Case 5:17-cv-02514-JGB-SHK Document 246-1 Filed 01/09/20 Page 1 of 11 Page ID #:5087

1 2 3 4 5 6	Tina Wolfson, SBN 174806 twolfson@ahdootwolfson.com Theodore Maya, SBN 223242 tmaya@ahdootwolfson.com AHDOOT & WOLFSON, PC 10728 Lindbrook Drive Los Angeles, California 90024 Tel: 310-474-9111; Fax: 310-474-8585 Counsel for Plaintiffs	
7 8 9	CENTRAL DISTR	ES DISTRICT COURT RICT OF CALIFORNIA RN DIVISION
10	RAUL NOVOA, JAIME CAMPOS	Civil Action No. 5:17-cv-02514-JGB-
11	FUENTES, ABDIAZIZ KARIM, and	SHKx
12	RAMON MANCIA , individually and on behalf of all others similarly situated,	SUPPLEMENTAL DECLARATION
13	Plaintiffs,	OF THEODORE W. MAYA IN SUPPORT OF PLAINTIFFS'
14		SUPPLEMENTAL MEMORANDUM OF LAW
15	THE GEO GROUP, INC.,	MEMORANDUM OF LAW PURSUANT TO LOCAL RULE 37
16 17	THE GEO GROUP, INC.,	Hearing Date: January 21, 2020
18	Defendant.	Time: 10:00 a.m.
19		Discovery Cutoff Date: Feb. 12, 2020
20		Pretrial Conf. Date: June 8, 2020 Trial Date: June 23, 2020
21		The Honorable Shashi Kewalramani
22		The Honorable onasin Rewaitamain
23		
24		
25		
26		
27		
28		

1

2

3

4

5

6

9

10

11

12

13

14

15

16

17

18

19

20

21

SUPPLEMENTAL DECLARATION OF THEODORE W. MAYA

I, THEODORE W. MAYA, declare as follows:

- I am an attorney licensed to practice in the courts of the State of California and 1. in the United States District Court for the Central District of California, Eastern Division, and a member of the law firm of Ahdoot & Wolfson, PC ("AW"), counsel for Plaintiffs in the above-captioned action. I submit this supplemental declaration in support of Plaintiffs' Supplemental Memorandum of Law Pursuant to Local Rule 37. The matters stated herein are true of my own knowledge or, where indicated, I am informed and believe that they are true. If called upon as a witness, I could and would competently testify to these facts.
- 2. On October 14, 2019 and November 7, 2019, GEO served two different sets of supplemental responses stating that it would produce the same financial documents it served in *Nwauzor*, a similar case pending in the Western District of Washington.
- On December 3, 2019, the parties had a telephonic meet and confer and GEO represented that it would be producing the financial documents later that week.
- 4. Attached hereto as **Exhibit A** are true and correct copies of two privilege logs produced by GEO. Highlighting has been added by Plaintiffs' counsel and highlights problems that Plaintiffs' counsel perceive with such entries, including that they do not "describe the nature of the documents, communications, or tangible things not produced or disclosed . . . in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the claim." Fed. R. Civ. P. 26(b)(5)(ii).

I declare under the penalty of perjury on the 9th day of January, 2020, that the foregoing is true and correct.

Theodore W. Maya

23

22

24

25

26

27

28

EXHIBIT A

Case 5:17-cv-02514-JGB-SH K_{Nov} Document 246 $_{\overline{2}}$ 14-JE $_{\overline{1}}$ 1960 Page 4 of 11 Page ID GEO's Privilege Lo#: 5090 Volume 9

Privilege Log ID	Responsiveness of Withheld Document	Document Type	Family Relationship	MasterDate	Custodian	Author / Sender	Recipients	Persons Copied	Subject / File Name	Scope of Privilege	Privilege Type	Description
Documents redact	ed at ICE's request	Email Communication	P	1/5/18	Wise McCormick Mary	Donald Dutcher	#ADE Detained@ice.dns.gov, #ADE Spectrum@ice.dns.gov, Candy Williams, Victor Duardo, Sharon Greenlee, Jennifer Duarde, Susanne Romero, Sandra Briseno, Samuel Gross, Regina Duran, Porschea Bowdre, Oswaldo Gonzalez, Michael Yarborough, Matthew Hotter, Mary Wise- McCormick, Laurel Withers, Kenneth Reveteriano, Johnny White, Joanne Crowder, Jane Diaz, Carlos R Deveza, Miguel Castaneda, Christopher Lechuga, Nicholas Marello, Ray New, Jordan Bunn, Miguel Castaneda, Chrystal Castaneda, Esteban Guerrero, Joel	LeoMccusker, Joshua Johnson, Fereti Semaia, Patricia Love, Nathan Allen, James Janecka	RELEASE FROM RESTRICTIVE HOUSING	Redacted	Statutory and/or Regulatory Provisions	E-mail protected by statutory and/or regulatory provisions related to the release of certain detainces from restrictive housing
											Statutory and/or	
	Responsive	Document	A	2/22/18	Wise McCormick_Mary	Regina Duran			Georgina-Ruiz A#3993.pdf	Redacted	Regulatory Provisions	Document protected by statutory and/or regulatory provisions related to a detainee work detail application.
	Responsive Responsive	Document Document	P	11/16/17	Medindl_Tabitha Seiber Love_Patricia				11-12-17E2.pdf SKM_654e1501231 2350.pdf	Redacted Redacted	Statutory and/or Regulatory Provisions	Document protected by statutory and/or regulatory provisions related to detiaince scheduling for November 12, 2017 Attorney-Client Privilege protected document related to investigations of staff misconduct
	Responsive	Email communication	P	1/5/18	Wise_McCormick Mary	Donald Dutcher <ddutcher@ge ogroup.com></ddutcher@ge 	#ADEDetained@ice.dhs.gov, #ADESpectrum@ice.dhs.gov, Candy Williams, Victor Duardo, Sharon Greenlee, Jennifer Duarte, Susanne Romero, Sandra Briseno, Samuel Gross, Regina Duran, Porschea Bowdre, Oswaldo Gonzalez, Michael Yarborough, Matthew Hotter, Mary Wise- McCormick, Laurel Withers, Kenneth Reveteriano, Johnny White, Joanne Crowder, Jane Diaz, Carlos R Deveza, Miguel Castaneda, Christopher Lechuga, Nicholas Marello, Ray New, Jordan Bunn, Miguel Castaneda, Chrystal Castanon, Esteban Guerrero, Joel Gonzalez	Leo Mccusker, Joshua Johnson, Fereti Semaia, Patricia Love, Nathan Allen, James Janecka	RELEASE FROM RESTRICTIVE HOUSING	Redacted	Redacted pursuant to statutory and/or regulatory provisions	E-mail communication protected by statutory and/or regulatory provisions related to a detainee's release from protective custody
	Responsive	Document	A	1/5/18	Wise_McCormick Mary				Georgina-Ruiz A#3993.pdf	Redacted	Redacted pursuant to statutory and/or regulatory provisions	Document protected by statutory and/or regulatory provisions related to a detainee work detail application.
	Responsive	Document	A	1/22/17	Uribe_Lindsie				ADF East 2nd Watch- 01-21-2017.pdf	Redacted	Redacted pursuant to statutory and/or regulatory provisions	Document protected by statutory and/or regulatory provisions related to the layout of all or part of the Adelanto facility
	Responsive	Document	А	1/29/17	Uribe_Lindsie				ADF East 3rd Watch- 01-28-2017.pdf	Redacted	Redacted pursuant to statutory and/or regulatory provisions Redacted pursuant to	Document protected by statutory and/or regulatory provisions related to the layout of all or part of the Adelanto facility
	Responsive	Document	A	1/28/17	Uribe_Lindsie				ADF East 3rd Watch- 01-26-2017.pdf	Redacted	statutory and/or regulatory provisions	Document protected by statutory and/or regulatory provisions related to the layout of all or part of the Adelanto facility
	Responsive	Document	A	2/2/17	Uribe_Lindsie				ADF East 3rd Watch- 02-01-2017.pdf	Redacted	Redacted pursuant to statutory and/or regulatory provisions	Document protected by statutory and/or regulatory provisions related to the layout of all or part of the Adelanto facility

