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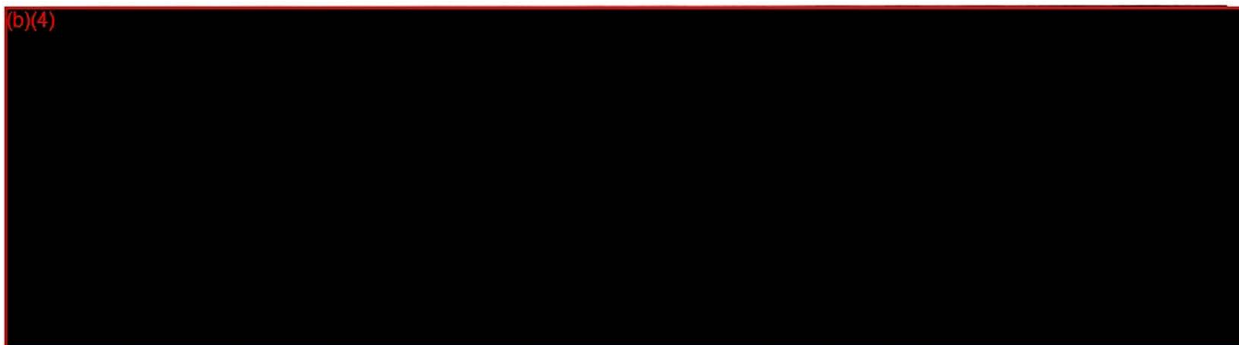
Peter Edge
Acting Deputy Director
Immigration and Customs Enforcement
Office of the Director
500 12th Street, SW
Washington, DC 20536

JUN 0 1 2018

Dear Deputy Director Edge:

- On February 14, 2018, GEO submitted a Request for Equitable Adjustment in the amount of [REDACTED] related to out-of-scope costs in defending ICE Policy providing [REDACTED] per day payment to detainee workers. The ICE Policy is alleged to be in violation of state minimum wage laws in class action lawsuits filed by the Plaintiffs: State of Washington; former Aurora, Colorado detainees; former Tacoma, Washington detainees; and former Adelanto, California detainees.
- On April 18, 2018, GEO sent ICE updated individual Requests for Equitable Adjustments for Aurora, Colorado; Adelanto, California; and Tacoma, Washington ICE Facilities totaling (b)(4) [REDACTED]
- As of May 24, 2018, the legal total expenses have increased to (b)(5) [REDACTED]
- We are deeply alarmed at the rapidly increasing costs in defending these lawsuits without reimbursement from ICE, or assistance in their defense by the Department of Justice (DOJ).
- Continued defense of these lawsuits is likely to cost \$15-20 million with an expense of tens of millions in the event of a final negative ruling by the courts.
- We have conducted an estimation of the costs necessary to achieve compliance with the Plaintiffs.

(b)(4)



- We urgently implore DOJ to take over the defense of these lawsuits and reimburse GEO for its costs.

(b)(6),(b)(7)(C)



Chairman and CEO