

County Jail Inmate Telephone and Commissary

Overcharging a Captive Population

SUMMARY

The COVID-19 (COVID) pandemic uncovered and highlighted many pre-existing inequities in our society, particularly in our criminal justice system. Details like the Sonoma County Main Adult Detention Facility's (MADF) telephone service, gained fresh importance and scrutiny when viewed through the pandemic's lens. As part of its inquiry into the jail's efforts to fight COVID (see companion report, *COVID-19 Mitigation*), the Sonoma County Civil Grand Jury (Grand Jury) found a pattern of charges for inmate phone use that exceeds the market rate by more than tenfold. This prompted the 2020-2021 Sonoma County Civil Grand Jury to investigate the inmate phone system.

Calls from our jail are highly expensive at more than 20 cents per minute. The Sonoma County Sheriff's office, along with many other Sheriff's offices, contracts with a private company that provides the service at a rate well above what is available to inmates in other California counties and to the general public.. In addition, Sonoma County's contract adds a 70% commission to the cost of every call, which the company accumulates and pays the Sheriff's Office monthly. This commission goes into the Inmate Welfare Trust (IWT) which was established to provide inmate programs, but also is used to fund some officer's salaries and other costs.

After over a year of lockdowns and restricted in-person gatherings, we have all experienced increased isolation. Nationwide video chats, messaging apps, and phone usage have exploded to fill the gap of lost in-person visits. Inmates in the county jail already experienced limited contact time, and then COVID struck. To counter the threat of the pandemic, since March 2020, all incarcerated persons have lost their in-person visitations rights. The only way to communicate with friends and family was through the jail's phone system. It is important to note that since the pandemic inmates have less than one hour per day of out of cell time. Sixty percent of the MADF incarcerated population have only been arrested and not yet been convicted of any crime.

In the course of the Grand Jury's investigation into the effects of COVID on the operations at MADF we learned:

- The Sheriff's Office has revenue in excess of \$1 million per year from the sale of commissary items and a commission on all phone calls made by inmates.
- By law this revenue must be deposited in the IWT, a fund designed to be used for the benefit, education, and welfare of inmates.
- While the majority of these funds are used for beneficial inmate programs, several hundred thousand dollars per year are used for jail staff salaries and supplies.
- The excess of revenue over expenses (approximately \$150,000 in 2019, the most recent available figures) each year is placed in the IWT, which is controlled by the Sheriff's office. This fund currently totals over \$1.6 million.
- Due to COVID, most of the inmate programs have been canceled, reducing the IWT expenses, yet the mark-ups and commissions continue.

- Federal and State regulators are forcing change on jails that continue to use commission-based phone contracts where the incarcerated population have no alternatives.
- Sheriff's Offices and Boards of Supervisors in other California counties have eliminated identical charges in their jails.

In the end, the Grand Jury concludes that our jail should not be a profit generating entity. Adding large commissions and mark-ups makes it harder for incarcerated people to maintain their support networks on the outside. When they leave the jail's front gate, the strength of that support network often determines whether the person returns to jail or not. The Grand Jury recommends solutions to offer a more accessible phone system and a more affordable commissary. It also recommends revising the existing Global Tel Link (GTL) contract to eliminate commissions and to provide a low-cost or free audio and video service as the State of California, San Francisco County, San Diego County and other counties have already implemented.

GLOSSARY

- CPUC California Public Utilities Commission
- FCC Federal Communications Commission
- GTL Global Tel Link
- IWT Inmate Welfare Trust
- MADF Main Adult Detention Facility
- OCA Out-of-Cell Activity

BACKGROUND

In response to the COVID threat, the Sheriff's office suspended in-person visitation at the jail in March 2020. Without visitors, the jail's telephone system became the only lifeline incarcerated people had to reach their families and friends outside. As part of its broader investigation into the jail's COVID mitigation efforts, the Grand Jury chose to investigate the GTL phone system and prepare this separate report.

The Sheriff's Office uses GTL as the exclusive inmate phone system for the MADF. GTL provides a turnkey system with all hardware and software for its own telephone network, including all telephones and workstations, with monitoring and recording systems built-in.

The Sheriff's Office Makes Phone Calls Expensive

For many years, the Sheriff's Office has used its jail phone contract as a source of revenue. All calls involving the housing module phones at the jail must use GTL, a private phone company that provides this service to the Sheriff's Office under an exclusive contract. The Sheriff's Office's contract requires GTL to add an additional 70% commission to every charge for jail calls. After collecting its fees and charges, GTL sends that additional 70% commission to the Sheriff's Office every month for deposit into the IWT.

