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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 CHAO CHEN, individually and on behalf of  
11 all those similarly situated,

12 Plaintiff,

13 v.

14 THE GEO GROUP, INC., a Florida  
15 corporation,

16 Defendant.

No. 3:17-cv-05769-RJB

**DECLARATION OF CHAO  
CHEN IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
CLASS CERTIFICATION**

17 I, CHAO CHEN, declare as follows:

18 1. I am over the age of eighteen, competent to testify in this matter, and do so  
19 based on personal knowledge.

20 2. I am a citizen of the People's Republic of China, but have been a lawful  
21 permanent resident of the United States since the 1980s.

22 3. I entered the Northwest Detention Center ("NWDC") as a civil immigration  
23 detainee on or about October 21, 2014. U.S. Immigration and Custom Enforcement ("ICE")  
24 released me from NWDC on or about March 1, 2016.  
25  
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1           4.       Upon my entry to the NWDC, Defendant The GEO Group, Inc. (“GEO”)  
2 issued me a “Detainee Handbook.” The Handbook is substantially the same as the one  
3 attached to my declaration as **Exhibit 1**.

4           5.       Also upon my arrival, I underwent an “NWDC Orientation” conducted by  
5 GEO, during which I learned about the Voluntary Work Program, among other things.  
6 Attached to my declaration as **Exhibit 2** is a true and correct copy of the “Northwest  
7 Detention Center Orientation Checklist” that I received from GEO dated October 22, 2014.  
8

9           6.       After learning about the VWP, I submitted a “Detainee Request Form” or  
10 “kite” requesting work through the VWP. Attached to my declaration as **Exhibit 3** is a true  
11 and correct copy of the Detainee Request Form I submitted requesting work, dated  
12 October 25, 2014.  
13

14           7.       About two months later, I received a work assignment and schedule. I  
15 continued working in the VWP until my release. I worked virtually every day of my  
16 detention, usually about an hour each shift. While at the NWDC, I typically worked the  
17 swing and graveyard shifts as a Dayroom porter cleaning the common area, replenishing  
18 supplies, and emptying trash canisters. I also worked the graveyard shift as a bathroom porter  
19 where I was responsible for cleaning toilets, sinks, sweeping and mopping floors,  
20 replenishing supplies, and emptying waste bins. Attached as **Exhibit 4** is a true and correct  
21 *redacted* copy of an undated work assignment and schedule I receive from GEO during my  
22 detention.  
23

24           8.       GEO supervised and controlled all aspects of my work, providing me with  
25 training and the equipment I needed to perform my jobs at NWDC. Because of my detainee  
26 status, GEO did not permit me to seek employment from another employer outside the walls

1 of the NWDC. Regardless of how many hours I worked in a day or week, I was never  
2 compensated more than \$1 per day for my labor.

3 9. To the best of my knowledge, hundreds of detainees, if not more, took part in  
4 the VWP while I was at NWDC. I believe that other detainees performed similar work  
5 assignments, as well as jobs in food service, laundry, the library, the barbershop, and other  
6 cleaning and maintenance type jobs. I am not aware of any other detainee receiving more  
7 than \$1 per day for participating in the VWP.  
8

9 10. I received a full and unconditional pardon for my 2002 criminal convictions  
10 from Washington Governor Jay Inslee on December 20, 2016.

11 11. I understand that I am bringing this case on behalf of all current and former  
12 detainees at NWDC who participated in the VWP at any time since September 26, 2014, and  
13 that I will be representing their interests in this case. I understand that my role in this case is  
14 to help the lawyers get proper payment for wages for all the other detainees participating in  
15 the VWP at NWDC since September 26, 2014, not just myself.  
16

17 12. I understand the responsibilities involved in being both a plaintiff and a class  
18 representative in this lawsuit. I am prepared to cooperate with my counsel and meet all of my  
19 duties and obligations to make sure this lawsuit is pursued in the best interest of me and all  
20 other current and former participants in the VWP at NWDC. I understand that this means that  
21 I may be required to have my deposition taken by GEO's lawyers and to respond to other  
22 discovery.  
23

24 13. I am prepared to help prepare for and attend trial, to testify, and assist my  
25 attorneys as needed and to continue to participate actively in the direction of this case.  
26

1 I declare under penalty of perjury under the laws of the United States that the  
2 foregoing is true and correct and based on my personal knowledge.

3  
4 Executed in Seattle, Washington, on 3/23, 2018.

5  
6 Chao Chen  
7 Chao Chen

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on March 23, 2018, I electronically filed the foregoing with the  
3 Clerk of the Court using the CM/ECF system, which will send notification of such filing to  
4 the following:

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27 DATED at Seattle, Washington this 23rd day of March, 2018.

28 *s/ Sheila Cronan*

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