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## State of Arizona v. The Geo Group, Inc.

Judge Susan R. Bolton

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## State of Arizona v. The Geo Group, Inc.

### Keywords

State of Arizona, Geo Group, 2:10-cv-01995-SRB, Consent Decree, sexual harassment, retaliation, sex, female, prison industry, Employment Law, Title VII

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

The State of Arizona, *ex rel.* Terry Goddard, the Attorney General; and the Civil Rights Division of the Arizona Department of Law and Equal Employment Opportunity Commission,

Plaintiffs,

vs.

The Geo Group, Inc., a Florida corporation, d/b/a Arizona State Prison-Florence West and Central Arizona Correctional Facility,

Defendant.

Case No.: 2:10-cv-01995-SRB

**CONSENT DECREE**

(Hon. Susan R. Bolton)

**I. RECITALS**

1. This matter was instituted by Plaintiffs, Equal Employment Opportunity Commission (“Commission” or “Plaintiff” or “EEOC”), an agency of the United States government, and the Arizona Civil Rights Division (“ACRD), a division of the Office of the Arizona Attorney General alleging that Defendant, The GEO Group, Inc., subjected Alisa Roach, Frances Wilcox Fullmer, Sofia Hines, Sharon Dill, Carole Garcia, Crystal Burrell, Patricia Norrbom, Teuta Dema, Erika Loud, Tonya Mireles, Margarita Bourdon, Catherine York, Tamika Burrell, Stephanie Miller, Amy De La Cerda, and Jennifer Barrett (collectively the “Aggrieved Individuals”) to sexual harassment and retaliation.

2. Defendant denies all of the allegations. Nothing in this Consent Decree

1 (“Decree”) shall constitute an admission of liability by the Defendant related to this  
2 matter.

3 3. The Parties to this Decree are the Plaintiff EEOC, Plaintiff Arizona Civil  
4 Rights Division (“ACRD”), and Defendant The GEO Group, Inc.

5 4. The Parties, desiring to settle this action by an appropriate Decree, agree to  
6 the jurisdiction of this Court over the Parties and the subject matter of this action, and  
7 agree to the power of this Court to enter a Consent Decree enforceable against  
8 Defendant.

9 5. As to the issues resolved, this Decree is final and binding upon the Parties  
10 and their successors and assigns.

11 6. The Parties agree that this Consent Decree is fair, reasonable, and not  
12 contrary to law.

13 7. For the purpose of resolving disputed claims, the Parties jointly request  
14 this Court to adjudge as follows:

15 **IT IS ORDERED, ADJUDGED, AND DECREED AS FOLLOWS:**

16 **II. JURISDICTION**

17 8. The Parties stipulate to the jurisdiction of the Court over the Parties and  
18 subject matter of this action and have waived the entry of findings of fact and  
19 conclusions of law.

20 **III. TERM AND SCOPE**

21 9. **Term:** The duration of this Decree shall be two (2) years from the date of  
22 signing by the Court.

23 10. **Scope:** The terms of this Decree shall apply to The GEO Group Inc.’s  
24 Florence West Facility (“Florence West”) and Central Arizona Correctional Facility  
25 (“CACF”) located in the State of Arizona.

26 **IV. ISSUES RESOLVED**

27 11. This Decree resolves the claims alleged in the above-captioned lawsuit,  
28 and constitutes a resolution of the Commission’s and ACRD’s claims arising from



1 Aggrieved Individuals have provided Defendant with an executed W-9. Otherwise, the  
2 payment is due within fifteen (15) days after Defendant's receipt of the executed tax  
3 documents. Within three (3) business days of issuance of the checks, Defendant shall  
4 furnish a copy of each check and related correspondence to the Regional Attorney, Equal  
5 Employment Opportunity Commission, 3300 N. Central Avenue, Suite 690, Phoenix,  
6 Arizona, 85012, and Vincent Sottosanti, Assistant Attorneys General, Arizona Civil  
7 Rights Division, 400 W. Congress, Suite S-215, Tucson, Arizona, 85701.

8 **VI. OTHER INDIVIDUAL RELIEF**

9 17. Within thirty (30) days after entry of this Decree, Defendant shall expunge  
10 from the Aggrieved Individuals' personnel files (a) any and all references to the  
11 allegations of discrimination or retaliation filed against Defendant that formed the basis  
12 of this action; and (b) any and all references to this action.

