

Immigration Detainees Who Performed Work at the Adelanto ICE Processing Center May Be Affected by a Class Action Lawsuit.

The Court has not endorsed either party's position, and this class notice does not mean Plaintiffs have prevailed. The Court authorized this notice. This is not a solicitation from a lawyer.

- A class action lawsuit has been filed in federal court against The GEO Group, Inc. ("GEO"). GEO operates the Adelanto ICE Processing Center in Adelanto, California as a subcontractor for the City of Adelanto. Plaintiffs in this lawsuit claim that GEO maintained a practice of wage theft, unjust enrichment, and forced labor against the people participating in Work Programs. GEO denies the allegations made in the lawsuit and argues it has fully complied with the law.
- The Court has allowed the lawsuit to be a class action on behalf of all detained persons who participated in the Voluntary Work Program or who otherwise performed work for less than minimum wage at the Adelanto ICE Processing Center, which includes those that performed work according to the Adelanto Housing Sanitation Policy.
- The Court has not decided whether GEO did anything wrong. There are no benefits available now, and there is no guarantee there will be. However, your legal rights are affected and you have a choice to make now.

Your Legal Rights and Options in This Lawsuit	
DO NOTHING	Stay in this Lawsuit. Await the outcome. Give up certain rights. By doing nothing, you keep the possibility of getting money or benefits that may come from a trial or a settlement. But you give up any rights to sue GEO separately about the same legal claims in this lawsuit.
EXCLUDE YOURSELF	Get out of this Lawsuit. Get no benefits. Keep your rights. If you ask to be excluded and money or benefits are later awarded, you will not share in those benefits. But, you keep any rights to sue GEO separately about the same legal claims in this lawsuit.

- Your options are explained in this notice. To ask to be excluded, you must act before **December 22, 2020**.

- There are no benefits available at this time. Lawyers must prove the claims against GEO at a trial. If any money or benefits become available, you will be notified about how to receive your share.
- Any questions? Read on and visit www.GEOAdelantoClassAction.com.

1. Why should I read this notice?

You may be part of a class action lawsuit if you participated in a Work Program at the Adelanto ICE Processing Center (“Adelanto”) located in Adelanto, California.

This notice explains that the Court has allowed, or “certified,” a class action lawsuit that may affect you. You have legal rights and options you may exercise before the Court holds a trial. The Court has scheduled the trial for March of 2021. The trial is to decide whether the allegations being made against GEO on your behalf are correct. The trial will be held in the United States District Court for the Central District of California. The lawsuit is known as *Novoa, et al. v. The GEO Group, Inc.*, No. 5:17-cv-02514-JGB-SHK.

2. What is this lawsuit about?

This lawsuit claims that GEO maintained a practice of wage theft, unjust enrichment, and forced labor against detainees who participated in various Work Programs at Adelanto. GEO denies the allegations made in the lawsuit and argues it has fully complied with the law.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called “Class Representatives” (in this case Raul Novoa, Jaime Campos Fuentes, Abdiaziz Karim, and Ramon Mancía) sue on behalf of other people who have similar claims. The people together are a “Class” or “Class Members.” The people who sued—and all the Class Members like them—are called the Plaintiffs. The company they sued (in this case GEO) is called the Defendant. One court resolves the issues for everyone in the Class—except for those people who choose to exclude themselves from the Class.

4. Has the Court made a ruling?

The Court has not decided whether GEO or the Plaintiffs are correct. By establishing the Classes and issuing this notice, the Court is not suggesting that the Plaintiffs will win or lose this case.

5. Is there any Money or Benefits available now?

No money or benefits are available now because the Court has not yet decided whether GEO did anything wrong, and the two sides have not settled the case. There is no guarantee that money or benefits ever will be obtained. If they are, you will be notified about how to ask for a share of the benefits.

6. Am I a Part of this Class?

The Court has decided that the following groups of people, or Classes, are involved in this lawsuit.

