

EXHIBIT B

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10 Counsel for Plaintiff
11 ***Additional Counsel on Signature Page.***

12
13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **EASTERN DIVISION**

16 **RAUL NOVOA**, individually and on
17 behalf of all others similarly situated,

18 *Plaintiff,*

19 v.

20 **THE GEO GROUP, INC.,**

21 *Defendant.*

Civil Action No. 5:17-cv-02514-JGB-SHKx

DECLARATION OF R. ANDREW FREE

22 **DECLARATION OF R. ANDREW FREE**

23 Pursuant to 28 U.S.C. § 1746, I, R. Andrew Free, hereby declare under penalty of
24 perjury that the following is true and correct:

- 25 1. Attached hereto are true and correct copies of the following:
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- a. Exhibit 1 – GEO’s Second Supplemental Response to Plaintiffs’ Request for Admission Number 2 in *Menocal v. The GEO Group, Inc.*, No. 1:14-cv-02887-JLK (D. Colo.), provided July 21, 2017.

- b. Exhibit 2 – Excerpts from agency records provided by U.S. Immigration and Customs Enforcement in response to a Freedom of Information Act assigned tracking number ICE 2013FOIA32547, which were disclosed during litigation in *Stevens v. U.S. Dep’t of Homeland Security*, No. 1:14-cv-3305 (N.D. Ill. Filed May 6, 2014).

- c. Exhibit 3 – An excerpt of the Detainee Handbook GEO provided detained immigrants at is LaSalle Detention Facility in Jena, Louisiana in 2014 or 2015.

Dated: July 30, 2018 /s/ R. Andrew Free

R. Andrew Free (admitted *pro hac vice*)
andrew@immigrantcivilrights.com
TN Bar # 030513
**LAW OFFICE OF R. ANDREW
FREE**
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CERTIFICATE OF SERVICE

On July 30, 2018, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Central District of California, using the electronic case filing system. I hereby certify that I have provided copies to all counsel of record electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

/s/ Korey Nelson
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EXHIBIT 1

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

Civil Action No. 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.

**DEFENDANT THE GEO GROUP, INC.'S SECOND SUPPLEMENTAL RESPONSES
TO PLAINTIFFS' WRITTEN DISCOVERY**

Defendant, The GEO Group, Inc. ("GEO"), through its undersigned attorneys, hereby provides its Second Supplemental Responses to Plaintiffs' Written Discovery. These responses are made pursuant to the Court's Orders dated June 6, 2016 (ECF Nos. 84 and 85), striking GEO's previous discovery responses and staying discovery with respect to class action issues. In providing information responsive to Plaintiffs' written discovery, GEO does not intend to waive any applicable privilege or work product protection.

Response: These documents are typically maintained in a detainee's file. GEO previously provided redacted detainee files for the named Plaintiffs, Bates numbered GEO_MEN 160-1394. GEO is producing unredacted copies of the detainee files.

16. Please provide any and all documents which purport to be signed by any Plaintiff.

Response: These documents are typically maintained in a detainee's file. GEO previously provided redacted detainee files for the named Plaintiffs, Bates numbered GEO_MEN 160-1394. GEO is producing unredacted copies of the detainee files.

REQUESTS FOR ADMISSION

1. Admit that at least one detainee in the Aurora Detention Center faced disciplinary or other corrective action for refusing to participate in work pursuant to the Housing Unit Sanitation Policy.

Response: GEO denies with respect to the named Plaintiffs. Any further response to this request for admission relates only to class action issues that are currently stayed.

2. Admit that immigration detainees in other detention facilities owned and or operated by GEO are paid more than \$1 per day for their participation in the VWP.

Response: There are some ICE detainees at some GEO facilities in some jobs that are paid more than \$1 per day. There are also some detainees at a GEO facility that are permitted to work more than one job, are paid \$1 per day for each job and, therefore, could earn more than \$1 per day for their participation in the VWP. However, at facilities that receive reimbursement from ICE for the VWP, detainees are only reimbursed \$1 per day.

of the Housing Unit Sanitation Policy; and

3. Any area that was the subject of detainee work as a result of the VWP.

Response: The requested date has passed, but GEO will work with Plaintiffs' attorneys to find a time for some of Plaintiffs' attorneys to inspect the Aurora facility.

Respectfully submitted this 21st day of July, 2017.

