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January 17, 2020

**VIA E-MAIL (shareholderproposals@sec.gov)**

Office of Chief Counsel  
Division of Corporation Finance  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549

**Re: The GEO Group, Inc. —  
Shareholder Proposal Submitted by  
The Service Employees International Union Pension Plans Master Trust**

Ladies and Gentlemen:

We submit this letter and enclosed materials on behalf of The GEO Group, Inc. (“GEO” or the “Company”) to request confirmation from the staff of the Division of Corporation Finance (the “Staff”) of the U.S. Securities and Exchange Commission (the “Commission” or “SEC”) that GEO may properly omit from its proxy materials for its 2020 Annual Meeting of Shareholders (the “2020 Proxy Materials”) the shareholder proposal and supporting statement (the “Proposal”) submitted by the Service Employees International Union Pension Plans Master Trust (“SEIU” or the “Proponent”). This letter sets forth the reasons why GEO believes it is justified in taking this action.

Pursuant to Rule 14a-8(j) promulgated under the Securities Exchange Act of 1934, as amended (the “Exchange Act”), and Staff Legal Bulletin No. 14D (November 7, 2008) (“*SLB 14D*”), we make this submission to the SEC via email to [shareholderproposals@sec.gov](mailto:shareholderproposals@sec.gov) and are simultaneously providing a copy of this submission to the Proponent as notice of GEO’s intention to omit the Proposal from its 2020 Proxy Materials. GEO will promptly forward to the Proponent any Staff responses regarding the no-action request sent solely to GEO and GEO reminds the Proponent that if additional correspondence is submitted to the Staff with respect to the Proposal, a copy of that correspondence should be concurrently sent to the undersigned, pursuant to Exchange Act Rule 14a-8(k).

**THE COMPANY**

GEO is a fully-integrated real estate investment trust (“REIT”) specializing in the design, financing, development, and operation of secure facilities, processing centers, and community reentry centers in the United States, Australia, South Africa, and the United Kingdom. GEO owns, leases, and operates a broad range of facilities, including maximum, medium, and minimum-security facilities, processing centers, as well as community-based reentry facilities and offers an expanded delivery of rehabilitation services under its “GEO Continuum of Care” platform. The “GEO Continuum of Care” program integrates enhanced rehabilitative programs, which are evidence-based and include cognitive

behavioral treatment and post-release services and provides academic and vocational classes in life skills and treatment programs while helping individuals reintegrate into their communities. GEO develops new facilities based on contract awards, using its project development expertise and experience to design, construct, and finance what it believes are state-of-the-art facilities that maximize security, safety, and efficiency. GEO provides innovative compliance technologies, industry-leading monitoring services, and evidenced-based supervision and treatment programs for community-based parolees, probationers, and pre-trial defendants. GEO also provides secure transportation services for individuals as contracted domestically and in the United Kingdom through its joint venture, GEO Amey PECS Ltd.

As of September 30, 2019, GEO's worldwide operations include the management and/or ownership of approximately 96,000 beds at 130 facilities—including idle facilities, projects under development, and recently awarded contracts—and the provision of community supervision services for more than 210,000 individuals, including approximately 100,000 individuals through an array of technology products, including radio frequency, GPS, and alcohol-monitoring devices.

GEO provides its facilities and services exclusively to governmental entities at the federal, state, and local levels. Thus, as a government contractor, it has no non-affiliated private-sector clients.

### **THE PROPOSAL**

The Proposal requests the preparation of a report, updated annually, disclosing:

1. Company policy and procedures governing lobbying, both direct and indirect, and grassroots lobbying communications.
2. Payments by GEO used for (a) direct or indirect lobbying or (b) grassroots lobbying communications, in each case including the amount of the payment and the recipient.
3. GEO's membership in and payments to any tax-exempt organization that writes and endorses model legislation.
4. Description of management's and the Board's decision making process and oversight for making payments described in sections 2 and 3 above.

A copy of the Proposal and the accompanying letter from the Proponent is attached to this letter as Exhibit A.

### **REASONS FOR EXCLUDING THE PROPOSAL**

We believe the Proposal may be properly omitted from the 2020 Proxy Materials pursuant to:

- Rule 14a-8(i)(7) because the Proposal relates to GEO's ordinary business operations;
- Rule 14a-8(i)(10) because GEO has already substantially implemented the Proposal; and

- Rule 14a-8(i)(4) because the Proposal relates to an ongoing grievance against GEO and is designed to further the Proponent's interest, which is not shared by other shareholders.<sup>1</sup>

## ANALYSIS

### ***The Proposal May be Omitted Under Rule 14a-8(i)(7) Because the Subject Matter of the Proposal Relates to GEO's Ordinary Business Operations.***

Rule 14a-8(i)(7) permits the omission of a shareholder proposal that deals with a matter relating to a corporation's ordinary business operations. The purpose of Rule 14a-8(i)(7) is to protect the authority of a corporation's board of directors to govern its business and affairs free from shareholder attempts to directly manage and oversee corporate operations. The SEC expounded upon the rule's rationale in *Exchange Act Release 34-40018* (May 21, 1998):

The general underlying policy of this exclusion is consistent with the policy of most state corporate laws: to confine the resolution of ordinary business problems to management and the board of directors, since it is impracticable for shareholders to decide how to solve such problems at an annual shareholders meeting.

