

**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 ADRIANA MENDOZA CASTELLANOS**

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1. My name is Adriana Mendoza Castellanos. 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 1/15/2014 and 10/23/2014. 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. 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. We had to do the cleaning, and if someone was sick, they had to find someone else to do the cleaning for them. There was no choice about it. The correctional officers told us, and told me directly, that they would send us to the "hole," or solitary confinement, if I/we didn't do the cleaning.

4. From approximately 1/2014 through 10/22/2014, I worked for GEO in the voluntary work program. They paid \$1/day for that work. I was told that GEO could only pay \$1 per day, and couldn't pay any more than that. We asked various GEO employees why we weren't paid more, and they told us that GEO could not pay more. I remember that we asked a guard named "Vasquez," who was in charge of the work, if we could be paid more and she told us that GEO was not allowed to pay more. I remember that we were in my unit when we asked "Vasquez" this question.
5. You apply for the \$1/day 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. I have known more than 20 people who have worked all kinds of jobs in the voluntary work program. Normally, I worked two to three hours per day. The pay for that work was always \$1/day.
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>th</sup> day of April, 2016.

Adriana Mendoza  
Adriana Mendoza Castellanos