	yes	11.45	
			7:30	21:00		Yes	Yes	4	no	Yes	no	1	Yes	no	yes	yes	12.5	
			7:30	21:00	Yes	Yes	Yes	4	yes	Yes	no	2.3	Yes	no	yes	yes	11.2	
			7:30	21:00		Yes	Yes	4	yes	Yes	no	1.1	Yes	no	yes	yes	12.4	
			7:30	21:00		Yes	Yes	3	no	Yes	no	3.15	Yes	no	yes	yes	10.35	
			7:30	21:00	Yes	Yes	Yes	4	yes	Yes	no	1	Yes	no	yes	yes	12.5	
			7:30	21:00		Yes	Yes	4	yes	Yes	no	2	Yes	no	yes	yes	11.5	
			7:30	21:00	Yes	Yes	Yes	4	yes	Yes	no	1	Yes	no	yes	yes	12.5	
			7:30	21:00		Yes	Yes	4	yes	Yes	no	1	Yes	no	yes	yes	12.5	
			7:30	21:00	Yes	Yes	Yes	0	no	Yes	no	7.3	Yes	no	yes	yes	6.2	
			7:30	21:00		Yes	Yes	4	yes	Yes	no	1	Yes	no	yes	yes	12.5	
[REDACTED]			7:30	21:00	Yes	Yes	Yes	1	yes	Yes	no	2.45	Yes	no	yes	yes	11.05	[REDACTED]
			7:30	21:00	Yes	Yes	yes	0	no	no	no	0	no	no	no	no	0	
			7:30	21:00		Yes	Yes	4	yes	Yes	no	1	Yes	no	yes	yes	12.5	
[REDACTED]			7:30	21:00	Yes	Yes	Yes			Yes	no		Yes	no	yes	yes	12.5	[REDACTED]
			7:30	21:00	Yes	Yes	Yes			Yes	no		Yes	no	yes	yes	12.5	
					Yes												0	
					Yes												0	

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn, Hyg,	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc. T/O	Dinner	Visit	Shower	Groups	Total Hours	# Resident
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	1	Yes	no	Yes	yes	12.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	1	Yes	no	Yes	yes	12.5	
			7:30	21:00	yes	Yes	Yes	4	yes	Yes	no	3	Yes	no	Yes	yes	10.5	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	1.5	Yes	no	Yes	yes	12	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	1	Yes	no	Yes	yes	12.5	
			7:30	21:00	yes	Yes	Yes	4	yes	Yes	no	2.3	Yes	no	Yes	yes	11.2	
			7:30	21:00	yes	Yes	Yes	1	yes	Yes	no	5.3	Yes	no	Yes	yes	8.2	
			7:30	21:00	yes	Yes	Yes	4	yes	Yes	no	3	Yes	no	Yes	yes	10.5	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	1.3	Yes	no	Yes	yes	12.2	
			7:30	21:00	No	Yes	Yes	4	no	Yes	no	1	Yes	no	Yes	yes	12.5	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	1	Yes	no	Yes	yes	12.5	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	1	Yes	no	Yes	yes	12.5	
			7:30	21:00	yes	Yes	Yes	4	yes	Yes	no	3	Yes	no	Yes	yes	10.5	
			7:30	21:00	yes	Yes	Yes	0	yes	Yes	no	10.3	Yes	no	Yes	no	3.2	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	

Page 157 of 243

06/0

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn, Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc., T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resident
[REDACTED]	[REDACTED]	[REDACTED]	7:30	21:00	Yes	Yes	Yes	0	no	Yes	no	7.3	Yes	no	Yes	no	6.2	[REDACTED]
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	1	Yes	no	Yes	yes	12.5	
			7:30	21:00	No	Yes	Yes	2	yes	Yes	no	1	Yes	no	Yes	yes	12.5	
			7:30	21:00	Yes	Yes	Yes	4	yes	Yes	no	3.15	Yes	no	Yes	yes	10.35	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	1.4	Yes	no	Yes	yes	12.1	
			7:30	21:00	Yes	no	no	0	no	no	no	0	Yes	no	Yes	no	4.2	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	

ge 159 of 243

06/05/2024

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn, Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc., T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resident		
			7:30	21:00		no	Yes	Yes	3	yes	Yes	no	1.3	Yes	no	Yes	yes	12.2		
			7:30	21:00		no	Yes	Yes	3	yes	Yes	no	1	Yes	no	Yes	yes	12.5		
			7:30	21:00	yes		Yes	Yes	0	no	Yes	no	11.45	Yes	no	Yes	no	2.05		
			7:30	21:00		No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5		
			7:30	21:00		No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5		
			7:30	21:00		No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5		
			7:30	21:00	yes		Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5		
			7:30	21:00		No	Yes	Yes	4	yes	Yes	no	11.45	Yes	no	Yes	no	2.05		
			7:30	21:00		No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5		
			7:30	21:00		No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5		
			7:30	21:00		No	Yes	Yes	4	no	Yes	no	1.3	Yes	no	Yes	yes	12.2		
			7:30	21:00		No	Yes	Yes	4	no	Yes	no	1.1	Yes	no	Yes	yes	12.4		
			7:30	21:00		No	Yes	Yes	3	yes	Yes	no	4.3	Yes	no	Yes	yes	9.2		
			7:30	21:00	yes		Yes	Yes	0	no	Yes	no	11.45	Yes	no	Yes	no	2.05		
			7:30	21:00	yes		Yes	Yes	0	no	Yes	no	9.15	Yes	no	Yes	no	4.35		
			7:30	21:00		No														
			7:30	21:00		No														
			7:30	21:00		No														
			7:30	21:00		No														
			7:30	21:00		No														
					Yes	No										0				
					Yes	No										0				
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					Yes	No										0				

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn, Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc, T/O	Dinner	Visit	Shower	Groups	Total Hours	If Res
[REDACTED]	[REDACTED]	[REDACTED]	7:30	21:00	Yes	Yes	Yes	1	no	no	no	0	no	no	no	no	3.3	[REDACTED]
			7:30	21:00	No	Yes	Yes	4	no	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	1.1	Yes	no	Yes	yes	12.4	
			7:30	21:00	Yes	Yes	Yes	1	yes	Yes	no	6	Yes	no	Yes	yes	7.5	
			7:30	21:00	No	Yes	Yes	3	yes	Yes	no	1	Yes	no	Yes	yes	12.5	
			7:30	21:00	Yes	Yes	Yes	0	yes	Yes	no	7.45	Yes	no	Yes	no	6.05	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0.4	Yes	no	Yes	yes	13.1	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	3	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	Yes	Yes	Yes	4	no	Yes	no	2	Yes	no	yes	yes	11.5	
			7:30	21:00	Yes	Yes	Yes	1	no	Yes	no	0	no	no	no	yes	4.3	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	4	no	yes	no	0.45	Yes	no	Yes	yes	13.05	
			7:30	21:00	No	Yes	Yes	3	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	

Page 162 of 243

100

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn, Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc., T/O	Dinner	Visit	Shower	Groups	Total Hours	If Residen
[REDACTED]			7:30	21:00	Yes	Yes	Yes	1	no	no	no	0	no	no	no	yes	3	[REDACTED]
			7:30	21:00	no	yes	Yes	4	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	4	yes	yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0.35	Yes	no	yes	yes	13.15	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0.3	Yes	no	yes	yes	13.2	
			7:30	21:00	no	Yes	Yes	3	yes	Yes	no	1.15	Yes	no	yes	yes	12.35	
			7:30	21:00	no	Yes	Yes	3	yes	Yes	no	1.15	Yes	no	yes	yes	12.35	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	1.15	Yes	no	yes	yes	12.35	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	1.15	Yes	no	yes	yes	12.35	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	3	yes	Yes	no	1.15	Yes	no	yes	yes	12.35	
			7:30	21:00	no	Yes	Yes	1	yes	Yes	no	10	Yes	no	yes	yes	3.5	
			7:30	21:00	no	Yes	Yes	3	yes	Yes	no	1.15	Yes	no	yes	yes	12.35	
			7:30	21:00	Yes	Yes	Yes	1	no	Yes	no	8.45	Yes	no	yes	no	5.05	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	yes	yes	13.5	
					Yes												0	
					Yes												0	
					Yes												0	

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn, Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc, T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resident
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	1.3	Yes	no	Yes	yes	12.2	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	1.3	Yes	no	Yes	yes	12.2	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	yes	Yes	Yes	1	yes	Yes	no	7.15	Yes	no	Yes	yes	6.35	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0.3	Yes	no	Yes	yes	13.2	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	1.15	Yes	no	Yes	yes	12.35	
			7:30	21:00	no	Yes	Yes	3	yes	Yes	no	1	Yes	no	Yes	yes	12.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	yes	Yes	Yes	3	yes	Yes	no	1.3	no	no	no	yes	5.45	
			7:30	21:00	yes	Yes	Yes	1	yes	Yes	no	5.15	Yes	no	Yes	yes	6.35	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	

Page 165 of 243

06/05/2024

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn, Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc. T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resident
					Yes	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
					No	Yes	Yes	4	yes	Yes	no	2.3	Yes	no	Yes	yes	11.2	
					No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
					No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
					No	Yes	Yes	4	yes	Yes	no	1.45	Yes	no	Yes	yes	12.05	
					No	Yes	Yes	3	yes	Yes	no	1.3	Yes	no	Yes	yes	12.2	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn. Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc., T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resident
			7:30	21:00	Yes	yes	Yes	0	no	Yes	no	10	Yes	no	yes	yes	3.5	
			7:30	21:00	Yes	Yes	Yes	4	yes	yes	no	2.15	Yes	no	yes	yes	11.35	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0.45	Yes	no	yes	yes	13.05	
			7:30	21:00	no	Yes	Yes	4.25	yes	Yes	no	0.05	Yes	no	yes	yes	13.45	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	1	Yes	no	yes	yes	12.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	1.3	Yes	no	yes	yes	12.2	
			7:30	21:00	no	Yes	Yes	4.25	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	1	Yes	no	yes	yes	12.5	
			7:30	21:00	no	Yes	Yes	3	yes	Yes	no	1	Yes	no	yes	yes	12.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	1.3	Yes	no	yes	yes	12.2	
			7:30	21:00	Yes	Yes	Yes	1	no	Yes	no	5.3	Yes	no	yes	yes	8.2	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	1	Yes	no	yes	yes	12.5	
			7:30	21:00	Yes	Yes	Yes	0	no	Yes	no	12	Yes	no	yes	yes	1.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	yes	yes	13.5	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn, Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc., T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resident
[REDACTED]	[REDACTED]	[REDACTED]	7:30	21:00	no	Yes	Yes	4	yes	Yes	no	1	Yes	no	Yes	yes	12.5	[REDACTED]
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	no	Yes	Yes	4	yes	Yes	no	0.05	Yes	no	Yes	yes	13.45	
			7:30	21:00	yes	Yes	Yes	3	yes	Yes	no	2.45	Yes	no	Yes	yes	11.05	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	yes	Yes	Yes	1	no	Yes	no	6.15	Yes	no	Yes	yes	7.35	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	3.25	yes	Yes	no	1	Yes	no	Yes	yes	12.5	
[REDACTED]	[REDACTED]	[REDACTED]	7:30	21:00	yes	Yes	Yes	4	yes	Yes	no	2.45	Yes	no	Yes	yes	11.05	[REDACTED]
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0.3	Yes	no	Yes	yes	13.2	
			7:30	21:00	yes	Yes	Yes	1	no	Yes	no	7.15	Yes	no	Yes	yes	6.35	
			7:30	21:00	No												0	
[REDACTED]	[REDACTED]	[REDACTED]			Yes												0	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]			Yes												0	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]			Yes												0	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]			Yes												0	[REDACTED]

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Mom, Hyg,	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc., T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resi
			7:30	21:00	No	Yes	Yes	4.25	yes	Yes	no	0.15	Yes	no	Yes	yes	13.35	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	1.3	Yes	no	Yes	yes	12.2	
			7:30	21:00	Yes	Yes	Yes	2.5	yes	Yes	no	9	Yes	no	Yes	no	4.5	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	3	yes	Yes	no	1.15	Yes	no	Yes	yes	12.35	
			7:30	21:00	Yes	Yes	Yes	4	yes	Yes	no	3.45	Yes	no	Yes	yes	10.05	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	3	no	Yes	no	1.45	Yes	no	yes	yes	12.05	
			7:30	21:00	No	Yes	Yes	4.25	yes	Yes	no	1	Yes	no	yes	yes	12.5	
			7:30	21:00	Yes	Yes	Yes	0	no	Yes	no	7.3	Yes	no	Yes	no	6.2	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0.45	Yes	no	Yes	yes	13.05	
			7:30	21:00	No	Yes	Yes	4.25	yes	yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0.15	Yes	no	Yes	yes	13.35	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	
					Yes												0	

Tulsa County Juvenile Detention Home Resident Program Hours Log

Last Name	First Name	Date	Time Start	Time End	Attended Full Day?	Morn. Hyg.	Breakfast	Attend School	Gym	Lunch	Rec. Yard	Disc. T/O	Dinner	Visit	Shower	Groups	Total Hours	If Resident
[REDACTED]	[REDACTED]	[REDACTED]	7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	[REDACTED]
			7:30	21:00	Yes	Yes	Yes	3	yes	Yes	no	3.05	Yes	no	Yes	yes	10.45	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	1.3	Yes	no	Yes	yes	12.2	
			7:30	21:00	Yes	Yes	Yes	3	yes	Yes	no	4.15	Yes	no	Yes	yes	9.35	
			7:30	21:00	No	Yes	Yes	4	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
			7:30	21:00	No	Yes	Yes	4.25	yes	Yes	no	0	Yes	no	Yes	yes	13.5	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	
					Yes	No											0	

name	unit	math	science	LA	SS	Monday	Tuesday	Wednesday	Thursday	Friday	Comments

**TULSA COUNTY JUVENILE DETENTION HOME
STATEMENT OF GRIEVANCE AND RESOLUTION**

Case Number 24-179 Date of Submission 4/10/24
Resident's Name [Redacted] Last [Redacted] Middle [Redacted] First [Redacted]

Ward Of The Court Yes ☐ No ☒ OJA Custody Yes ☐ No ☒ Jolts Number [Redacted]

Location Unit A Phone Call Room

Subject of Grievance: [Redacted]

Resident's Proposed Resolution: [Redacted]

Resident's Signature [Redacted] Date [Redacted]

Received by [Redacted] Date 4/10/24 Assigned to [Redacted] Date 4/17/24

Title [Redacted]
Proposed Resolution By Unit Shift Supervisor: [Redacted]

Were Resolutions Adopted?: Yes ☒ No ☐
Does Resident Accept Proposed Resolution?: Yes ☒ No ☐
Will Resident Appeal to Program Manager? Yes ☐ No ☒

Resident's Signature: [Redacted] Date 4/17/24
Unit/Shift Supervisor/Program Manager: [Redacted] Date 4/17/24

RESOLUTION ON FIRST APPEAL

Grievance Resolution By: Program Manager
Proposed Resolution: _____

**TULSA COUNTY
JUVENILE DETENTION HOME
Resident's Grievance**

Resident's Name:

Date:

04/10

My Grievance is:

White copy is placed in The Grievance Box.
Resident keeps yellow copy until grievance is resolved.

Resident's Signature:

**TULSA COUNTY
JUVENILE DETENTION HOME**

STATEMENT OF GRIEVANCE AND RESOLUTION

Date of Submission 4/12/24

Case Number 24-180 Resident's Name [REDACTED]
Ward of The Court Yes ☐ No ☒ OJA Custody Yes ☐ No ☒ Middle [REDACTED]
Location TCJDH Jolts Number [REDACTED]
Subject of Grievance: [REDACTED]
Resident's Proposed Resolution: [REDACTED]

Resident's Signature: [REDACTED] Date 4/15/24

Received by [REDACTED] Date 4-15-2024 Assigned to [REDACTED] Date 4/15/24
Title JUSS

Proposed Resolution By Unit Shift Supervisor: their Grievance will be forwarded to Administration, and we all will determine next steps.

Were Resolutions Adopted?: ☒ Yes ☐ No
Does Resident Accept Proposed Resolution?: ☒ Yes ☐ No
Will Resident Appeal to Program Manager? ☐ Yes ☒ No

Resident's Signature [REDACTED] Date 4/15/24
Unit/Shift Supervisor/ Program Manager: [REDACTED] Date 4/15/24

RESOLUTION ON FIRST APPEAL

Grievance Resolution By: Program Manager
Proposed Resolution: _____

**TULSA COUNTY
JUVENILE DETENTION HOME
Resident's Grievance**

Resident's Name

Date:

My Grievance is:

[Redacted Grievance Content]

[Lined area for additional notes or comments]

White copy is placed in The Grievance Box.
Resident keeps yellow copy until grievance is resolved.

Resident's Signature:

[Redacted Signature]

TULSA COUNTY JUVENILE DETENTION HOME
STATEMENT OF GRIEVANCE AND RESOLUTION

Case Number 24-181 Resident's Name [REDACTED]

Ward Of The Court Yes ☐ No ☒ OJA Custody Yes ☐ No ☒ Jolts Number [REDACTED]

Location TCJDH

Subject of Grievance: [REDACTED]

Resident's Proposed Resolution: [REDACTED]

Resident's Signature [REDACTED]

Date 4/18/24

Received by [REDACTED]

Date 4/18/24

Assigned to [REDACTED]

Date 4/18/24

Title JUSS

Proposed Resolution By Unit Shift Supervisor:

This grievance will be forwarded to the 3-11 supervisor to handle this situation.

Were Resolutions Adopted?:

Yes ☒

No ☐

Does Resident Accept Proposed Resolution?:

Yes ☐

No ☐

Will Resident Appeal to Program Manager?:

Yes ☐

No ☒

Resident's Signature: [REDACTED]

Date 04/18/24

Unit/Shift Supervisor/Program Manager: [REDACTED]

Date 4/18/24

RESOLUTION ON FIRST APPEAL

Grievance Resolution By: Program Manager

Proposed Resolution: _____

**TULSA COUNTY
JUVENILE DETENTION HOME
Resident's Grievance**

Resident's Name:



Date:

06/05/24

My Grievance is:

[Redacted Grievance Content]

White copy is placed in The Grievance Box.
Resident keeps yellow copy until grievance is resolved.

Resident's Signature:



**TULSA COUNTY JUVENILE DETENTION HOME
STATEMENT OF GRIEVANCE AND RESOLUTION**

Case Number 24-132 Resident's Name [REDACTED]

Ward Of The Court Yes ☐ No ☒ OJA Custody Yes ☐ No ☒ Jolts Number [REDACTED]

Location TCJDIH

Subject of Grievance: [REDACTED]

Resident's Proposed Resolution: [REDACTED]

Resident's Signature [REDACTED]

Date 4/18/24

Received by [REDACTED]

Date 4/18/24

Assigned to [REDACTED]

Date 4/18/24

Title USS

Proposed Resolution By Unit Shift Supervisor:

This grievance will be forwarded to the 311 supervisor, and Administration to determine next steps.

Were Resolutions Adopted?:

Yes (☒) No (☐)

Does Resident Accept Proposed Resolution?:

Yes (☐) No (☐)

Will Resident Appeal to Program Manager?

Yes (☐) No (☒)

Resident's Signature: [REDACTED]

Date 4/18/24

Unit/Shift Supervisor/Program Manager: [REDACTED]

Date 4/18/24

RESOLUTION ON FIRST APPEAL

Grievance Resolution By: Program Manager

Proposed Resolution: _____

**TULSA COUNTY JUVENILE DETENTION HOME
STATEMENT OF GRIEVANCE AND RESOLUTION**

Date of Submission 4/14/24

Case Number 24-183 Resident's Name [REDACTED] Last [REDACTED] Middle [REDACTED]

Ward Of The Court Yes ☐ No ☒ OJA Custody Yes ☐ No ☒ Joits Number [REDACTED]

Location TCJDIH

Subject of Grievance: [REDACTED]

Resident's Proposed Resolution: [REDACTED]

Resident's Signature [REDACTED] Date 4/15/24

Received by [REDACTED] Date 4/18/24 Assigned to [REDACTED] Date 4/18/24
Title 9283

Proposed Resolution By Unit Shift Supervisor: This grievance will be forwarded to the 311 supervisor and Administration for next steps.

Were Resolutions Adopted?: Yes (☒) No (☐)
Does Resident Accept Proposed Resolution?: Yes (☒) No (☐)
Will Resident Appeal to Program Manager? Yes (☐) No (☒)

Resident's Signature: [REDACTED] Date 4/15/24
Unit/Shift Supervisor/Program Manager: [REDACTED] Date 4/18/24

RESOLUTION ON FIRST APPEAL

Grievance Resolution By: Program Manager
Proposed Resolution: _____



**TULSA COUNTY
JUVENILE DETENTION HOME**
Resident's Grievance

Resident's Name:

Date:

My Grievance is:

[Redacted Grievance Content]

White copy is placed in The Grievance Box.
Resident keeps yellow copy until grievance is resolved.

Resident's Signature: _____

**TULSA COUNTY JUVENILE DETENTION HOME
STATEMENT OF GRIEVANCE AND RESOLUTION**

Date of Submission 4/16/24

Case Number 24-184 Resident's Name _____
Last _____ Middle _____ First _____
Ward Of The Court Yes _____ No X OJA Custody Yes X No _____ Jolts Number _____
Location TCIDH _____
Subject of Grievance: _____
Resident's Proposed Resolution: _____

Resident's Signature _____ Date 4-18-24

Received by _____ Date 4/18/24 Assigned to _____ Date 4/18/24
Title USS
Proposed Resolution By Unit Shift Supervisor: This grievance will be forwarded to the 3-11 supervisor and Administration to determine next steps and how to handle the situation.
Were Resolutions Adopted?: Yes (X) No ()
Does Resident Accept Proposed Resolution?: Yes (X) No ()
Will Resident Appeal to Program Manager? Yes () No (X)
Resident's Signature: _____ Date 4-18-24
Unit/Shift Supervisor/Program Manager: _____ Date 4/18/24

RESOLUTION ON FIRST APPEAL

Grievance Resolution By: Program Manager
Proposed Resolution: _____

**TULSA COUNTY
JUVENILE DETENTION HOME
Resident's Grievance**

Resident's Name:

Date: _____

My Grievance is:

White copy is placed in The Grievance Box.
Resident keeps yellow copy until grievance is resolved.

Resident's Signature:

Form 2187 (10-06)

06/05/2024

Page 184 of 243

TULSA COUNTY JUVENILE DETENTION HOME
STATEMENT OF GRIEVANCE AND RESOLUTION

4/17/24
LLA/abt

Case Number 24-185 Resident's Name [REDACTED]

Ward Of The Court Yes X No OJA Custody Yes X No Jolts Number [REDACTED]

Location TCJDI4

Subject of Grievance: [REDACTED]

Resident's Proposed Resolution: [REDACTED]

Resident's Signature [REDACTED] Date 4-18-24

Received by [REDACTED] Date 4/18/2024 Assigned to [REDACTED] Date 4/18/2024
Title WSS

Proposed Resolution By Unit Shift Supervisor: This grievance will be forwarded to the 3-11 supervisor and Administration for them to determine next steps.

Were Resolutions Adopted?: Yes (X) No ()
Does Resident Accept Proposed Resolution?: Yes (X) No ()
Will Resident Appeal to Program Manager? Yes () No (X)

Resident's Signature: [REDACTED] Date 4/18-24
Unit/Shift Supervisor/Program Manager: [REDACTED] Date 4/18/24

RESOLUTION ON FIRST APPEAL

Grievance Resolution By: Program Manager
Proposed Resolution:

**TULSA COUNTY
JUVENILE DETENTION HOME
Resident's Grievance**

Resident's Name:

Date:

4-19-24

My Grievance is:

[Redacted Grievance Content]

[Lined area for additional text or signature]

White copy is placed in The Grievance Box.

Resident keeps yellow copy until grievance is resolved.

Resident's Signature:

[Redacted Signature]

TULSA COUNTY JUVENILE DETENTION HOME
STATEMENT OF GRIEVANCE AND RESOLUTION

Case Number 24-186 Resident's Name [REDACTED] Date of Submission 4/18/24

Ward Of The Court Yes No OJA Custody Yes X No Jolts Number [REDACTED]

Location Unit B / 6am

Subject of Grievance: [REDACTED]

Resident's Proposed Resolution: [REDACTED]

[REDACTED]

Resident's Signature [REDACTED] Date 4/18/24

Received by [REDACTED] Date 4-18-24 Assigned to [REDACTED] Date 4/18/24

Title Store

Proposed Resolution By Unit Shift Supervisor: Will do my best to run store when able. If I cant, I will communicate to the residents

Were Resolutions Adopted?: Yes (X) No ()
Does Resident Accept Proposed Resolution?: Yes (X) No ()
Will Resident Appeal to Program Manager? Yes () No (X)

Resident's Signature: [REDACTED] Date 4/18/24

Unit/Shift Supervisor/Program Manager: [REDACTED] Date 4/18/24

RESOLUTION ON FIRST APPEAL

Grievance Resolution By: Program Manager
Proposed Resolution: _____

**TULSA COUNTY
JUVENILE DETENTION HOME
Resident's Grievance**

Resident's Name:

Date:

7-16-24

My Grievance is:

[Redacted Grievance Content]

[Lined area for additional text or signature]

White copy is placed in The Grievance Box.
Resident keeps yellow copy until grievance is resolved.

Resident's Signature

[Redacted Signature]

**TULSA COUNTY JUVENILE DETENTION HOME
STATEMENT OF GRIEVANCE AND RESOLUTION**

Case Number 24-187 Date of Submission 4-19-24
Resident's Name [REDACTED]
Ward Of The Court Yes No OJA Custody Yes No Joits Number [REDACTED]
Location Education Hallway
Subject of Grievance: [REDACTED]
Resident's Proposed Resolution: [REDACTED]

Resident's Signature [REDACTED] Date 4-19-24

Received by [REDACTED] Date 4-19-24 Assigned to [REDACTED] Date 4-19-24
Title LDC

Proposed Resolution By Unit Shift Supervisor: Staff was terminated due to a previous situation.

Were Resolutions Adopted?: Yes (☒) No ()
Does Resident Accept Proposed Resolution?: Yes (☒) No ()
Will Resident Appeal to Program Manager? Yes () No (☒)

Resident's Signature [REDACTED] Date 4-19-24
Unit/Shift Supervisor/Program Manager: [REDACTED] Date 4-19-24

RESOLUTION ON FIRST APPEAL

Grievance Resolution By: Program Manager
Proposed Resolution: _____

**TULSA COUNTY JUVENILE DETENTION HOME
2023-2024 RESIDENT GRIEVANCE LOG**

Grievance #	Resident	JOLTS #	DJA Custody	Date Filed	Resolved	Date Resolved
23-001			Yes	4/20/2023	Yes	4/25/2023
23-002			No	4/27/2023	Yes	5/2/2023
23-003			No	4/27/2023	Yes	5/3/2023
23-004			No	4/27/2023	Yes	5/3/2023
23-005			Yes	5/15/2023	Yes	5/19/2023
23-006			No	5/19/2023	Yes	5/19/2023
23-007			No	5/23/2023	Yes	5/24/2023
23-008			No	5/24/2023	Yes	5/26/2023
23-009			No	5/31/2023	Yes	6/2/2023
23-010			No	5/31/2023	Yes	6/1/2023
23-011			No	5/31/2023	Yes	6/2/2023
23-012			Yes	5/31/2023	Yes	6/1/2023
23-013			No	6/2/2023	Yes	6/2/2023
23-014			No	6/2/2023	Yes	6/2/2023
23-015			No	6/2/2023	Yes	6/2/2023
23-016			Yes	6/5/2023	Yes	6/8/2023
23-017			No	6/6/2023	Yes	6/8/2023
23-018			No	6/6/2023	Yes	6/8/2023
23-019			Yes	6/6/2023	Yes	6/8/2023
23-020			No	6/6/2023	Yes	6/8/2023
23-021			Yes	6/12/2023	No	6/13/2023
23-022			Yes	6/12/2023	No	6/13/2023
23-023			Yes	6/14/2023	Yes	6/16/2023
23-024			No	6/16/2023	Yes	6/16/2023
23-025			Yes	6/21/2023	Yes	6/23/2023
23-026			Yes	6/21/2023	Yes	6/23/2023
23-027			No	6/21/2023	Yes	6/23/2023
23-028			No	6/21/2023	Yes	6/23/2023
23-029			No	6/21/2023	Yes	6/23/2023
23-030			Yes	6/21/2023	Yes	6/23/2023

23-031		No	6/22/2023	Yes	6/27/2023
23-032		Yes	6/30/2023	Yes	6/30/2023
23-033		No	6/30/2023	Yes	6/30/2023
23-034		Yes	6/30/2023	Yes	6/30/2023
23-035		No	6/30/2023	Yes	6/30/2023
23-036		No	6/30/2023	Yes	6/30/2023
23-037		No	6/30/2023	Yes	6/30/2023
23-038		No	6/30/2023	Yes	7/3/2023
23-039		Yes	6/30/2023	Yes	7/3/2023
23-040		Yes	6/30/2023	Yes	7/3/2023
23-041		Yes	7/3/2023	Yes	7/6/2023
23-042		No	7/4/2023	Yes	7/6/2023
23-043		No	7/5/2023	Yes	7/6/2023
23-044		No	7/5/2023	Yes	7/6/2023
23-045		No	7/5/2023	Yes	7/6/2023
23-046		Yes	7/5/2023	Yes	7/6/2023
23-047		Yes	7/5/2023	Yes	7/6/2023
23-048		Yes	7/3/2023	Yes	7/4/2023
23-049		No	7/7/2023	Yes	7/14/2023
23-050		No	7/12/2023	Yes	7/14/2023
23-051		No	7/13/2023	Yes	7/14/2023
23-052		Yes	7/17/2023	Yes	7/20/2023
23-053		Yes	7/17/2023	Yes	7/20/2023
23-054		No	7/24/2023	Yes	7/26/2023
23-055		No	7/24/2023	Yes	7/26/2023
23-056		No	7/24/2023	Yes	7/26/2023
23-057		No	7/24/2023	Yes	7/28/2023
23-058		No	8/8/2023	Yes	8/10/2023
23-059		Yes	8/10/2023	Yes	8/10/2023
23-060		No	8/10/2023	Yes	8/10/2023
23-061		No	8/10/2023	Yes	8/10/2023
23-062		No	8/12/2023	Yes	8/16/2023
23-063		No	8/13/2023	Yes	8/16/2023
23-064		No	8/14/2023	Yes	8/16/2023