As to objections, requests for production, requests for admission, and request for inspection:

S/ Dana L. Eismeier

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S/ Charles A. Deacon

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**Attorneys for Defendant
The GEO Group, Inc.**

EXHIBIT 2



The GEO Group, Inc.

August 10, 2009
Invoice # 213090703
Client # 26906

DHS/ICE/BFC
SEP 14 2009

South Texas Detention Complex
566 Veterans Drive
Pearsall, Texas 78061

MAIN TEL: 830 (b)(6), (b)(7)(c)

FAX: 830 334 9192

www.thegeogroupinc.com

DHS ICE
Burlington Finance Center
P.O. Box 1620
Williston, VT 05495-1620
Attn: ICE DRO FOD San Antonio Invoice

Contract # ACD-4-C-0001
HSCEDM-09-F-00001

Detainee Work: July 1, 2009 – July 31, 2009

<u>Item Code</u>	<u>Amount Due</u>
CLIN 4021	\$6,722.00
Total Amount Due	\$6,722.00

I certify that services/supplies have been rendered.

(b)(6), (b)(7)(c)

8-10-09
Date

(b)(6), (b)(7)(c) COTR

Date

Payment Terms: Net (b)(4)
Tax ID: 65-0043078

Send Payment to:
South Texas Detention Complex
566 Veterans Drive
Attn: Detainee Trust Fund Account
Pearsall, Texas 78061



September 4, 2009
Invoice # 213090803
Client # 26906

DHS/ICE/BFC

SEP 14 2009

South Texas Detention Complex
566 Veterans Drive
Pearsall, Texas 78061

MAIN TEL: 830.334. (b)(6), (b)(7)(c)
FAX: 830.334.9192

www.thegeogroupinc.com

DHS ICE
Burlington Finance Center
P.O. Box 1620
Williston, VT 05495-1620
Attn: ICE DRO FOD San Antonio Invoice

Contract # ACD-4-C-0001
HSCEDM-09-F-00001

Detainee Work: August 1, 2009 – August 31, 2009

<u>Item Code</u>	<u>Amount Due</u>
CLIN 4021	\$6,488.00
Total Amount Due	\$6,488.00

I certify that services/supplies have been rendered.

(b)(6), (b)(7)(c)

9-4-09
Date

(b)(6), (b)(7)(c) COTR

Date

Payment Terms: Net (b)(4)
Tax ID: 65-0043078

Send Payment to:
South Texas Detention Complex
566 Veterans Drive
Attn: Detainee Trust Fund Account
Pearsall, Texas 78061

