

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

| | | |
|---------------------------------------|---|--------------------------|
| LAWRENCE CARTY, ET AL., |) | CIVIL NO. 1994-78 |
| |) | |
| |) | Plaintiffs, |
| |) | |
| v. |) | |
| |) | |
| GOVERNOR KENNETH MAPP, ET AL., |) | |
| |) | |
| |) | |
| |) | Defendants. |

NOTICE OF FILING OF QUARTERLY GOALS

COME NOW, Defendants, by and through undersigned counsel, and following the post-hearing conference with the Court on February 26, 2016, attached as Exhibit 1 are Defendants' quarterly goals for the period ending on May 6, 2016.

Respectfully submitted,

**CLAUDE EARL WALKER, ESQ.
ATTORNEY GENERAL**

February 26, 2016

BY: /s/ Shari N. D'Andrade
SHARI N. D'ANDRADE, ESQ.
ASSISTANT ATTORNEY GENERAL
V.I. Bar. No. 1221
V.I. Department of Justice
Office of the Attorney General
6040 Estate Castle Coakley
Christiansted, VI 00820
Telephone: (340) 773-0295
Fax: (340) 773-1425
Email: shari.d'andrade@doj.vi.gov

CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2016, I electronically filed a true copy of the **DEFENDANTS' NOTICE OF FILING OF QUARTERLY GOALS** with the Clerk of the Court using the CM/ECF system, which gives notification of such filing (NEF) to the following:

Eric Balaban
National Prison Project of the ACLU
915 15th Street, N.W., 7th Floor
Washington, DC 20005
Telephone: (202) 393-4930
Fax: (202) 393-4931
Email: ebalaban@npp-aclu.org

Benjamin A. Currence
Law Offices of Benjamin A. Currence
5045 Norre Gade, Suite 2
St. Thomas, VI 00802
Telephone: (340) 775-3434
Fax: (340) 774-1001
Email: bencurrence@gmail.com

Carol Thomas-Jacobs
Department of Justice
Office of the Attorney General
8050 Kronprindens Gade
St. Thomas, VI 00802
Telephone: (340) 774-5666
Fax: (340) 776-3494
Email: cjacobs@doj.vi.gov

/s/ Shari N. D'Andrade

Defendants' Quarterly Goals
BUREAU OF CORRECTIONS
SETTLEMENT AGREEMENT - CARTY et al v. TERRITORY OF THE VIRGIN ISLANDS
QUARTERLY GOALS – PERIOD ENDING MAY 6, 2016

| PROVISION | REF. | EXPERT | GOALS |
|--|--|--------|--|
| Complete training and implementation of Administrative Directives | Sec. IV.H.1.d, f, g; IV.G.1.a.[v ii.]; IV.I.1.f; IV.D.1.a-f; XI.1.e; IV.B.1.e. | Bogard | <ul style="list-style-type: none"> • Re-train staff that did not earn a passing score on the following Administrative Directives: <ul style="list-style-type: none"> ○ Use of Force De-escalation ○ Pre Hearing Detention ○ Contraband ○ Keep Separates ○ Outdoor Recreation ○ Maintaining Housing Posts ○ Housing Unit Rounds ○ Use of Force Incident Reporting • Revise lesson plan for Use of Force Incident Reporting policy. • Fully implement Administrative Directives. |
| Development and implementation of memorandum of understanding to ensure timely transfers of seriously mentally ill prisoners in need of inpatient or intermediate care, or those in need of acute stabilization, to an appropriate hospital or mental health facility. | Sec. V.2.x.iii | Burns | <ul style="list-style-type: none"> • Develop plan to address timely transfers of seriously mentally ill inmates in need of intermediate care to an appropriate hospital or mental health facility. |
| Defendants shall remedy all know security deficiencies and hazards at the Jail. Defendants shall ensure that security systems and equipment are readily available to staff and in working order. Defendants shall develop and implement policies regarding the operation and placement of security | Sec. IV C.1; IV.C.1.m | Bogard | <ul style="list-style-type: none"> • Develop a detailed plan for procurement and installation of new CCTV system (hardware and software) for both facilities. The plan must include all of the steps and approximate time frames for implementation, including but not limited to: identification of and initial consultation with potential vendors; description of work and technical requirements; identification of necessary funds based on informed capital estimates; estimated time frames to complete the work. |

cameras and the video monitoring system.