23-065		-	-	8/16/2023
23-066	No	8/17/2023	Yes	8/25/2023
23-067	No	8/22/2023	Yes	8/25/2023
23-068	No	8/22/2023	Yes	8/25/2023
23-069	No	8/24/2023	Yes	8/30/2023
23-070	No	8/26/2023	Yes	8/30/2023
23-071	No	8/26/2023	Yes	8/31/2023
23-072	Yes	8/28/2023	Yes	8/31/2023
23-073	No	9/11/2023	Yes	9/15/2023
23-074	No	9/15/2023	Yes	9/18/2023
23-075	No	9/18/2023	Yes	9/25/2023
23-076	No	9/22/2023	Yes	9/25/2023
23-077	No	9/22/2023	Yes	9/26/2023
23-078	No	9/22/2023	Yes	9/22/2023
23-079	No	9/24/2023	Yes	9/26/2023
23-080	No	9/25/2023	Yes	9/26/2023
23-081	No	9/25/2023	Yes	9/27/2023
23-082	No	9/28/2023	Yes	10/6/2023
23-083	Yes	9/30/2023	Yes	10/6/2023
23-084	No	10/2/2023	No	10/6/2023
23-085	No	10/9/2023	Yes	10/10/2023
23-086	No	10/3/2023	Yes	10/10/2023
23-087	No	10/7/2023	Yes	10/11/2023
23-088	No	10/10/2023	Yes	10/11/2023
23-089	No	10/17/2023	Yes	10/20/2023
23-090	No	10/16/2023	Yes	10/20/2023
23-091	No	10/24/2023	Yes	10/27/2023
23-092	No	11/14/2023	Yes	11/17/2023
23-093	No	11/15/2023	Yes	11/17/2023
23-094	No	11/19/2023	Yes	11/22/2023
23-095	No	11/22/2023	Yes	11/28/2023
23-096	No	11/22/2023	Yes	11/28/2023
23-097	Yes	11/22/2023	Yes	11/28/2023
23-098	No	11/22/2023	Yes	11/28/2023

23-099	No	11/22/2023	Yes	11/28/2023
23-100	Yes	12/11/2023	Yes	12/15/2023
23-101	No	12/16/2023	Yes	12/18/2023
23-102	No	12/15/2023	No	12/19/2023
23-103	No	12/27/2023	Yes	12/28/2023
23-104	No	12/28/2023	Yes	1/3/2023
24-105	No	1/1/2024	Yes	1/4/2024
24-106	No	1/1/2024	Yes	1/4/2023
24-107	Yes	1/8/2023	Yes	1/9/2024
24-108	Yes	1/20/2024	Yes	1/23/2024
24-109	No	1/20/2024	Yes	1/23/2024
24-110	No	1/20/2024	Yes	1/23/2024
24-111	Yes	1/20/2024	Yes	1/23/2024
24-112	No	1/20/2024	Yes	1/23/2024
24-113	Yes	1/20/2024	Yes	1/23/2024
24-114	No	1/20/2024	Yes	1/23/2024
24-115	No	1/20/2024	Yes	1/23/2024
24-116	No	1/20/2024	Yes	1/23/2024
24-117	No	1/22/2024	Yes	1/23/2024
24-118	No	1/23/2024	Yes	1/23/2024
24-119	No	1/25/2025	Yes	1/25/2025
24-120	No	2/1/2024	Yes	2/5/2024
24-121	No	2/1/2024	Yes	2/5/2024
24-122	No	2/1/2024	Yes	2/6/2024
24-123	No	2/5/2024	Yes	2/5/2024
24-124	No	2/6/2024	Yes	2/9/2024
24-125	No	2/8/2024	Yes	2/9/2024
24-126	No	2/8/2024	Yes	2/9/2024
24-127	No	2/8/2024	Yes	2/9/2024
24-128	No	2/11/2024	Yes	2/12/2024
24-129	No	2/14/2024	Yes	2/16/2024
24-130	No	2/15/2024	Yes	2/16/2024
24-131	No	2/15/2024	Yes	2/16/2024
24-132	No	2/15/2024	Yes	2/16/2024

24-133	No	2/15/2024	Yes	2/16/2024
24-134	No	2/16/2024	Yes	2/16/2024
24-135	Yes	2/16/2024	Yes	2/23/2024
24-136	No	2/16/2024	Yes	2/23/2024
24-137	No	2/20/2024	Yes	2/23/2024
24-138	No	2/20/2024	Yes	2/23/2024
24-139	Yes	2/20/2024	Yes	2/23/2024
24-140	Yes	2/23/2024	Yes	2/23/2024
24-141	No	2/22/2024	Yes	2/27/2024
24-142	Yes	2/23/2024	Yes	2/29/2024
24-143	No	2/23/2024	Yes	2/29/2024
24-144	No	2/25/2024	Yes	2/29/2024
24-145	No	2/27/2024	Yes	2/29/2024
24-146	Yes	3/1/2024	Yes	3/8/2024
24-147	No	3/2/2024	Yes	3/5/2024
24-148	No	3/4/2024	Yes	3/5/2024
24-149	No	3/6/2024	Yes	3/8/2024
24-150	No	3/7/2024	Yes	3/13/2024
24-151	No	3/9/2024	Yes	3/13/2024
24-152	Yes	3/10/2024	Yes	3/13/2024
24-153	Yes	3/12/2024	Yes	3/14/2024
24-154	No	3/13/2024	Yes	3/13/2024
24-155	No	3/13/2024	Yes	3/13/2024
24-156	No	3/14/2024	Yes	3/18/2024
24-157	Yes	3/13/2024	Yes	3/18/2024
24-158	No	3/14/2024	Yes	3/18/2024
24-159	No	3/13/2024	Yes	3/21/2024
24-160	No	3/17/2024	Yes	3/21/2024
24-161	No	3/18/2024	Yes	3/21/2024
24-162	Yes	3/18/2024	Yes	3/21/2024
24-163	Yes	3/18/2024	Yes	3/21/2024
24-164	No	3/18/2024	No	3/21/2024
24-165	Yes	3/19/2024	Yes	3/21/2024
24-166	No	3/20/2024	Yes	3/22/2024

24-167		No	3/22/2024	Yes	3/25/2024
24-168		Yes	3/13/2024	No	3/28/2024
24-169		No	3/24/2024	Yes	3/28/2024
24-170		No	3/27/2024	No	4/2/2024
24-171		No	4/1/2024	Yes	4/8/2024
24-172		No	4/2/2024	Yes	4/8/2024
24-173		No	4/2/2024	Yes	4/8/2024
24-174		Yes	4/5/2024	Yes	4/9/2024
24-175		No	4/8/2024	Yes	4/8/2024
24-176		No	4/8/2024	Yes	4/8/2024
24-177		No	4/9/2024	Yes	4/9/2024
24-178		Yes	4/9/2024	Yes	4/9/2024
24-179		No	4/10/2024	Yes	4/10/2024
24-180		No	4/12/2024	Yes	4/12/2024
24-181		No	4/16/2024	Yes	4/16/2024
24-182		No	4/16/2024	Yes	4/16/2024
24-183		No	4/16/2024	Yes	4/16/2024
24-184		Yes	4/16/2024	Yes	4/16/2024
24-185		Yes	4/17/2024	Yes	4/17/2024
24-186		Yes	4/16/2024	Yes	4/18/2024
24-187		No	4/19/2024	Yes	4/19/2029

Tulsa County Juvenile Detention Home

Weekly Sanitation, Safety and Security Inspection Form

Inspection Date: 4/19/2024

Time: 11:00 AM

Inspection Conducted By: _____

Living, Activity Areas Clean	Y / N	Y
Toilets, Sinks, Showers Function Properly	Y / N	Y
Exit Lights	Y / N	Y
Lighting	Y / N	N
Mattresses, bedding and linens	Y / N	Y
Clothing, Supply And Storage Areas	Y / N	Y
Doors And Windows	Y / N	Y
Locks And Keys	Y / N	Y
Intercom System And Telephones	Y / N	Y
Surveillance Cameras, Security System	Y / N	Y
Fire Safety Equipment, Alarm System	Y / N	Y
Security Devices	Y / N	Y
Recreational Yard Clear of Debris	Y / N	Y
Emergency Exits Clear Of Debris	Y / N	Y
Facility Gates Secure and Undamaged	Y / N	Y
Temperature Is Appropriate (66-80 F Summer, 61-73 F Winter)	Y / N	Y
Laundry Facilities Clean, Dryer Vent Clean	Y / N	Y
Kitchen and Dining Area Clean	Y / N	Y
Refrigerator(s) Temperature 35-40 F, Freezer 0 F Or Below	Y / N	Y
Pencil marks and food stains in units	Y / N	Y

Deficiencies: Light broken C-07, Replace glass in multi-purpose room (Unit C).

Lock broken B-19. Clean or paint over graffiti on walls in Unit C multi-purpose room.

Clean or paint over graffiti on main hall wall opposite of staff break room. Repair tiles and

grid in ceiling of Unit A Interview room. Unit A shower #2, staff bathroom sink and water

fountain broken. Clean and sanitize all tables and chairs, dining hall, units, CIC, visitation.

Notes: Vents in the gym, on the units, admissions, and dining hall need swept cleaned.

Sweep all main hallways. Remove balls from recreational yard.

Administrator Review

4-19-24
Date

Details of Incident/Complaint: (continued)

n/a

Resolution:

Modified programming was implemented due to lack of staff.

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):

n/a

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

n/a

Notification (List the Time and All Notifications of this Incident/Complaint Including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) Asst. Superintendent [REDACTED] 4) n/a

2) PM [REDACTED] 5) n/a

3) 6) n/a

Enclosures (list all attached Statements, Receipts, and Related Documents):

1) n/a 4) n/a

2) n/a 5) n/a

3) n/a 6) n/a

Was Use of Force Required: Yes ☐ No ☒

Was Medical Attention Required: Yes ☐ No ☒ First Aid N/A Nurse N/a Hospital N/A

Disciplinary Action Taken: Yes ☐ No ☒ (Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File _____ Assigned Counselor _____ OJA _____ District Attorney's Office _____

Judicial _____ TR [REDACTED] DHS _____ Other (Specify) _____

Administrator's Review _____ Date 4/25/2021

OC

TULSA COUNTY JUVENILE DETENTION HOME

IRN: _____

INCIDENT REPORT

Incident Report Title Modified ProgramLocation: DetentionDate: 04/24/2024 Time 0700(1) Subject/Victim: N/APosition: N/ARace: N/A Sex: N/A Age: N/A Date of Birth: N/A JOLTS ID: N/A(2) Subject/Victim: N/APosition: N/ARace: N/A Sex: N/A Age: N/A Date of Birth: N/A JOLTS ID: N/A

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code F	Name Kelly Levine	Position USS	Telephone 918-596-5060

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

On this date, there were 2 staff call ins for the 7-3 Shift. Youth Detention Specialist [REDACTED] contacted me, Unit Shift Supervisor [REDACTED] to inform that he was ill and would not be able to come to work today. Once arriving to work, I was informed that Youth Detention Specialist [REDACTED] had also called in to work due to illness. At that time it was observed that there would only be 2 males on shift. At 0800, I instructed Main Control to begin calling staff from the 3-11 shift to find out when and if they could come in early to help with coverage. The only person that responded to the call and came in early was Youth Detention Specialist [REDACTED] who arrived at 1305. I had also texted Lead Youth Detention Specialist [REDACTED] and asked her to come in on her day off, and she did. LYDS [REDACTED] arrived at 1218 to assist with coverage.

Unit A did modified programming, with the unit being divided into 2 groups, and each receiving 3.5 hours of programming. Unit C did modified programming, with the unit as a whole receiving 5.25 hours of programming.

EOR

Reporting Staff Name (Print) _____ Date _____

Signature of Reporting Person _____ Date _____

04/24/2024

Date

Date

[REDACTED]

From:

Sent:

[REDACTED]
Monday, April 29, 2024 11:49 AM

To:

Subject:

[REDACTED]
[EXTERNAL] Tulsa Detention Home April 2024 Monthly Report

Good morning OJAI

Hopefully, you all had a great weekend and had no storm damage.

Number of grievances total were filed this month: 26

Number of critical incident reports were filed this month: 8

Number of OCA referrals were filed and their incident report number: 1 (referral #2398807)

Have a great week.

[REDACTED]



www.tulsacounty.org/juvenile

"Improving Our Community Through Prevention, Diversion, Intervention
And Empowerment With the Youth And Families We Serve."

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TULSA COUNTY JUVENILE DETENTION HOME

IRN: _____

INCIDENT REPORT

Incident Report Title Psychiatric - Suicide Attempt

Location: Unit C - Room 2

Date: 04/03/24 Time 1140

(1) Subject/Victim: [REDACTED] Position: Resident

Race: H Sex: M Age: 14 Date of Birth: [REDACTED] JOLTS ID: [REDACTED]

(2) Subject/Victim: n/a Position: n/a

Race: n/a Sex: n/a Age: n/a Date of Birth: n/a JOLTS ID n/a

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code	Name	Position	Telephone
------	------	----------	-----------

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

Reporting Staff Name (Print)	Date
------------------------------	------

Date _____

Signature of Reporting Person	Date
--------------------------------------	-------------

Date _____

04/02/24

Date _____

Date _____

Details of Incident/Complaint: (continued)

Resolution:

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):
n/a

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:
n/a

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) Program Mgr 4) n/a
2) Assistant Superintendent 5) n/a
3) n/a 6) n/a

Enclosures (list all attached Statements, Receipts, and Related Documents):

1) Incident Report 4) n/a
2) n/a 5) n/a
3) n/a 6) n/a

Was Use of Force Required: Yes ☐ No ☒

Was Medical Attention Required: Yes ☐ No ☒ First Aid _____ Nurse _____ Hospital _____

Disciplinary Action Taken: Yes ☐ No ☒ (Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File _____ Assigned Counselor _____ OJA _____ District Attorney's Office _____

Judicial _____ TPD _____ TCSO _____ DHS _____ Other (Specify) _____

Administrator's Review _____
Date

TULSA COUNTY JUVENILE DETENTION HOME

IRN: 0C

INCIDENT REPORT

Incident Report Title Destruction Of Property

Location: Unit C # 2

Date: 4/3/24 Time 11:20AM

(1) Subject/Victim: [REDACTED]

Position: Resident

Race: [REDACTED] Sex: [REDACTED] Age: 1 Date of Birth: [REDACTED]

JOLTS ID: [REDACTED]

(2) Subject/Victim: N/A

Position: N/A

Race: N/A Sex: N/A Age: N/A Date of Birth: N/A

JOLTS ID: N/A

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code	Name	Position	Telephone
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

[REDACTED]

[REDACTED] 4/3/24
Reporting Staff Name (Print) Date
[REDACTED] 4-3-24
Signature of Reporting Person Date

[REDACTED] 4/3/24
Supervisor Name (Print) Date
[REDACTED] 4/3/24
Signature of Supervisor Date

Details of Incident/Complaint: (continued)

Resolution: [Redacted]

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):
Grey sweat-shirt, burgundy t-shirt and a blanket.

Was Property Damaged/Destroyed: Yes ☒ No ☐ (If YES, Is a requested for Restitution Needed/Attached?)

Location of Evidence/Property: [Redacted]

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) USS [Redacted]	4) N/A
2) N/A	5) N/A
3) N/A	6) N/A

Enclosures (list all attached Statements, Receipts, and Related Documents):

1) N/A	4) N/A
2) N/A	5) N/A
3) N/A	6) N/A

Was Use of Force Required: Yes ☐ No ☒

Was Medical Attention Required: Yes ☐ No ☒ First Aid N/A Nurse N/A Hospital N/A

Disciplinary Action Taken: Yes ☒ No ☐ (Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File _____ Assigned Counselor _____ OJA _____ District Attorney's Office _____

Judicial _____ TPD _____ TCSO _____ DHS _____ Other (Specify) _____

Administrator's Review _____ Date _____

OC

STATEMENT OF WITNESS
TULSA COUNTY JUVENILE BUREAU

IRN: _____
DATE: 4.3.24

I, [REDACTED] make the following STATEMENT OF WITNESS concerning
(specify incident) Negative behavior

That occurred on or about the time of 11:00 PM on the date of 4.3.24 which occurred at or near the
location of education hall ([REDACTED] classroom)
at the _____ located at Juvenile Detention Center in the city and
county of Tulsa, Oklahoma, [REDACTED]

[REDACTED]

Initials of person making statement: [REDACTED]

STATEMENT OF WITNESS
(Continued from other side)

*This statement was dictated to: _____ at my request.

WITNESS INFORMATION:

I affirm that I have made a truthful statement regarding my personal knowledge in the incident cited in this statement. I further understand that it may be necessary for me to cooperate with appropriate investigative authorities or testify in court.


Signature of Person Making Statement

4.3.24
Date

JYDS
Position/Title

918-594-5960
Telephone

STATEMENT OF WITNESS
TULSA COUNTY JUVENILE BUREAU

IRN: _____
DATE: 4-3-24

I, _____ make the following STATEMENT OF WITNESS concerning
(specify Incident) Resident

That occurred on or about the time of 11:10 on the date of 4-3-24 which occurred at or near the
location of North Hall
at the Unit C located at Unit C2
county of Tulsa, Oklahoma.

06/05/2024
Initials of person making statement: _____

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WITNESS INFORMATION:

Activity	Sedentary (n=10)	Low active (n=10)	High active (n=10)
Sleeping	~35	~35	~35
Eating	~10	~10	~10
Drinking	~5	~5	~5
Personal care	~10	~10	~10
Dressing	~5	~5	~5
Grooming	~5	~5	~5
Hygiene	~5	~5	~5
Work	~10	~10	~10
School	~10	~10	~10
Transportation	~5	~5	~5
Leisure	~10	~10	~10
Total	~100	~100	~100

4-3-24

540

Telephone

TULSA COUNTY JUVENILE DETENTION HOME

IRN:

2024-178

6

INCIDENT REPORT

Incident Report Title Negative Behavior

Location: Education Hall

Date: 04/12/2024 Time 10:18 A.M.

(1) Subject/Victim:

[REDACTED]

Position:

[REDACTED]

Race:

Sex:

Age:

Date of Birth:

[REDACTED]

JOLTS ID:

[REDACTED]

(2) Subject/Victim:

Steven Johnson

Position:

[REDACTED]

Race: W

Sex: M

Age: 16

Date of Birth:

08/23/2007

JOLTS ID:

9922209808

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code:

Name:

Position:

Telephone:

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

[REDACTED]

04/12/24

Reporting Staff Name (Print)

Date

Signature of Reporting Person

4/12/24

Date

[REDACTED]

04/12/2024

Supervisor Name (Print)

Date

Signature of Reporting Person

4-12-24

Date

Details of Incident/Complaint: (continued)

N/A

Resolution:

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):

N/A

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, Is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

N/A

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) USS  4) _____
2) LDC  5) N/A
3) _____ 6) N/A

Enclosures (list all attached Statements, Receipts, and Related Documents):

1) N/A 4) N/A
2) N/A 5) N/A
3) N/A 6) N/A

Was Use of Force Required: Yes ☐ No ☒

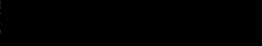
Was Medical Attention Required: Yes ☐ No ☒ First Aid N/A Nurse N/A Hospital N/A

Disciplinary Action Taken: Yes ☐ No ☒ (Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File _____ Assigned Counselor _____ OJA _____ District Attorney's Office _____

Judicial _____ TRO  TCSO _____ DHS _____ Other (Specify) _____

Administrator's Review  17-2024
Date

TULSA COUNTY JUVENILE DETENTION HOME

IRN: 2024-177

INCIDENT REPORT

Incident Report Title Contraband

Location: Unit C

Date: 04/12/24 Time 02:00 p.m.

(1) Subject/Victim:

Position: Gym

Race:

Sex:

Age:

Date of Birth:

JOLTS ID:

(2) Subject/Victim: N/A

Position: N/A

Race: N/A

Sex: N/A

Age: N/A

Date of Birth: N/A

JOLTS ID: N/A

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code

Name

Position

Telephone

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

Reporting Staff Name (Print)

04/12/24

Date

Signature of Reporting Person

Date

Supervisor Name (Print)

04/12/24

Date

Signature of Reporting Person

Date

Details of Incident/Complaint: (continued)

N/A

PROPERTY

Resolution:

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):

N/A

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

Item was given to Assitant Superintendent

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) [REDACTED] PM 4) _____
2) [REDACTED] Assistant Superintendent 5) N/A
3) _____ 6) N/A

Enclosures (list all attached Statements, Receipts, and Related Documents):

1) ~~N/A~~ Disciplinary 4) N/A
2) N/A 5) N/A
3) N/A 6) N/A

Was Use of Force Required: Yes ☐ No ☒

Was Medical Attention Required: Yes ☐ No ☒ First Aid N/A Nurse N/A Hospital N/A

Disciplinary Action Taken: Yes ☒ No ☐ (Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File _____ Assigned Counselor _____ OJA _____ District Attorney's Office _____

Judicial _____ TCSO _____ DHS _____ Other (Specify) _____

Administrator's Review [REDACTED] 11-17-2024
Date

0C

TULSA COUNTY JUVENILE DETENTION HOME

IRN: 2024-179

INCIDENT REPORT

Incident Report Title Contraband

Location: Unit C

Date: 04/12/2024 Time: 1500

(1) Subject/Victim:

Position: Resident

Race: Sex: Age: Date of Birth:

JOLTS ID:

(2) Subject/Victim:

Position: Resident

Race: Sex: Age: Date of Birth:

JOLTS ID:

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code	Name	Position	Telephone
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Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

Reporting Staff Name (Print) Date

Signature of Reporting Person Date

Supervisor Name (Print) Date

Signature of Reporting Person Date

Details of Incident/Complaint: (continued)

[REDACTED]

Resolution:

[REDACTED]

Evidence/Property (List and Describe Chain of Evidence Attached, Receipt Request Completed):

[REDACTED]

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

Assistant Superintendent [REDACTED] Office

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) [REDACTED] PM 4) n/a
2) [REDACTED] Assistant Superintendent 5) n/a
3) 6) n/a

Enclosures (List all attached Statements, Receipts, and Related Documents):

1) n/a Disciplinary (7) 4) n/a
2) n/a Use of Force (3) 5) n/a
3) n/a 6) n/a

Was Use of Force Required: Yes ☒ No ☐

Was Medical Attention Required: Yes ☒ No ☒ First Aid n/a Nurse list Hospital n/a

Disciplinary Action Taken: Yes ☒ No ☐ (Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File _____ Assigned Counselor _____ OJA _____ District Attorney's Office _____

Judicial _____ TPD [REDACTED] DHS _____ Other (Specify) _____

Administrator's Review [REDACTED] 17-2024
Date

TULSA COUNTY JUVENILE DETENTION HOME

IRN: 2024-180

INCIDENT REPORT

Incident Report Title Negative Behavior

Location: Cafeteria/ Unit C

Date: 04/13/24 Time 1732P.M.

(1) Subject/Victim: [Redacted] Position: Resident

Race: [Redacted] Sex: [Redacted] Age: [Redacted] Date of Birth: [Redacted] JOLTS ID: [Redacted]

(2) Subject/Victim: NA Position: NA

Race: NA Sex: NA Age: NA Date of Birth: NA JOLTS ID: NA

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code	Name	Position	Telephone
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

[Redacted]

Reporting Staff Name (Print) _____ Date _____

Supervisor Name (Print) [Redacted] 4/13/24
Date

Signature of Reporting Person _____ Date _____

Signature of Reporting Person [Redacted] 4/13/24
Date

Details of Incident/Complaint: (continued)

Resolution:

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):

N/A

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, Is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

N/A

Notification (List the Time and All Notifications of this Incident/Complaint Including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) N/A 4) N/A
2) N/A 5) N/A
3) N/A 6) N/A

Enclosures (list all attached Statements, Receipts, and Related Documents):

1) Disciplinary Report 4) N/A
2) Incident Report 5) N/A
3) N/A 6) N/A

Was Use of Force Required: Yes ☒ No ☒

Was Medical Attention Required: Yes ☒ No ☒ First Aid N/A Nurse List Hospital N/A

Disciplinary Action Taken: Yes ☒ No ☒ (Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File _____ Assigned Counselor _____ OJA _____ District Attorney's Office _____

Judicial _____ DHS _____ Other (Specify) _____

Administrator's Review _____
Date 4/17/24

TULSA COUNTY JUVENILE DETENTION HOME

IRN: 2024-181 OC

INCIDENT REPORT

Incident Report Title Negative Behavior

Location: Unit C South Hall

Date: 04/13/24 Time 1948P.M.

(1) Subject/Victim: [REDACTED] Position: Resident
 Race: [REDACTED] Sex: [REDACTED] Age: [REDACTED] Date of Birth: [REDACTED] JOLTS ID: [REDACTED]

(2) Subject/Victim: NA Position: NA
 Race: NA Sex: NA Age: NA Date of Birth: NA JOLTS ID: NA

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code	Name	Position	Telephone
[REDACTED]			
[REDACTED]			
[REDACTED]			

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

[REDACTED]

Reporting Staff Name (Print) _____ Date _____

[REDACTED] 4/13/24
 Supervisor Name (Print) _____ Date _____

Signature of Reporting Person _____ Date _____

[REDACTED] 4/13/24
 Signature of Reporting Person _____ Date _____

Details of Incident/Complaint: (continued)

Resolution:

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):

N/A

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, Is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

N/A

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) N/A 4) N/A
2) N/A 5) N/A
3) N/A 6) N/A

Enclosures (list all attached Statements, Receipts, and Related Documents):

1) Disciplinary Report 4) N/A
2) Incident Report 5) N/A
3) N/A Use of Force 6) N/A

Was Use of Force Required: Yes ☒ No ☒

Was Medical Attention Required: Yes ☒ No ☒

First Aid N/A Nurse List Hospital N/A

Disciplinary Action Taken: Yes ☒ No ☒

(Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File _____ Assigned Counselor _____ OJA _____ District Attorney's Office _____

Judicial _____ SO _____ DHS _____ Other (Specify) _____

Administrator's Review _____ Date 4/17/2024

TULSA COUNTY JUVENILE DETENTION HOME

INCIDENT REPORT

IRN: 2004-182 **OC**

Incident Report Title Negative Behavior

Location: Unit A Dayroom

Date: 4/14/24

Time 8:25 A.M.

(1) Subject/Victim: [REDACTED]

Position: Resident

Race: [REDACTED]

Sex: [REDACTED]

Age: [REDACTED]

Date of Birth: [REDACTED]

JOLTS ID: [REDACTED]

(2) Subject/Victim: NA

Position: NA

Race: NA

Sex: NA

Age: NA

Date of Birth: NA

JOLTS ID: NA

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code

Name

Position

Telephone

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

[REDACTED]
Reporting Staff Name (Print)

4/14/24

Date

Signature of Reporting Person

Date

[REDACTED]
Supervisor Name (Print)

4/14/24

Date

[REDACTED]
Signature of Reporting Person

4-14-24
Date



Details of Incident/Complaint: (continued)



Resolution:

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):

N/A

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, Is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

N/A

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

- 1) N/A
- 2) N/A
- 3) N/A
- 4) N/A
- 5) N/A
- 6) N/A

Enclosures (List all attached Statements, Receipts, and Related Documents):

- 1) N/A Witness Statement
- 2) N/A Use of Force
- 3) N/A
- 4) N/A
- 5) N/A
- 6) N/A

Was Use of Force Required: Yes ☒ No ☐

Was Medical Attention Required: Yes ☐ No ☒

First Aid N/A Nurse Yes Hospital N/A

Disciplinary Action Taken: Yes ☐ No ☒

(Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File _____ Assigned Counselor _____ OJA _____ District Attorney's Office _____

Judicial _____ TPD _____ TCSO _____ DHS _____ Other (Specify) _____

Administrator's Review _____

Date

TULSA COUNTY JUVENILE DETENTION HOME

IRN: 2024-183

6

INCIDENT REPORT

Incident Report Title Negative Behavior

Location: Unit C

Date: 04/14/2024 Time 10:25 A.M.

(1) Subject/Victim:

Position: Resident

Race Sex Age Date of Birth

JOLTS ID

(2) Subject/Victim:

Position: Resident

Race Sex Age Date of Birth

JOLTS ID

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code Name Position Telephone

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

Reporting Staff Name (Print) 4/14/24 Date

Signature of Reporting Person 4/14/24 Date

Supervisor Name (Print) 4/14/24 Date

Signature of Reporting Person 4-14-24 Date

Details of Incident/Complaint: (continued)

Resolution:

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):

n/a

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

n/a

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) LDC  4) n/a
2) n/a 5) n/a
3) n/a 6) n/a

Enclosures (list all attached Statements, Receipts, and Related Documents):

1) ~~n/a~~ Witness Statement 4) n/a
2) ~~n/a~~ Disciplinary 5) n/a
3) n/a 6) n/a

Was Use of Force Required: Yes ☐ No ☒

Was Medical Attention Required: Yes ☐ No ☒

First Aid n/a Nurse n/a Hospital n/a

Disciplinary Action Taken: Yes ☒ No ☐

(Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File _____ Assigned Counselor _____ OJA _____ District Attorney's Office _____

Judicial _____ CSO _____ DHS _____ Other (Specify) _____

Administrator's Review 

Date

TULSA COUNTY JUVENILE DETENTION HOME

IRN: 2024-172

INCIDENT REPORT

Incident Report Title Negative Behavior

Location: Gym

Date: 04/15/24 Time 1900P.M.