The policy underlying the ordinary business exclusion rests on two central considerations. The first relates to the *subject matter* of the proposal. Certain tasks are so fundamental to management's ability to run a company on a day-to-day basis that they could not, as a practical matter, be subject to direct shareholder oversight.... (*emphasis added*)

The second consideration relates to the degree to which the proposal seeks to "*micro-manage*" the company by probing too deeply into matters of a complex nature upon which shareholders, as a group, would not be in a position to make an informed judgment. (*emphasis added*)

The Proposal would require GEO to prepare an annual report disclosing: (i) internal GEO policy and procedures governing direct and indirect lobbying as well as grassroots lobbying communications, (ii) the amounts and recipients of payments made by GEO for lobbying activities, (iii) GEO's memberships in and payments to tax-exempt organizations that write and endorse model legislation, and (iv) the manner in which GEO's management and board make decisions and provide oversight regarding payments for lobbying activities and memberships. The annual report would be required to be presented to the Company's Audit and Finance Committee and posted on GEO's website.

GEO recognizes that the Staff has previously considered lobbying-related proposals similar to the one requested by the Proponent and concluded that such proposals could not be excluded. In reaching its decisions, the Staff determined that the proposals focused primarily on the companies' "general political activities" and did not excessively micromanage the companies. *See, e.g., Bank of America Corp.* (March 7, 2011); *Int'l Business Machines Corp.* (January 24, 2011). Notwithstanding those earlier decisions, we believe that under the "company-specific approach" the Staff takes in evaluating the significance of a

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<sup>1</sup> Although proposals similar to the one submitted by the Proponent have previously been included in GEO's proxy materials in prior years (2012 and 2013), the Company's decision to voluntarily include similar proposals in past proxy materials is not relevant to the Company's current No-Action Letter Request. Rule 14a-8 does not preclude exclusion of a proposal based on the fact that a company has previously submitted the proposal or a similar proposal to shareholders. *See Ford Motor Company* (February 6, 2004).

policy issue underlying a proposal, a different result is merited in this case because of material distinctions between this matter and those previously considered by the Staff.

### **Interacting with Governmental Officials is Fundamental to GEO's Ability to Run the Company**

As noted above, GEO is a REIT specializing in the design, financing, development, and operation of secure facilities, processing centers, and community reentry centers in the United States, Australia, South Africa, and the United Kingdom. GEO only offers these facilities and services to governmental entities at the federal, state, and local levels; the Company does not enter into such contracts with any private-sector clients. Thus, as a 100% government contractor, GEO is differently situated than other companies that have sought to exclude lobbying-related proposals, primarily because GEO necessarily has to communicate with governmental entities and officials on a constant basis in order to conduct its fundamental business operations. *Contrast with Eli Lilly & Co.* (March 1, 2019) (pharmaceutical company); *Bank of America Corp.* (March 7, 2011) (commercial bank); and *Int'l Business Machines Corp.* (January 24, 2011) (information technology)—all of which conduct extensive business providing goods or services to private-sector individuals and companies.

The Lobbying Disclosure Act (“LDA”) includes within its definition of “lobbying contact” any communications with covered executive or legislative officials about “the administration or execution of a Federal program or policy (*including the negotiation, award, or administration of a Federal contract* ...).” 2 U.S.C. § 1602(8)(iii). Analogous state statutes contain similar provisions. For instance, the Texas lobbying law requires persons who communicate with members of the state legislative or executive branches for the purpose of “influenc[ing] legislation or *administrative action*” to register as lobbyists and file regular reports to the state. *See* Tex. Code Ann. § 305.003. The term “administrative action” includes “a matter relating to the purchase of products or services by the agency or office.” *Id.* § 305.002(1). Florida imposes similar requirements. *See* Fla. Stat. §§ 11.044-.062 (legislative branch lobbying requirements); Fla. Admin. Code Ann. §§ 34-12.010-.760 (executive branch lobbying requirements). In particular, Florida’s executive branch lobbying regulations define “lobbying” to include seeking to influence “a decision of the agency in the area of policy or *procurement*.” *Id.* at 34-12.020(6).