13 18. Within thirty (30) days after entry of this Decree, Defendant will provide  
14 neutral letters of reference in the form attached as Exhibit A for each of the Aggrieved  
15 Individuals and will change each Aggrieved Individual's personnel record to reflect that  
16 she is eligible for rehire.

17 19. Within ten (10) days after entry of this Consent Decree, when contacted  
18 for references or any other information regarding the employment histories of any of the  
19 Aggrieved Individuals, Defendant shall direct any requests for employment references to  
20 its 1-800-WORK NUMBER which will provide the following information:

21 19.1. Dates of employment; and

22 19.2. Last position held.

23 No other information will be provided to prospective employers or any other  
24 entities that inquire about the Aggrieved Individuals' employment histories, other than  
25 to say that it is Defendant's policy only to provide dates of employment and last position  
26 held.

27 20. Within ten (10) days after entry of this Consent Decree, Defendant will  
28 inform all of its lieutenants, captains, assistant wardens, wardens, and Human Resources



1 of sexual harassment and/or retaliation at Florence West or CACF will be investigated  
2 by GEO's Office of Professional Responsibility ("OPR"); its designee within the  
3 Region; or the Human Resources Representative at Florence West or CACF. No  
4 individual who has been disciplined for sexual harassment and/or retaliation is eligible  
5 to investigate sexual harassment and/or retaliation complaints.

6 ***C. EEO Policy Review***

7 **25.** Within thirty (30) days of the entry of this Decree, the Defendant shall  
8 review its existing EEO policies to conform to the law and revise, if necessary. Such  
9 policy must be in conformity with the requirements provided in Paragraph 26 within  
10 ninety (90) days of the Court's entry of this Consent Decree.

11 **26.** The written EEO policies must include at a minimum:

12 **26.1.** A strong and clear commitment to preventing unlawful gender  
13 discrimination and retaliation;

14 **26.2.** A clear and complete definition of disparate treatment based on  
15 gender and retaliation;

16 **26.3.** A clear and complete definition of sexual harassment based on  
17 gender to include vivid examples of the types of behavior, including  
18 but not limited to horseplay, banter, and sexual innuendos, which  
19 would not be tolerated under the existing or new EEO policy;

20 **26.4.** An unequivocal statement that no sexually oriented materials or  
21 objects shall be brought onto or accessed from Defendant's  
22 premises;

23 **26.5.** A clear statement that employees are not to discuss sexual conduct  
24 and/or sexual jokes while at work;

25 **26.6.** A statement that discrimination, of any type, based on gender or  
26 retaliation is prohibited and will not be tolerated;

27 **26.7.** A clear and strong encouragement of persons who believe they have  
28 been discriminated or retaliated against to report such concerns;



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**26.8.** The identification of specific individuals and outside agencies such as the ACRD and EEOC, with telephone numbers, to whom employees can report their concerns about discrimination, harassment, or retaliation and the deadline for reporting to outside agencies, including:

**26.8.1.** The EEOC and ACRD; and

**26.8.2.** OPR.

**26.9.** Identification of a twenty-four (24) hour Hotline, which Defendant agrees to maintain, where employees will be able to call in to report what they reasonably believe to be discrimination. The hotline moderators will not disclose the name of any reporting employee, unless necessary to fully and fairly investigate the allegations being made;

**26.10.** A clear explanation of the steps an employee must take to report discrimination or retaliation, which must include the options of either an oral or written complaint;

**26.11.** An assurance that Defendant will investigate allegations of any activity that might be construed as unlawful discrimination and that such investigation will be prompt, fair, and reasonable, and conducted by a neutral investigator specifically trained in receiving, processing, and investigating allegations of discrimination;

**26.12.** A description of the role of the OPR under this Decree in responding to calls to the Hotline described in Paragraph 26.9, above;

**26.13.** An assurance that appropriate corrective action (including but not limited to disciplining employees found to have violated these policies) will be taken by Defendant to make victims whole and to eradicate the unlawful conduct within its workforce;



1 retaliation will be accepted in writing, orally, or anonymously, and all complaints will be  
2 taken seriously and investigated appropriately. Defendant shall put in writing all  
3 complaints of sexual harassment and/or retaliation that are made orally or anonymously  
4 to any of Defendant's supervisors, managers, or Human Resource personnel. The  
5 written summary of any sexual harassment and/or retaliation complaint shall be sent to  
6 OPR.

