

**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 CARLOS ELIEZER ORTIZ MUÑOZ

1. My name is Carlos Eliezer Ortiz Muñoz. 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 in 2014 and 2015. That facility is operated by The GEO Group. During my time in the Aurora Detention Facility, I worked for GEO.
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. People who refused to clean were put in solitary. I saw this happen to a detainee whose name I don't remember. Some of the guards would threaten us by saying: "¿Quieres ir al oyo?"- "You want to go to the hole?"

4. For approximately three months I worked for GEO in the voluntary work program. They paid \$1/day for that work. I worked in the kitchen. Everyone complained about the fact that they only paid us \$1 per day. 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. For example, I knew Christian Heredia and Omar Gonzalez, both of whom also worked in the program. They were only paid \$1 per day as well.
5. 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 25th day of April, 2016.

Carlos Ortiz
Carlos Eliezer Ortiz Muñoz