The IWT is overseen by the Inmate Welfare Trust Committee, which consists of nine members of the Sheriff's Office and one civilian representative. In a 2018-2019 IWT audit, the Committee approved expenses totaling over \$286,575 for unspecified salaries and supplies and \$508,500 for rehabilitative programs and inmate education.

Phone Calls Are Never Easy in Jail

All inmates in our Main Adult Detention Facility (MADF) need a plan and some luck to make a phone call at any given time. Each housing module typically has five phones for the inmates to use. Other than emergencies, the only time one can make a call is during assigned Out-of-Cell Activity (OCA) time. In the best of circumstances, incarcerated people in a general housing module were allowed 2-3 hours per day of OCA time, broken up over three periods, and shared with 50-60 other people. Since the pandemic, this time has dropped to a total of between 30 minutes and 60 minutes per day.

As soon as the cell doors open to the common area, lines begin to form. One set of lines form to get hot water for soup or a hot drink. One set of lines form to take a shower. One set of lines form to check-out a video/education tablet, only allowed to be used during OCA time. And one set of lines form for the phones. There may not be sufficient phones for the number of people waiting in line. As a result, it is very common to have OCA time end without everyone who wants to make a call having the opportunity.

Using the Phone in Jail

Getting to a jail phone is only part of the challenge. The system requires each incarcerated person to access the phone through an electronic account. Using a unique PIN code connected to their account, the incarcerated person can add money with a debit card. Friends and family outside the jail can also add money to their phone account through an online portal using a debit or credit card.

The phone system deducts the cost of each call in real-time on a per-minute basis. It's a system that harkens back to the day of excessive long-distance calling charges and hidden fees. If an incarcerated person's phone account runs out of funds during a call, the line disconnects.

There are a few ways incarcerated people and their families pay for calls:

- Buy phone cards (90 minutes for \$20) from the jail commissary
- Use money loaded into their phone account from their debit card or from friends and family outside
- Call collect

Each option has built-in barriers. Friends and families without a credit or debit card have limited access to the whole system. If families have a card, the private phone company also charges high transaction fees to use that card to transfer money into the incarcerated person's phone account. Each transfer requires a \$3 fee on every \$20 worth of minutes.

Using the collect call feature also presents problems for those who do not have a wired landline telephone. If the family member on the outside only has a cell phone, there is no easy way to call collect. Many households in the County, and especially those most economically vulnerable, no longer have access to a collect-call-capable landline.

To make up for the suspended in-person visitation, the Sheriff's Office, through the IWT, periodically distributed free phone cards from March 2020 until February 2021, and then provided 10 free minutes each day thereafter. Describing the phone cards or minutes as "free," however, is not exactly accurate. The money to pay for those phone cards comes from excessive charges added to those same incarcerated people's commissary and phone card purchases. Although the Sheriff's Office suspended most of the rehabilitative and educational programs

those commissions are supposed to be funding, it continued to require the commissions throughout the pandemic lockdown.

METHODOLOGY

This is a self-initiated report. The Grand Jury interviewed members of the Sheriff's Office, other County agencies, and the Board of Supervisors as well as a diverse group of people incarcerated in different housing modules at the MADF.

Grand Jurors conducted extensive research and reviewed Sheriff's Office policies and procedure manuals; contracts between the Sheriff's Office and telephone service providers; internal administrative reports; internal emails, documents, and meeting minutes; academic studies; budget and audit reports; press reports; and prior Grand Jury reports.

The Grand Jury encountered outstanding cooperation from the Sheriff's Office.

DISCUSSION

The Commissary and Inmate Welfare Trust

The Sheriff's Office-run commissary inside the MADF offers the incarcerated population personal items and packaged food for purchase. Luxuries are small. A single-serving \$0.70 package of ramen, for example, is among the most popular items. This item can be purchased at Safeway for \$.33 as a single serving or \$.25 when purchased in a package of eight single servings. On sale, the price can be as low as seven single servings for \$1.00.

The commissary serves a much broader role than just providing the incarcerated an opportunity to purchased snacks and personal items. Like most local jails in California, the Sheriff's Office adds a substantial mark-up to each non-essential item the commissary sells. In a rigorous process, paid for by the IWT, the detention staff regularly surveys retail outlets, mostly local 7-11 convenience stores, to set commissary prices. These prices are typically 200% to 300% over the jail's wholesale cost.