7       **29.** All parties contacted in the course of an investigation will be advised that  
8 any retaliation or reprisal against an individual who is an alleged target of harassment or  
9 retaliation, including complainants and witnesses, will not be tolerated and will result in  
10 disciplinary action, up to and including termination.

11       **30.** During the course of an investigation, Defendant will take adequate  
12 protective measures to protect the complainant and witnesses from sexual harassment,  
13 including placing employees who are under investigation for physical sexual harassment  
14 or other serious allegation on administrative leave.

15       **31.** Only those who have an immediate need to know may be informed of the  
16 identity of the complainant and the specifics of the complaint. All other information  
17 regarding complaints will be maintained confidential to the maximum feasible extent  
18 consistent with the NLRA.

19       **31.1.** When witnesses and/or complainants are called in for interviews  
20 pursuant to investigations of complaints of sexual harassment or  
21 retaliation, Defendant will ensure that no GEO employee not  
22 directly involved with the interview is informed of the purpose of  
23 the interview.

24       **31.2.** Such interviews will be conducted in private locations.

25       **32.** During an investigation of a sexual harassment complaint of an employee  
26 or other individual, OPR, its designee ("OPR representative"), or the Human Resources  
27 Representative at Florence West or CACF will have the responsibility for expeditiously  
28 and appropriately investigating all complaints in compliance with Defendant's policies

1 and this Decree.

2           **32.1.**       Upon receiving a complaint, the Investigative Officers shall  
3                           endeavor to immediately interview in person all affected individuals  
4                           and potential witnesses to the alleged harassment discreetly and  
5                           without the presence of other management officials.

6           **32.2.**       Prior to beginning any interview conducted during an investigation  
7                           of a complaint of sexual harassment and / or retaliation, the  
8                           investigator shall:

9                           **32.2.1.** Inform the witness of the purpose of the questioning;

10                          **32.2.2.** If the witness is not the alleged harasser, assure the witness that no  
11                           reprisal will take place based on his / her participation in the  
12                           investigation; and

13                          **32.2.3.** If the witness is not the alleged harasser, ensure that no threat of  
14                           disciplinary action for participation or failure to participate in the  
15                           investigation has occurred.

16                          **32.2.4.** During an interview conducted during an investigation of a  
17                           complaint of sexual harassment and/or retaliation, the investigator  
18                           will conduct the interview in a manner that a reasonable person  
19                           would not view as coercive.

20           **32.3.**       The investigator will conduct a thorough investigation of each and  
21                           every allegation or complaint of sexual harassment and/or  
22                           retaliation. At a minimum, investigations of complaints of sexual  
23                           harassment shall include the following:

24                           **32.3.1.** Documentation of all oral and/or written complaints;

25                           **32.3.2.** Interviews of all potential victims and witnesses identified,  
26                           including any and all individual(s) alleged to have participated in  
27                           or condoned the unlawful conduct;

28                           **32.3.3.** Review of all documents which might shed light on the allegations

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of the complaint;

**32.3.4.** Credibility assessment, where appropriate;

**32.3.5.** Detailed contemporaneous notes of the investigation and conclusions, as well as all corrective and remedial measures (where discrimination is found to have occurred); and

**32.3.6.** Finding of whether a violation of the company's EEO policy or anti-retaliation policy occurred.

**32.4.** GEO's Human Resources Department may recommend to the Florence West facility or the CACF facility, whichever is applicable, remedial measures if appropriate, based upon the results of the investigation, and Defendant will promptly consider that recommendation in determining any disciplinary action.

**32.5.** OPR will maintain a file on the original complaint(s) and any follow-up investigation. OPR will also forward one complete copy to the Human Resources Department and Warden at Florence West or CACF, whichever is applicable, unless the Warden is the subject of the investigation in which case it will forward a copy to the Region.

**33.** Defendant shall inform the complainant and the alleged harassing official of the outcome of the investigation.

**34.** Defendant will take steps to scrutinize the employment decisions affecting the complainant and witnesses during and after the investigation to ensure that such decisions are not based on retaliatory motives.