(1) Subject/Victim: [REDACTED]

Position: Resident

Race: [REDACTED] Sex: [REDACTED] Age: [REDACTED] Date of Birth: [REDACTED]

JOLTS ID [REDACTED]

(2) Subject/Victim: [REDACTED]

Position: Resident

Race: [REDACTED] Sex: [REDACTED] Age: [REDACTED] Date of Birth: [REDACTED]

JOLTS ID [REDACTED]

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code	Name	Position	Telephone
E	Derrick Harris	USS	918-596-5960
E	Austin	YDS	918-596-5960
E	Dustin Sife	YDS	918-596-5960
E	Terrence	YDS	918-596-5960

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

[REDACTED]

Reporting Staff Name (Print)

Date

Supervisor Name (Print)

Date

Signature of Reporting Person

Date

Signature of Reporting Person

Date

Details of Incident/Complaint: (continued)

Resolution:

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):
N/A

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, Is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

N/A

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1)  4) N/A
2) N/A 5) N/A
3) N/A 6) N/A

Enclosures (List all attached Statements, Receipts, and Related Documents):

1) Disciplinary Report 4) N/A
2) Incident Report 5) N/A
3) N/A 6) N/A

Was Use of Force Required: Yes ☐ No ☒

Was Medical Attention Required: Yes ☒ No ☐

First Aid: N/A Nurse List Hospital Yes

Disciplinary Action Taken: Yes ☒ No ☐

(Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File _____ Assigned Counselor _____ OJA _____ District Attorney's Office _____

Judicial _____ TPD _____ TCSO _____ DHS _____ Other (Specify) _____

Administrator's Review _____

Date

TULSA COUNTY JUVENILE DETENTION HOME

IRN: 2024-184 OC

INCIDENT REPORT

Incident Report Title Blood/ Self-Harm

Location: Unit C # 3

Date: 4/17/24 Time 8:20AM

(1) Subject/Victim: [Redacted] Position: Resident
 Race: [Redacted] Sex: [Redacted] Age: [Redacted] Date of Birth: [Redacted] JOLTS ID: [Redacted]

(2) Subject/Victim: N/A Position: N/A
 Race: N/A Sex: N/A Age: N/A Date of Birth: N/A JOLTS ID: N/A

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code	Name	Position	Telephone
[Redacted]			
[Redacted]			
[Redacted]			
[Redacted]			

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

[Redacted]

[Redacted] 4/17/24
 Reporting Staff Name (Print) Date
[Redacted] 4-17-24
 Signature of Reporting Person Date

[Redacted] 4/17/24
 Supervisor Name (Print) Date
[Redacted] 4/17/24
 Signature of Reporting Person Date

Details of Incident/Complaint: (continued)

Resolution:

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

N/A

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) USS ☐ 4) N/A
2) LDC ☐ 5) N/A
3) N/A 6) N/A

Enclosures (list all attached Statements, Receipts, and Related Documents):

1) N/A 4) N/A
2) N/A 5) N/A
3) N/A 6) N/A

Was Use of Force Required: Yes ☐ No ☒

Was Medical Attention Required: Yes ☒ No ☒

First Aid N/A Nurse X Hospital N/A

Disciplinary Action Taken: Yes ☐ No ☒

(Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File ☐ Assigned Counselor ☐ OJA ☐ District Attorney's Office ☐

Judicial ☐ DHS ☐ Other (Specify) ☐

Administrator's Review ☐ Date 6/17/2024

OC

TULSA COUNTY JUVENILE DETENTION HOME

IRN: 2024-185

INCIDENT REPORT

Incident Report Title Broken Equipment

Location: Unit A

Date: 04/16/2024 Time 1715

(1) Subject/Victim:

Position: Resident

Race:

Sex:

Age:

Date of Birth:

JOLTS ID:

(2) Subject/Victim: N/A

Position: N/A

Race: N/A

Sex: N/A

Age: N/A

Date of Birth: N/A

JOLTS ID: N/A

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code

Name

Position

Telephone

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

04/17/24
Date
04/17/24
Date
Signature of Reporting Person

04/17/24
Date
Supervisor Name (Print)
04/17/24
Date
Signature of Reporting Person

Details of Incident/Complaint: (continued)

Resolution:

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):
N/A

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

Unit A

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) [REDACTED]	4) N/A
2) [REDACTED]	5) N/A
3) [REDACTED]	6) N/A

Enclosures (list all attached Statements, Receipts, and Related Documents):

1) Incident Report	4) N/A
2) N/A Use of Force	5) N/A
3) N/A	6) N/A

Was Use of Force Required: Yes ☒ No ☐

Was Medical Attention Required: Yes ☒ No ☒ First Aid _____ Nurse ☒ Hospital _____

Disciplinary Action Taken: Yes ☐ No ☒ (Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File _____ Assigned Counselor _____ OJA _____ District Attorney's Office _____

Judicial _____ TCSO _____ DHS _____ Other (Specify) _____

Administrator's Review _____ Date _____

TULSA COUNTY JUVENILE DETENTION HOME

IRN: 2024-186

CC

INCIDENT REPORT

Incident Report Title Negative Behavior

Location: Kitchen

Date: 04/18/2023 Time 05:30 PM

(1) Subject/Victim:

Position: Resident

Race: Sex: Age: Date of Birth:

JOLTS ID

(2) Subject/Victim: N/A

Position: N/A

Race: N/A Sex: N/A Age: N/A Date of Birth: N/A

JOLTS ID N/A

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code	Name	Position	Telephone
------	------	----------	-----------

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

	04/18/2024
	Date
	04/18/2024
	Date

	04/18/2024
Supervisor Name (Print)	Date
	04/18/2024
Signature of Reporting Person	Date

Details of Incident/Complaint: (continued)

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):
N/A

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, Is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:
N/A

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) N/A 4) N/A
2) N/A 5) N/A
3) N/A 6) N/A

Enclosures (list all attached Statements, Receipts, and Related Documents):

1) Incident Report 4) N/A
2) N/A 5) N/A
3) N/A 6) N/A

Was Use of Force Required: Yes ☐ No ☒

Was Medical Attention Required: Yes ☐ No ☒

First Aid _____ Nurse _____ Hospital _____

Disciplinary Action Taken: Yes ☒ No ☒

(Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File _____ Assigned Counselor _____ OJA _____ District Attorney's Office _____

Judicial _____ TPD _____ DHS _____ Other (Specify) _____

Administrator's Review _____ Date 4-19-2024

TULSA COUNTY JUVENILE DETENTION HOME

IRN: 2024-187

OC

INCIDENT REPORT

Incident Report Title Contraband

Location: Unit C # 9

Date: 04-18-24 Time 9:40AM

(1) Subject/Victim:

Position: Resident

Race:

Sex:

Age:

Date of Birth:

JOLTS ID:

(2) Subject/Victim:

Position: N/A

Race: N/A

Sex: N/A

Age: N/A

Date of Birth: N/A

JOLTS ID: N/A

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code	Name	Position	Telephone
------	------	----------	-----------

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

	04-18-24
Reporting Person (Print)	Date
	4-18-24
Signature of Reporting Person	Date

	04-18-24
Supervisor Name (Print)	Date
	4-18-24
Signature of Reporting Person	Date

Details of Incident/Complaint: (continued) *MA*

Resolution:

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, Is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) USS N/A
2) LDC N/A
3) N/A 6) N/A

Enclosures (list all attached Statements, Receipts, and Related Documents):

1) MA Disciplinary N/A
2) MA Photo of clips N/A
3) N/A 6) N/A

Was Use of Force Required: Yes ☐ No ☒

Was Medical Attention Required: Yes ☐ No ☒ First Aid N/A Nurse N/A Hospital N/A

Disciplinary Action Taken: Yes ☒ No ☐ (Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File Assigned Counselor OJA District Attorney's Office

Judicial TPD SO DHS Other (Specify)

Administrator's Review 4/19-2024
Date

TULSA COUNTY JUVENILE DETENTION HOME

IRN: 2024-188

6

INCIDENT REPORT

Incident Report Title Contraband

Location: Unit C # 21

Date: 4/18/24

Time 10:00AM

(1) Subject/Victim:

Position: Resident

Race:

Sex:

Age:

Date

of Birth:

JOLTS ID

(2) Subject/Victim: N/A

Position: N/A

Race: N/A

Sex: N/A

Age: N/A

Date

of Birth: N/A

JOLTS ID N/A

Others Related to this Report: A. Complainant B. Victim C. Suspect/Subject D. Witness E. Staff F. Other

Code

Name

Position

Telephone

Details of Incident/Complaint: (Who, What, When, Where, How, and Why? Attach all related statements and documentation)

Reporting Staff Name (Print)

4/18/24

Date

Signature of Reporting Person

4-18-24

Date

Supervisor Name (Print)

4/18/24

Date

Signature of Reporting Person

4-18-24

Date

Details of Incident/Complaint: (continued)

Resolution:

Evidence/Property (List and Describe, Chain of Evidence Attached, Repair Request Completed):

Contraband was given to LDC

Was Property Damaged/Destroyed: Yes ☐ No ☒ (If YES, Is a requested for Restitution Needed/Attached?)

Location of Evidence/Property:

Destroyed in Printer near trash can.

Notification (List the Time and All Notifications of this Incident/Complaint including SUPERVISOR/DEPARTMENT HEAD/DIRECTOR)

1) USS ☐ 4) N/A
2) LDC ☐ 5) N/A
3) N/A 6) N/A

Enclosures (List all attached Statements, Receipts, and Related Documents):

1) N/A Disciplinary 4) N/A
2) N/A Photo 5) N/A
3) N/A 6) N/A

Was Use of Force Required: Yes ☐ No ☒

Was Medical Attention Required: Yes ☐ No ☒

First Aid N/A Nurse N/A Hospital N/A

Disciplinary Action Taken: Yes ☒ No ☐

(Attach a copy of disciplinary report - Form 3119)

DISTRIBUTION (Administrative Use Only):

Administrative File Assigned Counselor OJA District Attorney's Office

Judicial T SO DHS Other (Specify)

Administrator's Review 4-19-2014
Date

Resident Program Hours Report (7 Day Cycle)

All Residents in this report	12 Hour Program Day in Compliance	Education Day In Compliance	Hygiene Day in Compliance
	3*	2*	6*
	1*	1*	5*
	3*	1*	4*
	4*	4*	7
	6*	5	7
	7	5	7
	5*	4*	7
	6*	4*	7
	6*	4*	7
	7	3*	7
	6*	3*	7
	3*	2*	7
	2*	2*	7
	6*	2*	7
	1*	1*	4*
	1*	0*	1*
	7	4*	7
	7	3*	7
	6*	4*	7
	3*	4*	7
	6*	3*	7
	7	4*	7
	5*	4*	7
	1*	1*	7
	5*	4*	7
	6*	4*	7
	4*	4*	7
	6*	2*	7
	4*	3*	7
	1*	1*	6*
	0*	0*	7
	1*	1*	5*

	7	5	7
	5*	4*	7
	1*	2*	7
	5*	3*	7
	2*	2*	7
	2*	4*	4*
	7	4*	7
	7	1*	7
	3*	5*	7
	0*	0*	1*
	2*	1*	4*
	6*	4*	7
	7	4*	7
	7	4*	7
	7	3*	7
	5*	2*	7
	3*	3*	7
	5*	3*	7
	4*	3*	7
	6*	4*	7
	3*	2*	4*

* See Included Reports



OKLAHOMA
OFFICE OF JUVENILE AFFAIRS

MONTHLY DETENTION FACILITY MONITOR REPORT

Facility Information

Facility Name:	Tulsa Co. Juvenile Detention	Month Being Reported:	April 2024
JSA Facility Monitor:	[REDACTED]	Number of Facility Visits:	1
Number of Critical Incidents:	8	Number of Critical Incidents:	26

Monitoring Visits

In each box below, please list the date(s) of each Monitoring visit during the reporting period, a summary from the visit, and any areas of concern or needed follow up:

Date of Visit: 4/11/2024	Total Juvenile Population: 49 (43M, 6F)
--------------------------	---

Date of Visit:	Total Juvenile Population:
----------------	----------------------------

Review of Video Surveillance- Time in program/out of room Tracking

Date Reviewed: Time reviewed: Observations/Out of Room:

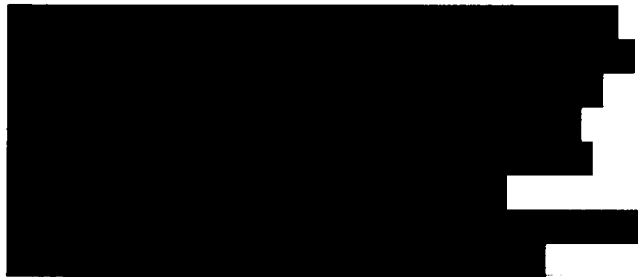
Date Reviewed	Time reviewed	Observations/Out of Room
---------------	---------------	--------------------------

04/03/2024	Approx 1:45pm
------------	---------------



Education Hall	N/A
----------------	-----

04/03/2024	Approx 7:00pm
------------	---------------



Gym	N/A
-----	-----

06/05/2024 12:00 PM

Date Reviewed Time reviewed Absenteeism concerns

Unit Reviewed Programming

04/08/2024 All Day [REDACTED]
Reviewed daily coming / going of A-Unit to ensure youth are out required number of programming hours. Youth were up at 710am, served breakfast at 730am, lunch at 1130am, and dinner at 430pm. Unit was down for the evening at 9pm. A-Unit 14 hours

OCA/Contract Concerns

Was any information requested to inform us as well as external to help OCA?	Yes
If so, please include provided OCA referral(s) reference number(s):	# 2398807

Additional Comments/Concerns:

Discussed unit procedures and Friday rewards on units that have done well through the week. Units are permitted to stay up slightly later (930-10pm) and sometimes have pizza for dinner while playing new games like Jeopardy. Admin states they continue to look into new games and ways to engage youth on the units.

Education classrooms continue to operate with improved organization and classroom management by staff.

Discussed continuing concerns regarding low staffing and administration struggles to get quality staff hired.

Detention admin continue to be very transparent and open with monitor, providing easy access to any requested information or video. Questions are answered readily and admin is very honest about struggles within the facility. Monitor receives weekly reports of all incident reports and grievances filed, as well as emails regarding any critical incidents.

Interviewed youth [REDACTED] while at facility. See attached report.

Reporter Information

Signature of Facility Monitor

Date: 4/29/2024

District Supervisor:

4/29/24

Signed/completed reports should be emailed to

by the 10th of each month.

Detention Interview Guide

Youth's Name: [REDACTED]

JOLTS Number: [REDACTED]

Detention Center: Tulsa

Date 03/27/24

Time: 12:30

1. How long have you been here in detention? [REDACTED]
 - How have things been going for you? [REDACTED]
2. Are you charged as a delinquent or as a youthful offender? [REDACTED]
3. What tribal court is your case out of? ____ (For tribal jurisdiction juveniles only)
4. Are you getting enough to eat? [REDACTED]
 - Is the food good? some of it. [REDACTED]
 - What could make the food better? [REDACTED]
 - Have you filed a grievance regarding the food? [REDACTED]
5. Are you taking any medication while you are here? [REDACTED]
 - What medication are you taking? [REDACTED]
 - Who gives you your medication? [REDACTED]
 - Does the nurse/staff give you the medication on the same schedule every day? [REDACTED]
 - Have you been on suicide watch while in this facility? [REDACTED]
6. Does everything in the facility work properly (water, heat, air, locks, etc.)? [REDACTED]
 - What is broken? [REDACTED]
 - How long has that been broken? [REDACTED]
 - Are any of the rooms in the detention center not being used to hold another juvenile because something is broken in the room? [REDACTED]
7. Are you attending school? [REDACTED]
 - How often do you get to go to school? [REDACTED]
 - Are there ever times when you don't get to go? [REDACTED]
 - Are you attending school in the classrooms or are you attending somewhere else? [REDACTED]
 - Have you ever been given packet of work to do rather than going to school with a teacher? [REDACTED]
 - When were you given the packet? [REDACTED]
 - If you are not in the classroom and are doing schoolwork and you have a question/don't know how to do something is there anyone there who can help you? [REDACTED]
8. When is the last time that you spoke to your family on the phone? [REDACTED]
 - How often do you get to call your family? [REDACTED]
 - Who helps you make those phone calls? [REDACTED]
 - Do you ever get to see your family during visitation? [REDACTED]
9. Are you able to speak with your attorney upon request? [REDACTED]
 - What is your attorney's name? [REDACTED]
 - If you ask to speak to your attorney, are you allowed to call them? [REDACTED]
 - When was the last time you spoke with your attorney? [REDACTED]
 - How often, if ever, do they come and see you in detention? [REDACTED]
10. Are you able to speak to your caseworker (JB/JSU/Tribe)? [REDACTED]
 - What is your caseworker's name? [REDACTED]
 - If you ask to speak to your caseworker, are you allowed to call them? [REDACTED]

- When was the last time you spoke with your caseworker? [REDACTED]
11. Where do you spend most of your day? [REDACTED]
- How many hours a day are you out of your room on weekdays/weekends? [REDACTED]
 - [REDACTED]
 - Around what time do you get to come out of your room during the week? [REDACTED]
 - Is that the same during the weekends? [REDACTED]
 - Do you ever get put in your room during the middle of the day? [REDACTED]
 - How often do you get to go outside for activities/recreation? [REDACTED]
 - [REDACTED]
 - Is there a level system in this facility? [REDACTED]
 - Can you request to voluntarily stay in your room? [REDACTED]
12. Have you ever gotten in trouble for violating a rule in detention? Yes What for? [REDACTED]
- [REDACTED]
- What was your punishment? [REDACTED]
 - Was the punishment fair? [REDACTED]
 - Have you ever been punished as part of a group for something someone else did? [REDACTED]
 - [REDACTED]
 - Aside from room confinement are you ever separated from the group for a certain period for disciplinary reasons? [REDACTED]
13. How often do you get to take a shower? [REDACTED]
14. How often do you get clean clothes? [REDACTED]
- [REDACTED]
15. Can you tell me how you would go about filing a grievance? [REDACTED]
- Have you ever filed a grievance? [REDACTED]
 - Do you have any pending grievances now? [REDACTED]
 - How was/were your grievance resolved? [REDACTED]
 - Have you been unfairly punished or disciplined while at this facility? [REDACTED]
 - [REDACTED]
16. Do you feel safe here in detention? [REDACTED] Why or why not? [REDACTED]
- [REDACTED]
- Do you feel staff is in control of this facility? [REDACTED]
 - Are there any staff members who you feel like you can talk to if you have a problem? [REDACTED]
 - Are there any staff who you do not get along with? [REDACTED]
 - Have you ever witnessed a staff member harass, bully or assault a resident? [REDACTED]
 - [REDACTED]
17. Is there anything good or bad happening in here that you think I need to know about that I have not asked you about? [REDACTED]

----- **Liaison and/or Monitor Notes** -----

received
4-3-24

Responded 4-3-24



May 3, 2024

EXHIBIT 3

Public Information Officer
pio@tcsso.org
Tulsa County Sheriff's Office
6080 E. 66th Street North
Tulsa, Oklahoma 74117

Re: *Incident reports and probable cause affidavits in response to calls from Tulsa County Family Center for Juvenile Justice as it pertains to children in detention/custody; Emails; Records; Open Records Act 51 O.S. §24A.1, et seq.*

To Whom it May Concern,

This letter serves as our organization's request made pursuant to the Open Records Act 51 O.S. §24A.1, *et seq.* to your office regarding the any incident reports, calls from, or Probable Cause affidavits in response to incidents at the Tulsa County Family Center for Juvenile Justice (FCJJ) relating to children in custody.

Oklahoma Appleseed is requesting all records, as defined in 51 O.S. §A.3(1), relating to said records of the FCJJ between 1/1/2020 and the present.

Oklahoma Appleseed also requests the following records, as defined in the Act:

1. Any record relating to TCSO responding to calls from the FCJJ in the same period;
2. Any record relating to TCSO leadership discussion or consideration of mistreatment of children in FCJJ custody between 1/1/2020 and the present;
3. Any correspondence between FCJJ and TCSO regarding mistreatment of children in FCJJ custody;
4. Any record relating to FCJJ staff, including detention officers, bringing contraband into the facility or having inappropriate contact or relationships with children in FCJJ custody.

If there are any fees for searching and copying said records please inform me if the cost will exceed \$50.00. However, I request a waiver of all fees in that the disclosure is in the public



interest and will contribute significantly to the public's understanding of the OJA's oversight and inspections of the FCCJ.

I ask for a prompt response to this request. As such, please produce the above records for copy and inspection within 30 days of receipt of this request. Should you anticipate a delay lasting longer than 30 days in responding to or fulfilling this request please contact me with information as to what caused the delay and when I can expect this request to be fulfilled. If you have any questions about my request, please let me know.

If you deny this request, please cite the specific exemption or provision of law you feel justifies a denial and the refusal to release information requested herein. Please also inform me of any internal appeal procedures which may be available to me.

Thank you for your prompt attention to this matter,

A handwritten signature in black ink, appearing to read "Colleen McCarty". The signature is stylized and cursive.

Colleen McCarty
Executive Director,
Oklahoma Appleseed Center for Law and Justice

Ashley Wheeler

From: Colleen McCarty <colleen@okappleseed.org>
Sent: Friday, May 3, 2024 11:40 AM
To: TCSO Public Information Officer; Leslie Briggs; Maria Easterly
Subject: Open Records Request re: FCJJ
Attachments: ORA to TCSO 5_2_24 (1).pdf

CAUTION: This email originated from outside of Tulsa County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Please find attached our open records request as it relates to the Family Center for Juvenile Justice.

Thanks,

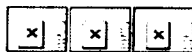
C

cc:

Colleen McCarty, Esq.

Leslie Briggs, Esq.

Maria Easterly, Esq.



cc:

colleen@okappleseed.org

colleen@okappleseed.org

colleen@okappleseed.org

colleen@okappleseed.org

We fight for justice and opportunity for every Oklahoman.

Confidentiality Note: This transmission may contain information that is privileged, confidential, and protected by the attorney-client or attorney work-product privileges. If you are not the addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify me immediately.

TULSA COUNTY SHERIFF OFFICE

Investigation Report

Summary

INCD#: TCSO-23-009470 CFS#: -000000

SEXCRIME - SEX CRIME (Other Than Rape)

Printed On: 05/09/2024 9:37 AM

JUVENILE REPORT

Incident Location

Location Type: Jail/Prison
District/Zone: PEORIA-33WA-N AND E OF RIVER-ADM-31
Beat/Area:
Bus/Common: JUVENILE BUREAU DETENTION CENTER
Address: 500 W ARCHER
TULSA, OK 74103

Report Information

Date: 08/08/2023 At: 22:14:14
Report Type: Investigation Report

Incident Date and Time

From: 08/08/2023 At: 22:14:14
To: 08/08/2023 At: 22:14:14

Involved Party Relationship

Person Type Involved Party

Offenses

No.	Code UCR	Description Larceny Type	Level Hate/Bias	Status
1	211123000B 13B	SEXUAL BATTERY	Felony None / No bias/not applicable	Committed

Involved Parties

Person Type: INVOLVED PARTY: 1

Name:
Address: 500 W ARCHER ST TULSA, OK 74103
Driver Lic. No.: Redacted Expiration:
State/Prov: Redacted
Phone: (O)
SSN/ID: Redacted Sex Offender: No
Sex: Male

☐ Person is a Complainant ☐ Juvenile at time of Incident
Birth Date: Age:
Hair Color: Eye Color:
Height From: Height To:
Weight From: Weight To:
Race:
Ethnicity: Unknown
Marital Status: N/A

Person Type: INVOLVED PARTY: 2

Name:
Address: 500 W ARCHER TULSA, OK
Driver Lic. No.: Redacted Expiration:
State/Prov: Redacted
Phone: (O)
SSN/ID: Redacted Sex Offender: No
Sex: Female

☐ Person is a Complainant ☐ Juvenile at time of Incident
Birth Date: Age:
Hair Color: Eye Color:
Height From: Height To:
Weight From: 0 Weight To: 0
Race:
Ethnicity:
Marital Status: N/A

Person Type: INVOLVED PARTY: 3

Name:
Address:
Driver Lic. No.: Redacted Expiration:
State/Prov: Redacted
Phone:
SSN/ID: Redacted Sex Offender: No
Sex: Male

☐ Person is a Complainant ☐ Juvenile at time of Incident
Birth Date: Age:
Hair Color: Eye Color:
Height From: Height To:
Weight From: 0 Weight To: 0
Race:
Ethnicity:
Marital Status: N/A

Person Type: OFFENDER: 1

Name: DOYLE, DQUAN D
Address: BROKEN ARROW, OK 74011
Driver Lic. No.: Redacted Expiration:
State/Prov: Redacted
Phone:
SSN/ID: Redacted Sex Offender: No
Sex: Male

☐ Person is a Complainant ☐ Juvenile at time of Incident
Birth Date: Age: 34
Hair Color: BLK Eye Color: BRO
Height From: 509 Height To: 509
Weight From: 245 Weight To: 245
Race: Black / African American
Ethnicity:
Marital Status: N/A

TULSA COUNTY SHERIFF OFFICE

Investigation Report

Summary

INCD#: TCSO-23-009470 CFS#: -000000

SEXCRIME - SEX CRIME (Other Than Rape)

Printed On: 05/09/2024 9:37 AM

JUVENILE REPORT

Person Type: VICTIM: 1

Name: Juvenile Information Redacted

Address: Juvenile Information Redacted

Driver Lic. No.: Redacted

Expiration:

State/Prov: Redacted

Phone:

SSN/ID: Redacted

Sex:

Sex Offender:

☐ Person is a Complainant

☒ Juvenile at time of incident

Birth Date:

Age: Juv

Hair Color: BRO

Eye Color: BRO

Height From: 507

Height To: 507

Weight From: 170

Weight To: 170

Race: Juvenile Information Redacted

Ethnicity: Juvenile Information Redacted

Marital Status:

Properties

Property Type: Recordings-Audio/Visual

Make: DVD/ FORENSIC INTERVIEW

Unit of Measure:

Quantity: 1.000

Property Value: 2.00

Owner:

Collection Date: 08/31/2023

Collected By: HOLLAND, PAUL

Location: 303 W 1 ST TULSA, OK 74103

Property Activity

Date	Time Activity	Agency	Quantity	Value
08/31/2023	1433 Evidence/Other/Dept Use	TULSA COUNTY SHERIFF OFFICE	1.00	2.00

Case Management

Reporting Officer: HILL, JOHN

Report Date: 08/08/2023

Approving Officer: WALKER, ERIC

Approval Date: 09/14/2023

Assigned Officer: WALKER, ERIC MICHAEL

Assigned Date: 08/10/2023

Reporting Officer Signature: _____

Signed Date: _____

Approving Officer Signature: _____

Signed Date: _____

TULSA COUNTY SHERIFF OFFICE

Investigation Report

Summary

INCD#: TCSO-23-009470 CFS#: -000000

SEXCRIME - SEX CRIME (Other Than Rape)

Printed On: 05/09/2024 9:37 AM

JUVENILE REPORT

Narratives

Subject:

Type

Initial Narrative

Date Time Author

08/08/2023 2214 HILL, JOHN LEE

Approving Officer

WALKER, ERIC MICHAEL



TULSA COUNTY SHERIFF OFFICE

Investigation Report

Summary

INCD#: TCSO-23-009470 CFS#: -000000

SEXCRIME - SEX CRIME (Other Than Rape)

Printed On: 05/09/2024 9:37 AM

JUVENILE REPORT

Narratives

Subject: Sexual Battery

Type

Initial report

Date Time Author

08/08/2023 2228 HILL, JOHN LEE

Approving Officer

Crime: Sexual Battery

Date: Exact date unknown

Time: Unknown

Location: 500 W. Archer Tulsa Juvenile Detention Center Tulsa County

Body Worn Camera Activated: No

Deputy's Summary: On 8-8-2023 while at the Juvenile Detention Center in reference to a contraband case Director Cortez Tunley informed me that one of his staff members, [REDACTED] had a resident, [REDACTED] tell her that [REDACTED] had been touched inappropriately by a staff member, Dquan Doyle, who is now on administrative leave in reference to a previous allegation of bringing contraband into the facility.

Cortez Tunley's Summary: Cortez did not state whether he had spoken with [REDACTED] directly or not. Only that he had heard from his Assistant Superintendent Douglas Currington about the incident through an e-mail. The e-mail from Douglas to [REDACTED] joint number 4 states that [REDACTED] did not know about any inappropriate relationship until after [REDACTED] came back from being interviewed, about the contraband, and stated that Dquan had grabbed or touched her inappropriately and that Dquan tried to get to go to the phone room to have [REDACTED] fix her shirt.

Evidence: E-mail between [REDACTED] and Douglas and [REDACTED] sheet will be scanned into this report.

Suspect Information: Doyle, Dquan, B/M, DOB [REDACTED]

Suspect Actions: Grabbed or touched a juvenile resident that he has custody over in a detention center in an inappropriate manner.

Canvass: Cortez stated that his staff is still working on finding security footage of the incident.

Relation: Dquan was a staff member employed at the correctional center where [REDACTED] incarcerated.

Investigative Results: I was not able to interview [REDACTED] as she is a juvenile resident of a detention facility. I was not able to interview the suspect as since the time he was put on administrative leave he has invoked his right to have an attorney present, and his exact location is unknown. I was not able to speak with [REDACTED] as she was out of the office at the time I was on scene.

TULSA COUNTY SHERIFF OFFICE

Investigation Report

Summary

INCD#: TCSO-23-009470 CFS#: -000000

SEXCRIME - SEX CRIME (Other Than Rape)

Printed On: 05/09/2024 9:37 AM

JUVENILE REPORT



NATIVE AMERICAN STATUS:

Suspect Native American Status verified through Tribal Dispatch: No

If yes, list tribe.

If no, list why not. Dquan is not listed as native on his employment records.

Victim Native American Status verified through Tribal Dispatch: No

If yes, list tribe.

If no, list why not. Naveah is not listed as native on her face sheet.

**TULSA COUNTY SHERIFF OFFICE**

Page: 1 of 2

Arrest and Booking ReportIncident Number: **TCSO-24-005770**

DLM:

1283532

Court Date/Division:

☐ Federal District ☐ State ☐ Municipal

Hold For:

Location Of Arrest:

8405 E 91 S ST, TULSA, OK, 74133

Location Of Occurance:

8405 E 91 S ST, TULSA, OK, 74133

Date (m/d/y) Day Time

Date (m/d/y) Day Time

Date (m/d/y) Day Time

Report Date: **04/26/2024 Fri 18:19**Arrested: **04/26/2024 Fri 18:23**Booked: **04/26/24 18:24**

Jacket #: Suspect Name (Last, First, Middle)

HINES, JONATHAN MICHAEL

Hgt Wgt Hair Eyes Skin Race Sex

602 155 BRO BRO W M

Street Address, City, State

Age

DOB

Social Security # (SSN)

26 to 26

Employer/School

Home Phone

Drivers License Num ST Class

KY

Employer Address

Business Phone

STID Number

FBI Number

Emergency Contact

Phone

Relationship

Personal Oddities

Tattoos

Warning Indicators

Place Of Birth: **Kentucky**

Arresting Officer - ID Num

Agency

Backing Officer

Jail Intake - ID Num

COUNTS, MICHAEL - 210**TCSO****COSTANZA USMS****FRISBY 131**

Force

Level:

Document:

Injured Prisoner

Officer:

Intoxilyzer



Finger Print

Intoxilyzer Operator/ID Num/Agency Intoxilyzer Supervisor/ID Num/Agency Test Results

Medical Problems

Property Receipt

VCR Tape

Photo Num

Latent Num

**TULSA COUNTY SHERIFF OFFICE**

Page: 2 of 2

Arrest and Booking ReportIncident Number: **TCSO-24-005770**

DLM:

Court Date/Division:

☐ Federal District☐ State☐ Municipal

Hold For:

Level	Crime Description	Offense Date	Warrant No.	Bond
F	HUMAN TRAFFICKING/POSS CELL PHONE IN JAI	04/26/2024	CF-24-1559	\$200,000.00

PROBABLE CAUSE NARRATIVE

On 4-26-2024 the Northern Oklahoma Violent Crimes Task Force located and apprehended Jonathan Hines at 8405 E 91 St. Hines was arrested on Tulsa County warrant CF-24-1559.

THE BELOW SIGNED OFFICER STATES UNDER PENALTY OF PERJURY UNDER THE LAWS OF OKLAHOMA THAT THE FORGOING AND ABOVE INFORMATION IS TRUE AND CORRECT AND PRAYS THIS HONORABLE COURT TO FIND PROBABLE CAUSE TO DETAIN THE ARRESTEE PENDING FURTHER PROCEEDINGS.


OFFICER SIGNATURE

2272

COUNTS, MICHAEL - 210

PRINTED OFFICER'S NAME

I FIND THAT THERE IS / IS NOT PROBABLE CAUSE TO DETAIN THE ARRESTEE PENDING FURTHER PROCEEDINGS.

