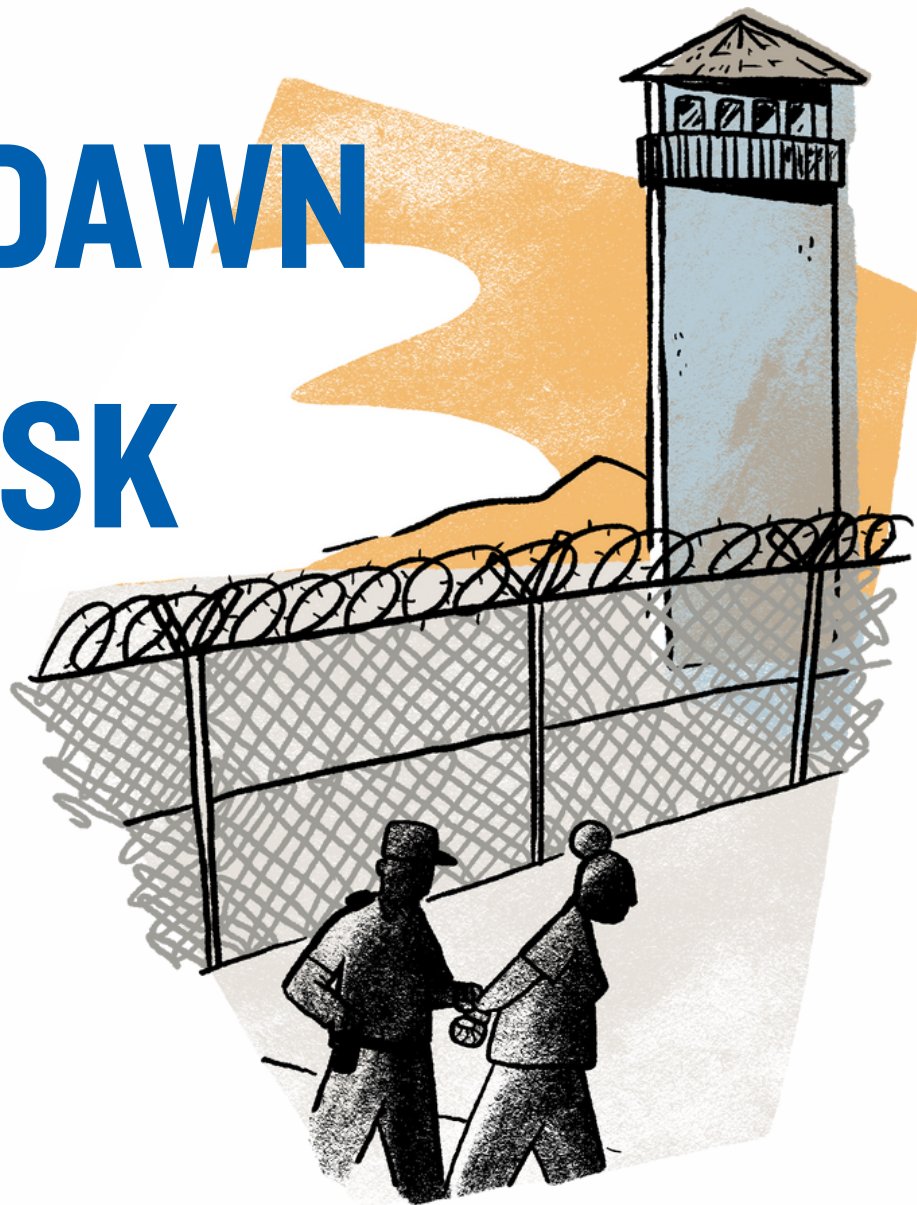


# FROM DAWN 'TIL DUSK

Private  
Equity's Impact  
on Incarceration



PRIVATE EQUITY  
STAKEHOLDER  
PROJECT

Report | September 2023

# TABLE OF CONTENTS

Executive Summary	2
Healthcare	3
Labor	5
Food and Commissary	6
Electronic Monitoring	8
Telecommunications	10
Construction	13

PRIVATE EQUITY  
STAKEHOLDER  
PROJECT

K Agbebiyi, [k.agbebiyi@pestakeholder.org](mailto:k.agbebiyi@pestakeholder.org)  
Azani Creeks, [azani.creeks@pestakeholder.org](mailto:azani.creeks@pestakeholder.org)  
Michael Fenne, [michael.fenne@pestakeholder.org](mailto:michael.fenne@pestakeholder.org)

Illustration by Noah Jodice, [@noahjodice](https://www.instagram.com/noahjodice)

# EXECUTIVE SUMMARY

Prison life is entirely controlled by the state and corporations that service detention facilities— beyond various physical space constraints, incarcerated people have little choice in what they consume, how they communicate with loved ones, and the structure of their day. Private equity firms profit from incarcerated people as a captive audience through contracts with local governments to provide various services.

A handful of private equity firms, using capital from pension funds, foundations, endowments, insurance companies, and other institutional investors, have invested heavily in companies providing tools and services used to detain, deport, and surveil people in the United States and around the world. The tools and services provided by private equity-owned companies in this sector disproportionately impact working-class, Black, indigenous, and immigrant communities.

While public and investor debate around the privatization of prisons, jails, and detention facilities has largely focused on publicly-traded corporations, private companies control a much larger portion of this market. The private equity-owned companies that provide phone and video services, commissary services, medical services, bail bonds, ankle monitors, facial recognition technology, and more to detention facilities, governments, and other businesses belong to a growing detention and surveillance industry.