***E. Training***

**35.** At least annually, Defendant shall provide EEO training for all its employees. Under this provision, employees will be trained at a minimum in the following areas: (a) the Defendant's policy and procedures for reporting alleged sex and gender discrimination; (b) understanding the kind of conduct which may constitute

1 unlawful sex and gender discrimination or harassment; (c) the penalties of engaging in  
2 discriminatory behavior; and (d) Defendant's non-retaliation policy and sex/gender  
3 harassment policies. Defendant shall record all live trainings under this Paragraph and, if  
4 requested to do so in writing, will send copies to the EEOC and/or ACRD. The training  
5 will be conducted as follows:

6           **35.1. Non-managerial Employees:** Defendant will provide its non-  
7 managerial employees at Florence West and CACF with training  
8 regarding gender discrimination, including sexual harassment and  
9 retaliation. These trainings should last at least one (1) hour, and  
10 may be live, video-recorded, or computer-based training sessions.

11           **35.2. Managerial and Supervisory Employees:** Defendant will require  
12 all individuals who work in a managerial or supervisory capacity at  
13 Florence West or CACF, including all sergeants, lieutenants,  
14 assistant wardens, and wardens who have hiring authority (as well  
15 as any employee who is temporarily acting in the capacity of any of  
16 these positions), to receive at least two (2) hours of live, video-  
17 recorded, or computer-based training annually regarding Title VII.  
18 One (1) of the two (2) hours must directly address gender-related  
19 discrimination, to include harassment and sexual harassment, and  
20 one (1) of the two (2) hours must be instruction in the proper  
21 methods of receiving, communicating, investigating (where  
22 applicable), and ameliorating discrimination. Defendant shall  
23 emphasize with managerial and supervisory employees that due to  
24 their position of power, such employees must (a) be particularly  
25 vigilant not to discriminate, whether consciously or due to their  
26 reliance upon subconscious stereotypes; (b) be sensitive of how  
27 their actions or words might be perceived by subordinate  
28 employees; and (c) avoid the temptation to retaliate against an

1 employee because a complaint is made, or might be made, against  
2 them. Additionally, Defendant will require employees who are  
3 newly hired or recently promoted into a managerial or supervisory  
4 position to complete the requisite one (1) hour of complaint-  
5 handling training within sixty (60) days of being hired or promoted.  
6 This training can be conducted in live, video-recorded, or  
7 computer-based training sessions.

8 **35.3. Human Resource Employees:** Defendant will require all  
9 individuals at Florence West and CACF who work in a human  
10 resource capacity to receive at least eight (8) hours of training  
11 annually regarding the Title VII and other federal anti-  
12 discrimination laws. Six (6) of the eight (8) hours must directly  
13 address gender-related discrimination, to include harassment and  
14 sexual harassment, and at least two (2) hours of the eight (8) hours  
15 must be instruction in the proper methods of receiving,  
16 communicating, investigating (where applicable), and ameliorating  
17 discrimination, including the proper procedures for documenting  
18 and preserving evidence of discrimination, archiving the  
19 corporation's investigation of complaints, as well as ensuring  
20 uniform and appropriate disciplinary consequences where  
21 discrimination is found. Defendant will require employees who are  
22 newly hired or promoted into a human resource position to  
23 complete this training within sixty (60) days of being hired or  
24 promoted into a human resource position. The training under this  
25 Paragraph must be provided by an appropriate third party approved  
26 by the EEOC and the ACRD. Human Resources employees who  
27 have received this training within the last year will receive annual  
28 training that mirrors the Managerial and Supervisory Training set



1                   forth in Paragraph 35.2, which could be online or video-recorded  
2                   and need not be live training.