The Sheriff's Office deposits these monies, which combined with the phone commissions total approximately \$1,000,000 each year into the IWT as State law requires.¹ The jail's Inmate Welfare Trust Committee governs the entire program, deciding what money goes in and how to spend it. The Committee meets quarterly and currently includes nine members of the Sheriff's Office correctional and administrative staff, and one civilian representative. The law does not set the requirements of the committee membership for a jail. In any given year, the IWT Committee may decide not to spend all of the money it raised. The remaining amount continues to accrue interest and, as of early 2021, the IWT held a surplus of over \$1.6 million.

The Sheriff's Office, as it must by law, spends the IWT funds "primarily for the benefit, education, and welfare of the inmates confined within the jail."² That definition is subject to a broad interpretation. The following chart summarizes expenses the IWT Committee allocated in the fiscal years ending on June 30, 2018, and June 30, 2019, the years subject to the most recent audit.

¹ California Penal Code § 4025.

² California Penal Code § 4025(e).

Inmate Welfare Trust			
Expenditure	FY 2017/18	FY 2018/19	% Change
Salary Reimbursement Costs	\$ 279,596	\$ 286,575	+ 2.5%
Inmate Education Programs	589,977	508,500	-13.8%
Inmate Incentives	15,384	38,984	+153.4%
Other Services and Supplies	120,138	87,334	-27.3%
Total Expenditures	\$ 1,005,096	\$ 921,396	-8.3%
Total Revenue	1,126,271 ³	1,074,258 ⁴	-4.6%
Change in Fund Surplus	121,175	152,862	+26.1%
Ending Fund Surplus Balance	\$ 1,334,802	\$ 1,487,664	+11.4%

Table 1

The Grand Jury reviewed audit results only, which did not provide complete financial line item detail. In each of the two years under review the IWT Committee decided not to spend all of the commissions it collected. A total of \$274,037 went to the IWT surplus.

The question arises whether the IWT Committee is prioritizing incarcerated program funding. On June 11, 2019, just as the FY 2018-19 was ending with declining phone usage and declining phone commissions, the Sheriff signed an amendment to its longstanding GTL phone contract. The new arrangement retained the same commission system, but it increased the rate for phone revenue from 60% to 70%. After signing, all phone charges at the jail increased and the additional revenue flowed into the IWT. As an amendment to a pre-existing contract, the County routing slip indicates that no Board of Supervisor review took place.

The Business of Incarcerated Telephone Access

The Sheriff's Office's IWT revenue comes mainly from two sources: adding convenience store-level mark-ups to commissary items, and the jail phone contract commissions. Incarcerated telephone access is a big business and many California county jails, including ours, have come to rely on their monthly cut of the profits.

The telephone system used by incarcerated residents at the MADF is provided exclusively by GTL, the largest of two private companies that dominate the national market for detention communication services. Due to their exclusive contracts, the jail phone service companies commanded a high valuation when they came to market. [GTL's last sale](#) took place in 2011 from a Goldman Sachs-led private equity group to GTL's current private equity owner, American Securities Capital, for \$1 billion. The Sheriff's Office contracted originally with a company called Legacy Inmate Communications, but GTL purchased [Legacy](#) as part of its strategy to consolidate 50% of the national market.

GTL has two main sources of income from its inherited contract with Sonoma County:

- Selling phone cards to the Sheriff's Office for resale in the commissary

³ The largest sources of FY 2017/18 revenue, in order, include: Phone Revenues (\$373,577), Commissary and Phone Cards (\$662,764), Misc. Revenue (\$50,671), Interest on Pooled Cash (\$23,018).

⁴ The largest sources of FY 2018/19 revenue, in order, include: Phone Revenues (\$316,845), Commissary and Phone Cards (\$633,000), Bail Bond Advertising (\$43,575), Interest on Pooled Cash (\$34,999).