PESP has created a zine and this accompanying report to share the impacts on private equity's investments in the carceral state. Titled "From Dawn 'Til Dusk," the project seeks to make the private equity industry more accessible to organizers and advocates through profiling a day within a prison where incarcerated people are forced to interact with the private equity system intimately. For more information about private equity investments in incarceration, visit <https://pestakeholder.org/issues/detention-surveillance/>.

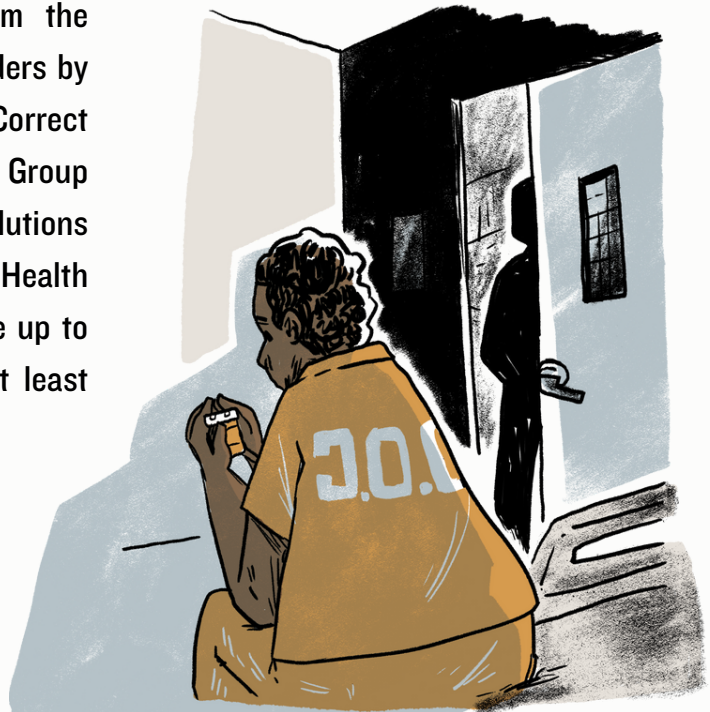
# HEALTHCARE

In 2016, the Justice Department’s Office of Inspector General found that federal prison spending on outsourced healthcare increased 24% to \$327 million between 2010 and 2014, while the overall prisons budget increased only 11%.<sup>1</sup> In 2016 it was estimated that half of all state and local prisons and jails had outsourced healthcare to an industry worth more than \$3 billion annually.<sup>2</sup>

As of 2022, correctional healthcare is estimated to be worth \$9.3 billion.<sup>3</sup> In a 2020 report, Reuters estimated that over 60% of jails outsource their healthcare to private companies.<sup>4</sup> The report also reviewed deaths in more than 500 jails from 2016 to 2018, and found that “those relying on one of the five leading healthcare contractors had higher death rates than facilities where medical services are run by government agencies.”

A handful of private equity firms have invested heavily in private prison services, including two of the biggest prison healthcare providers: Wellpath (H.I.G. Capital) and YesCare/Corizon (Perigrove Capital).

Wellpath and Corizon were both formed from the consolidation of smaller prison healthcare providers by private equity. In 2018, H.I.G. Capital merged Correct Care Solutions with Correctional Medical Group Companies to form Wellpath.<sup>5</sup> Correct Care Solutions had acquired another provider, Conmed Health Management, a few years earlier.<sup>6</sup> In the decade up to 2019, Correct Care Solutions had been sued at least 1,395 times in federal court.<sup>7</sup>



Corizon Health was formed in 2011 when Valitas Health Services consolidated its subsidiaries America Service Group and Correctional Medical Services, and named the merged company Corizon.<sup>8</sup> The company was owned by private equity firm Beecken Petty O’Keefe & Company for approximately a decade until 2017. It was then owned by private equity investor Blue Mountain Capital for about three years, and afterwards sold to private equity firm Flacks Group in 2020.<sup>10</sup>

As of late 2021, Corizon had faced more than 1,000 lawsuits alleging substandard care, and paid out millions to settle wrongful death lawsuits.<sup>11</sup> In 2022, Corizon Health split into two companies: the original Corizon and YesCare. Corizon kept the company’s problems and debt while YesCare was given a clean slate and almost all of the employees, contracts, and assets.<sup>12</sup> In February 2023, Corizon filed for bankruptcy in Texas. As of August 2023, YesCare is owned by private equity investor Perigrove Capital.<sup>14</sup>

Private equity firms continue to expand their reach in correctional healthcare. In April 2023, Full Guard Capital acquired Comprehensive Correctional Care, which provides healthcare services for county correctional facilities in Kentucky. Full Guard<sup>15</sup> Capital also owns IMS Correctional Healthcare, which provides correctional healthcare services in North Carolina.<sup>16</sup>



# LABOR

John R. Wald Company, owned by UK-based private equity firm Finance Birmingham, <sup>17</sup> considers itself “a leader in engineered manufacturing solutions and automated production systems for correctional industries” – the company’s founder was the superintendent of the Prison Labor Division of Pennsylvania from 1919 to 1924. <sup>18</sup> John R. Wald relies on prison labor throughout the United States. Although there are not publicly available statistics on the wages John R. Wald pays, the average wage for prison labor generally ranges from \$.30 to \$1.30 per hour as of 2021, according to the American Civil Liberties Union. <sup>19</sup> Around 80 percent of US license plates are made in prisons – in New York alone, incarcerated people fulfill \$30 million worth of license plate orders per year.



Televerde, backed by Main Street Capital, operates call centers entirely staffed by incarcerated women in Arizona, Indiana, Florida, and the United Kingdom. As prison demographics shifted in the 1990s with the state incarcerating women at a rapidly-increasing rate, prison labor that had largely been geared toward physical labor for men expanded programming. Founded in 1995, Televerde took advantage of this by opening call centers that have relied on consistent low-wage labor. As of July 2023, Televerde has generated \$12 billion in revenue for the companies it partners with, such as IBM, Microsoft, Epson, and Securus.