Consequently, GEO’s basic day-to-day operations — identifying and engaging potential clients; providing education about the facilities and services offered by GEO; bidding on government contracts; negotiating contractual language; maintaining ongoing interactions and discussions with existing government clients over the administration and performance of contracts; modifying contractual terms as necessary—are encompassed within the various applicable definitions of lobbying, which triggers various federal, state and local registration and reporting requirements. In other words, GEO is compelled by the very nature of its business to engage in lobbying activities in order to provide services to its existing clients and to engage new ones. Therefore, unlike most companies whose lobbying activities, though important for advancing company interests, are ultimately discretionary, GEO’s interactions with government officials are integral to, and indeed inseparable from, its ordinary business operations. The Staff has concurred that shareholder proposals directed at lobbying activities related to a company’s products involve such company’s ordinary business. For example, in *Bristol-Myers Squibb Co. (AFL-CIO Reserve Fund)* (February 17, 2009), a proposal requested that the company’s board prepare a report regarding the company’s lobbying activities and expenses relating to the Medicare Prescription Drug Plans (Part D). The company noted in its no-action request that its pharmaceuticals segment manufactured and sold numerous company products covered by the Medicare Prescription Drug Plans (Part D). The Staff concurred that the proposal could be excluded under Rule 14a-8(i)(7), noting that the proposal “relat[es] to [the company’s] ordinary business operations (i.e. lobbying activities concerning its product(s).”

For these reasons, GEO should be permitted to omit the Proposal from its 2020 Proxy Materials because the Proposal concerns the services it offers to its clients and relates to “tasks [that] are so fundamental to [GEO’s] ability to run [its] company on a day-to-day basis that [it] could not, as a practical matter, be subject to direct shareholder oversight.”

### **The Proposal Does Not Raise a Significant Social Policy Issue That Transcends GEO’s Ordinary Business Operations**

The “ordinary business operations” exclusion contains an exception for proposals that focus on significant policy issues. The Staff has explained that proposals “focusing on a significant policy are not excludable under the [ordinary business operations] consideration because the proposals would transcend the day-to-day business matters and raise policy issues so significant that it would be appropriate for a shareholder vote.” Staff Legal Bulletin No. 14K (October 16, 2019) (internal quotes and citations omitted) (“*SLB 14K*”). Nevertheless, “[t]he staff takes a *company-specific approach* in evaluating significance, rather than recognizing particular issues ... as universally ‘significant.’ Accordingly, a policy issue that is significant to one company may not be significant to another.” *Id.* (emphasis added).

Here, the Proposal does not raise a significant social policy issue as contemplated by Rule 14a-8(i)(7). As explained below, nearly all of the information that the Proposal seeks to have published in an annual report is already publicly disclosed on a regular basis—both in GEO’s annual lobbying and political activity report and in publicly accessible lobbying disclosure reports — diminishing the significance of the policy issue underlying the Proposal.

One method for evaluating the significance of a policy issue is a “delta analysis,” under which a company identifies “the differences—or the delta—between the proposal’s specific request and the actions the company has already taken.” *See SLB 14K*. Key to this method is examining whether “the company’s prior actions [have] diminished the significance of the policy issue to such an extent that the proposal does not present a policy issue that is significant to the company.” *Id.* According to the Staff, a delta analysis is “useful for companies that have already addressed the policy issue in some manner but may not have substantially implemented the proposal’s specific request for purposes of exclusion under Rule 14a-8(i)(10).” *Id.*

In this matter, the Proposal seeks information about GEO’s policy and procedures governing lobbying and grassroots lobbying, payments used for these efforts, and memberships in and payments to tax-exempt organizations. As explained in the first sentence of its supporting statement, the Proposal’s primary objective is “encourag[ing] transparency and accountability in our company’s use of corporate funds to influence legislation and regulation.” This objective is already being adequately addressed by GEO through (1) its annual publication of its lobbying and political activity report, *see* GEO, *Political Activity and Lobbying Report (2018)*, [https://www.geogroup.com/Portals/0/SR/Political%20Engagement/Political Activity and Lobbying Report 2018.pdf](https://www.geogroup.com/Portals/0/SR/Political%20Engagement/Political%20Activity%20and%20Lobbying%20Report%202018.pdf) (a copy is attached to this letter as Exhibit B), and (2) its compliance with applicable federal and state lobbying laws. For instance, GEO is subject to the LDA, which imposes registration and reporting requirements on persons who lobby various federal officials in the legislative and executive branches. *See* 2 U.S.C. § 1601 et. seq. LDA registrations by retained lobbyists disclose, among other things, the organizations employing the lobbyists and the issues that will be the focus of lobbying activities, *Id.* at § 1603(b), while quarterly LDA reports include the congressional offices and/or federal agencies contacted during the reporting period, the specific issues addressed (citing bill numbers and specific executive actions as appropriate), and good-faith estimates of lobbying expenses. *Id.* at 1604(b). As noted above, state lobbying laws require similar disclosures. The

information included in these reports publicly discloses the purposes for, and amounts spent on, GEO's lobbying activities, which constitutes much of the information demanded in the Proposal.

Notably, the congressional findings listed in the LDA reflect concerns similar to those expressed in the Proposal and supporting statement—namely, the importance of “public awareness of the efforts of paid lobbyists to influence the public decision making process in both the legislative and executive branches of the Federal Government,” and the need for “effective public disclosure of the identity and extent of the efforts of paid lobbyists to influence Federal officials.” *Id.* § 1601(1) & (3). The LDA and analogous state laws advance these objectives, and GEO's compliance with the laws' disclosure requirements substantially addresses the informational demands set forth in the Proposal. Evidence for this conclusion can, coincidentally, be found in the Proposal's supporting statement itself, which summarizes in some detail GEO's lobbying expenses at both the federal and state levels in recent years. This information was readily available to the Proponent as a result of lobbying disclosure laws already on the books, GEO's regularly released annual report of its political activity, and the internet's ability to provide easy public access to such information. (Screenshots of GEO's lobbying disclosure information found on the websites of the Secretary of the U.S. Senate and the Clerk of the U.S. House of Representatives are attached as Exhibit C.)

