UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON

**If you participated in the Voluntary Work
Program at the Northwest Detention Center,
a class action lawsuit may affect your rights**

*A court authorized this notice. This is not a solicitation from a lawyer.*

* People participating in the Voluntary Work Program at the Northwest Detention Center in Tacoma, Washington, have sued The GEO Group, Inc., alleging that GEO broke the law by failing to pay workers the minimum wage under Washington law. GEO denies the allegations in the lawsuit and denies that it did anything wrong.
* The Court has allowed the lawsuit to be a class action on behalf of all detained persons who participated in the Voluntary Work Program at the Northwest Detention Center at any time since September 26, 2014.
* The Court has not decided whether GEO did anything wrong. There is no money available now, and 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 |
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| 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.  |
| Ask to be Excluded | **Get out of this lawsuit. Get no benefits from it. Keep rights.** If you ask to be excluded and money or benefits are later awarded, you won’t share in those. 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 **March 24, 2020**.
* Lawyers must prove the claims against GEO at a trial. If money or benefits are obtained from GEO, you will be notified about how to receive your share.
* Any questions? Read on and visit www.vwpclassaction.com.

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| 1. What is this Notice about? |

You are receiving this notice because you participated in the Voluntary Work Program (“VWP” or “$1-a-day Program”) at the Northwest Detention Center located in Tacoma, Washington, at some time since September 26, 2014.

A lawsuit against The GEO Group, Inc. (“GEO”) has been certified as a class action by Judge Robert Bryan of the U.S. District Court for the Western District of Washington. The lawsuit is known as *Nwauzor, et al. v. The GEO Group, Inc.*, No. 17-cv-05769. This action asserts claims for backpay under Washington state wage law based on the allegations that GEO did not provide members of the certified class with minimum wages as required under the Washington Minimum Wage Act. GEO denies the allegations in the lawsuit.

The purpose of this notice is to advise you that you have been identified as a potential member of the certified class. You have the choice as to whether or not you wish to participate in this lawsuit. If you **want** to participate in the lawsuit, you do not need to do anything further at this time. You will automatically be a part of the case and will receive more information in the future. If you **do not want** to participate in the lawsuit, you **must** send a Request to Be Excluded form (or similar document) by mail, email, fax or other method of delivery to the Notice Administrator at the locations identified below. The Request to Be Excluded must be in writing and delivered, transmitted, or postmarked on or **February 24, 2020**. An example Request to Be Excluded form is attached to this Notice as **Exhibit A**.

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| 2. What is this lawsuit about?  |

This lawsuit is about whether GEO, as the owner and operator of the Northwest Detention Center, is an “employer” and whether the Class Members are “employees” under the Washington Minimum Wage Act. And if so, whether GEO violated the Act by failing to pay Class Members the minimum hourly wage under Washington law for work performed under the $1-a-day Program. GEO denies the allegations made in the lawsuit.

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| 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 Ugochukwu Goodluck Nwauzor and Fernando Aguirre-Urbina) 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.

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| 4. What are the Plaintiffs asking for?  |

The Plaintiffs are asking for money damages allowed under the Washington Minimum Wage Act.

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| 5. What does the Defendant say about this lawsuit? |

GEO denies that it did anything wrong, and says that Plaintiffs are not its “employees” under Washington law and that it does not have to pay them the Washington minimum wage.

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| 6. Has the Court decided who is right? |

The Court hasn’t decided whether GEO or the Plaintiffs are correct. By establishing the Class and issuing this Notice, the Court is not suggesting that the Plaintiffs will win or lose this case. The Plaintiffs must prove their claims at a trial.

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| 7. Is there any money 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.

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| 8. Am I part of this Class?  |

Judge Bryan decided has decided that the following people are potential members of the class:

All civil immigration detainees who participated in the Voluntary Work Program at the Northwest Detention Center at any time between September 26, 2014, and the date of final judgment in this matter.

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| 9. Are any civil immigration detainees not included in the Class? |

If you were detained at the Northwest Detention Center during the time period in question above, but you did not participate in the Voluntary Work Program, you are NOT a Class Member.