Case 5:17-cv-02514-JGB-SH K_{Nov} Document 246 $_{\overline{2}}$ 14-JE $_{\overline{1}}$ 1960 Page 5 of 11 Page ID GEO's Privilege Lo#: 5000 Nolume 9

Privilege Log ID	Responsiveness of Withheld Document	Document Type	Family Relationship	MasterDate	Custodian	Author / Sender	Recipients	Persons Copied	Subject / File Name	Scope of Privilege	Privilege Type	Description
									ADF East 3rd Watch-		Redacted pursuant to statutory and/or	Dogwood protected by statutory and/or recorded we receiving
	Responsive	Document	A	1/28/17	Uribe_Lindsie				01-27-2017.pdf	Redacted	regulatory provisions	Document protected by statutory and/or regulatory provisions related to the layout of all or part of the Adelanto facility
	Responsive	Document	A	11/26/12	Enterprise Vault				ODO 2012 Annual Report West_Response_111 412 (3).doc	Redacted	Deliberative materials	Document contains track changes and is a draft of a corrective audit plan.
									ODO 2012 Annual Report		D.17	
	Responsive	Document	A	11/26/12	Enterprise Vault				West_Response_111 412 (3).doc	Redacted	Deliberative materials	Document contains track changes and is a draft of a corrective audit plan.
									Adelanto IGSA with highlights 08-08-		Law enforcement	
	Responsive	Document	A	2/7/13	Enterprise Vault				2011.pdf Adelanto IGSA with	Redacted	sensitive	Document contains information that is law enforcement sensitive
	Doononoisso	Document		2/7/13	Enterprise Vault				highlights 08-08- 2011.pdf	Redacted	Law enforcement sensitive	Document contains information that is law enforcement sensitive
	Responsive	Document	A	211113	Enterprise vaun				Adelanto IGSA with highlights 08-08-	Redacted		Document contains information that is law emorement sensitive
	Responsive	Document	A	2/7/13	Enterprise Vault				2011.pdf	Redacted	Law enforcement sensitive	Document contains information that is law enforcement sensitive
									Adelanto IGSA with highlights 08-08-		Law enforcement	
	Responsive	Document	A	2/7/13	Enterprise Vault				2011.pdf Adelanto IGSA with	Redacted	sensitive	Document contains information that is law enforcement sensitive
	Responsive	Document	A	2/7/13	Enterprise Vault				highlights 08-08- 2011.pdf	Redacted	Law enforcement sensitive	Document contains information that is law enforcement sensitive
	Responsive	Document	Δ	5/13/13	Enterprise Vault				SKMBT_601130513 13480.pdf	Redacted	Law enforcement sensitive	Document contains information that is law enforcement sensitive
	Responsive	Document	11	5/15/15	Enterprise vaux				Appendix A - SOW	Redacted	Sensitive	Socialistic Contains information that is law emorecinent sensitive
	Responsive	Document	Δ	11/27/13	Enterprise Vault				Part A Adelanto 1940 Beds 11-21- 2013.doc	Redacted	Law enforcement sensitive	Document contains information that is law enforcement sensitive
	Responsive	Document	11	11/2//13	Enterprise vaun				Appendix A - SOW	Redacted	Schsieve	Socialistic Contains information that is law emorecinent sensitive
	Responsive	Document	Δ	11/29/13	Enterprise Vault				Part A Adelanto 1940 Beds 11-21- 2013.doc	Redacted	Law enforcement sensitive	Document contains information that is law enforcement sensitive
	Responsive	Document	11	11/23/13	Enterprise vaut				Appendix A - SOW	Reducted	Sensitive	Boetinent contains information that is law emoternent sensitive
									Part A Adelanto 1940 Beds 11-21-		Law enforcement	
	Responsive	Document	A	11/27/13	Enterprise Vault				2013.doc Appendix A - SOW	Redacted	sensitive	Document contains information that is law enforcement sensitive
									Part A Adelanto 1940 Beds 11-21-		Law enforcement	
	Responsive	Document	A	12/4/13	Enterprise Vault				2013.doc	Redacted	sensitive	Document contains information that is law enforcement sensitive
									Appendix A - SOW Part A Adelanto 1940 Beds 11-21-		Law enforcement	
	Responsive	Document	A	11/27/13	Enterprise Vault				2013.doc	Redacted	sensitive	Document contains information that is law enforcement sensitive
									Appendix A - SOW Part A Adelanto 1940 Beds 11-21-		Law enforcement	
	Responsive	Document	A	11/28/13	Enterprise Vault				2013.doc	Redacted	sensitive	Document contains information that is law enforcement sensitive
									Appendix A - SOW Part A Adelanto 1940 Beds 11-21-		Law enforcement	
	Responsive	Document	A	12/2/13	Enterprise Vault				2013.doc	Redacted	sensitive	Document contains information that is law enforcement sensitive
	Responsive	Document	A	6/28/12	Enterprise Vault				PBNDS audit tool.doc	Redacted	Deliberative materials	Document is deliberative because it is a draft inspection worksheet
	Responsive	Document	A	7/16/12	Enterprise Vault				SKMBT_601120716 12520.pdf	Redacted	Law enforcement sensitive/Detainee PII	Document contains information that is law enforcement sensitive
	теаропатуе	Document		.110/12	Emerprise vaun				Adelanto IGSA with highlights 08-08-	reduciou	Law enforcement	CORREST INCREMENTAL USE IS THE CHICAGO SCIENTIFIC
	Responsive	Document	A	1/26/14	Enterprise Vault				2011.pdf	Redacted	sensitive	Document contains information that is law enforcement sensitive