In Alabama, Arkansas, Florida, Georgia, and Texas, incarcerated people generally do not get paid for their work at all. At the call center in Florida, some percentage of women working at Televerde are paid 25 to 90 cents per hour through non-profit PRIDE Enterprises. In Arizona <sup>22</sup> and Indiana, as of 2019, a third of employees’ federal minimum wage pay immediately went to the state “to pay for room and board,” with another third set aside for savings upon release. <sup>23</sup>

# FOOD AND COMMISSARY

Prisons often outsource food service to other companies motivated by profit rather than providing nourishing meals. According to a 2017 report by the Centers for Disease Control and Prevention, incarcerated individuals are 6.4 times more likely to fall ill from spoiled or contaminated food than non-incarcerated individuals. The<sup>24</sup> food within prisons is often unappetizing, and does not always address food restrictions that incarcerated people may have due to religious reasons, allergies, or ethical preferences such as veganism.

H.I.G. Capital owns TKC Holdings, which provides food, commissary, and telecom services to jails, prisons, and immigrant detention centers. H.I.G. formed the company by combining Trinity Services Group (food services) and Keefe Group (commissary).<sup>25</sup> Mold, maggots, and dirt have been found in TKC-served facilities, at times leading to unrest and contract termination.<sup>26</sup> In the U.S. Immigration and Customs Enforcement Laredo Processing Center in Texas, immigrant detainees complained of TKC's "inedible food and undrinkable, foul-smelling water."<sup>27</sup>

In April 2022, Norman Simmonds sued Trinity Services (HIG Capital) and DeKalb County, GA officials for failing to provide a diet consistent with his faith, which he alleged led to "a prolonged period of insufficient nutrition that might have caused long-term health problems, including organ damage, given several pre-existing health conditions."<sup>28</sup> Simmonds and others observing Ramadan, when Muslim observers fast from dawn until dusk, were denied pre-sunrise and post-sunset meals. During the first week of Ramadan, Simmonds' commissary access was revoked, barring him from purchasing food he could eat outside of standard meal times.



The County settled the suit the day after it was filed, and agreed to start providing meals in a timely manner. Trinity did not admit wrongdoing as part of the settlement. The Executive Director of the Georgia chapter of the Council on American-Islamic Relations (CAIR) celebrated the settlement, but noted that "these basic accommodations should have been provided from the very start of Ramadan. The fact that these have just now been adopted after the filing of a federal lawsuit shows the extreme lengths Muslim detainees are forced to take."<sup>29</sup>

An Impact Justice report based on surveys from incarcerated people found that the current prison food system has unacceptably low standards, sacrificing health for the lowest cost and highest efficiency (a key example being the scarcity of fresh produce and fruits in prisons).<sup>30</sup> In the surveys, incarcerated people reported feeling routinely humiliated by the experience of eating in prisons with both immediate and long-term mental and physical health consequences.

At facilities where TKC Holdings has both the cafeteria and commissary store contracts, the company has an incentive to reduce the quality of food, so that customers buy food at the Keefe-operated commissary store rather than eating in the Trinity-owned cafeteria. In some cafeterias, meals are covered by the facility according to a set contract – profits can only increase by serving more people (increased incarceration) or reducing cost (and often quality) of food.

31

Prison and jail commissaries have basic necessities like toothpaste, soap, menstrual products, and thermal wear for cold months, but often at prices much higher than stores outside. As the only store in the facility, the commissary has no competition and no incentive to lower prices. For example, in 2022, a 4.6 ounce Crest toothpaste costs \$3.77 in a Kentucky commissary run by HIG Capital’s company Keefe Group, but costs just \$1.38 at the local Wal-Mart (173% markup).<sup>32</sup> In 2022, Keefe raised commissary prices in Idaho (8.5%),<sup>33</sup> Kentucky (7.2%),<sup>34</sup> and Nevada,<sup>35</sup> citing “world events such as supply chain shortages, shipping cost increases and increased labor costs” after a Nevada state audit.

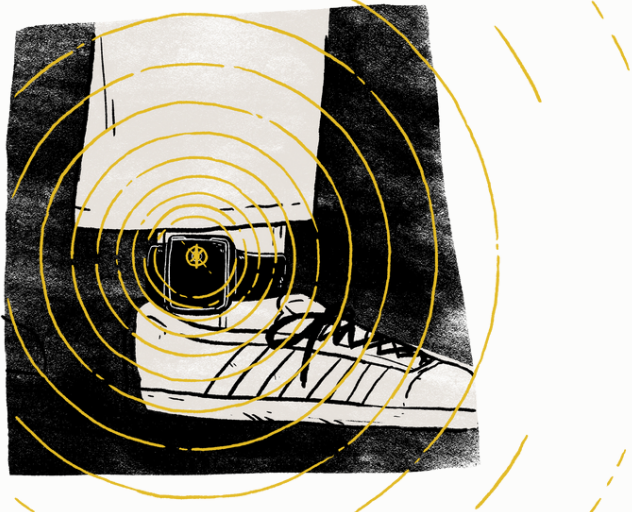




# ELECTRONIC MONITORING

A 2021 study from George Washington University Law School found that four companies control the electronic monitoring industry, three of which are owned by private equity firms: Satellite Tracking of People LLC (subsidiary of Securus Technologies), owned by Platinum Equity; Sentinel Offender Services, owned by Bison Capital Asset Management; and Attenti, owned by Warburg Pincus.<sup>36</sup> The report found that electronic monitoring does more harm than good: “It’s always intended to be a positive alternative to incarceration. But based on what we found, it’s doing the opposite. More rules and more surveillance generally leads to higher incarceration,” said Kate Weisburd, an associate professor of law at George Washington University, adding “Basically, every record we looked at had a negative impact, and by every measure it undermines people’s ability to survive outside of prison.”<sup>37</sup> Problems with e-carceration include:

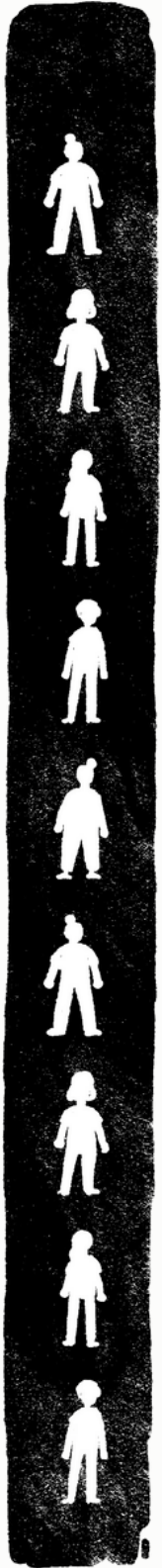
- Electronic monitoring can make it difficult for someone being monitored to secure a job, which is associated with reducing economic vulnerability and recidivism.<sup>38</sup>
- Technical glitches with electronic monitoring devices increase the chances of false positive alerts and civil liberty violations. False electronic monitoring alerts and technical failures can cause law enforcement officers to spend additional time tracking down those they are supervising.<sup>39</sup>
- People being monitored must often pay the cost of monitoring. Electronic monitoring’s user-funded schemes can be punitive on a scale that dwarfs the other terms of their sentence – costing individuals up to \$600 a month.<sup>40</sup>
- Like mass incarceration in prisons, electronic monitoring disproportionately affects some of the nation’s most vulnerable communities.<sup>41</sup>



Electronic monitoring is often presented as less restrictive and more humane than prisons. While home can be nicer than a prison cell, electronic monitoring only serves to make the prison portable – the prison or detention center comes with you. Given all of the location and other data that electronic monitoring devices and applications collect, civil rights organizations have raised questions about expectations of privacy and what is done with the data. <sup>42</sup>

In 2021, Warburg Pincus company Allied Universal acquired G4S, a global security firm with a significant prison and detention business. On August 1, 2022, Allied Universal completed its acquisition of Attenti, an electronic monitoring company with operations in more than 30 countries. <sup>43</sup> With this move, Warburg Pincus grows its prison and detention portfolio and controls one of the largest electronic monitoring providers. <sup>44</sup>

A number of Warburg Pincus' investors have previously divested from prison and detention companies, but are still invested through the firm's acquisitions of G4S and Attenti. <sup>45</sup> In its bid for G4S, Warburg Pincus / Allied Universal said it would evaluate the possibility of divesting all or a significant part of G4S' prison and detention business, but that has yet to happen. <sup>46</sup> Instead, Warburg Pincus has expanded its presence in detention-related services through Allied's acquisition of Attenti.

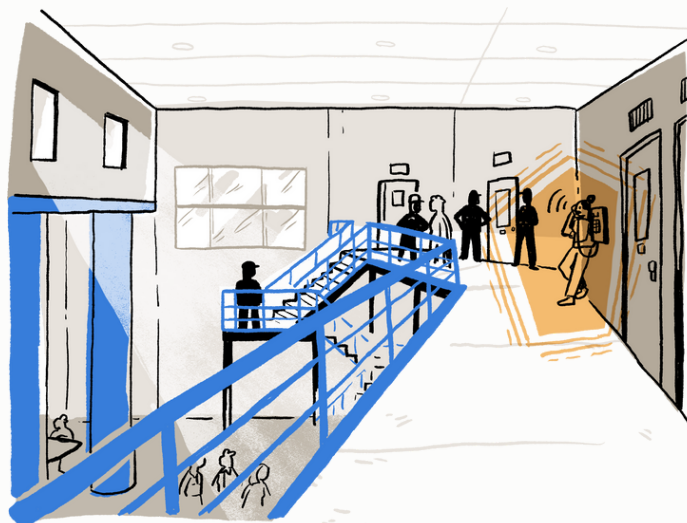


# TELECOMMUNICATIONS

Private equity firms dominate prison telecommunications services – Securus, owned by Platinum Equity, and ViaPath (formerly Global Tel Link), owned by American Securities, controlled an estimated 74 to 83 percent of the market as of 2019. Prisons and jails normally contract with a single provider,<sup>47</sup> allowing companies to charge high prices in what is literally a captive market. In 2021, ViaPath charged as much as \$16.50 for a 15-minute phone call. On top of the base<sup>48</sup> per-minute charges for calls, companies tack on additional fees for things like adding funds to an account.<sup>49</sup> These costs are passed on to family members, at times causing loved ones to go into debt.