For example, the Open Secrets website maintained by the Center for Responsive Politics allows readers to easily understand the full scope of GEO's federal lobbying activities. On this site alone, a user gains easy access to:

- A summary of GEO's spending on lobbying over the past 15 years;
- The firms and lobbyists hired by GEO;
- The agencies, issues, and bills lobbied by GEO; and
- Report images for all the relevant data.

*See, e.g.,* Center for Responsive Politics, *Client Profile: GEO Group*, <https://www.opensecrets.org/federal-lobbying/clients/summary?cycle=2019&id=D000022003> (information from the website is attached to this letter as Exhibits D1-D7). In short, under the “company-specific approach” set forth in *SLB 14K*, GEO's compliance with applicable lobbying disclosure laws substantially diminishes the significance of the policy issue underlying the Proposal.

Though the Proposal's concerns about grassroots lobbying and membership in tax-exempt organizations are not directly addressed by GEO's compliance with lobbying disclosure laws, the Proposal's omission is still justified. The difference between the information that GEO currently provides and what the Proposal requests does not represent a significant policy issue, primarily because GEO engages in no grassroots lobbying, and the amounts GEO spends on memberships in tax-exempt organizations that lobby is a fraction of what it spends on its already-disclosed lobbying activities—and GEO already annually releases a list of any such organizations to whom payments in excess of \$25,000 are made. Thus, the delta between the information GEO currently discloses on a regular and ongoing basis and the information sought by the Proposal is minor—we believe too minor to trigger the “significant policy issue” exception.

**The Proposal may be omitted under Rule 14a-8(i)(10) because GEO has already substantially implemented the Proposal.**

Rule 14a-8(i)(10) permits the omission of a proposal that the Company has substantially implemented. Because GEO publicly discloses virtually all of the information regarding its lobbying activities that the Proposal seeks to have published in an annual report, the Proposal has already been substantially implemented by GEO and, therefore, merits omission from the 2020 Proxy Materials.

The Staff has previously stated that Rule 14a-8(i)(10) was designed to “avoid the possibility of shareholders having to consider matters which have already been favorably acted upon by the management.” *Exchange Act Release No. 12598* (July 7, 1976). The SEC has clarified that a proposal need not be “fully effected” by a company to meet the “substantially implemented” standard under Rule 14a-8(i)(10). *See Exchange Act Release No. 34-40018* (May 21, 1998) (confirming the SEC’s position in *Exchange Act Release No. 34-20091* (August 16, 1983)). The Staff has stated that whether a shareholder proposal has been substantially implemented by a company under Rule 14a-8(i)(10) “depends upon whether [the company’s] particular policies, practices, and procedures compare favorably with the guidelines of the proposal.” *See Medtronic, Inc.* (June 13, 2013) and *Texaco, Inc.* (March 28, 1991). An evaluation of “substantial implementation” is dependent upon whether the actions of a company address the essential objective and underlying concerns of the proposal. *See The Procter & Gamble Co.* (August 4, 2010); *Exelon Corp.* (February 26, 2010); *Anheuser-Busch Companies, Inc.* (January 17, 2007); *ConAgra Foods, Inc.* (July 3, 2006); and *Johnson & Johnson* (February 17, 2006). Furthermore, the Staff has concluded that if a major portion of a stockholder’s proposal may be omitted pursuant to Rule 14a-8(i)(10), the entire proposal may be omitted. *See American Brands, Inc.* (February 3, 1993). Additionally, a shareholder proposal need not be implemented precisely or in full for it to be excluded under Rule 14a-8(i)(10). *See The Gap Inc.* (March 16, 2001).

In this matter, the Proposal’s essential objective and underlying concern is made clear in the first sentence of the Proposal’s supporting statement—“encourag[ing] transparency and accountability in our company’s use of corporate funds to influence legislation and regulation.” GEO is already addressing this essential objective and underlying concern by (1) annually publishing its lobbying and political activity report, *see* GEO, *Political Activity and Lobbying Report (2018)*, [https://www.geogroup.com/Portals/0/SR/Political%20Engagement/Political Activity and Lobbying Report 2018.pdf](https://www.geogroup.com/Portals/0/SR/Political%20Engagement/Political_Activity_and_Lobbying_Report_2018.pdf) (attached as Exhibit B), and (2) complying with applicable federal and state lobbying laws. As noted above, GEO is subject to the LDA’s registration and reporting provisions, which among other things require disclosure of (i) the organizations employing persons lobbying on GEO’s behalf, (ii) the issues being lobbied, (iii) the congressional offices and/or federal agencies contacted, (iv) the specific legislative or executive issues addressed, and (v) estimated lobbying expenses. 2 U.S.C. §§ 1603(b) & 1604(b). State lobbying laws demand similar information. The information disclosed in these federal and state filings, which as shown above is readily available online, represents virtually all of the information requested in the Proposal.