- Selling minutes through debit card transfers or online sales to people outside the jail who want to fund calls from friends or family inside the MADF

The phone card business is a straight-forward buy wholesale and sell retail model. In this case, however, profit margins are very high and the “customers” are without choice. The Sheriff’s Office collects profit by adding a 233% mark-up on every phone card its sells from the commissary. GTL sells 90-minute phone cards to the Sheriff’s Office for \$6, or approximately \$0.07 per minute. By contrast, the average prepaid phone cards available for retail sale in the community cost between \$0.02 and \$0.03 per minute.⁵ The Sheriff’s Office adds on \$14 before charging incarcerated consumers \$20 at the commissary for the same card. Tacking on the Sheriff’s Office’s surcharge to GTL’s already expensive prepaid phone service increases the \$0.07 per minute rate to \$0.22 per minute, or over 10 times the retail rate plus fees. Last year, the Sheriff’s Office made \$140,000 from these phone card mark-ups alone.

The Sheriff’s Office receives over twice that amount each year from GTL’s online business in the form of commissions. Families and support networks outside can transfer money to a jail inmate’s phone account through the GTL’s website. GTL charges its own fees and rates before adding an additional 70% commission for the Sheriff’s Office. The 70% mark-up also applies to every collect call from the jail. There is no option but to use GTL and its high rates to speak to anyone outside the jail. The more minutes users outside the MADF purchase directly from GTL online, the more commission money flows into the IWT.

The Sheriff’s Office’s Role

The amount of the commission is entirely within the Sheriff’s Office’s discretion. In these transactions, GTL is simply a pass through, applying the contract’s mark-up, and passing that commission on to the Sheriff’s Office.

The Sheriff’s Office points to the laudable programs, such as tablet based educational courses, rehabilitative programs and services which these mark-ups help fund. These programs play a role in furthering the jail’s rehabilitative goals.⁶ However, as shown in Table 1 above, only \$547,484 of the \$921,346, or about 60%, of the monies expended in the budget actually directly benefitted the inmates. The Jury agrees that many of the IWT expenditures remain critically important. The IWT pays for a host of different education programs, job training, reading materials, and coveted tablet-based coursework.

But, even after suspending all in-person visitation for over a year, and most of the programs these commissions were designed to fund, the Sheriff’s office continued the 70% commissions on all phone use. The result is a phone charge that serves mainly to enlarge the \$1.6 million IWT surplus.

Change Is Coming, Voluntarily or Not

This system of funding jail programs with phone service fees has been around for a long time. Recently, however, the national trend is moving toward abolishing these arrangements. In 2015, the Federal Communications Commission (FCC) investigated detention telephone contracts and imposed strict fee caps to prevent the practices we continue to use locally. In trying to fill the

⁵ 7-11, the convenience store maximum mark-up the Sheriff’s Office uses for other commissary pricing decisions, offers its own prepaid phone cards. 7-11 charges less than \$0.02 per minute for its prepaid cards.

⁶ The 2016-17 Civil Grand Jury reported extensively on *Programs At Sonoma County Detention Facilities*.

regulatory gap, the FCC described how these contracts impact families and work against our core detention goals:

Excessive rates for inmate calling deter communication between inmates and their families, with substantial and damaging social consequences. Inmates' families may be forced to choose between putting food on the table or paying hundreds of dollars each month to keep in touch. When incarcerated parents lack regular contact with their children, those children – 2.7 million of them nationwide – have higher rates of truancy, depression, and poor school performance. Barriers to communication for high inmate calling rates ... impede family contact that can “make[] prisons and jails safer spaces,” and foster recidivism.⁷

After the FCC reforms, all Federal prisons charge less than 10% of the rates we continue to charge for phone access at our County jail.

San Francisco, San Diego, and California Offer Examples

For now, local county jails including ours represent the last refuge in the State for these commission-based contracts. California's Public Utility Commission (CPUC) is looking to change that for good. The CPUC issued an [Order in October 2020](#), announcing it “will consider how to ensure incarcerated people and their families have access to intrastate telecommunication service at just and reasonable rates.” It is currently targeting a final decision before the end of 2021.

Other counties are not waiting. San Francisco provided a blueprint for a new model with the same GTL vendor in August 2020. In one of a series of reforms, [San Francisco County renegotiated its contract with GTL](#). A press release by the Mayor of San Francisco, explained why they eliminated the commission based phone contracts:

“When people are in jail they need to be able to stay connected with their family without being concerned about how much it will cost them or their loved ones. Being able to stay in touch with family is always important, but it is even more critical during a health emergency like COVID. This change is an important continuation of our efforts to reform fines and fees that disproportionately impact low-income people and communities of color.”