Case 5:17-cv-02514-JGB-SH K_{Nov} Document 246 $_{\overline{2}}$ 14-JE $_{\overline{1}}$ 1940 O1/09/20 Page 6 of 11 Page ID GEO's Privilege Lo#: 509 $\underline{2}$ 10 Volume 9

Privilege Log ID	Responsiveness of Withheld Document	Document Type	Family Relationship	MasterDate	Custodian	Author / Sender	Recipients	Persons Copied	Subject / File Name	Scope of Privilege	Privilege Type	Description
	Responsive	Document	Δ.	9/13/12	Enterprise Vault				ICE English Handbook_Revisions- 1.doc	Redacted	Deliberative materials	Document contains track changes and is protected as a deliberative material
	Responsive	Email	A						RE_Security Violation in		Law Enforcement	E-mail communication discussing a security violation in inake
	Responsive	Communication	P	8/23/12	Enterprise Vault	Jose G. Barr	Jaime Davis		Intake.msg	Redacted	Sensitive	contains information that is law enforcement sensitive.
		Email				Daniel A.		Matt Holm, Raymond Smith, Chris Strickland, Barr, Jose G,	RE_Conference call -		Deliberative	E-mail communication protected by the deliberative materials
	Responsive	Communication	Р	9/14/12	Enterprise Vault	Pomplun	Gabriel A. Valdez	Jeffrey Wrigley, Marin, David A	menu.msg	Redacted	materials Deliberative	privilege discussing alternative menus
	Responsive	Email Communication	Р	9/17/12	Enterprise Vault	Thomas Cherry	Chris Strickland	Raymond Smith	RE_Facility issues - old.msg	Redacted	materials; law enforcement sensitive	E-mail communication protected as a law enforcement sensitive, deliberative material discussing interior issues with the Adelanto facility.
	Responsive	Email Communication	D	9/17/12	Enterprise Vault	Matt Holm	Thomas Cherry, Dean Macur	Chris Strickland, Raymond Smith, Joshua Johnson	RE_Facility issues - old.msg	Redacted	Deliberative materials; law enforcement sensitive	E-mail communication protected as a law enforcement sensitive, deliberative material discussing interior issues with the Adelanto facility.
		Email		9/1//12	Encipise vauit	Chris	Thomas Cherry, Matt Holm, Dean	Sinui, Joshua Johnson	RE_Facility issues -	Reducted	Deliberative materials; law enforcement	E-mail communication protected as a law enforcement sensitive, deliberative material discussing interior issues with the Adelanto
	Responsive	Communication	P	9/17/12	Enterprise Vault	Strickland	Macur	Raymond Smith	old.msg	Redacted	sensitive	facility.
		Email				Chris			FW_Adelanto Detention Facility Supplemental Detainee		Deliberative	Email communication protected by deliberative materials privilege discusses potential revisions to supplemental detainee
	Responsive	Communication	P	8/24/12	Enterprise Vault	Strickland	Joshua Johnson		Handbook.msg	Redacted	Materials	handbook
	Responsive	Email Communication	Р	8/24/12	Enterprise Vault	Chris Strickland	Matt Holm		RE_Adelanto Detention Facility Supplemental Detainee Handbook.msg	Redacted	Deliberative Materials	Email communication protected by deliberative materials privilege discusses potential revisions to supplemental detainee handbook
		Email							FW_Conference call -		Deliberative materals, law enforcement	E-mail communication protected by the deliberative materials
	Responsive	Communication	Р	9/13/12	Enterprise Vault	Matt Holm	Jeffrey Wrigley		menu.msg	Redacted	sensitive	privilege discussing alternative menus
	Responsive	Document	P	1/21/14	Inchausti Revna				PBNDS audit	Redacted	Deliberative materals, law enforcement sensitive	Document is deliberative because it is a draft inspection worksheet
												Portions of document protected as law enforcement senstive
	Responsive	Document	D	4/11/14	Crowder_Joanne				ADF-East-3d-Watch- 04-10-2014.pdf	Redacted	Law Enforcement Sensitive	because they reveal the layout of all or part of the Adelanto facility
		Document	D		Crowder Joanne				ADF-East-3d-Watch- 01-28-2017.pdf	Redacted	Law Enforcement Sensitive	Portions of document protected as law enforcement senstive because they reveal the layout of all or part of the Adelanto facility
	•		D.		_				ADF-East-3d-Watch-		Law Enforcement	Portions of document protected as law enforcement sensitive because they reveal the layout of all or part of the Adelanto
	Responsive	Document	1		Crowder_Joanne				02-01-2017.pdf	Redacted	Redacted pursuant to statutory and/or	facility Document redacted pursuant to statutory and/or regulatory provisions reflecting detainee payroll for work within voluntary
	Responsive	Document	P	11/9/17	Medindl_Tabitha				11-1-17E3.pdf	Redacted	regulatory provisions	work program
	Responsive	Document	P	11/16/17	Medindl Tabitha				11-12-17E2.pdf	Redacted	Redacted pursuant to statutory and/or regulatory provisions	Document redacted pursuant to statutory and/or regulatory provisions reflecting detainee payroll for work within voluntary work program
	Responsive	Document	P	8/29/13	Langill_Joanne				7D-20.pdf	Redacted	Detainee PII	Detainee PII redacted
	Responsive	Document	P		Bezada_Mailah				conceicao #961.pdf	Redacted	Detainee PII	Detainee PII redacted
	Responsive	Document	P	9/26/17	Bezada_Mailah				conceicao#961.pdf DSM_WEEKLY_RE PORT_GS_EDIT_A	Redacted	Detainee PII	Detainee PII redacted
	Responsive	Document	A	9/26/17	Janecka_James				DLNTCA_9_22_201 7.pdf	Redacted	Deliberative Materails	Document is protected by deliberative materials privilege because it is a draft