3                   **35.4. Training on Investigative Techniques Regarding Sexual**  
4                   **Harassment and/or Retaliation:** All employees with responsibility  
5                   for responding to or investigating complaints of discrimination at  
6                   Florence West and/or CACF shall be provided two (2) additional  
7                   hours of annual training instructing on accepted professional  
8                   standards for receiving and investigating complaints of sexual  
9                   harassment and/or retaliation at Florence West or CACF, including  
10                  such matters as witness interview techniques, conducting discreet  
11                  and non-coercive interviews, other evidence-gathering techniques,  
12                  maintaining investigative notes and records, legal analysis of the  
13                  evidence, and the procedures described under this Decree. The  
14                  training under this Paragraph must be provided by an appropriate  
15                  third party approved by the EEOC and the ACRD. Defendant  
16                  agrees that the first such training session for each employee group  
17                  identified in Paragraph 35, will take place within one hundred  
18                  twenty (120) days after the Defendant's EEO Policy is in  
19                  conformity with the requirements provided in this Decree.  
20                  Defendant agrees that all of its personnel shall both register and  
21                  attend the training sessions. Defendant further agrees that it will  
22                  monitor training attendance to ensure that any missed sessions are  
23                  made up.

24                  ***F. Notice Posting***

25                  36. Within five (5) business days after the Court's entry of this Decree,  
26                  Defendant shall post at Florence West and CACF, in a conspicuous place frequented by  
27                  employees, the Notice attached as Exhibit C to this Decree. The Notice shall be the same  
28                  type, style, and size as set forth in Exhibit C. The Notice shall remain posted for the



1 duration of this Decree. If the Notice becomes defaced or illegible, Defendant will  
2 replace it with a clean copy. Defendant shall certify to the Commission and the ACRD,  
3 in writing, and include photographs of each notice as posted in the conspicuous  
4 location(s) in Defendant's Florence West and CACF facility, within twenty (20) days of  
5 entry of this Decree that the Notice has been properly posted and shall provide  
6 recertification in each of the semi-annual reports required under the Reporting  
7 provisions of this Consent Decree.

8 ***G. Individuals Ineligible for Hire, Rehire, Retention, or Transfer***

9       37. Defendant agrees that it shall never rehire James Baker, Doug Wilson,  
10 Charles Owens, Chris Porter, Anthony Bodey, Martin Richey, Wilburn Hassenzella,  
11 Richard Hilsden, James Furman, Patrick Gault, or Osbaldo Gonzalez any time at any of  
12 Defendant's facilities in the United States. To assure that these individuals are never  
13 rehired by Defendant, Defendant will place a document on the top of the employee's  
14 personnel file that reads in bold, "Not Eligible for Rehire at any facility in the United  
15 States." If Defendant maintains any computerized personnel file for the individual, such  
16 computerized file must also be annotated to reflect ineligible for rehire.

17 ***H. EEO Compliance as a Component of Management Evaluation***

18       38. Defendant shall, within sixty (60) days of the entry of this Consent Decree,  
19 and at least continuously for the duration of this Decree, develop and implement a  
20 management evaluation system at Florence West which includes EEO compliance,  
21 compliance with policies and laws prohibiting retaliation, and compliance with this  
22 Decree.

23 **VIII. REPORTING PROVISIONS**

24       39. Defendant shall report in writing and in affidavit form on a quarterly basis  
25 for each six (6) month period following the Court's entry of this Decree to the following  
26 entities:

27               **39.1.** Regional Attorney, Equal Employment Opportunity Commission,  
28 Phoenix District Office, 3300 North Central Avenue, Phoenix,

1 Arizona 85012

2 **39.2.** Vincent Sottosanti, Assistant Attorneys General or their successors,  
3 Arizona Civil Rights Division, 400 West Congress, Suite S-215,  
4 Tucson, Arizona 85701.

5 These reports shall be submitted at the same time that the reports required by the  
6 Consent Decree that the Court issued in *Equal Employment Opportunity Commission v.*  
7 *The GEO Group, Inc.*, No. CV-15-01909-PHX-SPL, are due, except the final report,  
8 which shall be submitted to the Commission and the ACRD two (2) weeks prior to the  
9 date on which the Consent Decree is to expire.

10 **40. Reporting Requirements:** Each report shall provide the following  
11 information:

12 **40.1. Reports of Discrimination at Florence West or CACF**

13 **40.1.1.** For purposes of this Paragraph, the term “report of discrimination”  
14 will include any written or verbal complaint which alleges sexual  
15 harassment and/or retaliation. For example, if a female employee  
16 reports that a male employee has made an offensive sexual  
17 comment, this should be recognized as a complaint of sexual  
18 harassment and/or gender discrimination even though the  
19 employee does not use the terms “harassment” or  
20 “discrimination,” and regardless of whether the complaint is made  
21 orally or in writing.