Platinum Equity owns Aventiv Technologies, the parent company of jail and phone communications company Securus, as well as JPay and AllPaid, which provide money transfer services for incarcerated people and their families. Money in JPay and AllPaid accounts can<sup>50</sup> be used to pay for calls or emails – to send an email, incarcerated people must pay for each page or picture they send, sometimes in the form of “stamps”. The price to send<sup>51</sup> a single message was up to 50 cents in Alaska and Arkansas as of March 2023. In October 2021, the Consumer Financial Protection Bureau (CFPB) fined JPay for violating the Consumer Financial Protection Act (CFPA) by charging consumers fees to access their own money on prepaid debit cards.<sup>53</sup>

In addition to telecommunications on shared facility devices, Securus and ViaPath offer personal tablets. The tablets can be used for emails, video calls, and educational content. While tablets are “free” for many across the country,<sup>54</sup> incarcerated people or loved ones must pay to use applications on the tablet. In Georgia’s Fulton County Jail, the initial price of the Securus tablet (including a required set of headphones) is \$16.95, plus an additional monthly fee for continued use.<sup>56</sup>



In December 2022, Congress approved the The Martha Wright-Reed Just and Reasonable Communications Act after a decades-long fight to make prison communications more affordable. Named for a woman who sued Corrections Corporation of America (now CoreCivic) in 2000 after paying thousands of dollars to call her grandson,<sup>57</sup> the bill gives the Federal Communications Commission (FCC) the authority to regulate costs of phone calls and other communications between incarcerated people and their loved ones. Though the FCC already had the power to regulate prices for calls between states, the Commission did not have authority to do so within states. Furthermore, the bill extends the FCC's authority to all forms of communication, as video calling has become increasingly popular in the last few years.



Beyond easing financial burdens for people both inside and outside of prison, the bill will likely interrupt and possibly reverse consolidation in the prison communications sector, an effort that has been led by private equity firms like Platinum Equity and American Securities. According to Senator Tammy Duckworth, the bill's lead sponsor, "the existing market has failed to produce adequate competition to protect inmates and detainees, their families, and law enforcement. The bill addresses this market failure ("localized monopolies") that limits competition at facilities." This is a problem<sup>58</sup> that the FCC has been concerned with for years; in 2017, former FCC Commissioner Mignon Clyburn called the sector "the clearest, most glaring type of market failure I've ever seen as a regulator."<sup>60</sup>

While prison telecom companies and the private equity firms that own them profit from high rates, county sheriff offices and state corrections departments often receive "commissions" (a form of legal kickbacks) from calls. Kickbacks are fundamental to the current industry business model as facilities often choose their telecom providers based on which company pays the most in kickbacks. <sup>61</sup> In 2019, the state of Georgia made more than \$8 million from site-commission kickbacks. <sup>62</sup> Though these kickbacks could be used to improve conditions for incarcerated people, investigations have revealed that departments have used kickbacks to provide perks for jail staff. Dauphin County, PA, where calls cost more than \$3 each, has collected \$3.7 million in kickbacks since 2019. With this money, the county purchased 480 gun range memberships (despite having fewer than 300 jail employees), uniforms, and employee appreciation meals. The Prison Policy Initiative recognizes kickbacks as fundamental to the current industry business model: "jails and prisons often choose their telecom providers on the basis of which company will pay the facility the most money in kickbacks."<sup>64</sup>

Without the ability to charge higher fees and offer greater kickbacks, companies would need to make efficient, innovative communications systems for affordable prices in order to beat competition. Given private equity's commitment to prioritizing return on investment, firms may seek to exit the sector before the FCC caps rates in 2024. Platinum Equity has already been subject to scrutiny for its investment in Securus in recent years as pressure from incarcerated people, their loved ones, and advocates garnered media attention.<sup>65</sup> Despite having clear proposals for exiting the investment, Platinum Equity continues to hold Securus in its portfolio.<sup>66</sup> Platinum Equity recently proposed spending an additional \$400 million to refinance Securus' debt, but failed to garner enough interest.<sup>67</sup><sup>68</sup>

Some states have already taken action to reduce or eliminate prison communications costs – at least 11 states have banned kickbacks,<sup>69</sup> while calls are free in California<sup>70</sup> and Connecticut.<sup>71</sup> The Act requires the FCC to implement maximum service rates between 18 and 24 months from the enactment, with new rates going into effect in the second half of 2024.<sup>72</sup>



# CONSTRUCTION

The estimated cost of the U.S. mass incarceration system is \$182 billion a year, with hundreds of companies competing for lucrative government contracts. <sup>73</sup> In 2015, states spent an estimated \$137 per state resident annually on prisons. It takes <sup>74</sup> hundreds of millions of dollars to design and build a prison in addition to millions more in annual maintenance.

Layton Construction, owned by Saybrook Capital, has a full portfolio of prison and jail construction projects concentrated in the western United States. <sup>75</sup> The company has constructed facilities that are under the management of county governments, California and Wyoming state corrections departments, and the Bureau of Indian Affairs.

Private equity has also fought firms that design prisons and provide various components to correctional facilities such as glass, heating, and water treatment.

CDI Engineering Solutions has designed detention and correctional facilities in Pennsylvania, Louisiana, and Florida, and has received national recognition for its services from the American Correctional Association. The company's <sup>76</sup> parent, CDI Corporation, was acquired in 2017 by private equity firm AE Industrial Partners, which was still <sup>77</sup> invested in the company as of August 2023. <sup>78</sup>

CleaverBrooks is a company that provides services for boiler room systems in various settings, including <sup>79</sup> correctional settings. Private equity <sup>80</sup> firm Harbour Group has owned the company since 2012.