DATE

TIME

JUDGE OF THE DISTRICT COURT

TULSA COUNTY SHERIFF OFFICE

Investigation Report

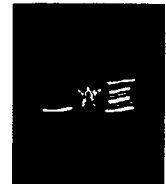
Summary

INCD#: TCSO-24-005386 CFS#: -000000

RAPE - RAPE

Printed On: 05/07/2024 1:22 PM

JUVENILE REPORT



Incident Location

Location Type: Government/Public Building (Incl. C)
District/Zone: OSAGE-PEORIA-ADM-26N
Beat/Area:
Bus/Common: TULSA COUNTY FAMILY CENTER FOR JUVENILE JUSTICE
Address: 500 W ARCHER ST
TULSA, OK 74103

Report Information

Date: 04/17/2024 At: 21:48:42
Report Type: Investigation Report

Incident Date and Time

From: 04/06/2024 At: 12:00:00
To: 04/17/2024 At: 21:48:42

Involved Party Relationship

Person Type Involved Party

Responders and Times

Responder ID	Dispatched	Enroute	At Scene	Cleared	Other	Total	Reporting Officer
26	21:52:05	21:52:05	21:52:05	21:52:05			Yes

Offenses

No.	Code UCR	Description Larceny Type	Level Hate/Bias	Status
1	2111150000 11B	RAPE 1ST DEGREE	Felony None / No bias/not applicable	Committed
2	57121 90Z	CONTRABAND, WEAPONS, ETC IN JAIL	Felony None / No bias/not applicable	Committed
3	37A0061097 290	DESTROY, DAMAGE, ALTER EVIDENCE	Misdemeanor None / No bias/not applicable	Committed

Involved Parties

Person Type: OFFENDER: 1
Name: HINES, JONATHAN MICHAEL
Address:
Driver Lic. No.: Redacted Expiration:
State/Prov: Redacted
Phone:
SSN/ID: Redacted Sex Offender: No
Sex: Male

☐ Person is a Complainant ☐ Juvenile at time of incident
Birth Date: Age: 26
Hair Color: BRO Eye Color: BRO
Height From: 602 Height To: 602
Weight From: 155 Weight To: 155
Race: White
Ethnicity: Non-Hispanic
Marital Status: N/A

Person Type: VICTIM: 1
Name: Juvenile Information Redacted
Address: Juvenile Information Redacted
Driver Lic. No.: Redacted Expiration:
State/Prov: Redacted
Phone:
SSN/ID: Redacted Sex Offender:
Sex:

☐ Person is a Complainant ☒ Juvenile at time of incident
Birth Date: Age: Juv
Hair Color: BLK Eye Color: BRO
Height From: 604 Height To: 604
Weight From: 180 Weight To: 180
Race: Juvenile Information Redacted
Ethnicity: Juvenile Information Redacted
Marital Status:

Case Management

Reporting Officer: ISENBERG, JEFFERY
Approving Officer: HUSS, PAUL
Assigned Officer: ISENBERG, JEFFERY DON

Report Date: 04/17/2024
Approval Date: 05/07/2024
Assigned Date: 05/07/2024

TULSA COUNTY SHERIFF OFFICE

Investigation Report

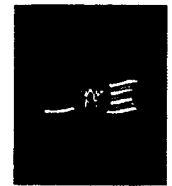
Summary

INCD#: TCSO-24-005386 CFS#: -000000

RAPE - RAPE

Printed On: 05/07/2024 1:22 PM

JUVENILE REPORT



Reporting Officer Signature: _____

Signed Date:

Approving Officer Signature: _____

Signed Date:

TULSA COUNTY SHERIFF OFFICE

Investigation Report

Summary

INCD#: TCSO-24-005386 CFS#: -000000

RAPE - RAPE

Printed On: 05/07/2024 1:22 PM

JUVENILE REFORM

Narratives

Subject:

Type

Initial Narrative

Date Time Author

04/17/2024 2148 ISENBERG, JEFFERY DON

Approving Officer

HUSS, PAUL BRYAN



TULSA COUNTY SHERIFF OFFICE

Investigation Report

Summary

INCD#: TCSO-24-005386 CFS#: -000000

RAPE - RAPE

Printed On: 05/07/2024 1:22 PM

JUVENILE REPORT

Narratives

Subject: Initial Report

Type

Initial report

Date Time Author

04/17/2024 2209 ISENBERG, JEFFERY DON

Approving Officer

Crime: Rape

Date: 4/6/2024

Time: 8:48 pm - 8:54 pm

Location: 500 W Archer South Hall, Unit A

Body Worn Camera Activated: No

Deputy's Summary: On April 17th, 2024 I was assigned to respond to 500 W Archer for a rape investigation at the Juvenile Detention Facility. Upon arrival I spoke with the Detention Asst Superintendent Curtis Williams.

Reporting Party Summary: The administrator became aware of this incident on April 16. The incident involves allegations of sexual relationship between staff member and resident. That [redacted] disclosed to [redacted] he was mad and wanted his money. When asked what he was talking about [redacted] stated on a Saturday night Jonathan acted like I [redacted] toilet needed to be plunged and put a shoe in the door and came into his room. [redacted] stated he and Jonathan had sex. Detention staff filed an Office of Client Advocacy - Intake Referral and provided a copy to Detective Isenberg.

Victim Summary: [redacted] stated that he and Jonathan had oral and anal sex in his cell. He stated he first gave Jonathan oral until he could get him hard in the middle of the cell. It didn't take long then they had sex on the edge of the bed and indicated the east side of the room. [redacted] stated that he was not injured, that he didn't feel any discomfort. He stated that Jonathan was nervous that night, but the next day he was fine like nothing happened.

Witness Summary:

Description of Scene: A single occupant cell on South Hall Unit A. The cell faces to the north with a bed on the south wall. The head of the bed is on the east wall and foot of bed on the west wall. On the northwest corner of the room is a toilet sink combination that is stainless steel.

Suspect(s) Description: Jonathan Hines DOB [redacted]

Suspect(s) actions: Hines went into juvenile's cell and had juvenile perform oral sex on him until he got hard and then had anal sex with the juvenile.

TULSA COUNTY SHERIFF OFFICE

Investigation Report

Summary

INCD#: TCSO-24-005386 CFS#: -000000

RAPE - RAPE

Printed On: 05/07/2024 1:22 PM



JUVENILE REPORT

DHS Referral: OKDHS Office of Client Advocacy was notified by Douglas Currington

Injuries: None reported

Medical Treatment: N/A incident occurred 11 days prior. Victim stated no injury, hurting, or itching at this time.

Rape Exam: Time is beyond protocol times.

Canvass: Det Munson was called to the scene to use alternate light source and collect potential DNA swabs.

Evidence: 1 USB thumb drive containing surveillance footage outside juvenile room.

Investigative Results: Pictures of the scene and swabs were taken by Det Munson. Det Isenberg spoke with the mother of the victim, [redacted] by phone. [redacted] states that she was contacted by Scott Hoskison, [redacted] probation officer who told her about the incident. [redacted] states that she has also spoken with [redacted] I explained the process of forensic interview, physical exam, and need for buccal swab. [redacted] stated she understood.

NATIVE AMERICAN STATUS:

Suspect Native American Status verified through Tribal Dispatch: Unknown

If yes, list tribe.

Victim Native American Status verified through Tribal Dispatch: No

If yes, list tribe.

TULSA COUNTY SHERIFF OFFICE

Investigation Report

Detailed

INCD#: TCSO-24-005984 CFS#: -000000

SEXCRIME - SEX CRIME (Other Than Rape)

Printed On: 05/07/2024 12:39 PM

JUVENILE REPORT

Incident Location

Location Type: Government/Public Building (Incl. C)
District/Zone: 33WA-81WA-EDISON-RIVER
Beat/Area:
Bus/Common: JUVENILE BUREAU DETENTION CENTER
Address: 500 W ARCHER
TULSA, OK 74103

Report Information

Date: 05/03/2024 At: 15:22:16
Report Type: Investigation Report

Incident Date and Time

From: 05/03/2024 At: 15:22:16
To: 05/03/2024 At: 15:22:16

Involved Party Relationship

Person Type Involved Party

Incident Origin

How Received:
Received From: 15:22:16 Thru: 15:22:16 Elapsed Time: 0 minutes
Entered By: HUGHES, JOSHUA
Entry Date: 5/03/2024 At: 15:22:16
Dispatched Nature:

Incident Characteristics

Rpt. Officer: HUGHES, JOSHUA
Shift: Court Operations
Lighting: Daylight
Weather: No adverse weather
Citations:
☐ Weapons Involved ☐ Cargo Theft Related

Caller Information

Last Name: Address:
First Name: Phone:
Middle Name:

Approval Information

Officer: Date: At:

Responders and Times

Responder ID	Dispatched	Enroute	At Scene	Cleared	Other	Total	Reporting Officer
	15:00:00	15:00:00	15:05:00	15:09:00		9	No

Offenses

No.	Code UCR	Description Larceny Type	Level Hate/Bias	Status
1	211123000B 11D	SEXUAL BATTERY	Felony None / No bias/not applicable	Committed

Type of Criminal Activity

1: None/Unknown 2: 3:

Suspected of Using

1: Not applicable 2: 3:

Type of Weapon/Force Used

1: Personal Weapons (Inc. Hand, Feet, 2: 3:

Location Type

Primary: Government/Public Building (Incl. C) Secondary:
Premises Entered: ☐ Premises Occupied

Method of Entry

Not Applicable Motor Vehicle Theft

Breaking and Entering

Entry 1: 2: 3:
Exit 1: 2: 3:

TULSA COUNTY SHERIFF OFFICE

Investigation Report

Detailed

INCD#: TCSO-24-005984 CFS#: -000000

SEXCRIME - SEX CRIME (Other Than Rape)

Printed On: 05/07/2024 12:39 PM



JUVENILE REPORT

Method Of Operation

1: 2: 3: 4: 5:

Gangs

1: 2:

Involved Parties

Person Type: OFFENDER: 1

Name: HINES, JONATHAN MICHAEL

Address:

Driver Lic. No.: Redacted

Expiration:

State/Prov: Redacted

Phone:

SSN/ID: Redacted

Sex Offender: No

University/College Use

☐ Student ☐ Faculty ☐ Staff ☐ Non-Affiliated

☐ Person is a Complainant

☐ Juvenile at time of incident

Birth Date: (

Age: 26

Hair Color: BRO

Eye Color: BRO

Height From: 602

Height To: 602

Weight From: 155

Weight To: 155

Place Of Birth: Kentucky

Resident Status: Resident (Lives In Tulsa County)

Deceased Date:

Injuries

☐ No Injury

☐ Apparent Broken Bones

☐ Possible Internal

☐ Severe Laceration

☐ Loss Of Teeth

☐ Unconsciousness

☐ Other Major Injury

☐ Apparent Minor Injury

☐ Fatal

☐ Unknown

Demographics

Sex: Male

Marital Status: N/A

Religion:

Gang:

Race: White

Ethnicity: Non-Hispanic

Nationality: United States

Charges

Code	Description	Charge No.	Date	Issue Date	Bond	Count
211123000B	SEXUAL BATTERY		05/03/2024	05/03/2024	0.00	1

Person Type: VICTIM: 1

Name: Juvenile Information Redacted

Address: Juvenile Information Redacted

Driver Lic. No.: Redacted

Expiration:

State/Prov: Redacted

Phone:

SSN/ID: Redacted

Sex Offender:

University/College Use

☐ Student ☐ Faculty ☐ Staff ☐ Non-Affiliated

☐ Person is a Complainant

☒ Juvenile at time of Incident

Birth Date:

Age: Juv

Hair Color: BRO

Eye Color: BRO

Height From: 508

Height To: 508

Weight From: 150

Weight To: 150

Place Of Birth:

Resident Status: Juvenile Information Redacted

Deceased Date:

Injuries

☒ No Injury

☐ Apparent Broken Bones

☐ Possible Internal

☐ Severe Laceration

☐ Loss Of Teeth

☐ Unconsciousness

☐ Other Major Injury

☐ Apparent Minor Injury

☐ Fatal

☐ Unknown

Demographics

Sex:

Marital Status:

Religion: Juvenile Information Redacted

Gang: Juvenile Information Redacted

Race: Juvenile Information Redacted

Ethnicity: Juvenile Information Redacted

Nationality: Juvenile Information Redacted

Reporting Officer Signature:

Signed Date:

Approving Officer Signature:

Signed Date:

TULSA COUNTY SHERIFF OFFICE

Investigation Report

Detailed

INCD#: TCSO-24-005984 CFS#: -000000

SEXCRIME - SEX CRIME (Other Than Rape)

Printed On: 05/07/2024 12:39 PM

JUVENILE REPORT

Narratives

Subject:

Type

Date Time Author

Approving Officer

Initial Narrative

05/03/2024 1522 HUGHES, JOSHUA DAVID



TULSA COUNTY SHERIFF OFFICE

Investigation Report

Detailed

INCD#: TCSO-24-005984 CFS#: -000000

SEXCRIME - SEX CRIME (Other Than Rape)

Printed On: 05/07/2024 12:39 PM

JUVENILE REPORT



Narratives

Subject: Sexual Battery

Type

Initial report

Date Time Author

05/03/2024 1532 HUGHES, JOSHUA DAVID

Approving Officer

Crime: Sexual Battery

Date: May 3, 2024

Time: 1535 HRS

Location: 500 West Archer, Tulsa County Juvenile Detention Center

Body Worn Camera Activated: N/A

Deputy's Summary: I was notified by Genie Esparza that she was notified by one of her Juvenile clients that he was touched.

Victim Summary: I made contact with [redacted] at the Tulsa County Juvenile Detention Center. I had [redacted] / fill out a witness statement. [redacted] stated that on March 12, 2024 John had come into work and offered [redacted] / a phone and a vape pen to touch his ass. [redacted] / stated that John did touch him. [redacted] stated that John would make weird comments like you look good today, or he would say my ass looks good today. [redacted] / stated that John would try to look at him as he was taking his pants off to go to sleep.

Suspect(s) Description: Jonathan M Hines W/M DOB:[redacted]

Suspect(s) actions: Suspect Jonathan Hines touched [redacted] on his buttocks, and made sexual suggestive comments to him.

DHS Referral: DHS Referral# [redacted]

Injuries: No Injuries reported at the time of this report.

Medical Treatment: No Medical Treatment was needed at the time of this report.

Evidence: Witness Statement scanned into this report.

NATIVE AMERICAN STATUS:

Suspect Native American Status verified through Tribal Dispatch:

If yes, list tribe.

TULSA COUNTY SHERIFF OFFICE

Investigation Report

Detailed

INCD#: TCSO-24-005984 CFS#: -000000

SEXCRIME - SEX CRIME (Other Than Rape)

Printed On: 05/07/2024 12:39 PM



JUVENILE REPORT

If no, list why not. No Affiliation

Victim Native American Status verified through Tribal Dispatch:

If yes, list tribe.

If no, list why not.. No Affiliation

IN THE DISTRICT COURT WITHIN AND FOR TULSA COUNTY, STATE OF OKLAHOMA



STATE OF OKLAHOMA,

Plaintiff,

vs.

Jonathan Michael Hines

Defendant (s)

Case No. 24-005386

EXHIBIT 4

CF-2024-1559

AFFIDAVIT

DISTRICT COURT
FILED

APR 26 2024

STATE OF OKLAHOMA

ss.

COUNTY OF TULSA

DON NEWBERRY, Court Clerk
STATE OF OKLA. TULSA COUNTY

The undersigned, of lawful age, being first duly sworn, upon oath deposes and states as follows:

1. He is a duly sworn Investigator with the Tulsa County Sheriff's Office.
2. He has read certain investigative reports and statements of witnesses regarding the above named Defendant (s) and, from these statements and reports it appears as follows:
3. On April 17th, 2024, Det Isenberg was assigned to respond to 500 W Archer for a rape investigation at the Juvenile Detention Facility. Upon arrival he spoke with the Detention Asst Superintendent Curtis Williams.
4. The administrator became aware of this incident on April 16. The incident involves allegations of sexual relationship between staff member and resident. That K.W., a seventeen-year-old resident at the Tulsa County Juvenile Detention Center, disclosed to Sparkle Johnson he was mad and wanted his money. When asked what he was talking about K.W. stated on a Saturday night Jonathan acted like K.W.'s toilet needed to be plunged and put a shoe in the door and came into his room. K.W. stated he and Jonathan had sex. Detention staff filed an Office of Client Advocacy - Intake Referral and provided a copy to Detective Isenberg.
5. K.W. stated that he and Jonathan had oral and anal sex in his cell. He stated he first gave Jonathan oral until he could get him hard in the middle of the cell. It didn't take long then they had sex on the edge of the bed and indicated the east side of the room. K.W. stated that he was not injured, that he didn't feel any discomfort. He stated that Jonathan was nervous that night, but the next day he was fine like nothing happened.
6. Detective Isenberg observed the scene to be a single occupant cell on South Hall Unit A. The cell faces to the north with a bed on the south wall. The head of the bed is on the east wall and foot of bed on the west wall. On the north west corner of the room is a toilet sink combination that is stainless steel.
7. Det Munson was called to the scene to use alternate light source and collect potential DNA swabs. Evidence: 1 USB thumb drive containing surveillance footage outside juvenile room.
8. Pictures of the scene and swabs were taken by Det Munson.
9. Superintendent Williams told Detective Isenberg that during their investigation they were alerted to a twenty dollar bill that Jonathan Hines had given to K.W. They collected that currency from K.W. and provided it to Tulsa County Sheriff's office for evidence.

10. On April 18th at about 0818 hours Sgt Huss and Detective Isenberg conducted an audio recorded interview of Jonathan Hines at 500 W Archer. After introducing ourselves as detectives with the Tulsa County Sheriff's office the recorder was started. Jonathan confirmed that he had just had a meeting with his supervisor's regarding an incident that occurred on the location. Hines was informed that he was not under arrest and would not be arrested during this interview. Hines stated he wanted to let us know firsthand and had nothing to hide. Hines stated that he was emotional right now because he was sad because of the allegations being made. Hines stated he knew K.W. He states Washington was on C unit. That Washington was getting into a lot of fights. That A unit was a more chill unit. That Washington was moved to A Unit about a week and a half to two weeks. Hines states that he works every day. That he may take a half a day off. That he works 7 am to 7 - 8 pm.

11. Hines was asked about his interactions with Washington. Hines stated that "with Washington personally? Whenever, there's a new, new kids come to the unit or just whenever I first got here, I like to talk to them." He finds out if they are going to be a trouble kid and wants to make sure they are safe. That when new kids come onto the unit the kids pick on them. That Washington was already on the unit when he got there. That Washington did not have a hygiene tray and he gave him one. Throughout the time he's been here, its against policy he isn't supposed to bring in candy or chips because its against policy because it's contraband. That if Hines is eating candy or chips he will share it. That towards the end he stopped doing that because he is trying to promote and he began to get push back. He had residents start questioning him. That KW and his friends started giving him pushback. That they said if he doesn't bring them candy then they were going to go to his bosses and tell them that he was bringing them chips.

12. He stated that what allegations that his bosses just told him about were mind blowing. That he is not that type of person. He stated that he was told that he was having sexual relations with a kid or talking sexually with a kid. Hines states that he was sexually assaulted as a kid and he knows what trauma that could occur. And it is mind blowing that allegation was brought about.

13. He again confirmed he brought in candy and snacks to the jail. He was asked if he brought in any money into the facility. He states he brings money in but doesn't give it to kids. That he brings in cash and will chip in if someone ordered food. He states that he had brought in about \$60 for vending machines or food. That a couple of twenties went missing when they went to the gym to play volleyball. That he took his wallet, keys and items out of his pockets and placed them down while playing sports and money came up missing. When asked if he reported it missing, he stated he had not. He stated he didn't want to cause more problems for the kids. He stated he knew kids have had money. That he has seen kids with money. That he has personally never given money to a resident.

14. When asked what he was told by staff about why we were there he stated that he was told that a resident came forward and stated that they had had sex and he performed oral on him and that seven residents have said that he made them feel uncomfortable. That they were going through their process.

15. When asked if he had ever been alone with KW he stated the only time there were alone was when they had got back from lunch or dinner. That KW stated that he needed a snake for his toilet. He wen back to try and find the snake and couldn't find it. He got the plunger and brought it forward. That what was supposed to happen was (Hines) was supposed to hold the door and let the resident plunge the toilet. What Hines told KW was to have KW hold the door and Hines would plunge the toilet. That they only had two staff at the time. That he would told the other staff to stay with the residents and he would go unclog the toilet. They go down there and they are at the door and he asked if KW could do it. KW attempts and he couldn't do it. That he told KW to trade places with him. He plunged the toilet a couple of times and flushed and nothing happened so he used more strength and did it. That worked and they left. He stated that he didn't even take five minutes. He stated that was the only time he was alone with any resident was when he plunged a toilet.

16. He states that KW is a good kid. He states that KW likes to listen to twerking music and we can't listen to that here so he will turn it off. That when he does that KW will call him fake. That when he walks past a table one of the kids would call him snitch.
17. He states that in the beginning he was nice to the residents. That he would tell the kids if they want to talk to let him know. He goes into a story about a resident that would cry to him and talk to him.
18. He states it makes him sad that a resident would make these allegations against him when he is the only one that is working his ass off for them.
19. He states that he had three residents move from C to A because they weren't eating.
20. He states that he has no hatred to KW for saying these things, that he must have had some trauma in his past to say this.
21. He states that he is too nice to these kids. That he is too nice and too caring. That if a resident walks up and wants to talk he will say sure and pull up a chair. He states that sometimes they might want to talk quietly into his ear so no one else hears what they are saying or maybe he will take them into the day room.
22. He states with the KW situation that he would just brush it off. That he knows he is being too nice until he started getting push back from his supervisors and they said that they needed to start enforcing rules. Hines states that he got out of the Navy in September. That he was living in Florida and moved to Oklahoma. That he has been here less than a year. That he still needs to use a GPS to get around.
23. He states that they are allowed to have their phones, but not allowed to have their phones in the unit. That they are supposed to keep their phones locked up. That if he is off the clock he will go get his stuff and hang with the staff. When asked if any of the residents have ever had his phone number he stated that he found a notebook next to a room that was empty. That he picked up the notebook and started going through it and saw on the first page several phone numbers including his. That he went out and asked the residents who had his number and several residents raised their hands. He states that he has never gotten a call from any former residents.
24. He states that when he moved here it was with step mother and other family members.
25. He states that he can't stress it enough how this makes him feel. That he is just too nice. He thinks they are just mad because he has started making them follow the rules and doing room searches.
26. He states that he is talking with one of the nurse's and only goes on dates with them. Detective Isenberg explained would like to get a DNA swab from him and he both verbally agreed and signed a Search Consent form. Detective Isenberg then collected the buccal swab from Hines.
27. He then stated that he felt he was too nice letting residents drink from his sodas.
28. When asked if there would be any reason for his DNA to be in KW's cell he stated there would be no reason. May spit when he speaks.
29. He states that he is not worried about us finding anything or the allegations. Then he states he is worried about the allegations, but not that anything will be found.
30. He was asked if he would be willing to let detectives look at his phone. The download process was explained. He agreed to the process and was given the option to come with detectives or leave it with detectives. He agreed to leave the phone with us and signed a search consent to have his phone downloaded.

Detective Isenberg provided his phone number and that he could call anytime. He provided detectives with his passcode on the phone. He explained he has his nudes on the phone. He stated that he has a house phone and does not know the number for it. He was provided with Detective Isenberg's contact information and a business card for Sgt Huss. He was told to call us with the number by 1pm that same day to give us his home phone number. During this time he stated he wanted to text his mother and let her know he wouldn't have his phone. He fidgeted with his phone for several minutes during this line of questions while agreeing to provide his phone to detectives.

31. Hines states that he is not Native American.

32. He provided his name Jonathan Michael Hines, DOB 3/28/1998, SSN, and that his driver's license is out of Kentucky.

33. On April 18th Detective Isenberg conducted a forensic extraction of an Apple iPhone 11 belonging to Jonathan Hines with the phone number of 918.861.0194. In the messages was a text thread with phone number 539.215.0657. In it it begins "Hey answer the phone" "It's Elijah" from the 918.861.0194. This text thread begins on April 7th at 1544 hours and continues through 4/13/2024 at 1548 hours. The 539 number states their name is Eli. These messages show to be deleted by user on 4/18/24 at 8:51 am. This would be during the interview with Hines after deputies asked to search his phone. Following this review the Apple iPhone 11 was booked into evidence property as Jonathan Hines had failed to contact TCSO as agreed.

34. On April 19th, 2024 at 10 am, Detective Isenberg observed a forensic interview between victim KW and forensic interviewer Karla Cordero at 2815 S Sheridan Ave. During the interview KW was told about the cameras in the room and had been told about the observation room. He spelled his name for the interviewer and pronounced it. KW stated he was 17 years old and his DOB 11/30/2006. KW stated that for his birthday he took a bus to Dallas Tx for a concert.

35. KW states right now he is living in the Juvenile Detention Center. That he lives with his mom when he isn't there. He lives with his mom and two little sisters.

36. When asked what he knows about coming here to talk to the interviewer, KW states "probably about the situation I had been in at juvenile." He states there was this staff that had been coming on to him real hard and he was going to take advantage of. He states he had a friend that had been told about his business. That it was his first day on unit A. That he came from unit C to unit A. That his friends told him (KW) to mess with him (Hines) and he (Hines) will get you right. The he would get cartridges, edibles, weed products, and money. KW states he was going to take one for the team. KW states that at first he told his friends that he wouldn't do anything until he got his stuff and they told home that he would take care of him. KW states that he was told that he brought in a weed vape. That he (Hines) was hitting on him real hard. KW states that he heard Hines was making like \$10,000 a month on OnlyFans. KW identified Hines by the name of Jonathan and did not know his last name. Hines was relaying messages through J.C.. J.C. would tell Jon that KW was down. J.C. would tell KW that Jon was excited he was on the unit. He states that when they clean their cells there are only two kids on the hallway. One day it was KW and J.C. on the hallway. KW states he told Jon "When are you going to put me on your OnlyFans?" Jon asked what he knew about his OnlyFans and KW said he was like famous. Jon asked what kind of tattoo he had on his side and KW said he didn't know, but it was a big one. Jon told him that he could get it tonight, which he took to mean that he could have sex that night. After that they were in gym and he talked in the gym and they were going to do it while everyone is taking showers because no one is on the cell hall. Jon would bring people snacks and extra calls and everyone would be on Jon for something. KW states we couldn't do it during showers. KW states he tells Jon we only have like 12 min so we probably aren't going to be able to do anything.

37. Jon tells him that he is going to act like he is plunging his room and that is when they are going to do it. KW states that Jon hit on other guys, but they aren't gay but he is and he would do it. He states that when Jon

took him to plunge his toilet they were probably in the room for like six minutes. That Jon went to his room and used his shoe to hold the door open. That when they went into the room Jon pulled out his penis and KW gave him oral. He (Ilincs) was trying to hurry up and have sex. That KW gave him oral for like 20 seconds and Jon bent him over and they had sex. KW states he know it was done when he pulled out and seamaned on his floor. KW states that he cleaned it up and flushed it down the toilet. KW that after he flushed it he was in his call sitting on his bed. That it was time for everyone to go to bed. That Jon told him that if anyone asks that Jon was just plunging his toilet.

38. KW states that he was supposed to get some carts (cartridges), dabs, weed pins. KW states that at first it wasn't supposed to be about money. That this happened like his first day in the unit. That after that Jon was bringing stuff into other people and not bringing KW his stuff. That come Tuesday he was talking with J.C. and Jon owed him as well. KW states he felt dumb and played. That KW and J.C. talked and if Jon hadn't brought their stuff by Thursday, they would blackmail Jon. KW states that Jon's attitude changed. That he would get mad a KW when he would listen to music and twerk. That KW brought Jon and three other people into the multipurpose room and confronted Jon that he was having an attitude and that he wanted a cart, some edibles, and some money. Jon asked the other guys in the room if he owed them if they got paid right away and they said no. KW then asked, "but did y'all have sex with him?" and they said no. KW said he thought he was supposed to leave the next week and was afraid Jon was just trying to wait him out. KW states Jon asked them to write down dispensaries where he could go to. KW says the next day was a Thursday. That Jon says he couldn't go because he worked like 7am - 7pm. That the next day he came in and said he was going to go during his break. That Jon came back from his break and said he couldn't get it. That he has a plug that he buys weed from and would have him bring it.

39. The next day he came in and said he had it in his car and couldn't bring it in because he had to go through a metal detector. That he would have to wait until his next break so he could come in another door. KW was upset because that break would be after 3pm and the next shift would be there and they couldn't enjoy their products. Jon brought KW into the phone call room and told him that he didn't feel comfortable bringing a dap in because Ms. Sholanda and Ms. Kelly had heard about a dap pen coming around and would start doing random drug tests.

40. So, Jon gave him two twenties. KW told him he needs \$200. Jon said he would give him \$20 before he leaves. That is when he gave him two \$20 and bring him the rest of his money. KW thought he was leaving the next Tuesday. Jon told him if he needs some snacks to just give him a \$20 and he will go get him some snacks. This was on like a Friday. On Sunday KW gave him \$20 for some hot fries and some Taki's. The hot fries were for KW and the Taki's were for a friend. On Monday Jon came in and said he was robbed. He brought in only one bag of Taki. That Jon would bring him his money they next day (when KW thought he was leaving the next day). That Jon is always bragging that he all this money and had Tesla's. Jon would talk about having all this money, but also talking about how he has to wait until he gets paid to get snacks and stuff. So Jon told him that he would pay him the next day. So, Tuesday comes and he isn't there. (They) said he was off. KW says that he thinks he got played because Jon usually works like every day and all the sudden he doesn't come in when he is owed.

41. KW said he called his PO to find out when he is leaving. His PO said he doesn't know when KW will move to the boy's home. KW says he was told that Jon was off Tuesday and Thursday. KW states he is starting to get mad because if this guy is gone two days in a row.

42. KW says that he went to Ms. Sparkle and said he needed to talk to her. She said she would talk to him after her break. She told Ms. Sparkle thinking that she would just confront Jon and tell him to bring KW money. When he told Ms. Sparkle she didn't believe him at first. KW told Ms. Sparkle that he had the \$20. He had a guy holding the money for him and he went to get the money. KW showed her the money and she knew that he was telling the truth. KW states that Ms. Sparkle tried to call Jon and he didn't answer. KW went to lay down and Ms. Melinda came in. That he has known Ms. Melinda for a while because KW used to get into a lot of

fight and would be locked up and Mrs. Melinda was always there. That Ms. Melinda worked the main control and would see KW keep going into this room. Ms. Melinda called him out of the unit and he saw Mr. Derrick. That the big boss was there and told him to write what happened.