Case 5:17-cv-02514-JGB-SHK_{Nov} Dogument 246 $_{\overline{2}}$ 1_{4-JE}iled 01/09/20 Page 7 of 11 Page ID GEO's Privilege Lo#:5000 Volume 9

Privilege Log ID	Responsiveness of Withheld Document	Document Type	Family Relationship	MasterDate	Custodian	Author / Sender	Recipients	Persons Copied	Subject / File Name	Scope of Privilege	Privilege Type	Description
	Responsive	Document	Α	9/26/17	Janecka James				DSM_WEEKLY_RE PORT_GS_EDIT_A DLNTCA_9_22_201 7.pdf	Redacted	Deliberative Materails	Document is protected by deliberative materials privilege because it is a draft
	Responsive	Document	A		Janecka_James				DSM_WEEKLY_RE PORT_GS_EDIT_A DLNTCA_9_29_201 7.pdf	Redacted	Deliberative Materails	Document is protected by deliberative materials privilege because it is a draft
	Responsive	Document	A		Janecka_James				DSM_WEEKLY_RE PORT_GS_EDIT_A DLNTCA_10_6_201 7.pdf	Redacted	Deliberative Materials	Document is protected by deliberative materials privilege because it is a draft
	Responsive	Document	A	10/16/17	Janecka_James				DSM_WEEKLY_RE PORT_GS_EDIT_A DLNTCA_10_13_20 17.pdf	Redacted	Deliberative Materials	Document is protected by deliberative materials privilege because it is a draft
	Responsive	Document	A	1/10/17	Janecka_James				A-PBNDS 2011 with 2016 Revisions in Tracked Changes.docx	Redacted	Deliberative Materials	Document is protected by deliberative materials privilege because it is a draft with tracked changes and comments
	Responsive	Document	A	6/8/16	Janecka_James				EROIGSA-11-003, P00013.pdf	Redacted	ICE PII; law enforcement sensitive ICE PII; law	Document is redacted in places where it contains ICE PII and information that is law enforcement sensitive
	Responsive	Document	A	6/8/16	Janecka_James				EROIGSA-11-003, P00013.pdf	Redacted	enforcement sensitive	Document is redacted in places where it contains ICE PII and information that is law enforcement sensitive
	Responsive	Email Communication	P	3/22/17	Janecka_James	James Janecka	Vincent Vantell		Re: Fwd: RE: Compliance Findings	Redacted	Law Enforcement Sensitive	Email communication where law enforcement sensitive information detailing security risks are redacted
	Responsive	Document	A	6/11/14	Hillers_Gregory				Contract 2.pdf	Redacted	Law Enforcement Sensitive	Document contains information that is law enforcement sensitive
	Responsive	Document	A	11/3/14	Nelson_Cheryl				Expansion Amendment_042814 .pdf	Redacted	ICE PII; law enforcement sensitive	Document is redacted in places where it contains ICE PII and information that is law enforcement sensitive
	Responsive	Document	A	11/24/14	Nelson_Cheryl				Expansion Amendment_P00013 EROIGSA-11- 0003.pdf	Redacted	ICE PII; law enforcement sensitive	Document is redacted in places where it contains ICE PII and information that is law enforcement sensitive
	Responsive	Document	A	5/8/14	Black_James				EROIGSA-11-003, P00013.pdf	Redacted	ICE PII; law enforcement sensitive	Document is redacted in places where it contains ICE PII and information that is law enforcement sensitive
	Responsive	Document	A	4/29/14	Black_James				EROIGSA-11-003, P00013.pdf	Redacted	ICE PII; law enforcement sensitive	Document is redacted in places where it contains ICE PII and information that is law enforcement sensitive
	Responsive	Document	A	12/2/13	Black_James				Appendix A - SOW Part A Adelanto 1940 Beds 11-21- 2013.doc	Redacted	Law enforcement sensitive	Document contains information that is law enforcement sensitive
	Domonoiyo	Document		12/2/12	Black_James				Appendix A - SOW Part A Adelanto 1940 Beds 11-21- 2013.doc	Redacted	Law enforcement sensitive	Document contains information that is law enforcement sensitive
	Responsive	Locument	Л	12/2/13	DIACK_JAINES				A - PBNDS 2011 with 2016 Revisions in Tracked	reducted	Deliberative	Document contains information that is law enforcement sensitive Document is protected by deliberative materials privilege
	Responsive	Document	A	1/12/17	Black_James				Changes.docx Appendix A - SOW	Redacted	Materials	because it is a draft with tracked changes and comments
	Responsive	Document	A	12/2/13	Black_James				Part A Adelanto 1940 Beds 11-21- 2013.doc	Redacted	Law enforcement sensitive	Document contains information that is law enforcement sensitive
	Responsive	Document	A	1/12/17	Black_James				A - PBNDS 2011 with 2016 Revisions in Tracked Changes.docx	Redacted	Deliberative Materials	Document is protected by deliberative materials privilege because it is a draft with tracked changes and comments