**SOUTH TEXAS DETENTION COMPLEX
AUGUST DETAINEE PAY REPORT
Dates Worked: 08/01/09 to 08/31/09**

ICE BILLABLE COST:	\$6,488.00
GEO BILLABLE COST:	<u>\$7,619.00</u>
TOTAL:	\$14,107.00

**SOUTH TEXAS DETENTION COMPLEX
JUNE DETAINEE PAY REPORT
Dates Worked: 06/01/09 to 06/30/09**

ICE BILLABLE COST:	\$6,121.00
GEO BILLABLE COST:	<u>\$7,258.00</u>
TOTAL:	\$13,379.00

GEO SOUTH TEXAS #1571 DETENTION COMPLEX

DETAINEE PAY FOR JUNE

WORK DATES: 6/1/09~6/30/09

A Number	Detainee Name	Date Worked	Entry Date	Receipt #	ICE Pay	GEO Pay	Total
		6/11/2009	06/12/2009		\$1.00	\$0.00	\$1.00
		6/18/2009	06/19/2009		\$1.00	\$2.00	\$3.00
		6/19/2009	06/20/2009		\$1.00	\$2.00	\$3.00
		6/20/2009	06/21/2009		\$1.00	\$2.00	\$3.00
		6/22/2009	06/23/2009		\$1.00	\$2.00	\$3.00
		06/24/2009	06/25/2009		\$1.00	\$2.00	\$3.00
		6/25/2009	06/26/2009		\$1.00	\$2.00	\$3.00
		06/26/2009	06/27/2009		\$1.00	\$2.00	\$3.00
		6/28/2009	06/29/2009		\$1.00	\$2.00	\$3.00
		6/29/2009	06/30/2009		\$1.00	\$2.00	\$3.00
		6/30/2009	07/01/2009		\$1.00	\$2.00	\$3.00
		6/9/2009	06/10/2009		\$1.00	\$2.00	\$3.00
		6/10/2009	06/11/2009		\$1.00	\$2.00	\$3.00
		6/11/2009	06/12/2009		\$1.00	\$2.00	\$3.00
		06/12/2009	06/13/2009		\$1.00	\$2.00	\$3.00
		06/13/2009	06/14/2009		\$1.00	\$2.00	\$3.00
		6/15/2009	06/16/2009		\$1.00	\$2.00	\$3.00
		6/23/2009	06/24/2009		\$1.00	\$2.00	\$3.00
		06/26/2009	06/27/2009		\$1.00	\$2.00	\$3.00
		6/23/2009	06/24/2009		\$1.00	\$0.00	\$1.00
		6/24/2009	06/24/2009		\$1.00	\$0.00	\$1.00
		6/25/2009	06/26/2009		\$1.00	\$0.00	\$1.00
		06/27/2009	06/28/2009		\$1.00	\$0.00	\$1.00
		6/29/2009	06/29/2009		\$1.00	\$0.00	\$1.00
		6/5/2009	06/08/2009		\$1.00	\$0.00	\$1.00
		6/6/2009	06/07/2009		\$1.00	\$0.00	\$1.00
		6/7/2009	06/08/2009		\$1.00	\$0.00	\$1.00
		6/8/2009	06/09/2009		\$1.00	\$0.00	\$1.00
		6/4/2009	06/05/2009		\$1.00	\$2.00	\$3.00
		6/8/2009	06/09/2009		\$1.00	\$2.00	\$3.00
		6/9/2009	06/10/2009		\$1.00	\$2.00	\$3.00
		6/10/2009	06/11/2009		\$1.00	\$2.00	\$3.00
		06/12/2009	06/13/2009		\$1.00	\$2.00	\$3.00
		06/16/2009	06/17/2009		\$1.00	\$2.00	\$3.00
		6/17/2009	06/18/2009		\$1.00	\$2.00	\$3.00
		6/23/2009	06/24/2009		\$1.00	\$2.00	\$3.00
		06/24/2009	06/25/2009		\$1.00	\$2.00	\$3.00
		6/25/2009	06/26/2009		\$1.00	\$2.00	\$3.00
		06/26/2009	06/27/2009		\$1.00	\$2.00	\$3.00
		6/29/2009	06/30/2009		\$1.00	\$2.00	\$3.00
		6/17/2009	06/18/2009		\$1.00	\$0.00	\$1.00
		6/18/2009	06/19/2009		\$1.00	\$0.00	\$1.00
		6/19/2009	06/20/2009		\$1.00	\$0.00	\$1.00

(b)(6), (b)(7)(c)

(b)(6), (b)(7)(c)

ICE 2013FOIA32547.005596

GEO SOUTH TEXAS #572 DETENTION COMPLEX

DETAINEE PAY FOR JUNE

WORK DATES: 6/1/09-6/30/09

A Number	Detainee Name	Date Worked	Entry Date	Receipt #1	ICE Pay	GEO Pay	Total
(b)(6), (b)(7)(c)	(b)(6), (b)(7)(c)	6/14/2009	06/15/2009	(b)(6), (b)(7)(c)	\$1.00	\$2.00	\$3.00
		6/15/2009	06/16/2009		\$1.00	\$2.00	\$3.00
		6/23/2009	06/24/2009		\$1.00	\$2.00	\$3.00
		06/24/2009	06/25/2009		\$1.00	\$2.00	\$3.00
		6/25/2009	06/26/2009		\$1.00	\$2.00	\$3.00
		06/27/2009	06/28/2009		\$1.00	\$2.00	\$3.00
		6/28/2009	06/29/2009		\$1.00	\$2.00	\$3.00
		6/29/2009	06/30/2009		\$1.00	\$2.00	\$3.00
		6/30/2009	07/01/2009		\$1.00	\$2.00	\$3.00
		6/23/2009	06/24/2009		\$1.00	\$0.00	\$1.00
		6/5/2009	06/07/2009		\$1.00	\$2.00	\$3.00
		6/07/2009	06/11/2009		\$1.00	\$2.00	\$3.00
		6/11/2009	06/12/2009		\$1.00	\$2.00	\$3.00
		6/15/2009	06/24/2009		\$1.00	\$2.00	\$3.00
		06/16/2009	06/17/2009		\$1.00	\$2.00	\$3.00
					ICE TOTAL	GEO TOTAL	TOTAL PAY