43. When asked what happened when KW said he came inside and bent over what that meant he stated. "He bent me over and put it in." "He put his penis in." KW said he did a bunch of different positions. They did it on the wall. Then they did it on his bed. KW said if the guy across the hall would have looked he could have seen, but he was like asleep and never saw anything.

44. KW said he (Hines) would talk to J.C. and whisper in J.C.'s ear or take him on the cell block and talk to him and J.C. would come back and talk to him. KW states that J.C. told him Jon never did anything with him.

45. When asked who Jon would give snacks and phone calls to KW stated that Jon would do deals and challenges with U.C., both J.C., the white boy J.R. and basically everybody that was at their table and they were consistent with. Jon would ask KW if he thought certain people were cute. KW states that Jon told him that he didn't like anyone else on the unit. KW states that U.C. let it be known that he doesn't get down like that. KW states that Jon told him that Tino showed Jon his dick. KW states that he asked Tino about it and Tino said he never showed him. Tino then confronted Jon and Jon changed his story.

46. When asked who Jon let use his phone, KW stated he let big J.C. use his phone in like his cell. KW stated that Jon was bringing J.C. some edibles.

47. KW stated that Jon gave him his number and Jon's number was written down in his notebook, but he didn't know it by heart.

48. KW states that he does not know of anyone else doing anything with Jon.

49. KW described Jon as White and maybe mixed with like Italian. Jon has tattoo's on his arm.

50. During the forensic interview Det Isenberg spoke with Scott Hoskison and other Juvenile Probation staff. When a photo was produced by Det Isenberg they were able to identify the juveniles in the photo, as former residents of Juvenile Detention and on Probation, as A.M. and E.M.

51. Detective Isenberg observed video of the date of the incident provided to him by Superintendent Williams. During the video it is observed that Jonathan Hines walks into the Unit A housing hall with two residents. He lets a resident into the second cell on the left.

51. Suspect Information: Jonathan Michael Hines Race: White Sex: Male DOB: 3/28/1998 Hgt: 6'2" Wgt: 155 lbs
Hair: Brown Eyes: Brown SSN: [REDACTED] ADD: [REDACTED]

52. That the above mentioned crime occurred in the County of Tulsa, State of Oklahoma.

*****OVER*****

WHEREFORE, affiant prays the Honorable Court to issue a warrant for the arrest of the within named Defendant(S.), that he/she/they may be brought before a magistrate and held to answer for the offense(s) of:

Subscribed and sworn to before me this 26 day of April, 2024.

Det. Jeff Isenberg AFFIANT

My commission expires 10/18/25

Notary Public

Charla Gray



FINDING OF PROBABLE CAUSE

On this 26 day of April, 2024 the above styled and numbered cause came on for hearing before me, the undersigned Judge of the District Court of Tulsa County, Oklahoma, upon the affidavit of Det. Jeff Isenberg requesting that a warrant of arrest be issued for the within named Defendant(s), that he/she/they might be arrested and held to answer for the offense(s) of: Human Trafficking,

Carry a process cell phone in Tulsa Prison & Disturbing Evidence
Based upon said Affidavit I am satisfied and do hereby find that the offense(s) of:
Human Trafficking, Carry a process cell phone in Tulsa Prison &

Destroying Evidence
has/been committed and that there is probable cause to believe the within named Defendant(s) has/have committed said offense(s) and that a warrant of arrest should be issued.

Dated this 26 day of April, 2024.

[Signature]
JUDGE OF THE DISTRICT COURT



Oklahoma Appleseed Center for Law and Justice

822 E. 6th St.

Tulsa, OK 74120

www.okappleseed.org

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF OKLAHOMA**

- (1) CHILD DOE 1, a minor, by and through parent and next friend, PARENT DOE 1;
- (2) CHILD DOE 2, a minor, by and through parent and next friend, PARENT DOE 2;
- (3) CHILD DOE 3, a minor, by and through parent and next friend, PARENT DOE 3;
- (4) CHILD DOE 4, a minor, by and through parent and next friend, PARENT DOE 4;
- (5) CHILD DOE 5, a minor, by and through parent and next friend, PARENT DOE 5;
- (6) CHILD DOE 6, a minor, by and through parent and next friend, PARENT DOE 6;
- (7) CHILD DOE 7, a minor, by and through parent and next friend, PARENT DOE 7;
- (8) CHILD DOE 8, a minor, by and through parent and next friend, PARENT DOE 8;
- (9) CHILD DOE 9, a minor, by and through parent and next friend, PARENT DOE 9;
- (10) CHILD DOE 10, a minor, by and through parent and next friend, PARENT DOE 10;
- (11) CHILD DOE 11, a minor, by and through parent and next friend, PARENT DOE 11;
- (12) CHILD DOE 12, a minor, by and through parent and next friend, PARENT DOE 12;
- (13) CHILD DOE 13, a minor, by and through parent and next friend, PARENT DOE 13;

Case No: 4:24-cv-00380-SEH-JFJ

ATTORNEY LIEN CLAIMED

JURY TRIAL DEMANDED

- (14) CHILD DOE 14, a minor, by and through parent and next friend, PARENT DOE 14;
 - (15) CHILD DOE 15, a minor, by and through parent and next friend, PARENT DOE 15;
 - (16) CHILD DOE 16, a minor, by and through parent and next friend, PARENT DOE 16;
 - (17) CHILD DOE 17, a minor, by and through parent and next friend, PARENT DOE 17;
 - (18) CHILD DOE 18, a minor, by and through parent and next friend, PARENT DOE 18;
 - (19) CHILD DOE 19, a minor, by and through parent and next friend, PARENT DOE 19;
 - (20) CHILD DOE 20, a minor, by and through parent and next friend, PARENT DOE 20;
 - (21) CHILD DOE 21, a minor, by and through parent and next friend, PARENT DOE 21;
 - (22) JOHN DOE 1;
 - (23) JANE DOE 1;
 - (24) JANE DOE 2;
 - (25) JOHN DOE 2;
 - (26) JOHN DOE 3; and,
 - (27) JOHN DOE 4;
- Plaintiffs,

v.

- (1) TULSA COUNTY, ex. rel. JUVENILE BUREAU OF THE TULSA COUNTY DISTRICT COURT;
- (2) BOARD OF COUNTY COMMISSIONERS OF TULSA COUNTY;
- (3) KEVIN GRAY; chief judge of the Juvenile Division of the Tulsa County District Court;
- (4) DAVID PARKER;. Manager of the detention home of the Juvenile Bureau;
- (5) ANTHONY TAYLOR; as former Director of the Juvenile Bureau;
- (6) ALONDO EDWARDS, as Acting Director of the Juvenile Bureau;
- (7) CURTICE WILLIAMS, as Superintendent of the Juvenile Bureau;
- (8) DOUGLAS CURRINGTON, as former Interim Superintendent of the Juvenile Bureau;
- (9) CORTEZ TUNLEY, as former Superintendent of the Juvenile Bureau;
- (10) JONATHAN HINES, former detention officer of the Juvenile Bureau;
- (11) AUSTIN ZENZEN, former detention officer of the Juvenile Bureau;
- (12) DQUAN DOYLE, former detention officer of the Juvenile Bureau, aka "DQ;"
- (13) MANDI LEE RAYMOND, former nurse at the Juvenile Detention Center;

- (14) CINDY TREADWAY, former employee of the Juvenile Bureau;
- (15) CIERRA MANNING, former nurse at the Juvenile Detention Center;
- (16) SPARKLE JOHNSON, a detention office of the Juvenile Bureau;
- (17) SHARON WILSON, current kitchen manager and/or worker at the Juvenile Bureau;
- (18) SHAYLONDA POWELL, current or former detention officer of the Juvenile Bureau;
- (19) KELLY LAVINE, current or former detention officer of the Juvenile Bureau;
- (20) CARRIE LOYD, current or former detention officer of the Juvenile Bureau;
- (21) TORIE GRAY, current or former detention officer of the Juvenile Bureau;
- (22) JANE DOE 1, current or former nurse at the Juvenile Detention Center;
- (23) DEREK HARRIS, current or former detention officer at the Juvenile Bureau;
- (24) STEVEN MCCOY, current or former detention officer at the Juvenile Bureau;
- (25) DUSTIN SLIFE, current or former detention officer at the Juvenile Bureau;
- (26) JOHN DOE 1, aka "Jeff," current or former detention officer at the Juvenile Bureau;
- (27) JOHN DOE 2, aka "Deandre," former detention officer at the Juvenile Bureau;

- (28) JOHN DOES 3-10, current and former detention officers of the Juvenile Bureau;
 - (29) JANE DOES 2-10, current and former detention officers of the Juvenile Bureau;
 - (30) STATE OF OKLAHOMA, ex rel. OFFICE OF JUVENILE AFFAIRS;
 - (31) JEFFREY CARTMELL, as Director for the Office of Juvenile Affairs;
 - (32) RACHEL HOLT, as former Director for the Office of Juvenile Affairs;
 - (33) BEN BROWN, as General Counsel for the Office of Juvenile Affairs,
 - (34) TURN KEY HEALTH CLINICS, LLC, a domestic limited liability company,
- Defendants.

THIRD AMENDED COMPLAINT

COMES NOW the Plaintiffs, CHILD DOE 1, a minor, by and through parent and next friend, PARENT DOE 1; CHILD DOE 2, a minor, by and through parents and next friend, PARENT DOE 2; CHILD DOE 3, a minor, by and through parent and next friend, PARENT DOE 3; CHILD DOE 4, a minor, by and through parents and next friend, PARENT DOE 4; CHILD DOE 5, a minor, by and through parent and next friend, PARENT DOE 5; CHILD DOE 6, a minor, by and through parent and next friend, PARENT DOE 6; CHILD DOE 7, a minor, by and through parent and next friend, PARENT DOE 7; CHILD DOE 8, a minor, by and through parent and next friend, PARENT DOE 8; CHILD DOE 9, a minor, by and through parent and next friend, PARENT DOE 9; CHILD DOE 10, a minor, by and through parent and next friend, PARENT

DOE 10; CHILD DOE 11, a minor, by and through parent and next friend, PARENT DOE 11; CHILD DOE 12, a minor, by and through parent and next friend, PARENT DOE 12; CHILD DOE 13, a minor, by and through parent and next friend, PARENT DOE 13; CHILD DOE 14, a minor, by and through parent and next friend, PARENT DOE 14; CHILD DOE 15, a minor, by and through parent and next friend, PARENT DOE 15; CHILD DOE 16, a minor, by and through parent and next friend, PARENT DOE 16; CHILD DOE 17, a minor, by and through parent and next friend, PARENT DOE 17; CHILD DOE 18, a minor, by and through parent and next friend, PARENT DOE 18; CHILD DOE 19, a minor, by and through parent and next friend, PARENT DOE 19; CHILD DOE 20, a minor, by and through parent and next friend, PARENT DOE 20; CHILD DOE 21, a minor, by and through parent and next friend, PARENT DOE 21; JANE DOE 1; JANE DOE 2; JOHN DOE 1; JOHN DOE 2; JOHN DOE 3; and JOHN DOE 4 (collectively “Plaintiffs”), by and through their attorneys of record, and for their causes of action against the Defendants, alleges and states as follows:

PLAINTIFFS AND INTRODUCTORY STATEMENT

1. Plaintiff CHILD DOE 1, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at the Detention Home of the Juvenile Bureau of the Tulsa County District Court (hereinafter “Juvenile Detention Center”) for the period including April 2024.

2. Plaintiff CHILD DOE 2, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at the Juvenile Detention Center for the period of June 2023 to May 2024.

3. Plaintiff CHILD DOE 3, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at the Juvenile Detention Center for the period of February 2024 to the present.

4. Plaintiff CHILD DOE 4, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at the Juvenile Detention Center for the period of January 2024 to March 2024.

5. Plaintiff CHILD DOE 5, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at the Juvenile Detention Center for the period of November 2023 to May 2024.

6. Plaintiff CHILD DOE 6, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at the Juvenile Detention Center for the period of February 2024 to present.

7. Plaintiff CHILD DOE 7, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at the Juvenile Detention Center for the period of February 2024 to May 2024.

8. Plaintiff CHILD DOE 8, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at the Juvenile Detention Center for the period of January 2023 to March 2024.

9. Plaintiff CHILD DOE 9, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center for the period of 2022 to present.

10. Plaintiff CHILD DOE 10, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center for the period of November 2023 to May 2024.

11. Plaintiff CHILD DOE 11, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center for the period of March 2024 to April 2024.

12. Plaintiff CHILD DOE 12, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center for the period of October 2023 to May 2024.

13. Plaintiff CHILD DOE 13, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center for the period of October 2023 to present.

14. Plaintiff CHILD DOE 14, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center for the period of 2022 to May 2024.

15. Plaintiff CHILD DOE 15, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center for the period of March 2024 to June 2024.

16. Plaintiff CHILD DOE 16, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center for the period of September 2023 to present.

17. Plaintiff CHILD DOE 17, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center for the period of December 2023 to present.

18. Plaintiff CHILD DOE 18, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center for the period of May 2024 to present.

19. Plaintiff CHILD DOE 19, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center for the period of August 2022 to present.

20. Plaintiff CHILD DOE 20, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center for the period in April 2022.

21. Plaintiff CHILD DOE 21, a minor and a resident of Tulsa County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center for the period of January 2024 to the present.

22. Plaintiff JANE DOE 1, an adult and a resident of Tulsa County at all times relevant hereto, was incarcerated at the Juvenile Detention Center for the period of June 2023 to August 2023.

23. Plaintiff JANE DOE 2, an adult and a resident of Tulsa County at all times relevant hereto, was incarcerated at the Juvenile Detention Center for the period of June 2023 to August 2023.

24. Plaintiff JOHN DOE 1, an adult and a resident of Tulsa County at all times relevant hereto, was incarcerated at the Juvenile Detention Center at various times from July 2021 to May 2024.

25. Plaintiff JOHN DOE 2, an adult and a resident of Tulsa County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center for the period of May 2024 to June 2024.

26. Plaintiff JOHN DOE 3, an adult and a resident of Muskogee County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center for the period from 2021 to early 2024.

27. Plaintiff JOHN DOE 4, an adult and a resident of Muskogee County at all times relevant hereto, was incarcerated at various periods of time at the Juvenile Detention Center March 2021 through June 2021.

28. Plaintiffs CHILD DOES 21-30 are unknown minors who are residents of Muskogee County and who were incarcerated at various periods of time at the Juvenile Detention Center beginning in or after December of 2019.

29. For the length of Plaintiffs' detentions, Defendants failed to provide Plaintiffs with adequate and safe housing, supervision, and security in order to protect them from the known risk of serious physical harm, including but not limited to rape and/or sexual abuse.

30. Over the course of Plaintiffs' detentions at the Juvenile Detention Center, each was sexually assaulted, harassed, and/or raped by detention officers or other staff at the Juvenile Detention Center, to-wit, including but not limited to, Defendants Jonathan Hines, Austin Zenzen, Dquan Doyle, Cindy Treadway, Mandi Lee Raymond, John Does, and Jane Does. As detention officers and other employees, it was Defendants duty to protect Plaintiffs from harm. However,

rather than protect them, these Defendants preyed on Plaintiffs. Knowing the deficiencies in safety and security within the Juvenile Detention Center where their actions would be unmonitored and knowing of the persistent inadequate staffing, these Defendants had total control over juvenile detainees like Plaintiffs. In an utter betrayal of public trust and duty, these Defendants exploited their positions of power to abuse, harass, rape, and sexually assault defenseless minor children.

31. The abuses, harassments, rapes, and sexual assaults upon Plaintiffs were eminently preventable. These heinous crimes were the foreseeable result of Defendants' policies, practices and/or customs of inadequate housing, supervision, and security. In sum, Defendants' deliberate indifference toward Plaintiffs' health and safety was a direct and proximate cause of their injuries and damages.

JURISDICTION AND VENUE

32. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1343 to secure protection of and to redress deprivations of rights secured by the Eighth Amendment and Fourteenth Amendment to the United States Constitution as enforced by 42 U.S.C. § 1983, which provides for the protection of all persons in their civil rights and the redress of deprivation of rights under color of law.

33. The jurisdiction of this Court is also invoked under 28 U.S.C. § 1331 to resolve a controversy arising under the Constitution and laws of the United States, particularly the Eighth and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983. This Court has jurisdiction over Plaintiffs' state law breach of contract claim because the federal question claims and the breach of contract claim "derive from a common nucleus of operative fact" and are "such that [a plaintiff] would ordinarily be expected to try them all in one judicial proceeding." *Mine Workers v. Gibbs*, 383 U.S. 715, 725 (1966).

34. Venue is proper under 28 U.S.C. § 1391(b)(1) because one or more Defendants are subject to this court's personal jurisdiction with respect to the civil action in question. Defendant Dquan Doyle is a resident of Wagoner County, which is in the Eastern District of Oklahoma.

35. Venue is also proper under 28 U.S.C. § 1391(e)(1)(C) because one or more Defendants are subject to this court's personal jurisdiction with respect to the civil action in question. Defendant State of Oklahoma *ex. rel.* Office of Juvenile Affairs ("OJA") is subject to this Court's personal jurisdiction.

36. Venue is proper under 28 U.S.C. § 1391(c)(2) because this action does not involve real property and JOHN DOES 3 and 4 are residents of this judicial district who were at relevant times juvenile detainees at the Juvenile Detention Center and were subjected to the same treatment suffered by Plaintiffs herein.

DEFENDANTS

37. Defendant Board of County Commissioners of Tulsa County ("BOCC") is a statutorily created governmental entity, incorporated under the laws of the State of Oklahoma and located in Tulsa County, State of Oklahoma. Defendant BOCC is responsible for the operation of the Tulsa County Juvenile Detention Center ("Juvenile Detention Center"), through its oversight of Defendant Juvenile Bureau of the District Court of Tulsa County ("Juvenile Bureau").¹ Defendant BOCC is required to discharge its responsibilities of operation and maintenance of the Juvenile Detention Center to Defendant Juvenile Bureau in a constitutional manner. Defendant BOCC is responsible for the execution of a wide range of legal and fiscal responsibilities, including

¹ 57 O.S. § 41 provides that "[e]very county, by authority of the board of county commissioners and at the expense of the county, shall have a jail or access to a jail in another county for the safekeeping of prisoners lawfully committed."

oversight of Defendant Juvenile Bureau. Defendant BOCC contracted with OJA regarding the Juvenile Detention Center. Defendant BOCC approved a \$13,070,125.00 budget for “juvenile detention” expenses, out of a \$17.5 million budget total for “court related” items for the 2023-2024 fiscal year.

38. Defendant Juvenile Bureau is an agency within Tulsa County, that is located in Tulsa County, State of Oklahoma. Defendant Juvenile Bureau contracts, through BOCC, with OJA, “for secure detention services.” Defendant Juvenile Bureau’s mission is to “provide the necessary programming to address the criminal justice needs of Tulsa County youth and families.” Defendant Kevin Gray (“K. Gray”) is the chief judge of the Juvenile Division of the Tulsa County District Court. “The chief administrative officer of the juvenile bureau shall be a director, *who shall be subject to the direction and supervision of the judge of the Juvenile Division*, subject to the general administrative authority of the Presiding Judge of the Judicial Administrative District within budgetary limitations.” 10A O.S. § 2-4-102 (emphasis added).²

39. Defendant David Parker is the manager of the Juvenile Detention Center who was, in part, responsible, during relevant timeframes for this lawsuit, for overseeing Plaintiffs’ health and well-being, and assuring that housing and security needs of Plaintiffs and other juveniles were met, during the time they were in the custody of the Juvenile Detention Center.

40. Upon information and belief that will be confirmed through discovery, Defendant Anthony Taylor (“Taylor”) is the former Director of Defendant Juvenile Bureau, who was, in part, responsible, during the relevant timeframes for this lawsuit, for overseeing Plaintiffs’ health and

² Judicial immunity does not apply to Defendant K. Gray in this matter. “[T]he judge is not acting in a judicial capacity when providing administrative services for the juvenile bureau and the judge’s authority is ‘subject to the general administrative authority of the county commissioners.’” *Bale v. Board of Cnty. Comm’rs*, Case No. 15-CV-0577-CVE-PJC, 2016 WL 3461292, *2 (N.D. Okla. 2016) (internal citations omitted).

well-being, and assuring that housing and security needs of Plaintiffs and other juveniles were met, during the time they were in the custody of the Juvenile Detention Center.

41. Upon information and belief that will be confirmed through discovery, Defendant Alondo Edwards (“Edwards”) is the Acting Director of Defendant Juvenile Bureau, who was, in part, responsible, during the relevant timeframes for this lawsuit, for overseeing Plaintiffs’ health and well-being, and assuring that housing and security needs of Plaintiffs and other juveniles were met, during the time they were in the custody of the Juvenile Detention Center.

42. Upon information and belief that will be confirmed through discovery, Defendant Curtice Williams (“Williams”) was the Interim Superintendent of Defendant Juvenile Bureau, who was, in part, responsible, during the relevant timeframes for this lawsuit, for overseeing Plaintiffs’ health and well-being, and assuring that housing and security needs of Plaintiffs and other juveniles were met, during the time they were in the custody of the Juvenile Detention Center.

43. Upon information and belief that will be confirmed through discovery, Defendant Douglas Currington (“Currington”) was the Interim Superintendent of Defendant Juvenile Bureau, who was, in part, responsible, during the relevant timeframes for this lawsuit, for overseeing Plaintiffs’ health and well-being, and assuring that housing and security needs of Plaintiffs and other juveniles were met, during the time they were in the custody of the Juvenile Detention Center.

44. Upon information and belief that will be confirmed through discovery, Defendant Cortez Tunley (“Tunley”) is the former Superintendent of Defendant Juvenile Bureau, who was, in part, responsible, during the relevant timeframes for this lawsuit, for overseeing Plaintiffs’ health and well-being, and assuring that housing and security needs of Plaintiffs and other juveniles were met, during the time they were in the custody of the Juvenile Detention Center.

45. Upon information and belief that will be confirmed through discovery, Defendant Jonathan Hines (“Hines”) is, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. Defendant Hines was employed by BOCC as a detention officer at the Juvenile Detention Center, when he abused, harassed, mistreated, raped, and/or sexually assaulted multiple Plaintiffs and other juveniles, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant Hines was acting within the scope of his employment and under the color of state law.

46. Upon information and belief that will be confirmed through discovery, Defendant Austin Zenzen (“Zenzen”) is, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. Defendant Zenzen was employed by BOCC as a detention officer at the Juvenile Detention Center, who abused, harassed, mistreated, raped, and/or sexually assaulted at least one Plaintiff, and possibly others, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant Zenzen was acting within the scope of his employment and under the color of state law.

47. Upon information and belief that will be confirmed through discovery, Defendant Dquan Doyle (“Doyle”) is, and was at all times relevant hereto, a resident of Wagoner County, Oklahoma. Defendant Doyle was employed by BOCC as a detention officer at the Juvenile Detention Center during the relevant times herein, who abused, harassed, mistreated, raped, and/or sexually assaulted multiple Plaintiffs and other juveniles, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant Doyle was acting within the scope of his employment and under the color of state law.

48. Upon information and belief that will be confirmed through discovery, Defendant Cierra Manning (“Manning”) is, and was at all times relevant hereto, a resident of Tulsa County,

Oklahoma. Defendant Manning was employed by Defendant BOCC (pursuant to a contract with Defendant Turn Key) as a nurse at the Juvenile Detention Center during the relevant times herein, who abused, harassed, mistreated, raped, and/or sexually assaulted at least one Plaintiff and other juveniles, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant Manning was acting within the scope of her employment and under the color of state law.

49. Upon information and belief that will be confirmed through discovery, Defendant Mandi Lee Raymond (“Raymond”) is, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. Defendant Raymond was employed by Defendant BOCC (pursuant to a contract with Defendant Turn Key) as a nurse at the Juvenile Detention Center during the relevant times herein, who abused, harassed, mistreated, raped, and/or sexually assaulted at least one Plaintiff and other juveniles, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant Raymond was acting within the scope of her employment and under the color of state law.

50. Upon information and belief that will be confirmed through discovery, Defendant Cindy Treadway (“Treadway”) is, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. Treadway was employed by Defendant BOCC as a detention officer at the Juvenile Detention Center during the relevant times herein, who knowingly allowed the abuse, harassment, mistreatment, rape, and/or sexual assault of multiple Plaintiffs and other juveniles to occur, both at the hands of Juvenile Bureau detention officers and staff as well as other detainees, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant Treadway was acting within the scope of her employment and under the color of state law.

51. Upon information and belief that will be confirmed through discovery, Defendant Sparkle Johnson (“Johnson”) is, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. Defendant Johnson was employed by Defendant BOCC as a detention officer at the Juvenile Detention Center during the relevant times herein, who knowingly allowed the abuse, harassment, mistreatment, rape, and/or sexual assault of multiple Plaintiffs and other juveniles to occur, both at the hands of Juvenile Bureau detention officers and staff as well as other detainees, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant Johnson was acting within the scope of her employment and under the color of state law.

52. Upon information and belief that will be confirmed through discovery, Defendant Sharon Wilson (“Wilson”) is, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. Defendant Wilson was employed by Defendant BOCC as the kitchen manager at the Juvenile Detention Center during the relevant times herein, who knowingly fed multiple Plaintiffs and other juveniles, food items that Defendant Wilson knew these children were allergic to, for the specific purpose of triggering these juveniles’ diagnosed medical food allergies and causing personal injury(ies). At all pertinent times, Defendant Wilson was acting within the scope of her employment and under the color of state law.

53. Upon information and belief that will be confirmed through discovery, Defendant Shaylonda Powell, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. Powell was employed by Defendant BOCC as a detention officer at the Juvenile Detention Center during the relevant times herein, who knowingly and intentionally allowed the abuse, harassment, mistreatment, rape, and/or sexual assault of multiple Plaintiffs and other juveniles to occur, both at the hands of Juvenile Bureau detention officers and staff as well as other detainees, during the

time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant Powell was acting within the scope of her employment and under the color of state law.

54. Upon information and belief that will be confirmed through discovery, Defendant Kelly Lavine (“Lavine”) is, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. Defendant Lavine was employed by Defendant BOCC as a detention officer at the Juvenile Detention Center during the relevant times herein, who knowingly and intentionally allowed the abuse, harassment, mistreatment, rape, and/or sexual assault of multiple Plaintiffs and other juveniles to occur, both at the hands of Juvenile Bureau detention officers and staff as well as other detainees, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant Lavine was acting within the scope of her employment and under the color of state law.

55. Upon information and belief that will be confirmed through discovery, Defendant Carrie Loyd (“Loyd”) is, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. Loyd was employed by Defendant BOCC at the Juvenile Detention Center during the relevant times herein, who knowingly and intentionally allowed the abuse, harassment, mistreatment, rape, and/or sexual assault of multiple Plaintiffs and other juveniles to occur, both at the hands of Juvenile Bureau detention officers and staff as well as other detainees, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant Loyd was acting within the scope of her employment and under the color of state law.

56. Upon information and belief that will be confirmed through discovery, Defendant Torie Gray (“T. Gray”) is, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. Defendant T. Gray was employed by BOCC at the Juvenile Detention Center during the relevant times herein, who knowingly and intentionally allowed the abuse, harassment,

mistreatment, rape, and/or sexual assault of multiple Plaintiffs and other juveniles to occur, both at the hands of Juvenile Bureau detention officers and staff as well as other detainees, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant T. Gray was acting within the scope of her employment and under the color of state law.

57. Upon information and belief that will be confirmed through discovery, Defendant JANE DOE 1, is, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. JANE DOE 1 was employed by Defendant BOCC at the Juvenile Detention Center during the relevant times herein, who knowingly and intentionally allowed the abuse, harassment, mistreatment, rape, and/or sexual assault of multiple Plaintiffs and other juveniles to occur, both at the hands of Juvenile Bureau detention officers and staff as well as other detainees, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant JANE DOE 1 was acting within the scope of her employment and under the color of state law.

58. Upon information and belief that will be confirmed through discovery, Defendant JOHN DOE 1, a.k.a. "Jeff," ("Defendant Jeff") is, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. Jeff was employed by Defendant BOCC at the Juvenile Detention Center during the relevant times herein, who assaulted and harassed one or more Plaintiffs and other juveniles, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant Jeff was acting within the scope of his employment and under the color of state law.

59. Upon information and belief that will be confirmed through discovery, Defendant JOHN DOE 2, a.k.a. "Deandre," ("Defendant Deandre") is, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. Deandre was employed by Defendant BOCC at the Juvenile Detention Center during the relevant times herein, and he assaulted and harassed one or more

Plaintiffs and other juveniles, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant Deandre was acting within the scope of his employment and under the color of state law.

60. Upon information and belief that will be confirmed through discovery, Defendant Derek Harris (“Harris”) is, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. Defendant Harris was employed by Defendant BOCC at the Juvenile Detention Center during the relevant times herein, who assaulted and harassed one or more Plaintiffs and other juveniles, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant Harris was acting within the scope of his employment and under the color of state law.

61. Upon information and belief that will be confirmed through discovery, Defendant Steven McCoy (“McCoy”) is, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. Defendant McCoy was employed by Defendant BOCC at the Juvenile Detention Center during the relevant times herein, and he assaulted and harassed one or more Plaintiffs and other juveniles, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendant McCoy was acting within the scope of his employment and under the color of state law.

62. Upon information and belief that will be confirmed through discovery, Defendant Dustin Slife (“Slife”) is, and was at all times relevant hereto, a resident of Tulsa County, Oklahoma. Defendant Slife was employed by Defendant BOCC at the Juvenile Detention Center during the relevant times herein, and he assaulted and harassed one or more Plaintiffs and other juveniles, during the time they were in the custody of the Juvenile Detention Center. At all

pertinent times, Defendant Slife was acting within the scope of his employment and under the color of state law.

63. Upon information and belief that will be confirmed through discovery, Defendants JOHN DOES 3-10 and JANE DOES 2-10 are current or former employees of Defendant BOCC working at Defendant Juvenile Bureau, who either sexually abused and assaulted, or knowingly and intentionally allowed the abuse, harassment, mistreatment, rape, and/or sexual assault of, multiple Plaintiffs and other juveniles to occur, both at the hands of Juvenile Bureau detention officers and staff as well as other detainees, during the time they were in the custody of the Juvenile Detention Center. At all pertinent times, Defendants JOHN DOES 2-10 and JANE DOES 2-10 were acting within the scope of their employment and under the color of state law.

64. Defendant OJA is an agency within the State of Oklahoma, which is subject to this court's personal jurisdiction with respect to the civil action in question and is located across the State of Oklahoma. Defendant OJA contracted with the Defendant BOCC and Defendant Juvenile Bureau regarding the Juvenile Detention Center. Additionally, Defendant OJA was given the management of the State of Oklahoma's juvenile affairs, including providing justice for serious and habitual juvenile offenders.

