

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No.: 1:14-cv-02887

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 LOURDES ARGUETA

1. My name is Lourdes Argueta. 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 have been detained at the Aurora Detention Facility since approximately May 8, 2014. The facility where I am detained 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 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 assign six of the detainees in my pod who didn't have a job in the voluntary work program to clean the pod. None of us got paid anything for the work we did cleaning the pod. We were threatened with being put in solitary confinement, or "segregation," if we refused to clean. I have spoken with GEO guards about this specifically and they tell me that detainees will be put in solitary if they refuse to clean.

4. Since approximately May 15, 2014, I have been working for GEO in the voluntary work program, cleaning the GEO medical unit. The other detainees who work for GEO and I clean toilets, sweep and mop floors, pull carpets and clean floors, clean windows, remove trash, clean offices and desks, clean patients' rooms (including cleaning up blood, feces and urine), and perform other cleaning tasks in GEO's medical unit. I have also worked for GEO in the booking area of the facility, creating new detainee files, and I have worked for GEO putting together new detainee clothing packages. The other detainees who I work with and I all get paid \$1 per day for our work.
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 under the laws of the United States of America that the foregoing is true and correct.

Executed on this 2nd day of December, 2014.



Lourdes Argueta