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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CHAO CHEN, individually and on behalf of  
all those similarly situated,

Plaintiff,

v.

THE GEO GROUP, INC., a Florida  
corporation,

Defendant.

No. 3:17-cv-05769-RJB

DECLARATION OF R. ANDREW  
FREE IN SUPPORT OF  
PLAINTIFF’S MOTION FOR  
CLASS CERTIFICATION

I, R. Andrew Free, declare that the following is true and correct based upon my  
personal knowledge:

1. I am attorney for the Plaintiffs in the above-captioned action.
2. I am a 2010 graduate of Vanderbilt University Law School, where I was  
awarded the Bennett Douglas Bell Memorial Prize.
3. I have been practicing law since 2011.
4. During law school, I served as a Community Services Team Intern at Holland  
& Knight in Washington, D.C., and as a Summer Associate at Winston & Strawn, LLP in  
San Francisco, California. Following graduation, I began working and eventually assumed  
the position of Litigation Counsel at Ozment Law in Nashville, Tennessee, which is a

1 boutique immigration and civil rights firm. In September 2013, I founded my own law  
2 practice and became Of Counsel to Barrett Johnston Martin & Garrison in Nashville,  
3 Tennessee.

4 5. I am currently Managing Attorney at the Law Office of Andrew Free.

5 6. I was selected as a 2017 SuperLawyers MidSouth Rising Star for the area of  
6 Civil Rights.

7 7. My firm and our co-counsel in this litigation are committed to advancing all  
8 costs of this litigation.

9 8. I am proficient in Spanish. My paralegal is a native Spanish speaker.

10 9. I have spent roughly 1000 hours over more than five years investigating the  
11 factual and legal bases for claims against companies like GEO that operate privately-run  
12 detention facilities, including filing and litigating Freedom of Information Act (“FOIA”)  
13 requests, interviewing current and former detainees and advocates, and reviewing corporate  
14 records issued by GEO and similar companies.

15 10. I am currently lead or co-lead class counsel in *Menocal v. The GEO Group,*  
16 *Inc., No. 1:14-cv-02887*, 113 F. Supp. 3d. 1125 (D. Colo.); *and Novoa v. The GEO Group,*  
17 *Inc., No. 5:17-cv-02514* (C.D. Cal.), and have applied to be appointed lead counsel in *Owino*  
18 *v. CoreCivic, Inc., No. 3:17-cv-02573-JLS-NLS* (S.D. Cal.). Each of these cases alleges wage  
19 theft, unjust enrichment, and/or forced labor at private civil immigration detention facilities.  
20

21 11. In addition, I am or was counsel for the following cases in the federal district  
22 courts:

23 a. *Villegas v. Metropolitan Government of Davidson County/Nashville –*  
24 *Davidson County Sheriff’s Office*, No. 3:09-cv-00219, 907 F.Supp.2d 907  
25 (M.D. Tenn. 2012)  
26

- 1           b.     *Dionicio v. Allison*, No. 3:09-cv-00575 (M.D. Tenn. 2011)
- 2           c.     *Ramos-Macario v. Jones*, No. 3:10-cv-00813, 2011 WL 831678 (M.D.
- 3                 Tenn. 2011)
- 4           d.     *Tapia-Tovar v. Epley*, No. 3:11-cv-00102 (M.D. Tenn.)
- 5           e.     *Renteria-Villegas v. Metropolitan Government of Nashville & Davidson*
- 6                 *County*, No. 3:11-cv-00218, 796 F.Supp.2d 900 (M.D. Tenn. 2011)
- 7           f.     *Ozment v. United States Department of Homeland Security, Immigration*
- 8                 *and Customs Enforcement*, No. 3:11-cv-00429 (M.D. Tenn.)
- 9           g.     *Cahuec-Castro v. Worsham*, No. 3:11-cv-00928 (M.D. Tenn.)
- 10          h.     *Escobar v. Gaines*, No. 3:11-cv-00994 (M.D. Tenn.)
- 11          i.     *Martinez v. Gaines*, No. 3:11-cv-01030 (M.D. Tenn.)
- 12          j.     *Rios-Quiroz v. Williamson County, Tennessee*, No. 3:11-cv-01168 (M.D.
- 13                 Tenn.)
- 14          k.     *Ramirez-Mendoza v. Maury County, Tennessee*, No. 1:12-cv-00014 (M.D.
- 15                 Tenn.)
- 16          l.     *United Steelworkers of America, Local Union 9426 v. Metropolitan*
- 17                 *Government of Nashville, Davidson County, Tennessee*, No. 3:12-cv-
- 18                 00120 (M.D. Tenn.)
- 19          m.     *Garcia v. Department of Homeland Security*, No. 3:12-cv-00354 (M.D.
- 20                 Tenn.)
- 21          n.     *Rosenboom v. Contec Construction, LLC*, No. 3:12-cv-00494 (M.D.
- 22                 Tenn.)
- 23          o.     *Santos-Garcia v. Cheatham County, Tennessee*, No. 3:12-cv-00826 (M.D.
- 24                 Tenn.)
- 25          p.     *Patel v. Miller*, 3:13-cv-00242 (M.D. Tenn.)
- 26          q.     *Moore v. Trevecca Nazarene University*, No. 3:13-cv-00276 (M.D. Tenn.)

