

EXHIBIT 6

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THE HONORABLE ROBERT J. BRYAN

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

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

Plaintiff,

v.

THE GEO GROUP, INC., a Florida
corporation,

Defendant.

Case No.: 3:17-cv-05769-RJB

GEO'S Fed. R. Civ. P. 26(a)(1) INITIAL
DISCLOSURES

The GEO Group, Inc. makes the following initial disclosures pursuant to Fed. R. Civ. P.
26(a)(1)(A)(i):

INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION
(Fed.R.Civ.P. 26(a)(1)(A)(i))

1. Chao Chen and any other class member named in this lawsuit.
Contact Information: Plaintiffs Counsel
This is the named plaintiff who may have information relevant to his claims.
2. Representatives of DHS/ICE

Point of Contact:

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James Yi
Deputy Chief Counsel
Seattle Office of the Chief Counsel / OPLA
Tacoma sub-office
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
Tel: (253) 779-6016 / Fax: (253) 779-6006

Mr. Yi or other DHS/ICE/ERO/OPR representatives may have information about the voluntary work program, the detainees, the ICE GEO contract, policies, procedures, protocols, and operations at the NWDC.

- 3. GEO Representatives
Amber Martin - contract compliance
David Venturella - operations
Ryan Kimble - expenses

These individuals may be contacted through counsel for GEO.

DOCUMENTS AND TANGIBLE THINGS
(Fed.R.Civ.P. 26(a)(1)(A)(ii))

- 1. The ICE GEO contract filed with the court; Dkt. Nos. 19 & 24
- 2. 2011 PBNDS; Bates Nos: GEO-CHEN000001 - GEO-CHEN000455.
- 3. National Detainee Handbook, Bates Nos: GEO-CHEN000462 - GEO-CHEN000489.
- 4. Northwest Detention Center Detainee Handbook, Bates Nos: GEO-CHEN000511 - GEO-CHEN000548.
- 5. Chao Xing Chen - Detainee File; Bates Nos: GEO-CHEN000782 - GEO-CHEN000850 (Withheld subject to ICE clearance and entry of a protective order).
- 6. ICE's Enforcement & Removal Operations Report (2016); Bates Nos: GEO-CHEN000490- GEO-CHEN000510
- 7. Chao Xing Chen - Pardon File; Bates Nos: GEO-CHEN000549 - GEO-CHEN000768
- 8. Chao Xing Chen - ICE File; not yet available.
- 9. Chao Xing Chen - Payment Records; Bates Nos: GEO-CHEN000769 -

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GEO-CHEN000781.

- 10. L&I ES.A.1 Minimum Wage Act Applicability; Bates Nos: GEO-CHEN000456 - GEO-CHEN000461.
- 11. Chao Xing Chen - Tax Returns, not yet available.
- 12. Chao Xing Chen - DOC file, not yet available.

COMPUTATION OF DAMAGES
(Fed.R.Civ.P. 26(a)(1(A)(iii))

- 1. Offset: \$17.12 per hour of participation in the Voluntary Work Program

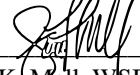
Each detainee who elects to participate in the voluntary work program receives at least \$27.12 per hour in compensation (room, clothing, food, laundry, utilities, etc.) in addition to the \$1.00 per day allowance. This additional compensation of \$27.12 per hour is calculated by taking FY 2016 expenditures of \$7,636,984.00 divided by the average hours (1.72) multiplied by the total allowance paid (\$157,913.00).

INSURANCE AGREEMENT
(Fed.R.Civ.P. 26(a)(1(A)(iv))

GEO has not identified any applicable insurance coverage because the fulfillment of a federal contract is not a risk insurance companies underwrite.

Dated this 20th day of December, 2017 at Fircrest, WA.

III Branches Law, PLLC



Joan K. Mell, WSBA #21319
Attorney for The Geo Group, Inc.

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CERTIFICATE OF SERVICE

I, Joseph Fonseca, hereby certify as follows:

I am over the age of 18, a resident of Pierce County, and not a party to the above action. On December 20, 2017, I electronically served the above GEO's Initial Disclosures, via Email to the following:

Schroeter, Goldmark & Bender	The Law Office of R. Andrew Free
Adam J. Berger, WSBA No. 20714	Andrew Free
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 Washington, DC 20001-4501
 (202)-662-0210
 mark.emery@nortonrosefulbright.com

I certify under penalty of perjury under the laws of the State of Washington that the above information is true and correct.

DATED this 20th day of December, 2017 at Fircrest, Washington.



Joseph Fonseca, Paralegal