As for the Proposal’s provisions regarding grassroots lobbying and tax-exempt organization memberships, we again note that GEO engages in no grassroots lobbying, and furthermore, that GEO includes in its annual *Political Activity and Lobbying Report* the names of any tax-exempt organizations to which GEO makes payments in excess of \$25,000. (In any event, GEO’s spending on such memberships is relatively nominal.) In short, GEO’s compliance with applicable lobbying disclosure laws and its publication of its annual *Political Activity and Lobbying Report* “compare[s] favorably with

the guidelines of the proposal.”<sup>2</sup> Accordingly, the Proposal has been substantially implemented by GEO and, thus, may be omitted from the 2020 Proxy Materials.

**The Proposal May be Omitted Under Rule 14a-8(i)(4) Because the Proponent Seeks to Manipulate the Shareholder Proposal Process to Achieve Personal Interests That Are Not in the Common Interest of GEO’s Shareholders.**

Rule 14a-8(i)(4) permits the omission of shareholder proposals that are (i) related to the redress of a personal claim or grievance against a company or any other person, or (ii) designed to result in a benefit to a proponent or to further a personal interest of a proponent, which other shareholders at large do not share. As the Commission has explained, Rule 14a-8(i)(4) is designed to “insure that the security holder proposal process [is] not abused by proponents attempting to achieve personal ends that are not necessarily in the common interest of the issuer’s shareholders generally.” Exchange Act Release No. 20091 (August 16, 1983). According to the Commission, “[t]he cost and time involved in dealing with” claims that further personal grievances or interests do “a disservice to the interests of the issuer and its security holders at large.” Exchange Act Release No. 19135 (October 14, 1982). The Commission has further clarified that proposals that “might relate to matters which may be of general interest to all security holders” may still be properly omitted “if it is clear from the facts presented by the issuer that the proponent is using the proposal as a tactic designed to redress a personal grievance or further a personal interest.” *Id.* We believe the facts in this matter illustrate that the Proponent is using the Proposal as a tactic to further a personal interest.

Though it is drafted to appear to be “of general interest to all security holders,” the Proposal must be considered within the larger context of the Proponent’s efforts to undermine GEO. The Proposal is the latest effort in a multi-front campaign mounted by the Proponent against GEO. The following list provides examples of those efforts:

- SEIU and allied groups have organized petition drives and protests designed to pressure banks that have provided GEO with loans and other financial services to cut off their relationships with GEO. *See United Farm Workers Petition*, SEIU (using digital tools provided by SEIU, the petition asks visitors to “sign the petition telling Wells Fargo and JPMorgan Chase to stop financing ... GEO Group”), <https://act.seiu.org/onlineactions/WaPd2nIH5Eu40OGHiF1XFA2?emci=3b0e8b4f-7a9a-e811-bce7-000d3a12b800&emdi=9298baa9-3ba2-e811-bce7-000d3a12b800&ceid=125499&smartlinkdata=JmZuPVJveSZsbl1OaXR6YmVyZyZlbt1ybml0emJlcmclNDBtaW5kc3ByaW5nLmNvbSZhZGQxPTY3MTYrU2VsZnJ> (last visited December 19, 2019); *#FamiliesBelongTogether Demands Wells Fargo and JPMorgan Chase Stop Financing For-Profit Prison Companies Benefiting from Family Separation*, Prison Industry Divestment Movement (July 16, 2018) (last visited January 16, 2020) (listing SEIU as a coalition member supporting the petition). These and similar efforts resulted in JPMorgan Chase announcing that it will no longer provide financing to GEO. *See David Henry & Imani Moise,*

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<sup>2</sup> Even assuming *arguendo* that the information GEO currently discloses does not encompass the total information requested by the Proposal, the “substantial implementation” exclusion still applies. As the Staff has made clear, a shareholder proposal may be excluded even if it is not implemented in full; the key is whether the company addresses a proposal’s key objective. Here, GEO’s annual political and lobbying report and its compliance with lobbying disclosure laws—which *inter alia* publicly discloses the purposes for, and amounts spent on, GEO’s lobbying activities—clearly addresses the Proposal’s objective regarding transparency and accountability and, thus, meets the “substantial implementation” test.

*JPMorgan Backs Away from Private Prison Finance*, Reuters (March 5, 2019), <https://www.reuters.com/article/us-jp-morgan-prisons/jpmorgan-backs-away-from-private-prison-finance-idUSKCN1QM1LE>.