San Francisco's Sheriff's Department took the lead on the transition with active Board of Supervisors encouragement and support. The new contract requires the San Francisco Sheriff's Department to pay a vastly smaller amount as a fixed fee to GTL each month rather than using the commission-based system, that Sonoma County and many other California jails still use.

By decoupling the programs its Inmate Welfare Trust were funding from the commissary and commission revenue sources, the San Francisco Sheriff's Department was able to use County funding for rehabilitative programs. The telephone and commissary could then function with a completely different model. In San Francisco, the commissary removed the mark-ups and prices dropped 40% overnight. After removing the commission-based mechanism, San Francisco's new GTL contract allows their Sheriff's Office to provide the same telephone service and video visitation at no charge to incarcerated people and their families.

⁷ *Global Tel*Link v. FCC*, 866 F.3d 397, 405 (D.C. Cir. 2017) (quoting the FCC's brief).

San Diego County took a different path to the same result. Instead of the Sheriff's Office, the [San Diego County Board of Supervisors voted on March 2, 2021](#), to reject their Sheriff's proposal to continue funding its IWT with phone and commissary overcharges. The San Diego Sheriff argued that eliminating the revenue streams would impact educational programs and other services. The Board of Supervisors voted unanimously to end the practice of charging incarcerated people for phone calls and video visits. Its public comment period resulted in broad support. At the time of this report it is unclear as to the result of these changes.

To date, eight states including California have eliminated commission-based telephone monopolies in their prisons. In each state, prices dropped significantly after the transition. In March 2021, California completed the renegotiation of its statewide communications contract with GTL, providing another example for what Sonoma County could accomplish on a smaller scale.

GTL is transitioning its business across the country in response to new laws, new regulations, class action lawsuits, price fixing lawsuits, and a racketeering action initiated by the Mississippi Attorney General. The [new GTL contract for California state prisons](#) changed its cost structure completely. All call charges dropped to 2 ½ cents per minute. The contract now requires a cap of 37 ½ cents for a nationwide 15-minute call to prevent GTL's practice of adding excessive fees. GTL is also going to roll out kiosk and tablet communication services in California prisons for email and video visitation. The program includes 15 minutes of free video calls every two weeks for each incarcerated person.

Sonoma County's \$1.6 million and growing IWT surplus is enough money to pay for the next two years of programs and phone calls, allowing a transition to a new contract that eliminates commissions and overcharging. The San Francisco's Board of Supervisors and Sheriff's Department took less than two years starting from scratch, and they implemented transition measures to drop the phone costs early on. Sonoma County should take advantage of that legwork and seek to implement similar measures on a faster timeline.

CONCLUSION

Whether the Sheriff's Office takes the lead or the Board of Supervisors takes up the issue:

- The Inmate Welfare Trust needs to be reformed
- Alternative sources of revenue for inmate programs need to be found
- Expenditures of the IWT need to be more transparent
- The Board of Supervisors needs to be involved in the IWT fund oversight
- Phone and commissary mark-ups work to the detriment of inmates and should be minimized
- The IWT Commission needs to be restructured with more community representation

If you didn't know, now you know.

FINDINGS

The Sonoma County Civil Grand Jury determined that:

- F1. Sonoma County Sheriff's Office commission-based contract with Global Tel Link unreasonably inflates the cost of telephone communication for incarcerated people and their families in the community.

- F2. High mark-ups on commissary and phone card sales place an undue burden on some of the most economically vulnerable families in the County.
- F3. A renegotiated agreement with Global Tel Link, without the excessive mark-up added for commissions, would lower the cost of telephone calls for the incarcerated population.
- F4. Five telephones for a group of 60 people to use in less than one hour is insufficient to promote communication between incarcerated people and their support networks outside the jail.
- F5. The Sheriff's Office will be required to find new funding for its Inmate Welfare Trust - supported programs if the California Public Utilities Commission issues its order in the coming year.
- F6. The Sheriff's Office detention staff holds disproportionate control over the Inmate Welfare Trust Commission with nine seats of the 10-member committee.
- F7. The high mark-up on the commissary and phone card sales continued while visitation and inmate supportive programs, which are funding by the Inmate Welfare Trust revenues, were cancelled.
- F8. The high mark-up on the commissary and phone card sales result in over \$1.6 million accumulated excess in the Inmate Welfare Trust.