81

In 2021, private equity investor BDT Capital Partners acquired Culligan, a company providing water treatment services in residential, office, and commercial settings, including correctional facilities. <sup>82</sup> BDT acquired Culligan from private equity firms Advent International and Centerbridge Partners. <sup>83</sup>



- [1] The Federal Bureau of Prisons' Reimbursement Rates for Outside Medical Care, 2016. <https://oig.justice.gov/reports/2016/e1604.pdf#page=2> .
- [2] Welcome to Jail Inc: how private companies make money off US prisons, 2016. <https://www.theguardian.com/us-news/2016/jun/16/us-prisons-jail-private-healthcare-companies-profit> .
- [3] A Human Rights Framework for Advancing the Standard of Medical Care for Incarcerated People in the United States in the Time of COVID-19, 2022. [https://www.hhrjournal.org/2022/06/a-human-rights-framework-for-advancing-the-standard-of-medical-care-for-incarcerated-people-in-the-united-states-in-the-time-of-covid-19/#\\_ednref50](https://www.hhrjournal.org/2022/06/a-human-rights-framework-for-advancing-the-standard-of-medical-care-for-incarcerated-people-in-the-united-states-in-the-time-of-covid-19/#_ednref50)
- [4] U.S. jails are outsourcing medical care — and the death toll is rising, 2020. <https://www.reuters.com/investigates/special-report/usa-jails-privatization/>.
- [5] One of Nashville's largest private companies merges with California firm, changes name, 2018. <https://www.bizjournals.com/nashville/news/2018/11/07/one-of-nashvilles-largest-private-companies-merges.html>.
- [6] Correct Care Solutions and Conmed Healthcare Management Announce Completion of Tender Offer for Conmed Healthcare Management, 2012. <https://www.prnewswire.com/news-releases/correct-care-solutions-and-conmed-healthcare-management-announce-completion-of-tender-offer-for-conmed-healthcare-management-167667505.html>.
- [7] The Private Option, 2019. <https://www.theatlantic.com/politics/archive/2019/09/private-equitys-grip-on-jail-health-care/597871/>.
- [8] Valitas closes America Service buy, takes name Corizon, 2011. <https://www.bizjournals.com/stlouis/news/2011/06/03/valitas-closes-america-service-buy.html>.
- [9] BPOC: Corizon Health. <https://www.bpoc.com/portfolio/corizon-health>.
- [10] Investment firm acquires Corizon, 2020. [https://www.nashvillepost.com/investment-firm-acquires-corizon/article\\_eeba5a0a-486c-5779-886c-2d50b1befc5a.html](https://www.nashvillepost.com/investment-firm-acquires-corizon/article_eeba5a0a-486c-5779-886c-2d50b1befc5a.html).
- [11] Arlington cuts ties with jail health-care provider, 2021. [https://www.washingtonpost.com/local/legal-issues/arlington-jail-corizon/2021/10/25/53ce61a0-35bd-11ec-91dc-551d44733e2d\\_story.html](https://www.washingtonpost.com/local/legal-issues/arlington-jail-corizon/2021/10/25/53ce61a0-35bd-11ec-91dc-551d44733e2d_story.html).
- [12] Billion dollar prison healthcare contract halted after claims of "undue influence", 2023. <https://www.alreporter.com/2023/02/07/billion-dollar-prison-healthcare-contract-halted-after-claims-of-undue-influence/>.
- [13] Corizon prison healthcare provider declares bankruptcy, YesCare apparently replaces CEO, 2023. <https://www.alreporter.com/2023/02/17/corizon-prison-healthcare-provider-declares-bankruptcy-yescare-apparently-replaces-ceo/>.
- [14] Perigrove Capital Portfolio Companies. <https://www.perigrove.com/portfolio-companies/>.
- [15] Full Guard Capital Partners with Comprehensive Correctional Care, 2023. <https://fullguardcapital.com/full-guard-capital-partners-with-comprehensive-correctional-care/>.
- [16] Full Guard Capital Partners with IMS Correctional Care, 2020. <https://fullguardcapital.com/lancer-capital-partners-with-ims-correctional-healthcare/>.
- [17] Pharmaceuticals and automotive driving deals activity, 2017. <https://www.thebusinessdesk.com/westmidlands/news/2011028-pharmaceuticals-automotive-driving-deals-activity>.
- [18] J.R. Wald: About. <https://www.jrwald.com/about>.
- [19] Captive Labor: Exploitation of Incarcerated Workers. <https://www.aclu.org/wp-content/uploads/legal-documents/2022-06-15-captivelaborresearchreport.pdf>.
- [20] Hochul Proposes Bringing Back Private Prison Labor, 2022. <https://nysfocus.com/2022/02/23/hochul-proposes-bringing-back-private-prison-labor>.