- 1 r. *Ramirez-Anzo v. Department of Homeland Security, U.S. Immigration and*  
2 *Customs Enforcement*, No. 3:13-cv-00682 (M.D. Tenn.)
- 3 s. *Ajualip-Miranda v. United States Department of Homeland Security, U.S.*  
4 *Immigration and Customs Enforcement*, No. 3:13-cv-00715 (M.D. Tenn.)
- 5 t. *Harrington v. Haslam*, No. 3:13-cv-01090 (M.D. Tenn.)
- 6 u. *Retana-Correa v. Morris Drywall Systems, Inc.*, No. 3:13-cv-728 (M.D.  
7 La.)
- 8 v. *Stevens v. United States Department of Justice*, No. 1:13-cv-2780 (N.D.  
9 Ill.)
- 10 w. *Stevens v. Department of Homeland Security*, No. 1:13-cv-3382 (N.D. Ill.)
- 11 x. *Stevens v. United States Department of State*, No. 1:13-cv-5152 (N.D. Ill.)
- 12 y. *Howe v. Aytes*, No. 2:14-cv-00077 (M.D. Tenn.)
- 13 z. *Beasley v. Turner*, No. 1:14-cv-00148 (M.D. Tenn.)
- 14 aa. *Bentz v. Sumner County, Tennessee*, No. 3:14-cv-02300 (M.D. Tenn.)
- 15 bb. *Contreras v. Corsicana Bedding, Inc.*, No. 4:14-cv-00006-HSM-SKL  
16 (E.D. Tenn.)
- 17 cc. *Pascual v. Corsicana Bedding, Inc.*, No. 4:14-cv-00008-HSM-SKL (E.D.  
18 Tenn.)
- 19 dd. *Gonzalez v. United States of America*, No. 2:14-cv-00696-CJB-JCW (E.D.  
20 La.)
- 21 ee. *Stevens v. U.S. Dep't of Homeland Security, Immigration & Customs*  
22 *Enforcement*, No. 1:14-cv-3305 (N.D. Ill.)
- 23 ff. *Figueroa-Barajas v. Lund*, No. 2:14-cv-1051-SSV-JCW (E.D. La.)
- 24 gg. *Ayala-Rosales v. Teal*, No. 4:14-cv-00048-HSM-CHS (E.D. Tenn.)
- 25 hh. *Stevens v. U.S. Dep't of Homeland Security*, No. 1:14-cv-08133 (N.D. Ill.)
- 26 ii. *Quick v. Hamilton County, Tennessee*, No. 1:14-cv-00478-CLC-SKL  
(E.D. Tenn.)
- jj. *Medina-Resendiz v. Kaylor*, No. 1:15-cv-00086-TRM-CHS (E.D. Tenn.)

