

**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 DEMTRIO A. VALERGA

1. My name is Demetrio A. Valerga. 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 5/22/2011-6/8/2011 and 9/11/2013-7/11/2014. That facility is operated by The GEO Group. During my time in the Aurora Detention Facility, I worked for the GEO Group.
3. From 5/22/2011 through 6/8/2011 and from 9/11/2013 through 10/25/2013, I did not have a \$1/day job in the voluntary work program. During those times, I had to work for no pay doing cleaning work in the common and private living areas. Every day, the guards would call on six of the detainees who didn't have a job in the voluntary work program. Those six individuals had to clean. The people the guards chose would rotate so that everybody had to take a turn on the cleaning crew. None of us got paid anything for the work we did on the cleaning crews. I did the work anyway because it was well known that those who refused to do that work for free were put in "the hole" – or solitary confinement. I know that guards

threatened detainees with solitary confinement if they didn't clean because a guard threatened me with being put in the hole when I protested that I didn't want to do the cleaning work for free.

4. From approximately 10/25/2013-6/4/2014, with a two-week period without work in there somewhere, I worked for GEO in the voluntary work program. They paid me \$1/day for that work. You apply for the jobs and GEO personnel interview, hire and supervise you. The GEO people determine when you work and for how long. The pay rate is the same for every detainee I know to have worked in that program. I have known more than 20 people who have worked all kinds of jobs in the voluntary work program. My job was to work in the kitchen and stripping and waxing floors. I worked from 4 a.m. until noon, five days per week in the kitchen. When I was waxing and stripping floors, I worked Sunday through Thursday nights starting at approximately 11 p.m. until approximately 6 a.m. The pay for that work was always \$1/day.
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 27th day of August, 2015.


Demetrio A. Valerga