RECOMMENDATIONS

The Sonoma County Civil Grand Jury recommends that:

- R1. The Sheriff's Office work with the Board of Supervisors to replace the current commission-based audio and video contract with Global Tel Link, using a model based on the San Francisco County Sheriff's Department, by December 31, 2021. (F1, F3)
- R2. By September 30, 2021, the Sheriff's Office develop a new communications model to provide for sufficient telephone kiosks to allow the inmate population free telephone and video visitation for at least 90 minutes per week until such time as a new communication contract is in effect. (F1, F2, F3)
- R3. As required by PC § 4025(e), the Sheriff's Office provide an annual report to the Board Of Supervisors detailing line item revenue and expenses within the Inmate Welfare Trust , beginning with the fiscal year ending June 30, 2021, with the initial report due by November 30, 2021. (F5, F7)
- R4. The Sheriff's Office use its \$1.6 million Inmate Welfare Trust surplus to remove all charges for telephone service while in-person visitation is suspended, on or before September 30, 2021. (F8)
- R5. The Sheriff's Office reevaluate its commissary markup to be in line with grocery store, as opposed to convenience store, pricing, on or before September 1, 2021. (F2, F7, F8)
- R6. By September 30, 2021, the Sheriff's Office, using the reserve Inmate Welfare Trust funds, resume all inmate programs in existence pre-COVID, with funding at the same level once COVID related restrictions are lifted. (F8)

- R7. The Sheriff's Office restructure the 10-member Inmate Welfare Trust Committee by December 31, 2021 to include more diverse representation, for example, community members, financial analysts, social workers and educators to bring the Committee more in line with the requirements of Penal Code § 5006 regarding commission membership standards for State Prisons. (F6)

REQUIRED RESPONSES

Pursuant to Penal Code §§ 933 and 933.05, the Grand Jury requires responses within 60 days as follows:

- Sonoma County Sheriff's Office (R1, R2, R3, R4, R5, R6, R7)
- Sonoma County Board of Supervisors (R1, R3)

The governing bodies indicated above should be aware that their comments and responses must be conducted subject to the notice, agenda and open meeting requirements of the Brown Act.

BIBLIOGRAPHY

Hyperlinks for key source material have also been included in the body of the electronic version of the report:

- "Justice Is Calling: How San Francisco Made Jail Phone Calls Free, Ended Commissary Markups, and Stopped Generating Revenue From Incarcerated People and Their Families," Financial Justice Project of San Francisco, San Francisco Treasurer's Office (Feb. 18, 2021) (<https://tinyurl.com/39nj8dw>)
- "Private Equity Firms Profit Handsomely from Prison Phone Services," *Prison Legal News* (October 15, 2012) (<https://tinyurl.com/3xfjpjzc>)
- Public Notice, "Applications Filed For The Acquisition Of Certain Assets Of Legacy Long Distance International, Inc. D/B/A Legacy Inmate Communications By Global Tel*Link Corporation" (August 27, 2020) (<https://tinyurl.com/2xn7jcn9>)
- Order Instituting Rulemaking to Consider Regulating Telecommunications Services Used by Incarcerated People, *Federal Communications Commission*, Rulemaking 20-10-002 (Issued October 19, 2020). (<https://tinyurl.com/wvp4xb4k>)
- Press Release, San Francisco Announces All Phone Calls From County Jails Are Now Free, San Francisco Mayor's Office (August 10, 2020) (<https://tinyurl.com/6ckyhans>)
- "County Supervisors Vote to End Charging Jail Inmates for Phone Calls," *Times of San Diego* (March 2, 2021). (<https://tinyurl.com/4xykutv9>)
- Erika Martin, "California cuts cost of state inmate phone calls, will expand prisoners' access to tablets," KTLA.com (March 1, 2021) (<https://tinyurl.com/5h8um5rc>)

Additional Sources Material

- Sonoma County Sheriff's Office Fiscal 2019-2020, Annual Report, <https://tinyurl.com/yjocdzs2>
- 2020-21 Sonoma County Budget, pages 115, 120, (<https://tinyurl.com/b82cab7a>)
- Internal Audit: Sonoma County Sheriff's Office Inmate Welfare and Jail Store Trust Funds, For the Period: July 1, 2017 – June 30, 2019, Report Date: October 30, 2020, (<https://tinyurl.com/3w2sxs42>)

Reports issued by the Civil Grand Jury do not identify individuals interviewed. Penal Code Section 929 requires that reports of the Grand Jury not contain the name of any person or facts leading to the identity of any person who provides information to the Civil Grand Jury.