22 **40.1.2.** The report will include:

- 23 **a.** The name of each person making a complaint of sexual  
24 harassment and/or retaliation to Defendant or to any federal,  
25 state, or local government agency;
- 26 **b.** The name, address, email address, and telephone number of  
27 each person making a complaint shall be provided to the  
28 EEOC and ACRD upon request; and

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c. A brief summary of each complaint, including the date of the complaint, the name of the individual(s) who allegedly engaged in the discriminatory conduct, the Defendant's investigation and response to the complaint, the name of the person who investigated or responded to the complaint, and what, if any resolution was reached.

**40.2. Training**

**40.2.1.** For each training program required under Paragraph 35 and conducted during the reporting period, Defendant shall submit a registry of attendance and a certificate of completion.

**40.2.2.** For each training program conducted by Defendant's staff under this Decree, Defendant will provide the following information: (a) a detailed agenda; (b) copies of all training material provided to or utilized by the trainers; (c) the name of each trainer; and (d) a summary of trainer's qualifications and/or the trainings the staff member attended.

**40.2.3.** For each training program conducted, Defendant will provide a copy of the program agenda.

**40.3. Posting of Notice at Florence West and CACF:** Defendant shall recertify to the Commission and the ACRD that the Notices required to be posted under this Decree have remained posted during the reporting period, or, if removed, were promptly replaced.

**40.4. Policy Review:** Defendant shall report on the status of the EEO policy review process required under this Decree.

**40.5. Ineligible for Rehire:** Defendant shall report that it has complied with the Decree and designated James Baker, Doug Wilson, Charles Owens, Chris Porter, Anthony Bodey, Martin Richey, Wilburn Hassenzella, Richard Hilsden, James Furman, Patrick Gault, and

1 Osbaldo Gonzalez as ineligible for rehire under this Decree.

2 **40.6. Component of Management Evaluation:** Defendant shall report  
3 its compliance with the management evaluation system required  
4 under this Decree.

5 **IX. RETENTION OF JURISDICTION AND ENFORCEMENT OF DECREE**

6 **41.** This Court shall retain jurisdiction of this cause for purposes of  
7 compliance with this Decree and entry of such further orders or modifications as may be  
8 necessary or appropriate to effectuate equal employment opportunities for employees.

9 **42.** There is no private right of action to enforce Defendant's obligations under  
10 the Decree and only the Commission and/or the ACRD, or their successors or assigns,  
11 may enforce compliance herewith.

12 **43.** The Commission and the ACRD may petition this Court for compliance  
13 with this Decree at any time during which this Court maintains jurisdiction over this  
14 action. Should the Court determine that Defendant has not complied with this Decree,  
15 appropriate relief, including extension of this Decree for such period as may be  
16 necessary to remedy its non-compliance, may be ordered.

17 **44.** Absent extension, this Decree shall expire by its own terms at the end of  
18 the second year from the date of the Court's entry of this Consent Decree without further  
19 action by the Parties.

20 **X. EEOC AND ACRD AUTHORITY**

21 **45.** With respect to matters or charges outside the scope of this Decree, this  
22 Decree shall in no way limit the powers of the Commission and the ACRD to seek to  
23 eliminate employment practices or acts made unlawful by any of the statutes over which  
24 the EEOC has enforcement authority, and do not arise out of the claims asserted in this  
25 lawsuit.

26 **XI. COSTS AND ATTORNEY'S FEES**

27 **46.** Each party shall be responsible for and shall pay its own costs and  
28 attorney's fees.


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**XIII. SIGNATURES**

47. The parties agree to the entry of this Decree subject to final approval by the Court.

SO ORDERED this Sat day of January, 2018.

BY THE COURT:

  
United States District Judge

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BY CONSENT:

EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION

By: Mary Jo O'Neil  
Mary Jo O'Neil  
Regional Attorney

Date: 1/3/18

APPROVED AS TO FORM:

Mark J. Sorokin  
Mark J. Sorokin  
William R. Hobson  
Wasan Awad  
James Driscoll-MacEachron

Equal Employment Opportunity  
Commission  
Phoenix District Office  
3300 N. Central Avenue, Suite 690  
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THE GEO GROUP, INC.