- [21] Televerde Announces Expansion in Indiana with New Call Center at Indiana Women's Prison, 2023. <https://www.prnewswire.com/news-releases/televerde-announces-expansion-in-indiana-with-new-call-center-at-indiana-womens-prison-301886457.html>.
- [22] Could a call center inside Homestead prison help female inmates?, 2021. <https://televerde.com/insights/newsroom/could-a-call-center-inside-homestead-prison-help-female-inmates-get-back-on-track/>.
- [23] This call center company relies on a workforce of incarcerated women to help companies like Microsoft, SAP, and Dell power their sales and marketing, 2019. <https://www.businessinsider.com/televerde-incarcerated-women-perryville-arizona-indiana-2019-6>.
- [24] Food-Related Illness for Prisoners Substantial, Report Says, 2018. <https://www.foodqualityandsafety.com/article/food-related-illness-for-prisoners-substantial-report-says/>.
- [25] How Private Equity Is Turning Public Prisons Into Big Profits, 2019. <https://www.thenation.com/article/archive/prison-privatization-private-equity-hig/>.
- [26] Report: HIG Capital's Prison Food and Commissary Store Racket, 2019. <https://pestakeholder.org/reports/report-hig-capitals-prison-food-and-commissary-store-racket/>.
- [27] What The Rise of Immigrant Detention Means For Some of the Most Vulnerable People Seeking Refuge On Our Border, 2016. <https://perma.cc/4NW7-2WMK>.
- [28] Case 1:22-cv-01479-VMC, 2022. <https://www.cair.com/wp-content/uploads/2022/04/Stamped-Complaint.pdf>.
- [29] BREAKING: CAIR, CAIR-Georgia Welcome Settlement with DeKalb County Jail Over Denial of Halal Food, Ramadan Meals for Muslim Inmates, 2022. <https://cairgeorgia.org/press-releases/breaking-cair-cair-georgia-welcome-settlement-with-dekalb-county-jail-over-denial-of-halal-food-ramadan-meals-for-muslim-inmates/>.
- [30] Food in Prison, 2020. <https://impactjustice.org/innovation/food-in-prison/#report>.
- [31] The Prison Food Machine, pg 21-22, 2021. <https://impactjustice.org/wp-content/uploads/IJ-Eating-Behind-Bars-Release4.pdf>.
- [32] Incarcerated people pay more as inflation hits Kentucky prison stores, 2022. <https://www.lpm.org/investigate/2022-07-28/incarcerated-people-pay-more-as-inflation-hits-kentucky-prison-stores>.
- [33] Prisoners Like Me are Being Held Hostage to Price Hikes, 2022. <https://www.nytimes.com/2022/11/02/opinion/inflation-prison.html>.
- [34] Incarcerated people pay more as inflation hits Kentucky prison stores, 2022. <https://www.lpm.org/investigate/2022-07-28/incarcerated-people-pay-more-as-inflation-hits-kentucky-prison-stores>.
- [35] Costs of incarceration rise as inflation squeezes inmates, families, 2022. <https://idahocapitalsun.com/2022/10/13/costs-of-incarceration-rise-as-inflation-squeezes-inmates-families/>.
- [36] Electronic Monitoring: The Operation of Ankle Monitoring in the Criminal Legal System, 2021. <https://issuu.com/gwlawpubs/docs/electronic-prisons-report?fr=sOGI5NDcxODg3>.
- [37] Ankle monitors, meant to be a positive alternative to incarceration, are hampering rehabilitation, 2021. <https://www.yahoo.com/now/other-prison-electronic-monitoring-most-100310068.html>
- [38] Digital Jail: How Electronic Monitoring Drives Defendants Into Debt, 2019. <https://www.propublica.org/article/digital-jail-how-electronic-monitoring-drives-defendants-into-debt>
- [39] Decades later, electronic monitoring of offenders is still prone to failure, 2017. <https://www.brookings.edu/blog/techtank/2017/09/21/decades-later-electronic-monitoring-of-offenders-is-still-prone-to-failure/>
- [40] Incarcerated at home: The rise of ankle monitors and house arrest during the pandemic, 2021. <https://www.nbcnews.com/tech/tech-news/incarcerated-home-rise-ankle-monitors-house-arrest-during-pandemic-n1273008>
- [41] Overview of Electronic Monitoring. <https://mediajustice.org/unshackling-freedom/what-you-should-know/>



- [42] Study of Electronic Monitoring Smartphone Apps Confirms Advocates' Concerns of Privacy Harms, 2022. <https://www.eff.org/deeplinks/2022/09/study-electronic-monitoring-smartphone-apps-confirms-advocates-concerns-privacy>.
- [43] Allied Universal® completes acquisition of Attenti to create the global leader in electronic monitoring, 2022. <https://www.aus.com/press-releases/allied-universal-completes-acquisition-attenti-create-global-leader-electronic>.
- [44] Electronic Monitoring: The Operation of Ankle Monitoring in the Criminal Legal System, 2021. <https://issuu.com/gwlawpubs/docs/electronic-prisons-report?fr=sOGI5NDcxODg3>.
- [45] Comptroller Stringer and Trustees: New York City Pension Funds Complete First-In-The-Nation Divestment From Private Prison Companies, 2017. <https://comptroller.nyc.gov/newsroom/comptroller-stringer-and-trustees-new-york-city-pension-funds-complete-first-in-the-nation-divestment-from-private-prison-companies/>.
- [46] G4S suitor would drop prison work, 2020. <https://www.thetimes.co.uk/article/g4s-suitor-would-drop-prison-work-d23jq3b8q>.
- [47] Phone rates in jails and other facilities, 2021. [https://www.prisonpolicy.org/phones/appendices2022\\_3.html](https://www.prisonpolicy.org/phones/appendices2022_3.html).
- [48] Phone rates and average daily population in Michigan jails, 2018. [https://www.prisonpolicy.org/phones/appendix\\_table\\_7.html](https://www.prisonpolicy.org/phones/appendix_table_7.html).
- [49] State of Phone Justice 2022. [https://www.prisonpolicy.org/phones/state\\_of\\_phone\\_justice\\_2022.html](https://www.prisonpolicy.org/phones/state_of_phone_justice_2022.html).
- [50] Allpaid. <https://www.govpaynow.com/gps/user/cyg/welcome;jsessionid=C45BA7900775DF117556129F5B041E21>.
- [51] Sending Email FAQ. <https://www.jpays.com/jpayHelp/Content/products%20and%20services/Email/Sending%20email%20FAQ.htm>.
- [52] SMH: The rapid & unregulated growth of e-messaging in prisons, 2023. <https://www.prisonpolicy.org/reports/emessaging.html>.
- [53] CFPB Penalizes JPay for Siphoning Taxpayer-Funded Benefits Intended to Help People Re-enter Society After Incarceration, 2021. <https://www.consumerfinance.gov/about-us/newsroom/cfpb-penalizes-jpay-for-siphoning-taxpayer-funded-benefits-intended-to-help-people-re-enter-society-after-incarceration/>.
- [54] Tablets for Indiana inmates might be free, but there's a catch, 2017. <https://www.indystar.com/story/news/crime/2017/11/20/indiana-prisons-tablets-offenders-inmates-department-correction/858322001/>.
- [55] The Hidden Cost of 'Free' Tablets in Prison, 2023. <https://scalawagmagazine.org/2023/06/prison-tablets/>.
- [56] Inmate Phone Service. <https://fcsoga.org/services/jail/>.
- [57] The Martha Wright-Reed Just and Reasonable Communications Act. <https://www.duckworth.senate.gov/imo/media/doc/White%20Paper%20-%20Martha%20Wright-Reed%20J&R%20Communications%20Act.pdf>
- [58] Prison Phone Justice is a Gender Justice Issue: The Legacy of Mrs. Martha Wright-Reed, 2019. <https://mediajustice.org/news/prison-phone-justice-is-a-gender-justice-issue-the-legacy-of-mrs-martha-wright-reed/>
- [59] The Martha Wright-Reed Just and Reasonable Communications Act. <https://www.duckworth.senate.gov/imo/media/doc/White%20Paper%20-%20Martha%20Wright-Reed%20J&R%20Communications%20Act.pdf>
- [60] The FCC can finally hammer predatory prison phone call companies, thanks to just-passed bill, 2022. <https://techcrunch.com/2022/12/22/the-fcc-can-finally-hammer-predatory-prison-phonocall-companies-thanks-to-just-passed-bill/>  
gucе\_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&gucе\_referrer\_sig=AQAAAL2h8Rlu3JEGzNhFtMiepAdNGOdv9Kx23oEuTvUkuZXpfPkGXdcSnZDnL3xKSEM6FQdmFj3huBL5SObA6zBoKMSOkcg585cIFR92Uzi2sjE7NGXzcbes9q6IBGx79ff0ewWSEvjE4QIDUWGYyjtHpl25E2IrlRL\_6r2aUyO\_fkjd&\_guc\_consent\_skip=I6942I0I58
- [61] State of Phone Justice 2022. [https://www.prisonpolicy.org/phones/state\\_of\\_phone\\_justice\\_2022.html](https://www.prisonpolicy.org/phones/state_of_phone_justice_2022.html).