- 1. The Adelanto Wage Class:** All civilly detained immigrants who (i) were detained at the Adelanto ICE Processing Center any time between December 19, 2014 and the date of final

judgment in this matter, and either (ii) participated in the Voluntary Work Program¹ at any point during their detention, or (iii) performed work for no compensation in the Uncompensated Work Program² pending their participation in the Voluntary Work Program, or (iv) performed work for no compensation pursuant to the Adelanto Housing Unit Sanitation Policy.³

2. The Adelanto Forced Labor Class: All civil immigration detainees who were detained at the Adelanto ICE Processing Center any time between May 1, 2011 and the date of final judgment in this matter (the “Adelanto Forced Labor Class”), with the following subclasses:

- a. *The Work Program Subclass:* All individuals who participated in the Voluntary Work Program at any point during their detention; and
- b. *The Uncompensated Work Program Subclass:* All individuals who participated in the Uncompensated Work Program at any point during their detention.

If you are still unsure if you are included in this lawsuit, visit the case website at www.GEOAdelantoClassAction.com, email the Notice Administrator at info@GEOAdelantoClassAction.com, or call toll-free at 1-888-383-0320 in the U.S, or at 1-800-062-4329 in Mexico.

7. Who represents the Classes?

The Court has appointed the law firms of Burns Charest, LLP, Ahdoot and Wolfson, PC, and the Law Office of R. Andrew Free as Class Counsel to represent the Classes in this matter. You do not need to hire an attorney in this matter, but you may do so at your own expense.

8. What do I need to do to participate?

If you are a member of any of the Classes, you are automatically included, and you do not need to do anything to participate in this class action against GEO. You will be notified if benefits become available.

9. What happens if I participate in the class action?

If you participate in the class action, you will be bound by any court decision in the case, whether favorable or unfavorable. This means that you will receive a share of any benefits the Classes obtain through trial or settlement. This also means that you will lose any right to pursue similar claims for the matters in this case if the court rules against the Classes. You will not be responsible to pay for costs or fees for Class Counsel,

¹ Plaintiffs allege that the “Voluntary Work Program” is the program GEO operates at Adelanto where detainees work as porters, janitors, kitchen workers, laundry workers, barbers, or in any other job in exchange for \$1 per day.

² Plaintiffs allege that the “Uncompensated Work Program” means GEO’s practice of hiring detainees to work as porters, janitors, kitchen workers, laundry workers, barbers, or in any other job outside their housing units for no money at all. Detained immigrants typically complete a Work Detail Application for a position in the Voluntary Work Program and must work for an arbitrary period of time—months, in some cases—for no compensation before they begin to receive \$1 per day for their labor.

³ Plaintiffs allege that the “Housing Unit Sanitation Policy” is a program GEO operates at Adelanto where detainees clean and sanitize their housing units, dormitories, pods, showers, and common living areas for no compensation. If you were detained at Adelanto, you were part of the Housing Unit Sanitation Policy.

but these amounts may be taken out of any recovery in the case. If you choose to participate in the class action, you may also engage an attorney of your own choosing, but at your own expense. If you choose to stay in the Classes, GEO is not permitted to retaliate against you in any way because of your participation in this case.

10. Can I exclude myself from this class action?

Yes. If you do not want to be a member of the Classes in this lawsuit, you can ask to be excluded, or “opt out.” To exclude yourself from the lawsuit, you must send a letter by mail to the Notice Administrator titled “Request for Exclusion.” **You must clearly state: “I want to be excluded from the action *Novoa, et al. v. The GEO Group, Inc., No. 5:17-cv-02514-JGB-SHK (C.D. Cal.)*.”** You must include your name, current mailing address, telephone number, and your signature. Your exclusion request must be **postmarked no later than December 22, 2020** to:

GEO Adelanto Class Action Lawsuit
c/o JND Legal Administration
P.O. Box 91350
Seattle, WA 98111

11. What happens if I exclude myself?

If you exclude yourself from the class action, you will not be affected or bound by any rulings, judgment, or settlement in the case. You will retain your rights under the law and are free to sue (or continue to sue) GEO in the future. This also means that you will not share in any recovery that might be paid to Class Members as a result of this lawsuit.

12. Can anyone retaliate against me for participating or excluding myself?

No one is permitted to retaliate against you in any way because you chose to participate in or exclude yourself from this class action. Participation in this lawsuit will not affect any pending or future immigration cases.

13. How can I get more information?

For more information, including Court Documents and Frequently Asked Questions, visit the case website, www.GEOAdelantoClassAction.com. You may also email the Notice Administrator at info@GEOAdelantoClassAction.com, or call toll-free at 1-888-383-0320 in the U.S, or at 1-800-062-4329 from Mexico.