Case 5:17-cv-02514-JGB-SH K_{Nov} Document 246 $_{\overline{2}}$ 14-JE $_{\overline{1}}$ 1940 O1/09/20 Page 8 of 11 Page ID GEO's Privilege Lo#: 5094 $_{\overline{1}}$ 1940 Volume 9

Privilege Log ID	Responsiveness of Withheld Document	Document Type	Family Relationship	MasterDate	Custodian	Author / Sender	Recipients	Persons Copied	Subject / File Name	Scope of Privilege	Privilege Type	Description
									PBNDS 2011 with 2016 Revisions in Tracked		Deliberative	Document is protected by deliberative materials privilege
	Responsive	Document	A	1/12/17	Aldape_Aida				Changes.docx			because it is a draft with tracked changes and comments
	Responsive	Document	A	1/20/16	Aldape_Aida				IGSA with Exhibits.pdf	Redacted	Law enforcement sensitive	Document contains information that is law enforcement sensitive

Case 5:17-cv-02514-JGB-SHK No Daccinc pt. 246 $_{\overline{25}4$ -JBF i led 01/09/20 Page 9 of 11 Page ID GEO's Privilege Lo# 15005 Volume 13

	Responsiveness	1	1					T	I	1		
	of Withheld	Document	Family			Author /				Scope of		
Privilege Log ID Documents reducted a	Document	Type	Relationship	MasterDate	Custodian	Sender	Recipients	Persons Copied	Subject / File Name	Privilege	Privilege Type	Description
Documents reducted a	at ICE's request						Michael				Redacted	
							Yarborough		[adfe] Re: Non-Emergent Geo		pursuant to	
						Tehani Brown	<myarborough< td=""><td></td><td>Transport to Outside Hospital</td><td></td><td>statutory and/or</td><td></td></myarborough<>		Transport to Outside Hospital		statutory and/or	
	Responsive	Email communication	n	7/25/17	Uribe_Linds	<tbr></tbr> tbrown@geog roup.com>	@geogroup.co	ADF_INTAKE <adf_intake@geogroup.com></adf_intake@geogroup.com>	Detainee-Guzman-Garcia, Alejandra A#2088	Redacted	regulatory provisions	E-mail protected by statutory and/or regulatory provisions that detail a detainee trip to a
	Responsive	communication	P	//23/17	ie	roup.com>	m>	ADF_INTAKE <adr_intake@geogroup.com></adr_intake@geogroup.com>	Alejandra A#2088	Redacted		nopsitai
											Redacted pursuant to	
						Diana Bonilla					statutory and/or	
		Email			Enterprise		Angelica				regulatory	E-mail protected by statutory and/or regulatory provisions related to removing one
	Responsive	communication	P	4/16/13	Vault	0 1	Hernanez		Hurtado-Chicas A#98594585	Redacted	provisions	detainee and adding one detainee to the kitchen
						Angelica Hernandez					Redacted	
						<anghernandez< td=""><td></td><td></td><td></td><td></td><td>pursuant to statutory and/or</td><td></td></anghernandez<>					pursuant to statutory and/or	
		Email			Enterprise	@geogroup.co					regulatory	E-mail protected by statutory and/or regulatory provisions related to a detainee's status in
	Responsive	communication	P	4/16/13	Vault	m>	Katie Clinton		RE: Lopez Diaz (A77059384)	Redacted	provisions	the voluntary work program
							Angelica				Redacted	
						Katie Clinton	Hernandez				pursuant to	
		Email			Enterprise	kclinton@geo	<anghernandez @geogroup.co</anghernandez 				statutory and/or regulatory	E-mail protected by statutory and/or regulatory provisions related to a detainee's status in
	Responsive	communication	P	4/16/13	Vault	group.com>	m>		Lopez Diaz (A77059384)	Redacted	provisions	the voluntary work program
							Angelica				Redacted	
							Hernandez				pursuant to	
		Email			Entermina	Domelo	<anghernandez< td=""><td></td><td></td><td></td><td>statutory and/or</td><td></td></anghernandez<>				statutory and/or	
	Responsive	communication	Р	8/31/12	Enterprise Vault	Pamela Spagnuolo	@geogroup.co m>		RE_Kitchen Workers.msg	Redacted	regulatory	E-mail protected by statutory and/or regulatory provisions related to a detainee's status in the voluntary work program
						-p-g	Angelica		<u>s</u>		Redacted	
							Hernandez				pursuant to	
							<anghernandez< td=""><td></td><td></td><td></td><td>statutory and/or</td><td></td></anghernandez<>				statutory and/or	
	Responsive	Email	n	8/31/12	Enterprise Vault	Pamela Spagnuolo	@geogroup.co		DE Vitalian Washing and	Redacted	regulatory provisions	E-mail protected by statutory and/or regulatory provisions related to a detainee's status in