[62] Securus: call rates and kickbacks, 2019. <https://www.prisonphonejustice.org/provider/securus/>.

[63] Dauphin County made millions on jail phone calls and spent it on staff perks, contractors, 2023. <https://www.pennlive.com/news/2023/01/dauphin-county-made-millions-on-jail-phone-calls-and-spent-it-on-staff-perks-contractors.html>.

[64] State of Phone Justice 2022. [https://www.prisonpolicy.org/phones/state\\_of\\_phone\\_justice\\_2022.html#sopjtable3](https://www.prisonpolicy.org/phones/state_of_phone_justice_2022.html#sopjtable3)

[65] LA Times series on Platinum Equity owner Tom Gores highlights headline risk of Securus prison phone investment, 2019. <https://pestakeholder.org/news/la-times-series-on-platinum-equity-owner-tom-gores-highlights-headline-risk-of-securus-prison-phone-investment/>.

[66] Letter to Platinum Equity. <https://pestakeholder.org/wp-content/uploads/2019/04/2019.03.19-Platinum-Equity-Securus-Commitment.pdf>.

[67] Where is Platinum Equity getting the money to invest \$400 million more in prison telecom company Securus?, 2023. <https://pestakeholder.org/news/where-is-platinum-equity-getting-the-money-to-invest-400-million-more-in-prison-telecom-company-securus/>.

[68] Aventiv and creditors plot next steps after refi fails, 2023. <https://community.ionanalytics.com/aventiv-and-creditors-plot-next-steps-after-refi-fails>.

[69] Prison Phone Justice. <https://www.prisonphonejustice.org>.

[70] CDCR Launches Free Audio Calls, 2022. <https://www.cdcr.ca.gov/news/2022/12/30/cdcr-launching-free-audio-calls-for-incarcerated-population/>.

[71] Now free, phone calls in Connecticut prisons soar, November 2022. <https://www.ctinsider.com/news/article/free-phone-calls-CT-prisons-increased-17553263.php>.

[72] S.1541 - Martha Wright-Reed Just and Reasonable Communications Act of 2022. <https://www.congress.gov/bill/117th-congress/senate-bill/1541/text>.

[73] Following the Money of Mass Incarceration, 2017. <http://www.prisonpolicy.org/reports/money.html>.

[74] Prison spending in 2015. <https://www.vera.org/publications/price-of-prisons-2015-state-spending-trends/price-of-prisons-2015-state-spending-trends-price-of-prisons-2015-state-spending-trends-prison-spending>.

[75] Layton Construction: Justice. <https://www.laytonconstruction.com/portfolio/justice/>.

[76] CDI Engineering Solutions: Battery Chemicals. <https://www.cdiengineeringsolutions.com/projects/corrections-justice/>.

[77] CDI Corp. to be Acquired by AE Industrial Partners for \$8.25 Per Share in Cash, 2017. <https://www.prnewswire.com/news-releases/cdi-corp-to-be-acquired-by-ae-industrial-partners-for-825-per-share-in-cash-300496513.html>.

[78] AE Industrial Partners: Portfolio. <https://www.aeroequity.com/investments/#cdi-corp13>.

[79] Cleaver Brooks. <https://cleaverbrooks.com/>.

[80] Pennsylvania Department of Corrections, SCI Dallas. <https://energiasaves.com/projects/pennsylvania-department-of-corrections-sci-dallas/>.

[81] Wellspring Sells Cleaver-Brooks to Harbour Group, 2012. <https://www.paulweiss.com/practices/transactional/mergers-acquisitions/news/wellspring-sells-cleaver-brooks-to-harbour-group?id=11972>.

[82] Culligan Water. <https://www.culligan.com/commercial/industries>.

[83] BDT Capital Partners Completes Acquisition of Culligan International, 2021. <https://www.businesswire.com/news/home/20210802005223/en/BDT-Capital-Partners-Completes-Acquisition-of-Culligan-International>