

The Honorable Robert J. Bryan

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UGOCHUKWU GOODLUCK
NWAUZOR, FERNANDO AGUIRRE-
URBINA, individually and on behalf of all
those similarly situated,

Plaintiffs,

v.

THE GEO GROUP, INC., a Florida
corporation,

Defendant.

No. 17-cv-05769-RJB

**DECLARATION OF R. ANDREW
FREE**

DECLARATION OF R. ANDREW FREE

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

1. Attached to Plaintiffs' Notice Regarding Proposed Order in *State of Washington v. The GEO Group Inc.* are the following Exhibits:
 - a. Exhibit A – Email from ICE Associate Legal Advisor dated June 20, 2017, ICE FOIA Response 2018-ICLI-00052-3034-36;
 - b. Exhibit B – Email from ICE Associate Legal Advisor dated July 24, 2017, ICE FOIA Response 2018-ICLI-00052-5439;
 - c. Exhibit C – Email from ICE Associate Legal Advisor dated June 6, 2018, ICE FOIA Response 2018-ICLI-00052-2739;

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- d. Exhibit D – Email from ICE Associate Legal Advisor dated September 12, 2018, with attachments “Statements of Government Interest in Wash v. GEO et al. (1.24.18).pdf” and “VWP Factual Background (July 2018).docx”, ICE FOIA Response 2018-ICLI-00052-3040;
 - e. Exhibit E - Letter from GEO Executive David Venturella to Acting ICE Director Thomas Homan dated February 14, 2018, ICE FOIA Response 2018-ICLI-00052-2751-55;
 - f. Exhibit F - Email from ICE Associate Legal Advisor dated July 23, 2018 with attachments, ICE FOIA Response 2018-ICLI-00052-6053-61;
 - g. Exhibit G - Letter from GEO CEO George Zoley to ICE Acting Deputy Director Peter Edge dated May 30, 2018, ICE FOIA Response 2018-ICLI-00052-3404; and
 - h. Exhibit H - Letter from ICE Acting Deputy Director Peter Edge to GEO CEO George Zoley dated July 9, 2018, ICE FOIA Response 2018-ICLI-00052-6062.
2. Each of these Exhibits is a true and accurate copy of the original record provided by the ICE FOIA Office.

DATED this 4th day of October, 2019.

LAW OFFICE OF R. ANDREW FREE

/s/ R. Andrew Free
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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DATED: October 4, 2019 at Nashville, Tennessee

/s/ R. Andrew Free

R. Andrew Free