- SEIU has issued studies criticizing privatization and included specific sections targeting GEO's contracts in California for operation of correctional facilities. *Evaluation of Outsourcing in the Public Sector*, SEIU Local 1000, 74-78, [https://www.inthepublicinterest.org/wp-content/uploads/Evaluation\\_of\\_Outourcing\\_in\\_the\\_Public\\_Sector.pdf](https://www.inthepublicinterest.org/wp-content/uploads/Evaluation_of_Outourcing_in_the_Public_Sector.pdf) (“*SEIU Privatization Report*”).
- SEIU authored a similar study focusing on California's contracts with private companies and specifically criticizes GEO. *See The Hidden Branch of Government: Corporate Mega-Contracts in California State Government*, SEIU 1000, 2-3 (Feb. 2012), [https://www.seiu1000.org/sites/main/files/file-attachments/state\\_contracting\\_web.pdf](https://www.seiu1000.org/sites/main/files/file-attachments/state_contracting_web.pdf).
- SEIU has helped organize and participate in protests at GEO's annual shareholder meeting. *See Over 100 Private Prison Protestors Converge at GEO Group's Shareholder Meeting*, Grassroots Leadership (April 29, 2015) (noting SEIU-Florida members' involvement in the protest), <https://grassrootsleadership.org/releases/2015/04/over-100-private-prison-protestors-converge-geo-group-s-shareholder-meeting>; Nadia Prupis, “*Expose the Slaveholders*”: *Activists Disrupts For-Profit Prison Corp. Meeting*, Common Dreams (April 29, 2015), <https://www.commondreams.org/news/2015/04/29/expose-slaveholders-activists-disrupt-profit-prison-corp-meeting>.
- SEIU has organized rallies outside facilities owned and operated by GEO. *See, e.g., South Floridians to Rally Outside Broward Transitional Center on National Day of Action to Prevent Deportations and Protect Immigrants and Refugees*, SEIU Florida (January 11, 2017), <http://www.seiufl.org/press-releases/south-floridians-rally-outside-broward-transitional-center-national-day-action>.

These actions demonstrate the Proponent's longstanding antagonism towards GEO. Especially as illustrated by the Proponent's efforts to get banks to end financial arrangements with GEO, it is clear the Proponent's motivations are not to maintain or improve, but rather to undermine, the Company's financial health. Such efforts, without question, are not “in the common interest of the issuer's shareholders generally.”

As shown in the *SEIU Privatization Report*, the Proponent is a vocal opponent of government privatization. Thus, the discrete interest of the Proponent and its members in fighting privatization efforts and against contracts awarded to companies like GEO should not be allowed to operate at cross-purposes with the interests of the Company's shareholders as a whole. Accordingly, GEO should also be permitted to omit the Proposal from its 2020 Proxy Materials under Rule 14a-8(i)(4).

**CONCLUSION**

For the reasons stated above, we respectfully request that the Staff concur that GEO may omit the Proposal from its 2020 Proxy Materials.

If you have any questions or need additional information regarding GEO's request, please do not hesitate to contact the undersigned at 305-982-5519 or [esther.moreno@akerman.com](mailto:esther.moreno@akerman.com).

Sincerely,

A handwritten signature in cursive script that reads "Esther L. Moreno".

cc: Joseph Negron, The GEO Group, Inc.  
Pablo Paez, The GEO Group, Inc.  
Louis Carrillo, The GEO Group, Inc.  
Maureen O'Brien, Segal Marco Advisors

**EXHIBIT A**



**Benefit Funds**  
**SEIU MASTER TRUST**

November 19, 2019

By overnight delivery and email: [ir@geogroup.com](mailto:ir@geogroup.com)

Mr. Joe Negron  
Senior Vice President, General Counsel and Corporate Secretary  
The Geo Group, Inc.  
One Park Place, Suite 700  
621 Northwest 53rd Street  
Boca Raton, Florida 33487-8242

RE: Service Employees International Union Pension Plans Master Trust  
Shareholder Proposal

Dear Mr. Negron:

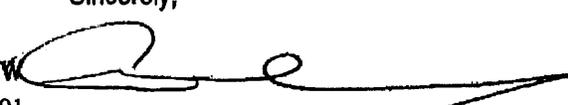
In my capacity as Trustee on the Service Employees International Union Pension Plans Master Trust (the "Fund"), I write to give notice that pursuant to the 2019 proxy statement of The Geo Group, Inc. (the "Company"), the Fund intends to present the attached proposal (the "Proposal") at the 2020 annual meeting of shareholders (the "Annual Meeting"). The Fund requests that the Company include the Proposal in the Company's proxy statement for the Annual Meeting.

A letter from the Fund's custodian documenting the Fund's continuous ownership of the requisite amount of the Company's stock for at least one year prior to the date of this letter is being sent separately. The Fund also intends to continue its ownership of at least the minimum number of shares required by the SEC regulations through the date of the Annual Meeting. I represent that the Fund or its agent intends to appear in person or by proxy at the Annual Meeting to present the attached Proposal. I declare the Fund has no "material interest" other than that believed to be shared by stockholders of the Company generally.

We welcome the opportunity to discuss this proposal with you in more detail. Please reach out to Maureen O'Brien, Vice President and Corporate Governance Director at Segal Marco Advisors. Ms. O'Brien can be reached at 312-612-8446 or [mobrien@segalmarco.com](mailto:mobrien@segalmarco.com).