- 1 kk. *Lopez v. Kaylor*, No. 1:15-cv-00202-TRM-CHS (E.D. Tenn.)
- 2 ll. *Mehta v. U.S. Department of State*, No. 2:15-cv-01533-RSM (W.D.
- 3 Wash.)
- 4 mm. *Benjamin v. U.S. Department of State*, No. 1:15-cv-00160-ABJ (D.D.C.)
- 5 nn. *Koukoulomates v. Kerry*, No. 1:15-cv-00384 (D.D.C.)
- 6 oo. *Sandoval v. Loy*, No. 3:15-cv-00444 (M.D. Tenn.)
- 7 pp. *Davis v. Grinder*, No. 3:15-cv-00763 (M.D. Tenn.)
- 8 qq. *Gutierrez-Cruz v. Lucero*, No. 5:15-cv-00631 (W.D. Tex.)
- 9 rr. *RAICES, Inc. v. U.S. Immigration and Customs Enforcement*, No. 1:15-cv-
- 10 01318-JEB (D.D.C.)
- 11 ss. *Contreras-Casco v. Lucero*, No. 5:15-cv-00716 (W.D. Tex.)
- 12 tt. *Quiroz-Trejo v. Rivera*, No. 3:15-cv-01020 (M.D. Tenn.)
- 13 uu. *Melendez de Segovia v. Johnson*, No. 1:15-cv-02019 (D.D.C.)
- 14 vv. *Cadet v. Kerry*, No. 1:16-cv-00328 (D.D.C.)
- 15 ww. *Doe v. United States of America*, No. 3:16-cv-856 (M.D. Tenn.).
- 16 xx. *American-Arab Anti-Discrimination Committee v. U.S. Customs and*
- 17 *Border Protection*, No. 1:17-cv-00708-CRC (D.D.C.)
- 18 yy. *Stevens v. U.S. Immigration and Customs Enforcement*, No. 1:17-cv-2853
- 19 (N.D. Ill.)
- 20 zz. *Goodman v. Arpaio*, 2:16-cv-04388-JJT-MHB (D. Ariz.)
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22 10. Several of these cases are putative class or collective actions, including

23 *Menocal v. The GEO Group, Inc.*, 320 F.R.D. 258 (D. Colo. 2017) (certified class action of

24 \_\_\_\_\_ current and former immigration detainees); *Mehta v. U.S. Department of State*, No.

25 2:15-cv-01533-RSM (W.D. Wash.) (putative class of 60,000+ foreign nationals); *Pascual v.*

26 *Corsicana Bedding, Inc. No.*, 4:14-cv-00008-HSM-SKL (E.D. Tenn.) (certified collective

1 action of 80+ workers, predominantly non-English speakers); *Ramirez-Mendoza v. Maury*  
2 *County, Tennessee*, No. 1:12-cv-00014 (E.D. Tenn.) (putative class of unlawfully held non-  
3 citizen detainees); and *Retana-Correa v. Morris Drywall Systems*, No. 3:13-cv-728 (M.D.  
4 La.).

5 11. Some of these cases were certified as 29 U.S.C. § 216(b) collective actions.  
6 *See Pascual v. Corsicana Bedding, Inc. No.*, 4:14-cv-00008-HSM-SKL (E.D. Tenn.); and  
7 *Retana-Correa v. Morris Drywall Systems*, No. 3:13-cv-728 (M.D. La.).

8 12. A substantial portion of my district court, among other, litigation experience  
9 involves exposing or remedying unlawful treatment by government officials or their agents  
10 of suspected non-citizens in various forms of custody or immigration detention, or requests  
11 for records relating thereto. A substantial portion of the remainder of these cases involves  
12 federal and/or state labor claims on behalf of immigrant workers.  
13

14 13. As part of my representation of clients in Freedom of Information Act  
15 lawsuits and damages actions under *Bivens* and the Federal Tort Claims Act, I have become  
16 uniquely familiar with the agreements, policies, procedures, regulations, and general legal  
17 regimes governing noncitizens in ICE detention, and the conditions under which they are  
18 forced to perform labor. *See, e.g., Stevens v. U.S. Dept. of Homeland Security – U.S.*  
19 *Immigration and Customs Enforcement*, No. 1:14-cv-3305 (N.D. Ill.) (demanding agency  
20 records regarding the Voluntary Work Program, grievances by detainees involved in the  
21 program, and policy and procedure guidance from the agency regarding the program's  
22 function). Through these cases, I have amassed and reviewed tens of thousands of pages of  
23 primary source documents relating to ICE detention, private prison contracting, and the work  
24 detainees and others perform in ICE facilities.  
25  
26



1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on March 23, 2018, I electronically filed the foregoing with the  
3 Clerk of the Court using the CM/ECF system, which will send notification of such filing to  
4 the following:

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*Attorney for Defendant*

27 DATED at Seattle, Washington this 23rd day of March, 2018.

28 *s/ Sheila Cronan*

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