65. Upon information and belief that will be confirmed through discovery, Defendant Jeffrey Cartmell ("Cartmell") is, and was at all times relevant hereto, a resident of Oklahoma County, Oklahoma. Defendant Cartmell is the Director for OJA, who "shall be responsible for the care and custody of a youthful offender who has been placed in the custody of the Office of Juvenile Affairs and shall have the duty and the authority to provide food, clothing, shelter, ordinary medical care, education, discipline and in an emergency to authorize surgery or other extraordinary care." OKLA. STAT. tit. 10A, § 2-5-212(D). This includes responsibility for the

Plaintiffs and other juveniles in the Juvenile Detention Center. At all pertinent times, Defendant Cartmell was acting within the scope of his employment and under the color of state law.

66. Upon information and belief that will be confirmed through discovery, Defendant Rachel Holt (“Holt”) is, and was at all times relevant hereto, a resident of Oklahoma County, Oklahoma. Defendant Holt was the former Director for Defendant OJA, until October 2023, who was “responsible for the care and custody of a youthful offender who has been placed in the custody of the Office of Juvenile Affairs and shall have the duty and the authority to provide food, clothing, shelter, ordinary medical care, education, discipline and in an emergency to authorize surgery or other extraordinary care.” OKLA. STAT. tit. 10A, § 2-5-212(D). This includes responsibility for the Plaintiffs and other juveniles in the Juvenile Detention Center. At all pertinent times, Defendant Holt was acting within the scope of her employment and under the color of law.

67. Upon information and belief that will be confirmed through discovery, Defendant Ben Brown (“Brown”) is, and was at all times relevant hereto, a resident of Oklahoma County, Oklahoma. Brown is the General Counsel for Defendant OJA, who “shall be responsible for the care and custody of a youthful offender who has been placed in the custody of the Office of Juvenile Affairs and shall have the duty and the authority to provide food, clothing, shelter, ordinary medical care, education, discipline and in an emergency to authorize surgery or other extraordinary care.” OKLA. STAT. tit. 10A, § 2-5-212(D). This includes responsibility for the Plaintiffs and other juveniles in the Juvenile Detention Center. At all pertinent times, Defendant Brown was acting within the scope of his employment and under the color of state law.

68. Upon information and belief, Defendant Turn Key Health Clinics, LLC (“Turn Key”) is a domestic corporation, licensed to conduct, and regularly conducting, business in the State of Oklahoma. Per its website, Defendant Turn Key oversees the day-to-day healthcare operations in correctional facilities with populations, including the Juvenile Detention Center.

FACTUAL ALLEGATIONS APPLICABLE TO ALL COUNTS

69. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 68, as though fully set forth herein.

70. Plaintiffs were in the custody of the Juvenile Detention Center at various periods of time. During these periods of custody, Plaintiffs were all minors.

71. In December 2019, Defendant Juvenile Bureau opened the Juvenile Detention Center in its present form.

72. During the entire relevant timeframes, Defendant Turn Key oversaw the day-to-day healthcare operations at the Juvenile Detention Center, including the appointment of various healthcare professionals and nurses at the Juvenile Detention Center.

73. On February 7, 2020, Defendant OJA inspected the Juvenile Detention Center, citing multiple areas of concerns, including grievance protocols.

74. On July 28, 2020, Defendant OJA inspected the Juvenile Detention Center, again, continuing to note areas of concern, including improper use of room confinement and locking the residents down for too long during the day. Defendant OJA found the Juvenile Detention Center non-complaint, again for grievance protocol and publicly noted staffing issues.

75. On April 1, 2021, Defendant OJA found the Juvenile Detention Center non-complaint for again abusing room confinement procedures on the residents.

76. On May 6, 2022, Defendant Brown issued correspondence to all members of Defendant BOCC, noting continued deficiencies at the Juvenile Detention Center, including abuse of extended room confinement on the residents.

77. On May 9, 2022, representatives of Defendant OJA met with Tulsa County representatives and stakeholders to discuss concerns that were raised as a result of the 2022 OJA Office of Public Integrity licensing and certification assessment for the Juvenile Detention Center.

78. Between May 9, 2022, and May 5, 2023, Defendant OJA continued to monitor developments at the Juvenile Detention Center, making unannounced visits regularly to address these concerns.

79. On May 3, 2023, Defendant Brown met with the Tulsa County Public Defender's Office to address comprehensive concerns about the Juvenile Detention Center. At that meeting, Defendant Brown acknowledged the public defender's following concerns:

- a. The juvenile residents did not go to school regularly;
- b. The juvenile residents spent significant amounts of time on lockdown, during all hours of the day and on weekends;
- c. The juvenile residents stayed on restriction/lockdown for days at a time, as opposed to hours;
- d. Discipline was utilized for groups of juvenile residents, as opposed to individuals;
- e. Juvenile residents were not allowed to take regular showers;
- f. Juvenile Detention Center staff was intoxicated on illegal substances while at work;
- g. Juvenile residents were getting "vape pens" in the Juvenile Detention Center; and,
- h. Medications were not being properly dispensed, administered or monitored for compliance.

80. On May 5, 2023, Defendant OJA placed the Juvenile Detention Center on probation. In a letter to Defendant BOCC, Defendant Brown noted that issues that "have remained out of compliance for the past 11 months" included "youth being kept in their rooms/isolated, education concerns, and problems handling grievances and their resolutions."

81. On May 17, 2023, a meeting was held to address a corrective plan, due to the Juvenile Detention Center's probationary status. In attendance at this meeting, among others, were Defendants Holt, Brown, Taylor, Edwards, Tunley, as well as various representatives from the

Tulsa County District Attorney's office, the Tulsa County Public Defender's office, and at least one Defendant BOCC Tulsa County Commissioner. Despite the purpose of the meeting being the formation of a corrective plan, Juvenile Bureau denied issues at the Juvenile Detention Center. At least one member of the Tulsa County Public Defender's office advised Defendant BOCC, at that time, that it was subjecting itself to a federal civil rights lawsuit if it did not correct the conditions within the Juvenile Detention Center.

82. On August 2, 2023, an OJA licensing specialist emailed the BOCC detailing multiple areas that the Juvenile Bureau needed to remedy at the Juvenile Detention Center and extending probation for 90 days. On August 15, 2023, two juvenile residents escaped from the Juvenile Detention Center.

83. On November 7, 2023, that same OJA licensing specialist recommended to Defendant Brown that a permanent two-year license be granted to the Juvenile Detention Center.

84. On December 6, 2023, Brown issued correspondence to the BOCC that OJA was extending the Juvenile Bureau's probation, against the OJA licensing specialist's recommendation, for another 90 days.

85. Despite continued documented reports of non-compliance within the Juvenile Detention Center, in February 2024 the Juvenile Bureau was given a two-year license for the operation of the Juvenile Detention Center.

86. The Juvenile Detention Center's policies and procedures state that "[w]hen a resident commits a major violation he or she may be placed on room confinement. This sanction is designed to be a last resort when the resident has been unresponsive to verbal counseling or committed an act so serious; it threatens the safety and security of the facility. Residents shall be room confined for major violations which relate to the self protection of the juvenile, to separate

juveniles who are fighting, to restrain juveniles who have escaped or who are in the process of escaping, to prevent property destruction, and to stop behavior that incites other residents which jeopardizes the safety of staff and residents of the facility. No resident will be room confined for 24 hours or more without the opportunity of a disciplinary review by the administrator or his designee who was not involved in the incident.” Tulsa County Juvenile Detention Home, Policy and Procedure Manual (“Manual”), Policy 03-28, Disciplinary Guidelines, at 5

87. From March 2021 through June 2021, JOHN DOE 4 was in custody at the Juvenile Detention Center. During this period of detention, JOHN DOE 4 was repeatedly abused and mistreated by staff and other representatives, including some of the Defendants, at the Juvenile Detention Center.

88. During his detainment, JOHN DOE 4 was physically assaulted, on multiple occasion by personnel within the Juvenile Detention Center. On one such occasion, JOHN DOE 4 was hit in the face with a cup of ice water by a male detention officer.

89. During his detainment, JOHN DOE 4 was placed on extended room confinement(s), in violation of Juvenile Bureau policies and procedures.

90. From 2021 through early 2024, JOHN DOE 3 was in custody at the Juvenile Detention Center at various times. During this period of detention, JOHN DOE 3 was repeatedly abused and mistreated by staff and other representatives, including some of the Defendants, at the Juvenile Detention Center.

91. During his detainment, JOHN DOE 3 was placed on extended room confinement, more than once, for more than three (3) days at a time, without running water. On one of those occasions, JOHN DOE 3 intentionally broke his hand, punching a wall, simply to be let out of his cell.

92. “You will have a Disciplinary Hearing Review of any disciplinary action within 7 days, if you have been confined to your room or have lost privileges or activities extending beyond 24 hours. This Disciplinary Hearing will be reviewed in detention by Detention Staff and Supervisors, and should not be confused with a ‘Judicial Court Hearing.’” Manual, Detention Home Resident Orientation at “RESIDENT DISCIPLINE.”

93. At no time during his extended room confinements was JOHN DOE 3 given a Disciplinary Hearing.

94. During JOHN DOE 3’s detainment, Defendant Doyle threatened to “beat [JOHN DOE 3’s] ass,” which was particularly egregious, since JOHN DOE 3 personally observed Defendant Doyle physically assault another resident.

95. “Activities and services are available to each juvenile outside their room at least twelve (12) hours a day.” Okla. Admin. Code § 377:3-13-45(a).

96. During JOHN DOE 3’s detainments in 2022 and 2023, there was never a single day that JOHN DOE 3 was out of his cell for more than twelve (12) hours a day.

97. From July 2021 to May 2024, JOHN DOE 1 was in custody at the Juvenile Detention Center. During this period of detention, JOHN DOE 1 was repeatedly abused and mistreated by staff and other representatives, including some of the Defendants, at the Juvenile Detention Center.

98. “The use of force in the workplace is prohibited other than in the exceptional circumstances provided in the Juvenile Bureau Use of Force Policy.” Manual, Policy JBDC 005, Code of Conduct at F(9).

99. In the Spring of 2023, JOHN DOE 1 was placed on “lockdown” for five days straight over a verbal altercation with another resident. During the first two days, JOHN DOE 1 was not given running water/shower privileges.

100. During JOHN DOE 1’s residency at the Juvenile Detention Center, the only disciplinary measure utilized by the detention officers was to place residents, including JOHN DOE 1 and other Plaintiffs, on room confinement for at least twenty-four (24) hours. Other forms of discipline were not utilized in JOHN DOE 1’s presence or to JOHN DOE 1’s knowledge.

101. In the Summer of 2023, JOHN DOE 1 was physically assaulted by Defendant Jeff as a result of a verbal argument. Defendant Jeff physically threw JOHN DOE 1 to the ground and against the walls of the Juvenile Detention Center, to the point where JOHN DOE 1 was diagnosed with a deep bone bruise to his knee. JOHN DOE 1 sustained permanent damage to his knee because of this assault.

102. In 2024, JOHN DOE 1 was routinely placed on room confinement by Harris, due to verbal comments made by JOHN DOE 1 to Defendant Harris, which outlined JOHN DOE 1’s personal feelings towards Defendant Harris. During many of these instances, Defendant Harris would notate the disciplinary action as a “resident request” in order to place JOHN DOE 1 on room confinement for extended periods of time and to avoid filling out required disciplinary paperwork.

103. The Manual states that “[e]very resident placed on room restriction or confinement must be visibly observed every 15 minutes and this will be documented on each resident’s room supervision log.” Manual, Policy 03-28, Disciplinary Guidelines, at 5(b).

104. During JOHN DOE 1’s periods of room confinement, as well as other Plaintiffs’ and residents’ confinement, Juvenile Detention Center staff and personnel would rarely, if ever, perform visible observation checks on the confined juveniles.

105. In 2024, JOHN DOE 1 witnessed pornography on Defendant Hines' Apple watch, when Hines was publicly displaying it.

106. In 2024, Defendant Hines offered to give JOHN DOE 1 pornographic images of women; however, JOHN DOE 1 declined Defendant Hines' offer to avoid retaliation for possession of contraband.

107. The Manual states that "[e]mployees are not to discuss with current or former clients the personal life, personal problems, personal concerns or personal information (including, but not limited to, phone numbers and addresses) of any employee or other client." Manual, Policy JBDC 005, Code of Conduct at 48(d).

108. In 2024, Defendant Hines engaged JOHN DOE 1 in conversations about the Internet content subscription service, "OnlyFans." Specifically, Defendant Hines told JOHN DOE 1, and other residents, that he maintained an OnlyFans account and would post pornography to that account, specifically noting that he performed financially superior by posting content that appealed to "gay dudes."

109. In 2024, Defendant Hines engaged JOHN DOE 1 in conversations that Hines was sexually attracted to two other male employees at the Juvenile Detention Center, specifically Defendant Currington and Emanuel Ezechinonso, also known as "Biggie."

110. In 2024, Defendant Hines told JOHN DOE 1 that he had a "vape pen."

111. The Manual states that "[t]herapeutic diets should be available upon medical authorization. Specific diets should be prepared and served to residents according to the orders of the facility Nurse, Doctor or treating dentist. Approved requests should be in writing and reviewed monthly. . . . 3. Prohibited Use of Food – At no time will a special diet be used as a disciplinary measure." Manual, Policy 04-26 at IV.

112. In April 2024, Defendant Wilson fed JOHN DOE 1 pineapple-soaked chicken, also known “Hawaiian chicken,” purposefully, despite knowing that JOHN DOE 1 had a food allergy to pineapple. After JOHN DOE 1 consumed the food, Wilson told JOHN DOE 1 to “Let me know how your nurse trip goes.”

113. This is not the only instance where JOHN DOE 1, and other juvenile residents, were intentionally given prohibited foods from their special diets. Between June 2023 and March 2024, Defendant Wilson also intentionally fed CHILD DOE 2 foods that knew CHILD DOE 2 was medically allergic to.

114. From 2022 to May 2024, CHILD DOE 14 was in custody at the Juvenile Detention Center, at various times. During this period of detention, CHILD DOE 14 was repeatedly abused and mistreated by staff and other representatives at the Juvenile Detention Center.

115. The Juvenile Detention Center policies and procedures state that “[t]he extension of an existing room confinement of a resident may exceed 24 hours or more if the resident continues to display negative behavior and/or fails to de-escalate their negative behavior. A resident on extended room confinement must have his sanction reviewed by the administrator or his designee every 24 hours. Additionally, a resident may request a hearing on any major disciplinary action levied against him. Extended room confinement must meet the following criteria: a. The extended confinement shall be constructed within the facility Guidelines for disciplinary actions and not as a means of revenge or retaliation. b. Residents shall be allowed to use personal hygiene items and shower while on room confinement.” Manual, Policy 03-28, Disciplinary Guidelines, at 6(a, b).

116. From 2022 to May 2024, the Juvenile Detention Center would place CHILD DOE 14 on extended room confinement for up to three days at a time, for minor infractions.

117. From 2022 to May 2024, the Juvenile Detention Center would engage in a “half and half” protocol with CHILD DOE 14’s unit, wherein half the residents would be placed on lockdown for half a day while the other residents were released and then the unit would switch, so that those locked down were released and vice versa.

118. From 2022 to May 2024, Defendant Hines repeatedly made sexual propositions to CHILD DOE 14.

119. From 2022 to May 2024, Defendant Hines repeatedly leered at CHILD DOE 14 and stared at his, and other resident’s, genitals.

120. From 2022 to May 2024, Defendant Hines repeatedly told CHILD DOE 14 that he would engage in various sexual acts with CHILD DOE 14, for compensation, once CHILD DOE 14 was released from the Juvenile Detention Center.

121. From August 2022 to the present, CHILD DOE 19 was in custody at the Juvenile Detention Center, at various times. During this period of detention, CHILD DOE 19 was repeatedly abused and mistreated by staff and other representatives at the Juvenile Detention Center.

122. During CHILD DOE 19’s period of confinement, Defendant Deandre would give CHILD DOE 19 access to his cellphone, in exchange for CHILD DOE 19 “beating up” other juvenile residents.

123. Defendant Deandre would release CHILD DOE 19, and other juvenile residents, from the cells and take those juveniles to the personal cell of the juvenile victim Defendant Deandre wanted assaulted. CHILD DOE 19 physically assaulted two other juvenile residents at the Juvenile Detention Center, at the direction of Defendant Deandre and knows other juvenile

residents similarly assaulted juvenile victims at Defendant Deandre's direction. Juvenile Bureau staff would place bets on which resident would be the winner in these "fight clubs."

124. In late 2023 or early 2024, Defendant Harris threw CHILD DOE 19 against a wall and repeatedly punched CHILD DOE 19, causing physical injury.

125. In the Fall 2023, Defendant Doyle gave CHILD DOE 19 pills to "help" CHILD DOE 19 sleep. Doyle gave CHILD DOE 19 two white pills and two gummies, which CHILD DOE 19 assumed contained marijuana. Doyle also widely disseminated drugs to multiple juvenile residents at the same time. After consuming the pills and gummies provided by Doyle, CHILD DOE 19 went on an extended room confinement, along with the majority (if not entirety) of CHILD DOE 19's unit. Shortly thereafter, CHILD DOE 19's heart started racing and he began to vomit. Juvenile Bureau staff member, "Mr. Rick," came to discuss a previously-filed grievance with CHILD DOE 19. During this interaction, CHILD DOE 19 vomited again and passed out unconscious for more than 24 hours. CHILD DOE 19 was later advised that he was taken to the hospital, due to a drug overdose.

126. Between July 2023 and May 2024, CHILD DOE 19 was placed on extended room confinement for five days straight.

127. From January 2023 to May 2024, CHILD DOE 8 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 8 was repeatedly abused and mistreated by staff and other representatives at the Juvenile Detention Center.

128. At some point in mid- to late-2023, CHILD DOE 8 was left in "lockdown" in their personal cell for four days, in a row, without even being afforded the ability to shower.

129. The Manual states that "TCJDC will ensure that residents are able to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender

viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Upon arrival of any person of the opposite gender, employees will announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing.” Manual at Policy 00-05, Prison Rape Elimination Act at F.9.

130. During CHILD DOE 8’s period of detention, CHILD DOE 8 was forced to strip down to undergarments for sleeping purposes, in the presence of Juvenile Detention Center staff of the opposite gender. When CHILD DOE 8 refused, on occasion, to so disrobe, CHILD DOE 8 was given disciplinary punishments, which included denial of family visitation.

131. The Juvenile Detention Center Code of Conduct states that “Employees will not bring or cooperate with others in bringing illegal drugs, unauthorized weapons or ammunition, beverages containing alcohol, or other dangerous items into or upon any Juvenile Bureau or other Tulsa County facility, building or vehicle, or onto any surrounding grounds, parking area or property.” Tulsa County, Juvenile Bureau of the District Court/Administration & Management/Personnel Policies, Policy File Number JBDC 0005, Policy Code of Conduct (“Code of Conduct”) at ¶ 12.

132. During CHILD DOE 8’s period of detention, CHILD DOE 8 was offered cocaine by Defendant Hines.

133. The Manual states that “[s]exual abuse of an inmate, detainee, or resident by another inmate, detainee, or resident includes any of the following acts, with or without consent of the detainee or resident, is coerced into such act by overt or implied threats of violence, or is unable to consent or refuse. **No juvenile in custody can legally consent to sexual behavior.**”

Manual at Policy 00-01, Prison Rape Elimination Act (PREA) of 2003, PREA Compliance Requirement at IV(C) (emphasis in original).

134. The Manual further provides that the “Tulsa County Juvenile Detention Home (TCJDH), in accordance with State Statute 10A O.S., § 1-2-101 and the Oklahoma Office of Juvenile Affairs Policy, has a ZERO TOLERANCE stance towards all forms of sexual abuse and sexual harassment. TCJDH will take appropriate action to prevent, detect, and respond to all forms of sexual abuse and sexual harassment in compliance with the Prison Rape Elimination Act (PREA) of 2003.” Manual at Policy 00-02, PREA Compliance, Coordinated Facility Response at I.

135. From June 2023 to March 2024, CHILD DOE 2 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 2 was raped and sexually assaulted, multiple times, by Defendant Raymond, who was a nurse at the Juvenile Detention Center during that time.

136. Defendant Raymond would proscribe “heat treatments” for CHILD DOE 2 and provide said treatments in a one-on-one setting, in order to engage in sexual relations with CHILD DOE 2.

137. The Juvenile Detention Center policies and procedures states that “Employees will not provide any juvenile/client with any item(s) of contraband, i.e., any item(s) prohibited for all juveniles/clients by Juvenile Bureau or department/facility policy or prohibited for a specific juvenile/client or group of juveniles/clients by administrative or supervisory directive.” Code of Conduct at ¶ 11.

138. Defendant Raymond would provide CHILD DOE 2 with “vape pens” or e-cigarettes in exchange for CHILD DOE 2 having sex with Raymond.

139. The Juvenile Detention Center policies state that “[a]ny staff member with a substantiated allegation of the sexual abuse or harassment of a resident shall be terminated and reported to local authorities for legal prosecution.” Manual at Policy 00-01, PREA Compliance Requirement at IV(D).

140. By the end of 2023, PARENT DOE 2 reported that her child, CHILD DOE 2, had received “vape pens” from Defendant Raymond to Defendant Currington.

141. Defendant Raymond was never terminated but was merely transferred from Juvenile Detention Center to David L. Moss Correctional Center; however, upon information and belief, to date, none of the Defendants, nor any of their personnel or representatives, ever made a child abuse referral pursuant to OKLA. STAT. tit. 10A, § 1-2-201.

142. Plaintiffs JANE DOE 1 and JANE DOE 2 were both in custody at the Juvenile Detention Center from June 2023 to August 2023. During this period of time both JANE DOE 1 and JANE DOE 2 were repeatedly sexually assaulted and harassed by Defendant Doyle.

143. At least from June 2023 to August 2023, Defendant Doyle provided marijuana gummies and other marijuana-based products to multiple juveniles in the Juvenile Detention Center, including JANE DOE 1 and JANE DOE 2.

144. Under the Code of Conduct, “Employees will avoid contact with current and former clients outside the context of professional interaction. NOTE: Contact with current and former clients is unacceptable if such contact is nonprofessional, social, and/or otherwise inappropriate, unless approval of the interaction has been obtained in advance from the department supervisor or facility director. (Department supervisors and facility directors may have differing levels of tolerance in this regard. Employees are thus encouraged not to violate the contact

prohibition without first obtaining guidance concerning the department/facility's specific contact policies.)” Code of Conduct at ¶ 47(a).

145. At some point between June 2023 and August 2023, JANE DOE 2 was released for a period of time from custody. During her period of release, Defendant Doyle sent JANE DOE 2 unprovoked messages requesting sex and sending a picture of his penis.

146. Between June 2023 and August 2023, among other things, Defendant Doyle:

- a. entered JANE DOE 1’s cell, to “snake” her toilet and licked her;
- b. choked JANE DOE 1 in a sexual manner;
- c. grabbed his penis in front of JANE DOE 1;
- d. repeatedly attempted to get JANE DOE 1 to grab and touch him in a sexual manner;
- e. showed JANE DOE 1 a picture of his penis; and,
- f. told JANE DOE 1 to “lift” her shirt and expose her breasts to him, to which she complied.

147. Between June 2023 and August 2023, Defendant Doyle stated to JANE DOE 2 that he found JANE DOE 2’s friend on Facebook, while JANE DOE 2 was using the women’s restroom.

148. Between June 2023 and August 2023, Defendant Doyle repeatedly made sexually-explicit remarks and verbal advances to both JANE DOE 1 and JANE DOE 2.

149. Between June 2023 and August 2023, Defendant Doyle regularly gave JANE DOE 1 and JANE DOE 2 unauthorized privileges, such as use of his cellphone, use of the computer facilities in the Juvenile Detention Center, and unauthorized freedoms within the physical spaces of the Juvenile Detention Center.

150. From June 2023 to the present, the cameras in Unit B, JANE DOE 1’s and JANE DOE 2’s unit, of the Juvenile Detention Center have been inoperable. Upon information and belief, Unit B was originally a male unit, but the female residents were transferred there, due to the camera

issues. The inoperable camera situation was made known to the residents in the Juvenile Detention Center and provided the ability for multiple policy violations and resident abuses.

151. Between June 2023 and August 2023, Defendant Treadway recruited JANE DOE 1 to write and pass romantic notes to a male juvenile resident, with whom Defendant Treadway was engaged in an ongoing relationship.

152. The Manual States that “It is the responsibility of every staff member to report possible sexual abuse or sexual harassment of residents or any person in our environment. Manual at Policy 00-02, PREA Compliance, Coordinated Facility Response at IV(C).

153. From June 2023 to August 2023, Defendants Treadway, Powell, Lavine, Loyd, and T. Gray, all witnessed and personally observed Defendant Doyle’s sexually inappropriate behavior and other inappropriate conduct, regarding JANE DOE 1 and JANE DOE 2, as well as other juvenile residents of the Juvenile Detention Center, and not only failed to intervene, but actually encouraged Defendant Doyle’s behaviors.

154. Prior to their release from the Juvenile Detention Center, both JANE DOE 1 and JANE DOE 2 were interviewed, in the presence of their lawyers, after multiple juvenile residents tested positive for marijuana, because Defendant Doyle had provided several residents gummies.

155. During her interview, JANE DOE 1 disclosed Defendant Doyle’s sexual assaults and harassments, as well as the various improprieties from multiple Defendants, directly to Juvenile Bureau personnel, including Defendants Taylor, and Currington, among others. JANE DOE 1 also provided a written statement as a part of this interview.

156. During her interview, JANE DOE 2 also disclosed multiple improprieties regarding Juvenile Detention Center personnel, including Defendant Doyle, and specifically disclosed the inoperable cameras in “Unit B.” JANE DOE 2’s interview was recorded.

157. The discovery of Defendant Doyle's actions resulted in the Tulsa County criminal felony case, styled *State of Oklahoma v. Dquan Deuantay Doyle*, CF-2024-2270. On July 1, 2024, Doyle posted bond on charges of sexual battery, indecent exposure, abetting a minor in a drug crime and possession of contraband in jail.

158. From September 2023 to the present, CHILD DOE 16 was in custody at the Juvenile Detention Center, at various times. During these periods of detention, CHILD DOE 16 was abused by various staff and personnel at the Juvenile Detention Center.

159. From September 2023 to the present, PARENT DOE 16 brought over-the-counter melatonin, with permission, to the Juvenile Detention Center for CHILD DOE 16. A nurse told PARENT DOE 16, she thought that "she had to give it to the other residents" because they could not sleep.

160. Between September 2023 and the present, CHILD DOE 16 suffered a head wound and had to be taken to OSU-Medical Center, as well as seek dental treatment at Oklahoma Smiles. PARENT DOE 16 was never timely notified of these medical developments.

161. From September 2023 to the present, Defendant Hines would bring unauthorized snacks and other contraband to CHILD DOE 16 and other juvenile residents.

162. From October 2023 to May 2024, CHILD DOE 12 was in custody at the Juvenile Detention Center. During this period of detention, Hines engaged in grooming tactics with CHILD DOE 12, including bringing in unauthorized snacks, vape pens, and marijuana gummies.

163. From October 2023 to May 2024, CHILD DOE 12 was allowed to contact CHILD DOE 12's parents, multiple times, from personal cellphones of staff at the Juvenile Detention Center.

164. From October 2023 to May 2024, Defendant Harris repeatedly confiscated CHILD DOE 12's family photos and letters from CHILD DOE 12's personal cell.

165. From October 2023 to May 2024, Defendant Harris denied CHILD DOE 12 access to a shower for more than a week.

166. From October 2023 to May 2024, Defendant Harris would refuse to allow CHILD DOE 12 to shower with shampoo or soap, on occasion.

167. From October 2023 to May 2024, Defendant Hines repeatedly sexually propositioned CHILD DOE 12 and brought CHILD DOE 12 unapproved snacks and other "treats" as incentives to engage in sexually inappropriate conduct.

168. The Manual states that "[t]he activities of private physicians working with residents in detention will be coordinated through the responsible physician. The Nurse will screen all residents with pre-existing illness or injury which may require medication or additional treatment. Medication prescribed by a private physician will be verified by the facility nurse or other medically trained staff. All treatment or medication will be continued as necessary. The resident will be examined by the facility physician if complications or additional patient complaints occur during the residents stay in the facility. Subsequent treatment or a change in treatment will be coordinated through the private physician." Manual at Policy 04-09, Responsible Healthcare Authority at IV(A)(2).

169. CHILD DOE 12 entered the Juvenile Detention Center with medical diagnoses for depression, anxiety, and reactive attachment disorder ("RAD"). CHILD DOE 12 had medically-documented prescriptions for depression, anxiety, and RAD; however, the Juvenile Detention Center would not place CHILD DOE 12 on his prescribed medications for the first three months of CHILD DOE 12's residency at the Juvenile Detention Center.

170. The Juvenile Detention Center denied CHILD DOE 12 access to therapeutic services for the first three months of CHILD DOE 12's residency.

171. Defendant Juvenile Bureau contracted with Tulsa Public Schools on July 13, 2013, to meet and address the needs of juvenile residents at the Juvenile Detention Center. The contract, in part, states that "[w]ithin five (5) school days of admittance, a team of professionals shall review the education needs of each qualified residential student participating in the District's educational services at [the Juvenile Detention Center]. The purpose of this review is to determine the student's educational needs and to develop an Individualized Learning Plan consistent with state and federal laws and regulations."

172. CHILD DOE 12 entered the Juvenile Detention Center with an individualized education program ("IEP"); however, the Juvenile Detention Center did not place CHILD DOE 12 on an educational curriculum consistent with CHILD DOE 12's IEP for the first three months of CHILD DOE 12's residency.

173. From October 2023 to the present, CHILD DOE 13 was in custody at the Juvenile Detention Center. During this period of detention, Defendant Hines engaged in grooming tactics with CHILD DOE 13, including bringing in unauthorized snacks, vape pens, and marijuana gummies.

174. From October 2023 to the present, Defendant Hines told all the residents of Unit A, including CHILD DOE 13, that the Juvenile Detention Center required Defendant Hines to "pat down" the residents before bed, in order for Hines to physically touch multiple residents.

175. From October 2023 to the present, Defendant Hines repeatedly stared at CHILD DOE 13 from the doorway of his cell, while CHILD DOE 13 would undress for bed.

176. From October 2023 to the present, Defendant Hines asked all the residents of Unit A to do a line dance for him.

177. From October 2023 to the present, Defendant Hines told CHILD DOE 13 about his experiences in the United State Navy, including having to shower with groups of men.

178. From October 2023 to the present, CHILD DOE 13 overheard Defendant Hines ask CHILD DOE 9 to shower with him.

179. From October 2023 to the present, Defendant Hines disclosed to CHILD DOE 13 that he “sucked dick for money” on his OnlyFans account.

180. Between October 2023 and the present, Defendant Hines attempted to physically touch CHILD DOE 13’s buttocks. CHILD DOE 13 physically stopped the sexual assault, at which time Hines remarked that he was “just playing.”

