

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No.: 1:14-cv-02887-JLK

ALEJANDRO MENOCA,  
MARCOS BRAMBILA,  
GRISEL XAHUENTITLA,  
HUGO HERNANDEZ,  
LOURDES ARGUETA,  
JESUS GAYTAN,  
OLGA ALEXAKLINA,  
DAGOBERTO VIZGUERRA and  
DEMETRIO VALERGA  
on their own behalf and on behalf of all others similarly situated,

Plaintiffs,

v.

THE GEO GROUP, INC.,

Defendant.

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**DECLARATION OF GRISEL XAHUENTITLA-FLORES**

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1. My name is Grisel Xahuentitla-Flores. I am a named Plaintiff in this lawsuit. I am over eighteen years old. I have personal knowledge of the contents of this declaration.
2. I was detained at the Aurora Detention Facility between approximately May 15, 2014 through September 3, 2014. That facility is operated by The GEO Group. During my time in the Aurora Detention Facility, I have worked for the Defendant.
3. When I first arrived at the Aurora Detention Facility, I did not have a \$1/day job in the voluntary work program. During that time, I had to work for no pay doing cleaning work in the common and private living areas. Every day, the guards would call on some of the detainees to clean. None of us got paid anything for the work we did on the cleaning crews. If we didn't do the cleaning, we would be sent to the hole – or solitary confinement. One time, during my detention, I saw one of the GEO guards, I don't remember her name, though I believe she was a lieutenant, tell another detainee who was sick that she would be sent to the hole if she did not do the cleaning.

4. From approximately May, 2014 through June, 2014. I worked for GEO in the voluntary work program as a "trustee" in my pod. They paid \$1/day for that work. You apply for the jobs and GEO personnel interview, hire and supervise you. The GEO people determine when you work and for how long. The pay rate is the same for every detainee I know to have worked in that program, it didn't matter how many hours each detainee worked, they only paid them \$1 per day. I have known of more than 50 people who have worked all kinds of jobs in the voluntary work program. I worked approximately six hours per day. The pay for that work was always \$1/day.
5. I want to present this lawsuit on my own behalf and on behalf of all the other detainees who were forced to clean for no pay and/or who were paid \$1/day for their work in the voluntary work program. I understand that, as a representative, I have the responsibility to participate actively in this case and to assure that the interests of the other workers are protected by my attorneys. I am ready and able to do this. Moreover, I am ready to reimburse my attorneys a proportionate share of the costs of sending a letter notifying the other workers of this lawsuit and of their right to participate.
6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 22<sup>nd</sup> day of April, 2016.

  
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Grisel Ahuentilla-Flores