

EXHIBIT A

To: Van Pelt, David (Ptrn-Lax)
Subject: RE: Novoa - Class Notice Program

From: Daniel Charest <dcharest@burnscharest.com>
Sent: Thursday, July 2, 2020 10:15 AM
To: Novoa-OC <novoa-OC@burnscharest.com>
Cc: Novoa - External <Novoa-External@burnscharest.com>
Subject: Novoa - Class Notice Program

Team GEO:

We have been working on the class notice program for this case. Here are our thoughts and plans. We intend to seek court approval but wanted to give GEO the opportunity to weigh in on the submission.

In broad strokes, here are the concepts behind the program we've developed with our vendor. Efforts in the United States consist of a summary notice in Spanish in three leading Spanish-language newspapers and a digital campaign through the leading digital network, Google Display Network (GDN), targeting potential class members in several western states. Efforts in Mexico/Latin America consist of Spanish radio and digital through GDN and the social media platform, Facebook. An email effort to relevant third-party churches and relief organizations, an internet search campaign, and the distribution of a press release will extend notice exposure further. The notice administrator will also create (a) a dedicated website accessible to people within and outside the United States and (b) a toll-free number featuring IVR and live operator support in multiple dialects. The notice program also includes the posting of notice at relevant facilities operated by GEO.

In addition to the generalized description above, the notice program, as envisioned, would include the following components:

1. The notice administrator will coordinate publication of a shortened summary notice in the following leading Spanish-language publications: La Opinion, Excelsior (Los Angeles and Orange County), and El Chicano. The proposed "Summary Notice" is attached hereto as Exhibit B.
2. The notice administrator will execute a regional digital notice campaign targeting California, New Mexico, Arizona, Nevada, Idaho, Montana, Washington, and Oregon through GDN. The notice administrator will also execute an international digital notice campaign in Mexico, El Salvador, Guatemala, and Honduras using GDN and Facebook. In addition, the notice administrator will execute an internet search campaign in Mexico, El Salvador, Guatemala, and Honduras using search engines such as Google and Bing. All proposed digital ads are attached hereto as Exhibit C.

3. The notice administrator will prepare radio advertisements in Spanish to run on news, talk radio, and entertainment stations in Mexico, El Salvador, Guatemala, and Honduras. The proposed radio script is attached hereto as Exhibit D.
4. The notice administrator will cause the distribution of a press release to news lines throughout the U.S., Spanish Latin America, and India. The proposed press release is attached hereto as Exhibit E.
5. The notice administrator will send an email campaign to key churches and relief organizations in California. The proposed email notice is attached hereto as Exhibit F.
6. The notice administrator will create and maintain an informational case-specific website on which notices, other important court documents, and Frequently Asked Questions will be posted. In more detail, the website will include an email contact form, frequently asked questions page, and links to downloadable copies of the Long Form Notice in English and Spanish, and other important court documents. The proposed Long Form Notice is attached hereto as Exhibit G.
7. The notice administrator will maintain a toll-free information line with IVR and live operators fluent in multiple dialects that Class Members can call for more information about the case.

We intend to file the proposed notice plan and order with the Court before the end of the month. We'd like to represent the submission as unopposed, so we welcome GEO's timely and reasonable input. Please provide any edits, comments, etc. to the attached documents by July 16.

All the best.

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