181. Between October 2023 and the present, Defendant Hines told multiple residents that he had physically seen CHILD DOE 13’s penis. CHILD DOE 13 confronted Defendant Hines about this remark, because CHILD DOE 13 felt that Defendant Hines was inferring that CHILD DOE 13 was homosexual, which he is not.

182. Prior to CHILD DOE 13’s confrontations with Defendant Hines, Defendant Hines would bring CHILD DOE 13 vape pens, marijuana gummies, and unapproved snacks and would show CHILD DOE 13 unique attention he would not show all the other residents. After CHILD DOE 13 confronted Defendant Hines on the penis remarks, Defendant Hines stopped showing CHILD DOE 13 attention and stopped bringing CHILD DOE 13 contraband.

183. From November 2023 to May 2024, CHILD DOE 5 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 5 was sexually assaulted and harassed by Defendant Hines.

184. From November 2023 to May 2024, Defendant Hines told CHILD DOE 5 to tell CHILD DOE 1 to put “Vaseline” on CHILD DOE’s butt to make sure it did not hurt when Defendant Hines had sex with CHILD DOE 1.

185. CHILD DOE 5 witnessed Defendant Hines rape CHILD DOE 1.

186. From November 2023 to May 2024, Defendant Hines showed CHILD DOE 5 pornography, including videos of Defendant Hines having sex with other Juvenile Detention Center personnel and videos of Hines raping other juvenile detainees at the Juvenile Detention Center.

187. Between November 2023 and May 2024, Defendant Hines told CHILD DOE 5 that “your dick is big today.”

188. Between November 2023 and May 2024, Defendant Hines propositioned CHILD DOE 5 on multiple occasions and CHILD DOE 5 touched Defendant Hines’ leg at least once.

189. From 2022 until present, CHILD DOE 9 was in custody, at various times, at the Juvenile Detention Center. During CHILD DOE 9’s custodial residency in 2024, CHILD DOE 9 was sexually assaulted and harassed by Defendant Hines.

190. In 2024, Defendant Hines repeatedly requested sexual contact from CHILD DOE 9, in exchange for money, vape pens, and other contraband.

191. In 2024, Defendant Hines repeatedly discussed having pornographic photographs with CHILD DOE 8 and offered to provide those photographs to CHILD DOE 9.

192. In 2024, Defendant JANE DOE 1 gave CHILD DOE 9, as well as other juvenile residents, a vape pen.

193. In April 2024, CHILD DOE 9 was able to post a video of another juvenile resident, who was undisputedly still in custody at the Juvenile Detention Center, based on the content of the

video, to CHILD DOE 9's personal Instagram account, through possession of a contraband cellular telephone provided by a staff member at the Juvenile Detention Center.

194. From January 2024 to the present, CHILD DOE 21 was in custody, at various times, at the Juvenile Detention Center. During CHILD DOE 21's custodial residency CHILD DOE 21 was sexually assaulted and harassed by Defendants Zenzen and Hines.

195. From January 2024 to the present, Zenzen sexually assaulted and groped CHILD DOE 21 against CHILD DOE 21's will.

196. From January 2024 to the present, Hines offered CHILD DOE 21, along with multiple residents of CHILD DOE 21's unit, snacks and other contraband if the juveniles would "dance" for Hines. Specifically, Hines said "If you dance, I'll bring you a sandwich." These dances were "sexual" in nature.

197. From January 2024 to the present, Hines would participate in inappropriate line dances with the residents of CHILD DOE 21's unit, at various times.

198. From January 2024 to the present, CHILD DOE 21 was aware that multiple juvenile residents would engage in direct sexual acts with Hines in exchange for snacks and other contraband.

199. From January 2024 to the present, Hines would regularly utilize extended room confinement on CHILD DOE 21, because CHILD DOE 21 was not one of Hines' "favorite" residents on CHILD DOE 21's unit and would not participate in Hines' "quid pro quo" barter system of snacks/contraband for favors. From November 2023 to May 2024, CHILD DOE 10 was in custody, at various times, at the Juvenile Detention Center. During CHILD DOE 10's custodial residency in 2024, CHILD DOE 10 was sexually assaulted and harassed by Defendant Hines.

200. From November 2023 to May 2024, Defendant Hines made sexual comments to CHILD DOE 10.

201. From November 2023 to May 2024, Defendant Hines started a CHILD DOE 10's genitals.

202. From November 2023 to May 2024, Defendant Hines massaged CHILD DOE 10's back and touched CHILD DOE 10 in sexually suggestive ways.

203. From November 2023 to May 2024, Defendant Hines propositioned CHILD DOE 10 to make pornography for Hines' OnlyFans account.

204. In February 2024, Defendant Currington, as well as other personnel and/or employees at the Juvenile Detention Center, accosted multiple Hispanic residents, including multiple Plaintiffs, and threatened the group of Hispanic residents with "conspiracy to form a gang" charges, even though the residents were merely friends with one another. This meeting occurred without notification to any of the juvenile residents' counsel nor their parents. The juvenile's families were never told of this meeting by any representative of the Juvenile Detention Center.

205. In April 2024, JOHN DOE 1 witnessed a post made by a fellow resident at the Juvenile Detention Center, who posted a "selfie" during said resident's period of detainment.

206. In or around January 2024, Defendant Manning was terminated from the Juvenile Detention Center for having an "Inappropriate Relationship" with a juvenile resident. On February 1, 2024, Defendant Currington sent an email to multiple OJA and Juvenile Bureau personnel advising of this incident.

207. From December 2023 to the present, CHILD DOE 17 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 17 was repeatedly abused

and mistreated by staff and other representatives, including some of the Defendants, at the Juvenile Detention Center.

208. Defendant Deandre gave CHILD DOE 17 marijuana gummies during CHILD DOE 17's detainment at the Juvenile Detention Center.

209. Defendant Deandre directed CHILD DOE 17 to participate in a "fight club" by beating up other juvenile residents for favors, such as cellphone privileges, snacks, drugs, etc.

210. Defendant Hines told CHILD DOE 17 that he would take CHILD DOE 17 "on his yacht when [CHILD DOE 17] got out" of the Juvenile Detention Center. Hines also gave CHILD DOE 17 snacks and provided CHILD DOE 17 with his cellphone number and Facebook contact, so that CHILD DOE 17 could "hang out" with Hines upon release.

211. CHILD DOE 17 heard about Hines raping CHILD DOE 1 from multiple staff members throughout the Juvenile Detention Center.

212. From January 2024 to March 2024, CHILD DOE 4 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 4 was sexually assaulted and harassed by Defendant Hines.

213. From January 2024 to March 2024, Defendant Hines would show pornographic images and videos to CHILD DOE 4 on his Apple Watch. These videos would include Defendant Hines having sex with other individuals.

214. From January 2024 to March 2024, Defendant Hines would supply CHILD DOE 4 with marijuana-based products.

215. Between January 2024 to March 2024, Defendant Hines made sexually inappropriate comments to CHILD DOE 4, such as "Goodnight, Honey Buns" as CHILD DOE 4 was going to bed.

216. From February 2024 to the present, CHILD DOE 3 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 3 was sexually assaulted and harassed by Defendant Hines.

217. From February 2024 to the present, Defendant Hines would require CHILD DOE 3 to take his pants off to go to bed, inferring to CHILD DOE 3 that this was Juvenile Detention Center policy.

218. From February 2024 to the present, Defendant Hines provided “vape pens” and sodas to CHILD DOE 3, multiple times.

219. From February 2024 to the present, Defendant Hines would allow CHILD DOE 3 to use his personal cellphone to have videoconference calls with his girlfriend. CHILD DOE 3 was shirtless for one or more of these calls.

220. Between February 2024 to the present, Defendant Hines called CHILD DOE 3 “cute” while CHILD DOE 3 was on a FaceTime call with his girlfriend, who observed the interaction.

221. Between February 2024 to the present, Defendant Hines touched CHILD DOE 3’s butt on at least one occasion.

222. From February 2024 to the present, Defendant Hines disclosed to CHILD DOE 3 that he was paying other juvenile residents money in exchange for performing sex acts with those residents.

223. From February 2024 to April 2024, CHILD DOE 6 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 6 was sexually assaulted and harassed by Defendant Hines.

224. Between February 2024 and April 2024, Defendant Hines attempted to sexually touch CHILD DOE 6 while he was alone in his cell, including attempting to touch CHILD DOE 6's genitals.

225. Upon information and belief, inappropriate photographs of CHILD DOE 6 were found on Defendant Hines' phone.

226. Between February 2024 and April 2024, Defendant Hines propositioned CHILD DOE 6 on multiple occasions.

227. Between February 2024 and April 2024, Hines provided CHILD DOE 6 with marijuana-based products.

228. Upon information and belief, Defendant Hines attempted to contact CHILD DOE 6 after being released from custody in the Juvenile Detention Center.

229. From February 2024 to May 2024, CHILD DOE 7 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 7 was sexually assaulted and harassed by other juvenile residents in the presence of Juvenile Detention Center personnel, who failed to intervene or prevent said abuses.

230. Between February 2024 and May 2024, CHILD DOE 7 was sexually threatened by a group of juvenile residents and disclosed the harassment/threats to Juvenile Detention Center staff.

231. At no point did BOCC or Juvenile Bureau address or rectify CHILD DOE 7's disclosures or follow up on the allegations of harassment.

232. From February 2024 to May 2024, the Juvenile Detention Center was personally aware of CHILD DOE 7's diagnoses of Attention Deficit/Hyperactivity Disorder, Oppositional

Defiant Disorder, and Intellectual Development and Disability; however, Juvenile Detention Center staff never gave CHILD DOE 7 correct prescription dosages for various medications.

233. The Manual does not contain any provision that allows the Juvenile Detention Center to mandate a haircut for a juvenile resident. Further, the Manual specifically states that “[h]air style will be limited only to a shorter cut of the ‘existing style cut’ that the resident has. No ‘buzz cut’ or drastic departure from that style cut may be made, such as long hair to a ‘Bald Cut.’ Only conservative modification of the hair is acceptable, whether male or female resident.” Manual at Policy 04-07, Hair Care Services at IV(B)(3).

234. Between February 2024 to May 2024, the Juvenile Detention Center forced CHILD DOE 7 to cut off all their hair, from long to short, in direct violation of the Manual.

235. On March 9, 2024, Defendant Hines molested his stepsister’s child while babysitting for her. Hines previously took pictures of the child’s genitalia. A contemporaneous police report of the March 9, 2024, incident was prepared and, presumably, disclosed and disseminated to Juvenile Bureau and OJA, respectively. Hines remained employed well into April 2024.

236. From March 2024 to April 2024, CHILD DOE 1 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 1 was raped by Defendant Hines.

237. On April 6, 2024, Defendant Hines physically raped CHILD DOE 1. This rape was witness by multiple juvenile residents at the Juvenile Detention Center, including one or more of the Plaintiffs.

238. Upon information and belief, the April 6, 2024, incident is not the only instance of sexual abuse perpetrated by Defendant Hines upon CHILD DOE 1 during CHILD DOE 1’s detention at the Juvenile Detention Center.

239. The discovery of CHILD DOE 1's rape resulted in the Tulsa County criminal felony case, styled *State of Oklahoma v. Jonathan Michael Hines*, CF-2024-1559. Defendant Hines remains in custody on charges of human trafficking, possession of a cellphone in jail, and destroying evidence.

240. Subsequently, an additional Tulsa County criminal felony case, styled *State of Oklahoma v. Jonathan Michael Hines*, CF-2024-2030, was also filed against Defendant Hines. Defendant Hines remains in custody on charges of solicitation of a minor and possession of a cellphone in jail.

241. Another Tulsa County criminal felony case, styled *State of Oklahoma v. Jonathan Michael Hines*, CF-2024-2471 was also filed against Defendant Hines. Defendant Hines remains in custody on charges of lewd molestation and possession of a cellphone in jail.

242. From March 2024 to April 2024, CHILD DOE 11 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 11 was sexually assaulted by Defendant Hines.

243. From March 2024 to April 2024, Defendant Hines touched CHILD DOE 11 in a sexually suggestive manner on the shoulders and arms.

244. On at least one occasion between March 2024 and April 2024, Defendant Hines took photographs of CHILD DOE 11 and other Plaintiffs, while in the Juvenile Detention Center, and allowed them to be posted on social media.

245. From March 2024 to April 2024, CHILD DOE 11 was placed on extended room confinement in violation of Juvenile Detention Center policy.

246. From March 2024 to June 2024, CHILD DOE 15 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 15 was assaulted and abused by multiple staff and personnel of the Juvenile Detention Center.

247. The Manual states that “[i]t shall be the policy, procedure and practice of the Detention Home to provide 24-hour emergency medical, dental, and mental health care for residents.” Manual at Policy 04-13, Emergency Medical/Dental/Mental Health Care. Policy 0-4-13 provides procedures for transporting juveniles offsite for medical treatment when circumstances warrant.

248. From March 2024 to June 2024, CHILD DOE 15 was pushed into a wall at the Juvenile Detention Center by a detention officer and sustained visible injuries to his head. CHILD DOE 15 was not taken to a medical professional and was never administered any type of concussion protocol. PARENT DOE 15 was also never notified.

249. From March 2024 to June 2024, CHILD DOE 15 was placed on extended room confinement in excess of 24 hours.

250. As of April 16, 2024, Defendant Juvenile Bureau was aware of CHILD DOE 1’s rape and did not disclose the incident to CHILD DOE 1’s legal counsel.

251. On April 17, 2024, Defendant Currington disclosed the April 6, 2024 rape and noted that an “internal investigation” was initiated. Defendant Currington’s email was sent to multiple parties, including various personnel with OJA; however, Defendant Currington excluded CHILD DOE 1’s legal counsel from said disclosures.

252. In April 2024, Defendants Currington, Williams, Lavine and other personnel within the Juvenile Detention Center, held a meeting with multiple juvenile male residents of “Unit A,” who witnessed, or were otherwise aware of, Defendant Hines’ rape of CHILD DOE 1. During

this meeting, Defendant Currington told the residents that they “cannot talk” about the Defendant Hines incident to their therapists, workers, other residents or staff. None of the juvenile residents’ lawyers or families were present or notified of this meeting.

253. On April 19, 2024, at approximately 6:30 p.m., Defendant Johnson threatened CHILD DOE 1, through counsel, into silence regarding the April 6, 2024, rape. Specifically,

- a. Defendant Johnson approached a Tulsa County public defender in the parking lot of the Juvenile Detention Center;
- b. Defendant Johnson stated to counsel that “you need to tell your client to keep his mouth shut.”
- c. Defendant Johnson disclosed that the Juvenile Detention Center employees were instructing the juvenile residents that if any of them discuss the April 6, 2024 incident, “detention will get shut down and all of the kids will be sent to [David L. Moss], and you know what happens to kids at DLM.”
- d. Defendant Johnson stated that “what happened” between CHILD DOE 1 and Hines was agreed upon and between them, so everyone should just let it go.
- e. Defendant Johnson stated that CHILD DOE 1 got what he bargained for.

254. On April 24, 2024, at 11:03 a.m., Tulsa County Public Defender Juvenile Division Supervisor notified various personnel with OJA and Juvenile Bureau, specifically including Defendants Taylor, Currington, and Cartmell, about the April 19, 2024, incident regarding a female detention officer and noting a “culture” within the Juvenile Detention Center that promotes harm to the juvenile detainees.

255. On April 24, 2024, at 11:27 a.m., Defendant K. Gray issued correspondence to Defendant Taylor, copying Defendants Currington and Brown, noting his receipt of the correspondence sent earlier that morning by the Tulsa County Public Defender’s office and further noting his concerns. Defendant K. Gray stated:

I'm sure you read the email from Ms. Feldhake that she sent a short while ago. They brought the detention officer's conversation to my attention yesterday, and it is quite disturbing. I do agree that it worries me that this exemplifies a culture that might not understand the magnitude of the responsibility that detention officers carry with them as they care for some of our most vulnerable young citizens. I would ask that

there be a mandatory meeting and training done as soon as possible to discuss issues surrounding inappropriate contact with detainees, specifically sexual contact. I know that you know this, but it appears that some of the staff either does not know or simply disagrees with the reality that it is a crime to engage in ANY sexual contact with a detainee, even if that contact is initiated by or done willingly by a detainee. Not only is it a crime, but a conviction of such a crime will place an offender on the Sex Offenders Registry. Additionally, I would like for a part of that training to make clear to the detention officers that it is absolutely inappropriate for them to encourage the detainees not to talk about incidents, not to report incidents, or to otherwise share information they have about incidents. It is astonishing to me that someone would make such comments to our detainees. The detainees should ABSOLUTELY be reporting such contact to supervisors and/or their attorneys, and detention leadership should address the issues appropriately. The staff also needs to be informed (because clearly this particular detention officer does not know) that federal and state law would not allow our detainees to be simply transferred to DLM if our detention facility were to either close or lose its license. If they don't know, they need to be educated about the law. It appears to me that any mention of DLM to the detainees would be designed to frighten or otherwise intimidate the detainees into silence. That is also unacceptable and inappropriate.

Additionally, I would like to review our detention center's policies regarding the reporting of critical incidents such as the one that occurred the other day, to take into account the related but particular needs of both a personnel investigation and a criminal investigation. I understand the need to make sure that detention ascertains quickly what, if any, incident occurred so as to take proactive action regarding suspending or otherwise reassigning personnel until a thorough investigation is completed. That said, we must ensure that a personnel investigation neither hampers nor harms any subsequent criminal investigation. We also need to ensure that all detention leadership is clear on who needs to be informed about such an incident, when they need to be informed, and what law enforcement agency should take the lead on any criminal investigation. It is my position that as soon as any safety or security issues are quickly resolved, that law enforcement needs to be IMMEDIATELY called to initiate a criminal investigation. The delay in engaging law enforcement should not be measured in days, but likely in minutes or an hour. Coupled with that should be immediate notification to a detainee's parents and attorney, not as an afterthought but as a quick response to the incident. I would like to ensure that our policies and procedures reflect these positions. If not, they need to be updated and/or changed.

256. At 3:55 p.m. that same day, Defendant Taylor responded to Defendant K. Gray's email noting that he had identified the female detention officer from the April 19th interaction with the public defender and that she denied making those comments. In that same email, Taylor noted that "[o]ur continued improvement is reflected in *the increased confidence of employees* when

working with complex and hostile residents.” To be clear Defendant Taylor was undisputedly aware that his employee raped a juvenile resident two weeks earlier.

257. In that same communication, Defendant Taylor also touted that the Juvenile Detention Center “continues to receive accolades from our state licensing agency, which monitors our facility monthly.” OJA is the “licensing agency” referenced by Defendant Taylor.

258. On April 25, 2024, correspondence was sent from the Tulsa County Public Defender’s Office to Defendant Brown, copying Defendant Cartmell and Defendant K. Gray and Tulsa County District Presiding Judge Dawn Moody, requesting “immediate action regarding Tulsa County Juvenile Detention.” The correspondence outlined:

- a. the April 6, 2024 rape incident;
- b. past incidents of sexual assault that had occurred within the confines of the Juvenile Detention Center in the past eighteen (18) months; and
- c. The April 19, 2024 physical threats made by a female detention officer to the Tulsa County public defender in an attempt to bully CHILD DOE 1 into silence.

The correspondence concluded noting “[i]f immediate action is not taken to ensure the safety of these children, [the Tulsa County Public Defender’s Office] will not hesitate to get the ball rolling so that a federal lawsuit may be brought.”

259. From May 2024 to July 2024, CHILD DOE 18 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 18 was physically and sexually assaulted by various Juvenile Bureau staff within the Juvenile Detention Center.

260. In May 2024, CHILD DOE 18 was “body slammed” by Juvenile Bureau personnel and sustained physical injuries.

261. During CHILD DOE 18’s detainment, Defendant Slife made sexually inappropriate comments to CHILD DOE 18, telling CHILD DOE 18 that he was a “male stripper” and Slife would like to see CHILD DOE 18 strip for him.

262. Despite visible injuries to the right arm and left foot, CHILD DOE 18 was not allowed a nurse visit for three weeks.

263. On May 28, 2024, CHILD DOE 18 was taken to the hospital for a bacterial infection to the right arm. When it became clear that CHILD DOE 18 would require further medical intervention and incur heavy medical expenses at the Juvenile Bureau's expense, Defendant K. Gray signed a medical release for CHILD DOE 18.

264. On July 1, 2024, CHILD DOE 18 underwent surgery at OU Pediatrics for a bacterial infection to the right arm. On July 10, 2024, St. Francis performed a follow-up surgery for the infection. CHILD DOE 18 has also been diagnosed with a bacterial infection in the left foot. As of the filing of this complaint, it is unknown if CHILD DOE 18 will make a full recovery or whether further surgical intervention, including possible amputation, will be necessary to prevent further spread of this infection.

265. From May 2024 to June 2024, JOHN DOE 2 was in custody at the Juvenile Detention Center. During this period of detention, CHILD DOE 1 was raped by Hines.

266. Between May 2024 and June 2024, JOHN DOE 2 sustained a head injury necessitating multiple stitches. A nurse at the Juvenile Detention Center immediately stated that JOHN DOE 2 appeared to have a minor concussion and needed stitches. The Juvenile Detention Center refused to take JOHN DOE 2 to the hospital for eight hours.

267. Between May 2024 and June 2024, at OSU-Medical Center, the doctor informed JOHN DOE 2 that he would need to follow-up with the doctor to have his stitches removed in ten days. On the eleventh day, JOHN DOE 2 notified Defendant Powell about his missed follow up but was met with indifference. JOHN DOE 2 asked the nurses if they could remove his stitches, but they were not able to do so. On the thirteenth day, JOHN DOE 2 was forced to remove his

stitches himself, causing increased pain, permanent scarring and possible further injury. Upon disclosure to Defendant Powell, she simply stated “I’ve got things to do.”

268. On May 6, 2024, Defendant Taylor was fired as Director of Juvenile Bureau. Defendant Edwards, who was the First Deputy Director at the time, replaced Defendant Taylor as Acting Director.

269. On May 23, 2024, less than two months since a resident was raped by a detention officer, Defendant Harris engaged in a conversation with multiple juvenile residents in the multi-purpose room of Unit A, including CHILD DOE 15, CHILD DOE 16 and JOHN DOE 2, wherein Defendant Harris discussed the following:

- a. graphic details about Harris’s wife “sucking his dick;” and,
- b. that Harris’s “ass is clean enough to eat,” because Harris’s wife regularly “eats [my] ass.”

270. Defendant Harris had discussed oral sex and analingus with a similar group of juvenile residents shortly before the May 23rd incident, outside the showers at the Juvenile Detention Center; however, the group of residents that heard the May 23rd disclosures all executed a group grievance. Upon information and belief, Defendant Harris remains employed at the Juvenile Detention Center.

271. On June 18, 2024, Defendant Johnson disclosed in a group meeting to every juvenile resident, including CHILD DOE 5 and CHILD DOE 13, in “Unit A,” the following:

- a. the juveniles in “Unit A” were “responsible” for Defendant Hines being caught and charged with the rape of CHILD DOE 1;
- b. that Defendant Johnson personally felt that Defendant Hines was “a good man;”
- c. that the juveniles all got what they bargained for in Defendant Hines’ sexual advances, propositions, etc., by receiving money, snacks, vapes, etc.;
- d. Defendant Johnson further specifically targeted CHILD DOE 5, making him feel unsafe and uncomfortable;

- e. Defendant Johnson intentionally mispronounced CHILD DOE 5's last name in a racially-derogatory manner and inferred that CHILD DOE 5 also engaged in sexual activity with Hines; and,
- f. Defendant Johnson called CHILD DOE 13 a racially-derogative nickname.

272. CHILD DOE 5's counsel notified Defendant Currington about the June 18th incident; however, Defendant Johnson was allowed to resume her job at the Juvenile Detention Center, supervising the very juvenile residents she was intimidating.

273. Between June 18, 2024, and June 27, 2024, Defendant Johnson confronted at least CHILD DOE 5, again, about the rape incident.

274. Upon information and belief, on or near June 27, 2024, Defendant Johnson's employment was finally terminated.

275. On July 8, 2024, Defendant OJA placed the Juvenile Bureau back on probation and publicly warned that the Juvenile Detention Center was at risk of closure if "new information comes to light."

276. On July 12, 2024, the Department of Homeland Security, Tulsa County Sheriff's Office, Tulsa County District Attorney's Office, Tulsa Policy Department and OJA served a federal search warrant on the Juvenile Bureau to search the Juvenile Detention Center.

277. The next day, on July 13, 2024, CHILD DOE 17 overdosed on pills provided by Defendant McCoy. McCoy gave CHILD DOE 17 two white pills and one red pill, which CHILD DOE 17 took all at once "because [he] didn't want to feel anything." CHILD DOE 17 was taken to the hospital where CHILD DOE 17 tested positive for methamphetamine.

278. On July 19, 2024, Defendant BOCC assumed management of the Juvenile Detention Center and hired Defendant Parker as the "manager."

279. On July 24, 2024, CHILD DOE 20 was sexually assaulted, upon intake at the Juvenile Detention Center by Defendant JOHN DOE 3. Specifically, Defendant JOHN DOE 3

purposefully groped and grabbed CHILD DOE 20's genitalia, while CHILD DOE 20 was having an initial intake done.

280. After the initial incident, Defendant JOHN DOE 3 repeatedly came to CHILD DOE 20's cell that same night and asked if CHILD DOE 20 "wanted anything," clearly inferring to CHILD DOE 20 that Defendant JOHN DOE 3 wanted to engage in further inappropriate activities with CHILD DOE 20.

281. Upon discovery of the July 24th incident, Tulsa County Public Defendant, Lora Howard, issued the following statement to Defendant Cartmell, all three members of the Defendant BOCC, and Defendant Parker, among others:

I am once again writing to request immediate closure of the Tulsa County Juvenile Detention Center. Serious incidents continue to take place. Less than two weeks ago, hours after a large law enforcement presence which included federal agents served a search warrant on detention, a child overdosed on drugs that were provided by a staff member. Yesterday, I became aware of a report of sexual battery upon a child by a worker that occurred the night before last. This assault has been reported to TPD. Notably, this most recent assault occurred after control of the detention center was assumed by the BOCC, and the appointment of David Parker as detention manager. When Mr. Parker spoke with the media last Friday, he indicated that he would "run the facility by himself" if that was what it took. Practically speaking, it is not possible to run the detention facility without a robust and well-trained staff. The current staff continues to engage in criminal behavior against children. Closure of the facility, for a brief interim period, would allow Mr. Parker to build a new team from the ground up. It is abundantly clear that a new team is needed to provide a safe environment for these vulnerable children. I would urge you to close this facility immediately in the interest of protecting the children currently detained.

282. To date, no publicly-available corrective action, by either Juvenile Bureau or OJA, has occurred to protect the children held within the confines of the Juvenile Detention Center.

283. Relative to juvenile rights, the Manual states:

The Oklahoma Juvenile Code (10 O.S. 7302-6.3) defines the rights of a juvenile in custody. This policy is not intended to infringe on the stated rights of any juvenile, but put in place an organized predictable system of discipline that is consistent with the goals and mission of the Detention Home. This system is designed to utilize

positive approaches that encourage the juvenile to be personally responsible for his or her actions. The degree of disciplinary actions, sanctions, or related restrictions initiated on a resident shall be directly related to the severity of the rule broken as detailed in the resident orientation form and disciplinary guidelines. The objective of disciplinary sanctions shall be to hold residents accountable and encourage responsible behavior within the program.

Manual at Policy 03-28, Disciplinary Guidelines at I. Even juvenile residents under “room confinement”, per the Juvenile Detention Center policy, “shall be afforded living conditions, essential services and privileges approximating those available in the program. No resident will be denied access to mail, daily exercise, regular phone calls, *visitation*, access to attorney or worker due to disciplinary sanction.” *Id.* at 5(c) (emphasis added).

284. Furthermore, “A denial of visitation privileges shall be based on the safety, security, and order of the facility and the safety of the individuals involved. The resident shall be notified in writing the Supervisor of a denial of visitation that includes the name of the restricted or prohibited visitor, the name of the person making the decision, and the resident’s right to appeal the decision.” Manual at Policy 05-10, Resident Visitor Program at B(1).

285. By May 2023, Defendants BOCC, Juvenile Bureau, and OJA were put on notice that swaths of juvenile residents were being placed on “lockdown” during all hours of the day, in clear violation of policy.

286. It is the visitation policy within the Juvenile Detention Center that juvenile residents can only have visitation, even with family members, during the weekends.

287. During their periods of detainment, multiple juvenile Plaintiffs reported having their rights to visitation with their family members revoked, even for infractions as minor as having “two books” in their cell. These infractions and restrictions often came in tandem with those same juveniles declining to perform specific sexual acts with various detention officers and/or personnel within the Juvenile Detention Center, including but not limited to multiple Defendants.

288. Defendants BOCC, Juvenile Bureau, and OJA have exhibited a clear culture of weaponizing a disciplinary system into not only retaliating against juvenile residents who refuse to comply with the sexual advances of the detention officers and other personnel within the Juvenile Detention Center, but also to cut off those juvenile residents from any means of contemporaneously reporting sexual abuse, even rape, to their family members, instead becoming wholly reliant on the reporting system within the very administration that allowed the abuses in the first place.

289. Detainees of an incarceration facility are extraordinarily vulnerable and subject to being preyed upon by the detention personnel; however, these vulnerabilities are compounded for juvenile detainees. For this reason, the law of the State of Oklahoma specifically protects such persons. Under Oklahoma criminal statutes, any state, federal, county, municipal or political subdivision employee who has sexual intercourse with a person under the supervision of a sheriff is guilty of the crime of rape. OKLA STAT. tit. 21, § 1111(A)(7). These same laws protect minors even further. *Id.* at § 1111(A)(1) and (8).

290. Various Defendants' acts of depravity and crimes were facilitated by a total breakdown in supervision, security, and housing within the Juvenile Detention Center.

291. Despite the Juvenile Detention Center being placed on probation in May 2023 for documented May 2022 violations, Defendants BOCC, Juvenile Bureau, and OJA, as well as Defendants K. Gray, Taylor, Edwards, Williams, Currington, Tunley, Cartmell, Holt, and Brown, did nothing to change the policies, procedures, or culture of the Juvenile Detention Center or otherwise take action to protect Plaintiffs and other juvenile detainees.

292. Upon learning of legitimate concerns from the Tulsa County Public Defenders' Office, Defendants BOCC, Juvenile Bureau, and OJA, as well as Defendants K. Gray, Taylor,

Edwards, Williams, Currington, Tunley, Cartmell, Holt, and Brown, did nothing to change the policies, procedures, or culture of the Juvenile Detention Center or otherwise take action to protect Plaintiffs and other juvenile detainees.

293. Upon learning that CHILD DOE 2 was raped by Defendant Raymond in mid- to late-2023, Defendants BOCC, Juvenile Bureau, and OJA, as well as Defendants K. Gray, Taylor, Edwards, Williams, Currington, Tunley, Cartmell, Holt, and Brown, did nothing to change the policies, procedures, or culture of the Juvenile Detention Center or otherwise take action to protect Plaintiffs and other juvenile detainees.