	Responsive	communication	г	0/31/12	vauit		III>		RE_Kitchen Workers.msg	Redacted		the voluntary work program
						Angelica Hernandez					Redacted pursuant to	
						<anghernandez< td=""><td></td><td></td><td></td><td></td><td>statutory and/or</td><td></td></anghernandez<>					statutory and/or	
		Email			Enterprise	@geogroup.co	Pamela				regulatory	E-mail protected by statutory and/or regulatory provisions related to a detainee's status in
	Responsive	communication	P	8/31/12	Vault	m>	Spagnuolo		RE_Kitchen Workers.msg	Redacted	provisions	the voluntary work program
						Angelica Hernandez					Redacted pursuant to	
						<anghernandez< td=""><td></td><td></td><td></td><td></td><td>statutory and/or</td><td></td></anghernandez<>					statutory and/or	
		Email			Enterprise	@geogroup.co	Pamela				regulatory	E-mail protected by statutory and/or regulatory provisions related to a detainee's status in
	Responsive	communication	P	8/31/12	Vault	m>	Spagnuolo		RE_Kitchen Workers.msg	Redacted	provisions	the voluntary work program
						Angelica					Redacted	
						Hernandez <anghernandez< td=""><td></td><td></td><td></td><td></td><td>pursuant to statutory and/or</td><td></td></anghernandez<>					pursuant to statutory and/or	
		Email			Enterprise	@geogroup.co	Pamela				regulatory	E-mail protected by statutory and/or regulatory provisions related to a detainee's status in
	Responsive	communication	P	8/29/12	Vault	m>	Spagnuolo		Kitchen Workers.msg	Redacted	provisions	the voluntary work program
											Personnally	
	Responsive	Document	A	9/12/17	Janecka_Jam				EROIGSA-11-0003 P00003.pdf	Redacted	Identifying Information	ICE PII redacted from Amendment of Solicitation/Modification of Contract
	гозронатус	2.0cumciit		2112111					2.X.010.071-17-0003 1 00003.pdf	recuncted	Redacted	POLITY TOWNS OF THE PROPERTY O
											pursuant to	
						Tabitha Meindl	Gregory		00000000A8BDFA59F887474		statutory and/or	
	D	Email	D	8/16/17	Janecka_Jam		Hillers, James Janecka		BB0D02C1DBA79CCABA4B12	Redacted	regulatory	E-mail protected by statutory and/or regulatory provisions related to a detainee's pay for work in the voluntary work program
	Responsive	communication	г	0/10/1/	es	group.com>	Ј апеска		800.msg	Redacted	provisions	work in the voluntary work program
		1	1								Redacted pursuant to	
											statutory and/or	
		1									regulatory	Document protected by statutory and/or regulatory provisions related to Amended of
	Responsive	Document	A	7/16/14	Fouts_Kyle				EROIGSA-11-0003P00014.pdf	Redacted	provisions	Solicitation/Modification of Contract
						Aimee					Redacted	
					Seiber	Crickenberger <acrickenberge< td=""><td>Mary Wise-</td><td></td><td>00000000D35FFB59B4F7F349</td><td></td><td>pursuant to statutory and/or</td><td></td></acrickenberge<>	Mary Wise-		00000000D35FFB59B4F7F349		pursuant to statutory and/or	
		Email			Love_Patrici	r@geogroup.co	McCormick,		936A563B4AA3DD7944F62A		regulatory	E-mail protected by statutory and/or regulatory provisions related to multiple detainees'
	Responsive	communication	P	8/28/17	a	m>	Patricia Love		00.msg	Redacted	provisions	performance while participating in the voluntary work program
											Redacted	
						D			000000000000000000000000000000000000000		pursuant to	
		Email			Seiber Love_Patrici	Patricia Love <plove@geogr< td=""><td>Aimee</td><td>Sharon Buczkowske, Michelle Keeney, Mary</td><td>00000000B6843D85C2AF944 DADC20BD2C7704D50C4342</td><td></td><td>statutory and/or regulatory</td><td>E-mail protected by statutory and/or regulatory provisions related to a detainee's</td></plove@geogr<>	Aimee	Sharon Buczkowske, Michelle Keeney, Mary	00000000B6843D85C2AF944 DADC20BD2C7704D50C4342		statutory and/or regulatory	E-mail protected by statutory and/or regulatory provisions related to a detainee's
	Responsive	communication	P	7/15/17	a a	oup.com>	Crickenberger	Wise-McCormick	400.msg	Redacted	provisions	performance while participating in the voluntary work program

Case 5:17-cv-02514-JGB-SHK Novacument 3/46 $_{\overline{02}1_{14-JE}}$ Filed 01/09/20 Page 10 of 11 Page ID GEO's Privilege Lo# 1500000 Volume 13

