

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.,

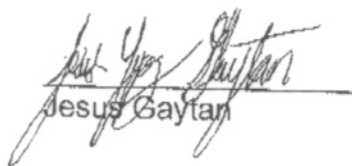
Defendant.

DECLARATION OF JESUS GAYTAN

1. My name is Jesus Gaytan. 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 2014 through October 23, 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 six of the detainees who didn't have a job in the voluntary work program. Those six individuals had to clean. The people the guards chose would rotate so that everybody had to take a turn on the cleaning crew. None of us got paid anything for the work we did on the cleaning crews. I did the cleaning because I was told that I'd be sent to solitary confinement if I didn't do the cleaning.

4. From approximately May, 2014 through October 2014, I worked for GEO in the voluntary work program. 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. My job was to work in the laundry. I worked between 6 and 8 hours per day, 5 days per week.
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 2th day of November, 2015.


Jesus Gaytan