Sincerely,

1800 Massachusetts Ave NW  
Suite 301  
Washington DC 20036-1202  
202-730-7542  
800-458-1010



Arun Ivatury  
Trustee, SEIU Pension Plans Master Trust

Whereas, we believe in full disclosure of The GEO Group's ("GEO") direct and indirect lobbying activities and expenditures to assess whether GEO's lobbying is consistent with GEO's expressed goals and in the best interests of shareholders.

**Resolved**, the shareholders of GEO request the preparation of a report, updated annually, disclosing:

1. Company policy and procedures governing lobbying, both direct and indirect, and grassroots lobbying communications.
2. Payments by GEO used for (a) direct or indirect lobbying or (b) grassroots lobbying communications, in each case including the amount of the payment and the recipient.
3. GEO's membership in and payments to any tax-exempt organization that writes and endorses model legislation.
4. Description of management's and the Board's decision making process and oversight for making payments described in sections 2 and 3 above.

For purposes of this proposal, a "grassroots lobbying communication" is a communication directed to the general public that (a) refers to specific legislation or regulation, (b) reflects a view on the legislation or regulation and (c) encourages the recipient of the communication to take action with respect to the legislation or regulation. "Indirect lobbying" is lobbying engaged in by a trade association or other organization of which GEO is a member.

Both "direct and indirect lobbying" and "grassroots lobbying communications" include efforts at the local, state and federal levels.

The report shall be presented to the Audit Committee or other relevant oversight committees and posted on GEO's website.

### **Supporting Statement**

As shareholders, we encourage transparency and accountability in our company's use of corporate funds to influence legislation and regulation. GEO has spent \$7.13 million from 2010 – 2018 on federal lobbying, including \$1.7 million in 2017, which reportedly was the highest amount in a year for a private prison.<sup>1</sup> These figures do not include lobbying expenditures to influence legislation in states, where GEO also lobbies but disclosure is uneven or absent. For example, GEO had at least 67 lobbyists in 16 states in 2018 (followthemoney.org). GEO spent \$1,500,000 on lobbying in Alabama for 2018<sup>2</sup> and \$3,995,000 on lobbying in Florida from 2012 – 2017.<sup>3</sup> And GEO's lobbying over how long immigrant children in Texas can be detained has attracted negative scrutiny.<sup>4</sup>

GEO is a member of the National Association of Real Estate Investment Trusts, which spent over \$7.8 million on lobbying in 2017 and 2018. GEO is also listed as a member of the Florida Chamber of Commerce, which had at least 25 lobbyists in Florida in 2017.<sup>5</sup> GEO does not comprehensively disclose its memberships in, or payments to, trade associations, or the amounts used for lobbying. Absent a system of accountability, company assets could be used for objectives contrary to GEO's long-term interests.

---

<sup>1</sup> <https://www.opensecrets.org/news/2018/06/zero-tolerance-immigration-is-big-money-for-contractors-nonprofits/>

<sup>2</sup> <https://www.alreporter.com/2019/09/16/private-prison-detention-companies-spending-on-alabama-politicians/>

<sup>3</sup> <https://www.followthemoney.org/research/blog/private-prisons-pour-millions-into-lobbying-state-lawmakers>

<sup>4</sup> <https://theintercept.com/2017/05/02/private-prison-corporation-wrote-texas-bill-extending-how-long-immigrant-children-can-be-detained/>

<sup>5</sup> <https://www.flchamber.com/the-good-the-bad-and-the-ugly/>

We are concerned that GEO's lack of lobbying disclosure presents reputational risks, and thus we urge the Board to institute comprehensive lobbying disclosure.

**EXHIBIT B**



# Political Activity And Lobbying Report (2018)



## Overview

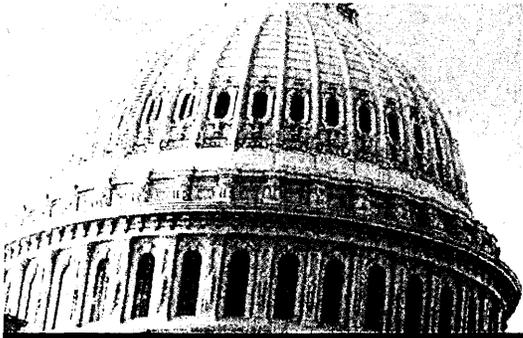
As a company whose business is based on public-private partnerships with government agencies in the United States and around the world, The GEO Group, Inc. (GEO) strives to maintain the highest level of ethics and compliance with respect to its government relations and political contributions. GEO's political contributions and lobbying activities are strictly monitored by GEO's Legal Department to ensure compliance with applicable state and federal laws.

GEO's government relations activities are focused on government actions (legislative, regulatory and executive) that impact public-private partnerships in corrections, detention, reentry, rehabilitation, and electronic monitoring services. Otherwise, GEO's political contributions and lobby expenditures do not encompass criminal justice or immigration policies such as whether to criminalize behavior, the length of criminal sentences or the basis for an individual's incarceration or detention. The disclosure in the lobbying reports filed by the company is representative of the types of matters on which the company lobbies. **GEO does not lobby for or against immigration enforcement policies or any policies or legislation that would determine the basis for an individual's incarceration or detention, the length of sentences or the criminalization of behavior.**

Government relations engagements and expenditures require Vice President level or above approval. The Legal Department provides support for the company's reporting and other compliance obligations.