ICE 2013FOIA32547.005597

GEO SOUTH TEXAS DETENTION COMPLEX

DETAINEE PAY FOR JULY

WORK DATES: 7/1/09~7/31/09

(b)(6), (b)(7)(c)	7/18/2009	07/19/2009	(b)(6), (b)(7)(c)	\$0.00	\$1.00	\$1.00
	7/18/2009	07/20/2009		\$1.00	\$0.00	\$1.00
	7/20/2009	07/21/2009		\$1.00	\$0.00	\$1.00
	7/21/2009	07/22/2009		\$1.00	\$0.00	\$1.00
	7/22/2009	07/23/2009		\$1.00	\$0.00	\$1.00
	7/23/2009	07/24/2009		\$1.00	\$0.00	\$1.00
	07/24/2009	07/25/2009		\$1.00	\$0.00	\$1.00
	07/25/2009	07/26/2009		\$1.00	\$0.00	\$1.00
	7/26/2009	07/27/2009		\$1.00	\$0.00	\$1.00
	7/27/2009	07/28/2009		\$1.00	\$0.00	\$1.00
	7/28/2009	07/29/2009		\$1.00	\$0.00	\$1.00
	7/29/2009	07/30/2009		\$1.00	\$0.00	\$1.00
	7/30/2009	07/31/2009		\$1.00	\$0.00	\$1.00
	07/31/2009	08/01/2009		\$1.00	\$0.00	\$1.00
				ICE TOTAL	GEO TOTAL	TOTAL PAY
				\$6,722.00	\$8,007.00	\$14,729.00



From: 8303349192 Page: 2/2 Date: 8/10/2009 7:16:48 PM

ICE 2013FOIA32547.005600

EXHIBIT 3

VOLUNTARY WORK PROGRAM

Every effort will be made to provide you an opportunity to participate in the voluntary work program. Any detainee assigned to work in the kitchen will be paid \$4.00 per day. Laundry Work Details and Barbershop Workers will be paid \$3.00 per day. Special Work Details are paid \$2.00 per day. All other job assignments are \$1.00 per day. Ordinarily you will not be permitted to work more than eight hours per day or 40 hours per week. Wages earned are calculated and credited to your account, daily. A detainee must submit a claim for non-payment within 14 days of the date in question. Detainees may also request a copy of their personal account once per week. You will be provided any necessary training to perform the job to which you are assigned and will be required to sign a voluntary work program statement. You must complete a detainee request form indicating that you wish to participate in the voluntary work program and are encouraged to list any special skills or experience that you may have on the form. The form is routed to the Classification Officer. Prior experience and/or specialized skills are not a requirement for participation in the voluntary work program. Detainees who choose to participate are required to work according to an assigned work schedule. Unexcused or frequent absences or unsatisfactory work performance may result in your removal from the voluntary work program. Voluntary Work Program attire will be supplied to your for certain job assignments.

LIBRARY

The cultural diversity of the detainee population has been carefully considered in soliciting donation of printed materials. A wide variety of subject matter and language is represented in the collection. You may have two library books at a time and are asked to return it in a timely manner so that others may enjoy it.

LAW LIBRARY

The Library/Law Library is located on Falcon Walk. Detainees will have access to the law library as posted in the Detainee Bulletin Board in the housing unit. Law Library hours are 8:00 am to 5:00 pm Monday - Friday. A detainee can fill out a detainee request form which is available in the housing units to gain access to the Law Library. Detainees will be allowed to access the computer with the Lexus Nexus software during the posted time by submitting a request to the library supervisor. The library supervisor will notify the dorm before picking up any detainees for library use. After the dorm has been notified you will be escorted to the Law Library and escorted back to you dorm when you are finished. Detainees may utilize the computer and printer for preparation of legal documents. You may request to make copies of legal documents pertaining to your case through the Law Library. There is no charge for making these copies. Request for additional time or materials may be requested through the library supervisor. If at any time you notice materials missing from the library or damaged you are encouraged to report this to the library supervisor. You may also request legal material not in the law library by submitting a request to the library supervisor.

COMPUTERS

A word processing computer is provided in the law library for preparation of legal documents ONLY. This equipment is provided at no cost to you and is not to be used for personal correspondence. If you need to use the computer you must complete a detainee request form for access to the law library. No supervisor or staff member will read your documents beyond verifying that they are in reference to legal matters.