	Responsiveness	_								_		
Privilege Log ID	of Withheld Document	Document Type	Family Relationship	MasterDate	Custodian	Author / Sender	Recipients	Persons Copied	Subject / File Name	Scope of Privilege	Privilege Type	Description
											Redacted	
					Seiber	Patricia Love			00000000B6843D85C2AF944		pursuant to statutory and/or	
		Email			Love_Patrici	<pre><ple><ple><ple>cogr</ple></ple></ple></pre>	Aimee		DADC20BD2C7704D50647A2		regulatory	E-mail protected by statutory and/or regulatory provisions related to multiple detainees'
	Responsive	communication	P	8/29/17	a	oup.com>	Crickenberger	Mary Wise-McCormick	400.msg	Redacted	provisions	performance while participating in the voluntary work program
						Aimee					Redacted pursuant to	
					Seiber	Crickenberger <acrickenberge< td=""><td></td><td></td><td>00000000D35FFB59B4F7F349</td><td></td><td>statutory and/or</td><td></td></acrickenberge<>			00000000D35FFB59B4F7F349		statutory and/or	
		Email			Love_Patrici	r@geogroup.co		Sharon Buczkowske, Michelle Keeney, Mary	936A563B4AA3DD7984CF290		regulatory	E-mail protected by statutory and/or regulatory provisions related to termination of a
	Responsive	communication	P	6/16/17	a	m>	Patricia Love	Wise-McCormick	0.msg	Redacted	provisions	detainee from the voluntary work program
											Redacted pursuant to	
						Joshua Johnson					statutory and/or	
		Email communication		4/6/15	Johnson_Jos	<josjohnson@g< td=""><td>Susanne Romero</td><td>n : n</td><td></td><td>n 1 . 1</td><td>regulatory</td><td>E-mail protected by statutory and/or regulatory provisions related to a detainee's pay for</td></josjohnson@g<>	Susanne Romero	n : n		n 1 . 1	regulatory	E-mail protected by statutory and/or regulatory provisions related to a detainee's pay for
	Responsive	communication	Р	4/6/15	hua	eogroup.com>	Romero	Regina Duran	Workers	Redacted	provisions Redacted	work in the voluntary work program
											pursuant to	
											statutory and/or	
	Responsive	Email communication	D	4/6/15	Johnson_Jos hua	Susanne Romero	Joshua Johnson		Re: Workers	Redacted	regulatory	E-mail protected by statutory and/or regulatory provisions related to a detainee's pay for
	Responsive	Communication	1	4/0/15	nua	Komero	Joshua Johnson		IC. WUINCIS	redacted	Redacted	work in the voluntary work program
											pursuant to	
						Joshua Johnson			00000000E0ADF480A7EDEA		statutory and/or	
	Responsive	Email communication	p	3/6/14	Johnson_Jos	<josjohnson@g eogroup.com></josjohnson@g 	Liz Burson, Mark Stephens		48AE1CC25DED811DA8E4F9 2100.msg	Redacted	regulatory provisions	E-mail where attachment is protected by statutory and/or regulatory provisions related to a detainee's injury while participating in the voluntary work program
	responsive	communication		576711	nuu	cogroup.com	тик этерненз		2100 mag	recuncted	Redacted	a detailed signify white participating in the voluntary work program
											pursuant to	
									D 4500 TF 1 11 TF		statutory and/or	
	Responsive	Document	A	3/6/14	Johnson_Jos hua				1) 4583-Hernandez-Alcaraz-W (5 Copies).xps	Redacted	regulatory provisions	Document protected by statutory and/or regulatory provisions related to a detainee's injury while participating in the voluntary work program
									(Redacted	my mar parate pa
											pursuant to	
					Vaanay Mia						statutory and/or regulatory	Document protected by statutory and/or regulatory provisions where staff member filed
	Responsive	Document	A	4/30/18	Keeney_Mic helle				GIR abundiz.pdf	Redacted	provisions	Incident Report regarding detainee refusing to participate in voluntary work program
											Redacted	
											pursuant to	
					Keeney_Mic				GIR Garcia-Rodriguez-		statutory and/or regulatory	Document protected by statutory and/or regulatory provisions where staff member filed Incident Report regarding detainee who stole food while leaving the voluntary work
	Responsive	Document	A	9/7/17	helle				Magalit.pdf	Redacted	provisions	program
							Michael				Redacted	
						Tehani Brown	Yarborough <myarborough< td=""><td></td><td>000000003EA41EADC7E5D14</td><td></td><td>pursuant to statutory and/or</td><td></td></myarborough<>		000000003EA41EADC7E5D14		pursuant to statutory and/or	
		Email			Uribe_Linds	<tbr></tbr> tbrown@geog	@geogroup.co		593379952A680CF3664D0210		regulatory	E-mail communication protected by statutory and/or regulatory provisions related to a
	Responsive	communication	P	7/25/17	ie	roup.com>	m>	ADF_INTAKE <adf_intake@geogroup.com></adf_intake@geogroup.com>	0.msg	Redacted	provisions	detainee's trip to the hospital for pelvic pain
					г						ICE PII; law	D
	Responsive	Document	A	10/12/12	Enterprise Vault				Modification 3.pdf	Redacted	enforcement sensitive	Document is redacted in places where it contains ICE PII and information that is law enforcement sensitive
											ICE PII; law	
	D	D		10/12/12	Enterprise				M-4:6:6: 2 -46	Redacted	enforcement sensitive	Document is redacted in places where it contains ICE PII and information that is law enforcement sensitive
	Responsive	Document	А	10/12/12	Vault				Modification 3.pdf	renacted	ICE PII; law	emorement sensitive
					Enterprise						enforcement	Document is redacted in places where it contains ICE PII and information that is law
	Responsive	Document	A	10/12/12	Vault				Modification 3.pdf	Redacted	sensitive	enforcement sensitive
					E-ti						ICE PII; law	December is and acted in all and where it contains ICE DH and inform 2 1 4 1 1
	Responsive	Document	A	10/12/12	Enterprise Vault				Modification 3.pdf	Redacted	enforcement sensitive	Document is redacted in places where it contains ICE PII and information that is law enforcement sensitive
											ICE PII; law	
	D	D		10/12/12	Enterprise Vault				Modification 3.pdf	Redacted	enforcement	Document is redacted in places where it contains ICE PII and information that is law
	Responsive	Document	Α	10/12/12	vauit				iviouification 3.pdf	redacted	sensitive ICE PII; law	enforcement sensitive
					Enterprise						enforcement	Document is redacted in places where it contains ICE PII and information that is law
	Responsive	Document	A	10/12/12	Vault				Modification 3.pdf	Redacted	sensitive	enforcement sensitive
					F						ICE PII; law	D
	Responsive	Document	A	10/12/12	Enterprise Vault				Modification 3.pdf	Redacted	enforcement sensitive	Document is redacted in places where it contains ICE PII and information that is law enforcement sensitive
				T					1	T	ICE PII; law	
					Enterprise					L.	enforcement	Document is redacted in places where it contains ICE PII and information that is law
	Responsive	Document	A	10/12/12	Vault				Modification 3.pdf	Redacted	sensitive	enforcement sensitive