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Date: 12 22 17

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Attorneys for Defendant

**EXHIBIT A**

[The GEO Group, Inc. Letterhead]

To Whom It May Concern:

This letter will serve to confirm Ms. \_\_\_\_\_'s employment with The GEO Group, Inc., from \_\_\_\_\_ to \_\_\_\_\_. During this time, Ms. \_\_\_\_\_ held the position[s] of \_\_\_\_\_.

Sincerely,

\_\_\_\_\_  
[Warden Ricky Mauldin]  
[Florence West, The GEO Group]

OR

[Warden Bennie Rollins]  
[Central Arizona Correctional Facility,  
The GEO Group]

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**EXHIBIT B**

[Letterhead]

Dear Ms. \_\_\_\_\_:

While this letter is in no way an admission of any legal violation under Title VII or state law, we regret, on behalf of The GEO Group, Inc., and our management staff, any offensive or objectionable language or conduct you believe you experienced during your employment with us. Please accept our commitment that the Company will continue to take whatever steps are necessary to ensure that current and future employees work in an environment free of gender and sexual harassment.

Sincerely,

\_\_\_\_\_  
[Warden Ricky Mauldin]  
[Florence West, The GEO Group]

OR

[Warden Bennie Rollins]  
[Central Arizona Correctional Facility,  
The GEO Group]



**EXHIBIT C**

**NOTICE**

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3 The following notice is being posted pursuant to the terms of a Consent Decree  
4 reached between the Parties in EEOC v. The GEO Group Inc. filed in the United States  
5 District Court for the District of Arizona, Civil Action Nos. CV10-1995-PHX-SRB &  
6 CV10-2088-PHX-TMB.

7 Management of the GEO Group Inc. will provide equal employment opportunity  
8 in all of its operation and in all areas of employment practices. The GEO Group Inc. will  
9 not discriminate against any employee or applicant for employment on the grounds of  
10 race, color, religion, sex, pregnancy, national origin, age or disability. This policy  
11 extends to insurance benefits and all other terms, conditions and privileges of  
12 employment.

13 Pursuant to Title VII, it is unlawful for an employer to discriminate based upon  
14 the gender of an applicant or employee. Further, it is unlawful for any employer to  
15 retaliate against an employee because he or she has requested reasonable  
16 accommodation for disability or religion, opposed discriminatory employment practices,  
17 or because he or she has filed a charge of discrimination with any municipal, state or  
18 federal equal employment opportunity agency, or because he or she has participated in  
19 an investigation of a charge of discrimination.

20 Any employee who believes that he/she has suffered discrimination on the basis  
21 of age, race, color, religion, sex, pregnancy, national origin, or disability, has the right to  
22 contact the EEOC directly at 1-800-669-4000. Employees in Arizona may also call the  
23 Arizona Civil Rights Division ("ACRD") at 602-542-5263. In compliance with federal  
24 and Arizona state law, no official at the GEO Group Inc. will retaliate against an  
25 employee who makes an internal complaint of discrimination or who contacts the EEOC  
26 or the ACRD.

27 It is against the law for any action to be taken against you by any officer,  
28 supervisory or management official of The GEO Group, Inc., for : (1) opposing sexual  
or gender harassment or other discriminatory practices made unlawful by federal or state  
law; (2) filing a charge or assisting or participating in the filing of a charge of  
discrimination; or (3) assisting or participating in an investigation or proceeding brought  
under Title VII or the Arizona Civil Rights Act, including internal investigations into  
sexual or gender harassment and/or retaliation. Should any such retaliatory actions be  
taken against you, you should immediately contact the EEOC or ACRD at the address  
and/or telephone numbers listed below.

**Equal Employment Opportunity Commission**

**Arizona Civil Rights Division**

3300 North Central Avenue  
Suite 690  
Phoenix, Arizona 85012  
Telephone: (602) 640-5000  
TTY: (602) 640-5072  
Website (national): [www.eeoc.gov](http://www.eeoc.gov)

Arizona Attorney General's Office  
1275 West Washington Street  
Phoenix, Arizona 85007  
Telephone: 602-542-5263  
TDD: 602-542-5002

This Notice shall remain posted for the term of two (2) years.

The GEO Group, Inc.

By: \_\_\_\_\_