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| 10. Who will represent the Class?  |

The Court has approved Ugochukwu Goodluck Nwauzor and Fernando Aguirre-Urbina to serve as the Class Representatives. The Court also decided that the law firms Schroeter Goldmark & Bender, Sunbird Law PLLC, and Menter Immigration Law PLLC of Seattle, WA, and the Law Office of R. Andrew Free of Nashville, TN, are qualified to represent you and all Class Members. Together the law firms are called “Class Counsel.” They are experienced in handling similar cases. More information about these law firms, their practices, and their lawyers’ experience is available at www.sgb-law.com, www.meenamenter.com, and www.immigrantcivilrights.com.

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| 11. What do I need to do to take part in the Class Action? |

If you want to participate in the class action against GEO and you want to have the Class Representatives and Class Counsel represent your interests, you are not required to do anything at this time.

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| 12. 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 share in any recovery the class obtains through trial or settlement. This also means that you will lose any right to pursue similar claims for this time period if the court rules against the class. You will not be responsible to pay for costs or fees for Class Counsel, 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 be included in the class, GEO is not permitted to retaliate against you in any way because of your participation in this case.

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| 13. Can I exclude myself from the Class Action? |

Yes. If you do not want to be a member of the class in this lawsuit, you can opt out. If you want to be excluded, you must communicate your decision to opt out to Class Counsel by using the Request to Be Excluded form attached as **Exhibit A** to this Notice. The Request to Be Excluded Form is also available at www.vwpclassaction.com. You may also prepare your own request to be excluded, but any request must be in writing.

The Request to Be Excluded form must be delivered to the Notice Administrator by mail, email or fax by **March 24, 2020** to the following address:

Nwauzor, et al. v. The Geo Group, Inc.

c/o JND Legal Administration

PO Box 91226

Seattle, WA 98111

Email: info@vwpclassaction.com

Fax: (206) 788-8766

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| 14. What happens if I exclude myself from the class action? |

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 pursue any possible claims on your own. This also means that you will not share in any recovery that might be paid to class members as a result of this lawsuit.

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| 15. 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.

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| 16. How can I obtain more information? |

**DO NOT CONTACT THE COURT FOR INFORMATION.**

Visit the website, www.vwpclassaction.com, where you will find the Court’s Order Certifying the Class, the Complaint that the Plaintiffs submitted, the Defendant’s Answer to the Complaint, as well as an Exclusion Request form. You may also call 1-855-961-0959 for more information, or by writing to: *Nwauzor v. The GEO Group, Inc. Class Action*, c/o JND Legal Administration, PO Box 91226, Seattle, WA 98111.

You may also contact the Notice Administrator at:

Website: www.vwpclassaction.com,

Email: info@vwpclassaction.com

Toll-free Phone Number: 1-855-961-0959

You may also seek the advice of your own attorney if you desire.

Finally, all pleadings and other records in this litigation may be examined and copied at any time during regular office hours at the Office of the Clerk, U.S. District Court, 1717 Pacific Avenue, Room 3100, Tacoma, WA 98402-3200.

*Exhibit A to Long Form Notice*

**REQUEST TO BE EXCLUDED FROM THE CLASS**

Please carefully read the attached Notice of Class Action before filling out this form.

**DO NOT FILL OUT THE FORM IF YOU WANT TO REMAIN PART OF THE CASE AND BE REPRESENTED BY CLASS COUNSEL**

If you want to **exclude** yourself from the Class, please sign and date this form and return it to Class Counsel on or before **March 24, 2020.** The Request to Be Excluded must be sent by mail, email, fax, or other delivery method on or before **March 24, 2020** to:

Nwauzor v. The GEO Group, Inc. Class Action

c/o JND Legal Administration

PO Box 91226

Seattle, WA 98111

Email: info@vwpclassaction.com

Fax: 206-788-8766

I want to be **excluded** from the class that has been certified in the case of *Nwauzor et al. v. The GEO GROUP, Inc., No. 17-cv-5769-RJB*, U.S. District Court for the Western District of Washington at Tacoma.

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