

**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 ALEJANDRO MENOCA LEPE

1. My name is Alejandro Menocal Lepe. I am a named Plaintiff in this lawsuit. 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 June 6, 2014 and September 11, 2014. That facility is operated by The GEO Group. During my time in the Aurora Detention Facility, I have worked for the Defendant.
3. When I first arrived at the Aurora Detention Facility, I did not have a \$1/day job, but I worked in the voluntary work program. I cleaned the rec yard for a few hours each day. Along with all of the other detainees, I also was required to clean my living area. I was not paid for the work I did cleaning my living area or cleaning the rec yard. I did the work because if you did not, the guards would send you to the "hole," which was isolation, or solitary confinement. I myself was not put into solitary confinement, but I did witness a group of six detainees refuse to clean the common living areas, and they were put into the "hole" for refusing to work.

4. From approximately July 28, 2014 to September 1, 2014, I worked for GEO for \$1/day. Because I had been volunteering, when another detainee was transferred out of the detention center, a GEO guard asked me if I would like the job. I worked as a food server for the other detainees, and then after the detainees ate, I would clear the dining area of the food and containers, and then clean up the dining area. I worked a few hours in the morning, a few hours in the afternoon for lunch, and a few hours in the evening for dinner, approximately six to eight hours a day. The pay of \$1/day stayed the same, no matter if we worked two hours or six hours. The pay of \$1/day also was the same regardless of what kind of work you were doing, in the kitchen, in the laundry, or landscaping.
5. I want to present this lawsuit on my own behalf and on behalf of all the other detainees who were forced to clean for no pay and/or who were paid \$1/day for their work in the voluntary work program. I understand that, as a representative, I have the responsibility to participate actively in this case and to assure that the interests of the other workers are protected by my attorneys. I am ready and able to do this. Moreover, I am ready to reimburse my attorneys a proportionate share of the costs of sending a letter notifying the other workers of this lawsuit and of their right to participate.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 28th day of SEPTEMBER 2015.


Alejandro Menocal Lepe