294. Upon learning that JANE DOE 1 and JANE DOE 2 were sexually assaulted and harassed by Defendant Doyle by August 2023, Defendants BOCC, Juvenile Bureau, and OJA, as well as Defendants K. Gray, Taylor, Edwards, Williams, Currington, Tunley, Cartmell, Holt, and Brown, did nothing to change the policies, procedures, or culture of the Juvenile Detention Center or otherwise take action to protect Plaintiffs and other juvenile detainees.

295. Despite receiving definitive proof that CHILD DOE 1 was raped by Defendant Hines in April 2024, Defendants BOCC, Juvenile Bureau, and OJA, as well as Defendants K. Gray, Taylor, Edwards, Williams, Currington, Tunley, Cartmell, Holt, and Brown, did nothing to change the policies, procedures, or culture of the Juvenile Detention Center or otherwise take action to protect Plaintiffs and other juvenile detainees.

296. Despite receiving multiple, documented, instances of various employees refusing to give residents prescription medication, having inappropriate relationships with multiple residents, distributing one resident's medications to multiple, other, residents, failing to ensure proper or prompt medical treatment for physical injuries, etc., Defendant Turn Key has done

nothing to change the policies, procedures, or culture of medical treatment at the Juvenile Detention Center or otherwise take action to protect Plaintiffs and other juvenile detainees.

297. The Juvenile Detention Center promotes rape culture within its walls and each and every one of the Defendants is culpable, in some fashion, for committing said act, promoting said culture or for turning a blind eye, despite overwhelming information, evidence, and documented proof that said depravities were occurring to children, for years.

298. Defendants failed to provide adequate housing, supervision, and security for Plaintiffs as juvenile detainees.

299. Defendants' deliberate indifference to the clear and present risks to Plaintiffs' safety, as well as the deliberate indifference to the incontrovertible proof of rape incidents, was a direct and proximate cause of each of Plaintiffs' serious injuries and damages.

300. Defendants' deliberate indifference to the safety and welfare of Plaintiffs is evinced by their persistent violation of numerous provisions of the Manual, listed above, as well as PREA, adopted by OJA in December 2019. In fact, the PREA states at the very beginning:

The Office of Juvenile Affairs (OJA) has a ZERO-TOLERANCE toward all forms of sexual abuse and sexual harassment. OJA will take appropriate action to prevent, detect, and respond to all forms of sexual abuse and sexual harassment in compliance with the Prison Rape Elimination Act (PREA) of 2003. (115.311 (a))

301. Among other provisions, the PREA further states:

- Retaliation - An act of vengeance, covert or overt action, or threat of action, taken against a juvenile in response to the juvenile's complaint of sexual misconduct, in the reporting or investigation of sexual misconduct, regardless of the merits or the disposition of the complaint is prohibited. Examples of acts of retaliation are unnecessary discipline, intimidation, unnecessary changes in work or program assignments, unjustified transfers or placements and unjustified denials of privileges or services.
- Institutional Superintendents shall ensure that facility staff discourage and prevent sexual misconduct by providing clear definitions of prohibited conduct, establishing uniform methods for the prompt reporting and investigation of

allegations of misconduct, and prescribing sanctions for both substantiated misconduct and false allegations. Sexual misconduct between staff and juveniles, volunteers or contract personnel and juveniles, regardless of consensual status, is prohibited and subject to administrative and criminal disciplinary sanctions.

- Institutional Superintendents shall develop, implement, and document a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect juveniles against sexual abuse. (115.313 (a))
- When designing or acquiring new facilities and in planning any substantial expansion or modification of existing facilities, OJA shall consider the effect of the design, acquisition, expansion, or modification upon OJA's ability to protect juveniles from sexual abuse. (115.318 (a)) D.
- When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, OJA shall consider how such technology may enhance OJA's ability to protect juveniles from sexual abuse. (115.318 (b))
- OAC 377:3-1-25. Abuse, neglect, and caretaker misconduct of a child in OJA custody and placed in a secure facility or other facility operated by or through contract with OJA

(a) Requirements for reporting incidents of abuse and neglect. Title 10A O.S. § 1-2-101 requires every person who, in good faith and exercising due care, has reason to believe that a child under the age of eighteen (18) is a victim of abuse or neglect to report the condition or incident to the appropriate office for investigation through the DHS statewide centralized hotline. For the purposes of the reporting requirements for this subchapter, abuse shall include sexual abuse and sexual harassment. An employee who, in good faith and exercising due care, has reason to believe that a child is a victim of abuse or neglect shall make an immediate, verbal or email report, as required by 10A O.S. § 1-2-101 and to the supervisor who shall ensure a report is made to the OJA Office of Advocate General, or as required by 10A O.S. § 1-2-102 to the DHS hotline, when: (1) the employee has reason to believe such child has been the victim of abuse or neglect; (2) a child, parent, guardian, or other person makes an allegation of abuse or neglect of such child. ...

- All OJA staff shall report immediately any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency; retaliation against juveniles or staff who reported such an incident; and any staff neglect or violations of responsibilities that may have contributed to an incident or retaliation. (115.361 (a))

- All allegations of sexual abuse or sexual harassment are referred for administrative or criminal investigation. (115.322 (a)(b))

Each of these provisions states widely accepted minimum standards for the operation of Oklahoma juvenile detention facilities. The failure to uniformly and consistently observe such standards evidences deliberate indifference to the safety and security of juvenile detainees, generally, and Plaintiffs specifically. These standards were clearly and flagrantly violated. The sexual rapes, abuses, harassment, etc., of Plaintiffs resulted from a total and complete breakdown in the minimum supervision, security, and housing practices that Defendants, across the board, are required to provide and/or ensure are followed.

302. Defendants' deliberate indifference to Plaintiffs' health and safety was in furtherance of and consistent with policies, procedures, customs, and practices which Defendants BOCC, Juvenile Bureau, and OJA, as well as Defendants K. Gray, Taylor, Edwards, Williams, Currington, Tunley, Cartmell Holt, and Brown, promulgated, created, implemented, or possessed responsibility for the Juvenile Detention Center's operation.

303. BOCC and Juvenile Bureau failed to promulgate and implement adequate housing and supervision policies responsive to the specific needs of juvenile detainees at the Juvenile Detention Center. Defendants BOCC and Juvenile Bureau have long been aware of instances of inappropriate and improper sexual contact at the Juvenile Detention Center, including rape and sexual abuses between staff members/detention officers and juvenile detainees, which can qualify as felony rape under Oklahoma law. Consistent with past practices, in the present case, when Defendants BOCC and Juvenile Bureau were on notice of sexual contact between staff and juveniles, nobody notified the District Attorney's office, the Public Defender's office, or the Oklahoma Department of Human Safety after learning of sexual contact between

staff and juvenile detainees. Defendants BOCC and Juvenile Bureau failed to take adequate corrective action to prevent additional instances and harm.

304. Despite knowledge of inappropriate sexual contact, Defendants K. Gray, Taylor, Edwards, Williams, Currington, and Tunley failed to provide adequate facilities or promulgate and implement adequate policies, training, procedures, and guidelines to ensure the safety of juvenile detainees. The lack of adequate and appropriate supervision for juvenile detainees and the utter lack of guidance for employees to follow at the Juvenile Detention Center as to the standard of supervision, security and care for juvenile detainees demonstrates a failure to train, failure to supervise, and deliberate indifference toward known risks to the health and safety of detainees like Plaintiffs.

305. Defendants BOCC and Juvenile Bureau, as well as Defendants K. Gray, Taylor, Edwards, Williams, Currington and Tunley, have promulgated, and in fact profited, off perpetuating rape culture. Through their deliberate indifference and conscious choices, these Defendants have knowingly allowed juvenile detainees, including Plaintiffs, to be raped, sexually abused, exploited, and harassed by multiple staff and personnel within the Juvenile Detention Center. Indeed, Defendants have been aware of these facts and circumstances since mid-2023, likely before, and have elected to do nothing to change the policies, practices, procedures, or supervision within the Juvenile Detention Center. Such action, and intentional inaction, amounts to deliberate indifference toward known risks to the health and safety of detainees like Plaintiffs.

306. The “Office of Juvenile Affairs shall be responsible for the care and custody of a youthful offender who has been placed in the Office of Juvenile Affairs and shall have the duty and the authority to provide food, clothing, shelter, ordinary medical care, education, discipline

and in an emergency to authorized surgery or other extraordinary care.” OKLA. STAT. tit. 10A, § 2-5-212(D).

307. Despite their statutory responsibility and their “ZERO TOLERANCE policy” for sexual abuse, Defendant OJA, as well as Defendants Cartmell, Holt, and Brown, failed to promulgate and implement adequate safety measures to address the needs of the juvenile detainees at the Juvenile Detention Center. These Defendants not only deferred to Defendants BOCC and Juvenile Bureau their statutory responsibilities owed to Plaintiffs and other juvenile detainees, despite the undisputed evidence that juvenile detainees were being raped, sexually abused, sexually harassed, and physically abused by the personnel, detention officers, and staff at the Juvenile Detention Center for a considerable amount of time. Indeed, Defendants have been aware of these facts and circumstances since mid-2023, likely before, and have chosen to do nothing to intervene in the pervasive culture within the Juvenile Detention Center. Such action, and intentional inaction, amounts to deliberate indifference toward known risks to the health and safety of juvenile detainees like Plaintiffs.

308. Among other things, BOCC is responsible for approving an annual budget for Juvenile Bureau, which includes the day-to-day operation of the Juvenile Detention Center. In this regard, Defendant BOCC was aware of Juvenile Bureau’s non-compliance in the operation of the Juvenile Detention Center in May 2022 and received formal, written, documentation of the continued non-compliance in May 2023. Defendant BOCC was further made personally aware of the continued deficiencies at the Juvenile Detention Center at a multi-agency meeting on May 17, 2023. Defendant BOCC was well aware that these deficiencies, over the span of at least two (2) years, perpetuated an undue and preventable risk to juvenile detainees at the Juvenile Detention Center, for rape, sexual abuse and harassment. Despite this knowledge, Defendant

BOCC approved a more than \$13 million budget for “juvenile detention” for the 2023-2024 fiscal year, thereby intentionally allowing a deficient Juvenile Detention Center to continue its ongoing operation and, by proxy, perpetuate the ongoing rape culture within its confines. Such action, and intentional inaction, amounts to deliberate indifference toward known risks to the health and safety of juvenile detainees like Plaintiffs.

309. Defendants Hines, Zenzen, Doyle, Treadway, and Raymond, each individually and separately, committed one or more sexual abuses on juvenile detainees, including but not limited to Plaintiffs, during their periods of employment at the Juvenile Detention Center. Such action clearly amounts to deliberate indifference toward known risks to the health and safety of juvenile detainees like Plaintiffs.

310. Defendants Treadway, Powell, Lavine, Loyd and T. Gray, each witnessed, and maintained personal knowledge of, one or more sexual abuses on juvenile detainees, including but not limited to Plaintiffs, during their periods of employment at the Juvenile Detention Center. Despite this personal knowledge, each of these Defendants not only elected not to report these abuses but conspired to further allow these abuses to continue within the Juvenile Detention Center. Such action clearly amounts to deliberate indifference toward known risks to the health and safety of juvenile detainees like Plaintiffs.

311. Upon information and belief, Defendants JOHN DOES 2-10 and JANE DOES 2-10 each either committed one or more sexual abuses on juvenile detainees, or witnessed or had personal knowledge of such abuses, including but not limited to Plaintiffs, during their periods of employment at the Juvenile Detention Center. Such action clearly amounts to deliberate indifference toward known risks to the health and safety of juvenile detainees like Plaintiffs.

312. As a direct and proximate result of Defendants' actions and failures to act, Plaintiffs and other juvenile detainees have suffered physical and emotional trauma, personal injury, mental pain and suffering, emotional distress, and other actual damages.

CLAIMS FOR RELIEF

I. CRUEL AND UNUSUAL PUNISHMENT IN VIOLATION OF THE EIGHTH AND FOURTEENTH AMENDMENTS TO THE CONSTITUTION OF THE UNITED STATES (42 U.S.C. § 1983)

a. Allegations Applicable to Defendants Hines, Zenzen, Doyle, Raymond, Treadway, Wilson, Harris, McCoy, Slife Jane Doe 1 and John Doe 1, John Doe 2 and John Doe 3.

313. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 312, as though fully set forth herein.

314. The Fourteenth and/or Eighth Amendments to the U.S. Constitution protects Plaintiffs' right to be free from physical abuse at the hands of state actors and the right to personal security, liberty, dignity, and bodily integrity.

315. Each of these Defendants sexually abused one or more of the Plaintiff's within the Juvenile Detention Center, between June 2023 and the present.

316. On April 30, 2024, Defendant Zenzen sexually abused a male juvenile detainee, by grabbing his genitals, while said detainee was using the restroom.

317. Between June 2023 and May 2024, Defendant Raymond raped CHILD DOE 2. Defendant Raymond would exchange "vape pens" for sex with CHILD DOE 2. BOCC, Juvenile Bureau, and OJA were made aware of this relationship, sometime in 2023, and transferred Defendant Raymond to David L. Moss as a corrective measure.

318. Between June 2023 and August 2023, Defendant Doyle repeatedly sexually abused JANE DOE 1 and JANE DOE 2 and further abused an unknown number of juvenile

detainees, including JOHN DOE 1, within the Juvenile Detention Center, resulting in the widespread dissemination of marijuana-based products through the Juvenile Detention Center.

319. Additionally, Defendant Doyle further provided CHILD DOE 19 with illicit drug, including marijuana, which caused CHILD DOE 19 to go to the hospital.

320. By August 2023, Defendant Treadway was involved in a romantic relationship with at least one male juvenile detainee at the Juvenile Detention Center and used JANE DOE 1 and JANE DOE 2 to exploit this vulnerable male juvenile detainee by sending correspondence to the detainee through JANE DOE 1 and JANE DOE 2.

321. Defendant JOHN DOE 2 directed both CHILD DOE 17 and CHILD DOE 19 to physically assault and fight other juvenile residents, in exchange for favors, contraband, etc., for the amusement and gambling whims of the personnel within the Juvenile Detention Center.

322. In April 2024, Defendant Hines raped CHILD DOE 1. Due to pornographic videos and photographs Defendant Hines showed other juvenile detainees at the Juvenile Detention Center, including CHILD DOE 4 and CHILD DOE 5, the disclosure of money-for-sex to CHILD DOE 3, as well as the fact that an inappropriate photograph of CHILD DOE 6 is believed to have been found on Defendant Hines' phone, it is believed that Defendant Hines also raped more juvenile detainees while employed at the Juvenile Detention Center.

323. Between May 2024 and July 2024, Defendant Slife made sexually inappropriate comments and advances to CHILD DOE 18.

324. In 2024, Defendant JANE DOE 1 gave CHILD DOE 9, as well as other juvenile residents, a vape pen.

325. In April 2024, Defendant Wilson intentionally triggered Plaintiff JOHN DOE 1's food allergies by feeding JOHN DOE 1 food that Wilson knew he was allergic to and, thereafter, remarking that JOHN DOE 1 would need to seek medical attention.

326. In July 2024, Defendant McCoy supplied CHILD DOE 17 with methamphetamine, necessitating a visit to the hospital.

327. In the Summer 2023, Defendant JOHN DOE 1 physically assaulted Plaintiff JOHN DOE 1, in violation of the disciplinary policies and procedures of the Juvenile Detention Center, causing permanent injury to JOHN DOE 1's knee.

328. In 2024, Defendant Harris regularly placed Plaintiff JOHN DOE 1 on room confinement as a matter of routine discipline, often notating the confinement as a "resident request."

329. On July 24, 2024, Defendant JOHN DOE 3 sexually assaulted CHILD DOE 20.

330. Each of these Defendants exploited their positions of power by repeatedly sexually assaulting and raping the Plaintiffs and were therefore deliberately indifferent to the Plaintiffs' health and safety.

331. As a direct and proximate result of Defendants' actions and failures to act, Plaintiffs and other juvenile detainees have suffered physical and emotional trauma, personal injury, mental pain and suffering, emotional distress, and other actual damages.

b. Allegations Applicable to the Defendants BOCC and Juvenile Bureau (Monell Liability)

332. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 331, as though fully set forth herein.

333. Defendants BOCC and Juvenile Bureau are "persons" for purposes of 42 U.S.C. § 1983.

334. At all times pertinent hereto, Defendants BOCC and Juvenile Bureau were acting under the color of state law.

335. Defendant Juvenile Bureau was endowed by Defendant BOCC with powers or functions governmental in nature, such that Juvenile Bureau became an instrumentality of the state and subject to its Constitutional limitations.

336. Defendants BOCC and Juvenile Bureau are charged with implementing and developing the policies of Defendant OJA and the Oklahoma Juvenile Code with respect to the care and supervision of juvenile inmates that are housed at the Juvenile Detention Center and has the responsibility to adequately staff the Juvenile Detention Center, and adequately train and supervise its employees.

337. The Fourteenth Amendment requires municipalities to provide detained juveniles with reasonably safe conditions of confinement.

338. As detained juveniles in custody, Defendants BOCC and Juvenile Bureau had a special relationship with Plaintiffs and had an affirmative duty to protect Plaintiffs from harm.

339. Defendants BOCC and Juvenile Bureau violated Plaintiffs' rights to personal security and bodily integrity and breached its affirmative duty to Plaintiffs when it failed to provide Plaintiffs with reasonably safe conditions and when it facilitated, enabled, countenanced, approved, and permitted Plaintiffs' continued sexual abuse by staff at the Juvenile Detention Center.

340. The aforementioned acts and/or omissions of Defendants Hines, Zenzen, Doyle, Raymond, and Treadway in being deliberately indifferent to Plaintiffs' health and safety and violating Plaintiffs' civil rights were the direct and proximate result of customs, practices and

policies which Defendants BOCC and/or Juvenile Bureau promulgated, created, implemented and/or possessed responsibility for.

341. Such policies, customs and/or practices include, but are not limited to:

- a. The failure to promulgate and implement adequate and appropriate housing, supervision policies, procedures or guidelines responsive to the special needs of juvenile inmates;
- b. The failure to ensure adequate supervision and safety precautions with respect to areas that are not monitored via surveillance equipment, or “blind spots,” within the Juvenile Detention Center;
- c. The pattern and practice of understaffing the Jail, leaving juvenile inmates vulnerable and increasing the risk of harm;
- d. The failure to take precautions to prevent danger to the health and wellbeing of juvenile inmates;
- e. The failure to train Jail personnel and staff regarding: the supervision of juvenile inmates within the Jail and the special security needs of juvenile inmates; and
- f. The failure to take adequate corrective measures, such as disciplinary action, to address known sexual assaults by Jail personnel, and to prevent such sexual assaults from occurring.

342. Defendants Juvenile Bureau and BOCC knew (either through actual or constructive knowledge), or it was obvious, that these policies, practices and/or customs posed substantial risks to the health and safety of juvenile inmates like Plaintiffs.

343. For instance, by May 2023, Defendants BOCC and Juvenile Bureau possessed actual knowledge, in writing, of the inadequate facilities, supervision and security within the Juvenile Detention Center, which gave rise to the heightened risks of sexual abuses and harassment, including rape, to the juvenile detainees, including Plaintiffs.

344. Nevertheless, Defendants BOCC and Juvenile Bureau failed to take reasonable steps to alleviate those risks in deliberate indifference to juvenile inmates’ health and safety.

345. Defendants BOCC and Juvenile Bureau tacitly approved of Juvenile Detention Center staff's unconstitutional conduct by failing to act, amounting to an official policy of inaction. Defendants BOCC and Juvenile Bureau had ample notice and knowledge of this likelihood and existence of a continuing pattern of abuse and unconstitutional behavior.

346. Defendants BOCC and Juvenile Bureau also acted affirmatively to promote and maintain conditions in the Juvenile Detention Center and to promote and maintain inadequate hiring, training, retention, and supervision of Juvenile Detention Center Staff such that the continued abuse of detained children, including Plaintiffs, was virtually guaranteed.

347. In this manner, Defendants BOCC and Juvenile Bureau knowingly, and with deliberate indifference and conscious disregard, created and/or increased the risk of the danger—i.e., sexual abuse of Plaintiffs by Juvenile Detention Center Staff—and affirmatively put Plaintiffs in harm's way.

348. These affirmative acts by the Defendants BOCC and Juvenile Bureau, taken as a whole and in the context of known abuse at the Juvenile Detention Center, increased the danger to the Plaintiffs and amounted to egregious and outrageous behavior.

349. As a direct and proximate result of Defendants' actions and failures to act, Plaintiffs and other juvenile detainees have suffered physical and emotional trauma, personal injury, mental pain and suffering, emotional distress, and other actual damages.

c. Allegations Applicable to Defendants K. Gray, Parker, Taylor, Edwards, Williams, Currington, Tunley, Cartmell, and Holt (Supervisory Liability)

350. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 349, as though fully set forth herein.

351. In their supervisory roles with Juvenile Bureau, Defendants K. Gray, Parker, Taylor, Edwards, Williams, Currington, and Tunley were responsible for creating, adopting,

approving, ratifying, and enforcing the rules, regulations, policies, practices, procedures, and/or customs of the Jail, including the policies, practices, procedures, and/or customs which led to violations of Plaintiffs' Constitutional rights as set forth in this Amended Complaint.

352. Defendants Cartmell and Holt were, at all pertinent times, employed by the State of Oklahoma as the Executive Directors of OJA. As Executive Director, Defendants Cartmell and Holt were responsible for the overall management of OJA's portfolio of operated and contracted programs and services. As Executive Directors, Defendants Cartmell and Holt had responsibility for maintaining OJA policies, protocols and customs and a supervisory duty to assure that juvenile residents under OJA custody, like Plaintiffs, have their basic safety, medical and mental health care needs met.

353. There is an affirmative link between the aforementioned violation of the Plaintiffs' constitutional rights and policies, practices, and/or customs (as alleged above) which Defendants K. Gray, Parker, Taylor, Edwards, Williams, Currington, Tunley, Cartmell, and Holt possessed responsibility for.

354. The aforementioned acts and/or omissions of Defendants in being deliberately indifferent to the Plaintiffs' health and safety and violating Plaintiffs' civil rights were the direct and proximate result of customs, practices, and policies which Defendants promulgated, created, implemented and/or possessed responsibility for.

355. These Defendants knew and/or it was obvious that the maintenance of the aforementioned policies, practices and/or customs posed an excessive risk to the health and safety of juvenile inmates like Plaintiffs.

356. These Defendants disregarded the known and/or obvious risks to the health and safety of citizens like Plaintiffs.

357. Defendants K. Gray, Parker, Taylor, Edwards, Williams, Currington, Tunley, Cartmell, and Holt, through their continued encouragement, ratification, and/or approval of the aforementioned policies, customs, and/or practices, in spite of their known and obvious inadequacies and dangers, have been deliberately indifferent to juvenile inmates' health and safety.

358. As a direct and proximate result of Defendants' actions and failures to act, Plaintiffs and other juvenile detainees have suffered physical and emotional trauma, personal injury, mental pain and suffering, emotional distress, and other actual damages.

**II. FAILURE TO INTERVENE
(42 U.S.C. § 1983)**

(As to Defendants Treadway, Powell, Lavine, Loyd and T. Gray)

359. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 358, as though fully set forth herein.

360. In the manner described above, by their conduct and under color of law, during the constitutional violations committed by Defendant Hines, Defendants Zenzen, Doyle, Raymond, Treadway, and T. Gray each stood by without intervening to prevent the violation of Plaintiffs' constitutional rights, even though they had the opportunity and duty to do so.

361. Between June 2023 and August 2023, each of these Defendants witnessed, and maintained personal knowledge of, one or more sexual abuses on juvenile detainees, including JANE DOE 1 and JANE DOE 2, by Defendant Doyle.

362. Between June 2023 and August 2023, each of these Defendants witnessed or otherwise had personal knowledge that Defendant Doyle was supplying marijuana-based products to multiple juvenile detainees within the Juvenile Detention Center, including JANE DOE 1 and JANE DOE 2, which resulted in widespread overdoses on marijuana by multiple juvenile detainees.

363. Despite this personal knowledge, these Defendants chose not to intervene to prevent the violation of the Plaintiffs' constitutional rights.

364. These Defendants had a reasonable opportunity to prevent this harm but failed to do so.

365. The misconduct described in this count was objectively unreasonable and was undertaken intentionally, with malice, willful and/or reckless indifference to the Plaintiffs' constitutional rights.

366. As a direct and proximate result of Defendants Treadway's, Powell's, Lavine's, Loyd's, and T. Gray's failure to intervene to prevent the violation of Plaintiffs' constitutional rights, Plaintiffs and other juvenile detainees have suffered physical and emotional trauma, personal injury, mental pain and suffering, emotional distress, and other actual damages.

**III. BREACH OF THIRD-PARTY BENEFICIARY CONTRACT
(COMMON LAW)
(As to Defendants OJA, BOCC, and Juvenile Bureau)**

367. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 366, as though fully set forth herein.

368. Defendants OJA, BOCC, and/or Juvenile Bureau entered into a contract for the operation of, among other things, the Juvenile Detention Center in accordance with applicable laws.

369. That contract was made for the benefit of juvenile detainees who would end up in custody at the Juvenile Detention Center, like Plaintiffs.

370. Defendants breached that contract in that they failed to perform their duties to protect intended third-party beneficiaries, including Plaintiffs.

371. As a direct and proximate result of the actions and omissions of these Defendants arising from the contract, to which Plaintiffs were intended third-party beneficiaries, Plaintiffs suffered injuries.

372. As a result of the acts and/or omissions of these Defendants, Plaintiffs have each been damaged in an amount in excess of \$75,000.00.

IV. NEGLIGENCE
(COMMON LAW)
(As to Defendant Turn Key)

373. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 372, as though fully set forth herein.

374. Defendant Turn Key, owed a duty to Plaintiffs, and all other juvenile residents at the Juvenile Detention Center, to provide medical services in a safe and reasonable manner, using ordinary care to prevent injury to other persons.

375. By failing to provides said services in this way, as more fully described above, and by acting recklessly and with complete disregard for the health and safety of Plaintiffs, and other juvenile residents, Defendant Turn Key breach the duty owed.

376. Defendant Turn Key's breach was the actual and proximate cause of multiple Plaintiffs' injuries.

377. At all relevant times, Defendant Turn Key employees and staff mentioned herein were acting in the course and scope of their employment with Defendant Turn Key. Consequently, Defendant Turn Key is vicariously liable for Defendants Raymond's, Manning's, and JANE DOE 1's (and possibly) acts and omissions under the legal theory of *respondeat superior*, and is thus liable for the damages as set forth herein.

378. As a result, Plaintiffs have each been damaged in an amount in excess of \$75,000.00.

**V. NEGLIGENCE, TRAINING, SUPERVISION, RETENTION, AND MAINTENANCE
(COMMON LAW)
(As to Defendant Turn Key)**

379. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 378, as though fully set forth herein.

380. Defendant Turn Key had a duty to train and supervise any and all employees and/or agents in the safe performance of medical and nursing services at the Juvenile Detention Center.

381. At all times relevant herein, Defendant Turn Key knew or should have known that Defendants Raymond, Manning, and JANE DOE 1 each had propensities to engage in unlawful conduct in the administration of nursing services within the Juvenile Detention Center.

382. By failing to adequately train and supervise Defendants Raymond, Manning, and JANE DOE 1, Defendant Turn Key breached the duties owed to Plaintiffs and all other juvenile residents at the Juvenile Detention Center.

383. This breach was the actual and proximate cause of various Plaintiffs' injuries and the damages alleged herein.

384. As a result, Plaintiffs have each been damaged in an amount in excess of \$75,000.00.

**VI. INJUNCTIVE RELIEF
(COMMON LAW)
(As to Defendants OJA, BOCC, and Juvenile Bureau)**

385. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 384, as though fully set forth herein.

386. Defendants OJA, BOCC, and/or Juvenile Bureau's conduct continues to harm those Plaintiffs still in detention at the Juvenile Detention Center and other detainees.

387. Thus, Plaintiffs request the Court issue a permanent injunction and corresponding declaratory relief pursuant to Fed. R. Civ. P. 57 and 65 compelling these Defendants to develop and implement constitutional policies, training, and supervision of their agents and employees with respect to the rights of juvenile detainees and protect them from the actions alleged herein.

388. Thus, Plaintiffs request the Court issue a permanent injunction and corresponding declaratory relief pursuant to Fed. R. Civ. P. 57 and 65 compelling these Defendants to redress Defendants' ongoing deliberate indifference in policies, training, and supervision with respect to the serious needs of juvenile inmates with respect to the rights of Plaintiffs and other juvenile detainees and protect them from the actions alleged herein in violation of the Eighth and Fourteenth Amendments of the Constitution.

389. Plaintiffs further request the Court issue a permanent injunction and corresponding declaratory relief pursuant to Fed. R. Civ. P. 57 and 65 compelling these Defendants to obtain a third-party audit of these Defendants' policies and procedures, and the Juvenile Detention Center to protect the Constitutional rights of Plaintiffs and other juvenile detainees and protect the juvenile detainees from the actions alleged herein.

390. Plaintiffs further request the Court issue a permanent injunction and corresponding declaratory relief pursuant to Fed. R. Civ. P. 57 and 65 compelling these Defendants to appoint and maintain an unaffiliated and independent compliance officer with authority to enforce the constitutional policies, training, and supervision of their agents and employees with respect to the rights of Plaintiffs and other juvenile detainees and protect them from the actions alleged herein.

391. Plaintiffs further request the Court issue a permanent injunction and corresponding declaratory relief pursuant to Fed. R. Civ. P. 57 and 65 compelling these Defendants to repair and maintain all institutional guardrails, such as security cameras, intended to protect Plaintiffs still in the Juvenile Detention Center, and other juvenile detainees.

392. Plaintiffs further request the Court issue a permanent injunction and corresponding declaratory relief pursuant to Fed. R. Civ. P. 57 and 65 compelling these Defendants to have all security camera footage taken at the Juvenile Detention Center going forward monitored and audited by an unaffiliated and independent third-party.

VII. PUNITIVE DAMAGES

393. Plaintiffs re-allege and incorporate by reference paragraphs 1 through 392, as though fully set forth herein.

394. Plaintiffs are entitled to punitive damages on their claims brought pursuant to 42 U.S.C. § 1983 as each of the individual Defendants' conduct, acts and omissions alleged herein constitute malicious and/or reckless or callous indifference to Plaintiffs' federally protected rights.

WHEREFORE, based on the foregoing, Plaintiffs pray that this Court grant the relief sought, including, but not limited to, actual damages in excess of Seventy-Five Thousand Dollars (\$75,000.00), with interest accruing from date of filing of suit, punitive damages in excess of Seventy-Five Thousand Dollars (\$75,000.00), reasonable attorney fees, injunctive and declaratory relief as requested in Count VI, and all other relief deemed appropriate by this Court. Plaintiffs demand a jury trial on all claims and causes.

Respectfully submitted,

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