Case 5:17-cv-02514-JGB-SHK Novement 346 $_{\overline{02}1_{4-JE}}$ Filed 01/09/20 Page 11 of 11 Page ID GEO's Privilege Lo# 1500 $_{\overline{0}}$ Volume 13

Privilege Log ID	Responsiveness of Withheld Document	Document Type	Family Relationship	MasterDate	Custodian	Author / Sender	Recipients	Persons Copied	Subject / File Name	Scope of Privilege	Privilege Type	Description	
	Responsive	Document	4	10/16/12	Enterprise Vault				2012-10-16 Staffing Adjustment - Adelanto Processing Center.pdf	Redacted	ICE PII; law enforcement sensitive	Document is redacted in places where it contains ICE PII and information that is law enforcement sensitive	
	Responsive	Document	Δ	10/12/12	Enterprise Vault				Modification 3.pdf	Redacted	ICE PII; law enforcement sensitive	Document is redacted in places where it contains ICE PII and information that is law enforcement sensitive	_
	Responsive	Document	A	10/12/12	Enterprise Vault				Modification 3.pdf	Redacted	ICE PII; law enforcement sensitive	Document is redacted in places where it contains ICE PII and information that is law enforcement sensitive	
	Responsive	Document	A	10/16/12	Enterprise Vault				2012-10-16 Staffing Adjustment - Adelanto Processing Center.pdf	Redacted	ICE PII; law enforcement sensitive	Document is redacted in places where it contains ICE PII and information that is law enforcement sensitive	
	Responsive	Document	A	10/16/12	Enterprise Vault				Modification 3.pdf	Redacted	ICE PII; law enforcement sensitive	Document is redacted in places where it contains ICE PII and information that is law enforcement sensitive	_
	Responsive	Email communication	p	8/31/12	Enterprise Vault	Pamela Spagniolo	Angelica Hernandez <anghernandez @geogroup.co</anghernandez 		RE Kitchen Workers.msg	Redacted	Redacted pursuant to statutory and/or regulatory	E-mail protected by statutory and/or regulatory provisions related to a detainee's status in the voluntary work program	
	Responsive	Email communication	p	8/31/12	Enterprise Vault	Pamela Spagnuolo	Angelica Hernandez <anghernandez @geogroup.co</anghernandez 		RE Kitchen Workers.msg	Redacted	Redacted pursuant to statutory and/or regulatory	E-mail protected by statutory and/or regulatory provisions related to a detainee's status in the voluntary work program	
	Responsive	Email communication	P	3/6/14	Johnson_Jos	Зрадицого			1) 4583-Hernandez-Alcaraz-W (5 Copies).xps	Redacted	Redacted pursuant to statutory and/or regulatory provisions	Document protected by statutory and/or regulatory provisions related to a detainee's injury while participating in the voluntary work program	
	Responsive	Document	P	5/24/12	Langill_Joan				4C-41.pdf	Redacted	Law enforcement sensitive	Document evaluating GEO policy had law enforcement sensitive material redacted.	_
	Responsive	Document	A	5/18/17	Janecka_Jam				ADF East 3rd Watch-03-31- 2017.pdf	Redacted	Law Enforcement Sensitive	Portions of document protected as law enforcement senstive because they reveal the layout of all or part of the Adelanto facility	
	Responsive	Document	A	9/12/14	Janecka_Jam es				ADE Medical Staff Increase Letter&StaffingCharttoJonKroh mer Medical Staffing 10- 2012.pdf	Redacted	Law enforcement sensitive	Document with law enforcement sensitive information redacted	
	Responsive	Email communication	P	8/16/17	Janecka_Jam es				00000000A8BDFA59F887474 BB0D02C1DBA79CCABA4B12 800.msg	Redacted	Redacted pursuant to statutory and/or regulatory provisions	Email redacted related to a detainee whose identity is protected by statutory and/or regulatory provisions	
	Responsive	Document	A	4/20/14	Fouts_Kyle				ADF East 3rd Watch-04-19- 2014.pdf	Redacted	Law Enforcement Sensitive	Portions of document protected as law enforcement senstive because they reveal the layout of all or part of the Adelanto facility	
	Responsive	Document	A	12/24/13	Hillers_Greg ory				ADF East 3rd Watch - 12-23- 13.pdf	Redacted	Law Enforcement Sensitive	Portions of document protected as law enforcement senstive because they reveal the layout of all or part of the Adelanto facility	
	Responsive	Document	A	3/26/14	Hillers_Greg ory				ADF West-3rd-Watch-03-25- 2414.pdf	Redacted	Law Enforcement Sensitive	Portions of document protected as law enforcement senstive because they reveal the layout of all or part of the Adelanto facility	
	Responsive	Document	A	4/18/17	Aldape_Aid a				DHS IDF Pre-Audit Questionnaire_Updated.pdf	Redacted	Law Enforcement Sensitive	Document in which law enforcement sensitive materials have been redacted	
	Responsive	Document	A	4/5/17	Aldape_Aid a				DHS IDF Pre-Audit Questionnaire_Updated.pdf	Redacted	Law Enforcement Sensitive	Document in which law enforcement sensitive materials have been redacted	
	Responsive	Document	A	4/13/17	Aldape_Aid a				DHS IDF Pre-Audit Questionnaire_Updated.pdf	Redacted	Law Enforcement Sensitive	Document in which law enforcement sensitive materials have been redacted	
	Responsive	Document	A	3/17/14	Aldape_Aid a				ADF West-3rd-Watch-03-26- 2014.pdf	Redacted	Law Enforcement Sensitive	Portions of document protected as law enforcement senstive because they reveal the layout of all or part of the Adelanto facility	4
	Responsive	Document	A	6/16/17	Seiber Love_Patrici a				GIR W 6-16.pdf	Redacted	Redacted pursuant to statutory and/or regulatory provisions	Document protected be statutory and/or regulatory provisions regarding a detainee who quit the voluntary work program	