GEO also sponsors a non-partisan political action committee (GEO PAC) which is funded solely through voluntary employee contributions and which makes contributions to federal candidates and to candidates in certain jurisdictions where contributions from political action committees are allowed.

Corporate funds may be used to make political contributions where permitted by law. Political contributions using corporate funds are governed by GEO's Political Contributions Policy and their expenditure requires authorization and approval by our CEO, GEO's Legal Department and the Chief Accounting Officer or Treasurer (summarized herein). GEO's Board of Directors routinely engages with GEO's management to ensure proper oversight of said policy. Political contributions made by GEO entities or the GEO PAC should not be construed as an endorsement of all policies or positions adopted by any given candidate.

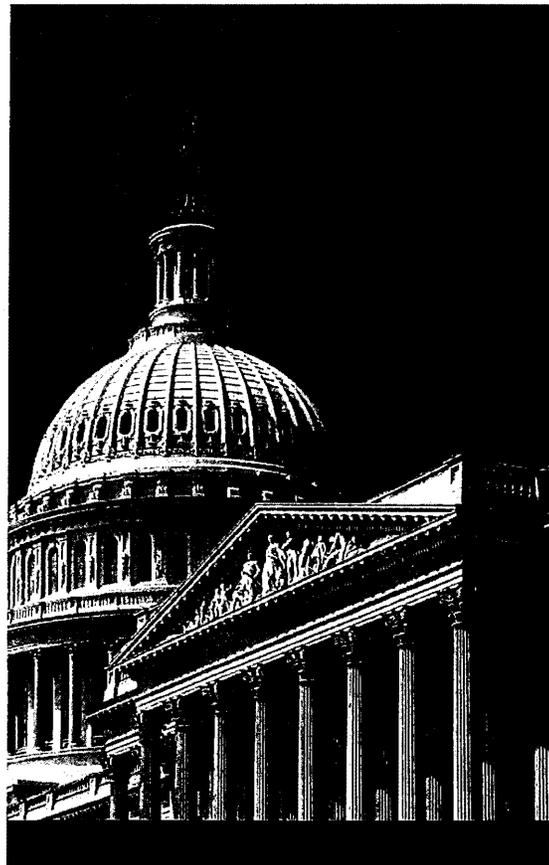


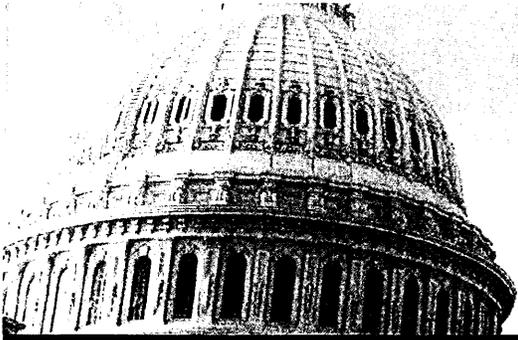
## GEO PAC Contributions

GEO sponsors a non-partisan federal political action committee that is funded solely by voluntary employee contributions. The GEO PAC is a federally registered PAC that may make contributions in connection with federal elections, subject to contribution limits defined by the Federal Election Campaign Act. The GEO PAC may also make state-level political contributions, in compliance with state contributions limitations, registration and reporting requirements where applicable.

All GEO PAC contributions must be approved by the GEO PAC Board of Directors. Detailed information on the GEO PAC's contributions to candidate campaigns and other political committees is publicly disclosed in the GEO PAC's regular reports to the Federal Election Commission (FEC). Disbursements from the PAC to state-level candidates and committees are also reported on these FEC filings.

All of the PAC's filings with the FEC are available for public review on the FEC's website at [www.fec.gov](http://www.fec.gov).





## The GEO Group's Policy on Political Contributions:

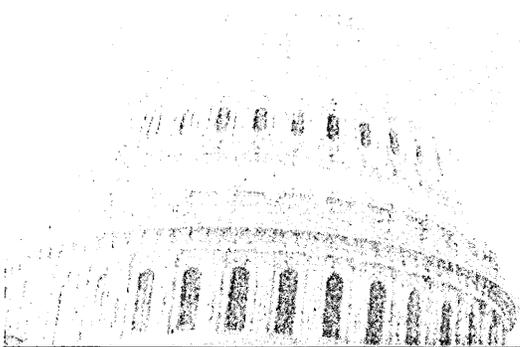
Where lawfully permitted, GEO is authorized to contribute corporate funds to political candidates and political parties.

### Guidelines

- A. Federal campaign laws prohibit corporate contribution to federal candidates and most political committees.
- B. Political contributions may include direct monetary contributions of corporate funds, in-kind contributions of corporate funds such as disbursement of funds to pay for candidate or party expenses, contributions of goods and services and all monetary contributions of political nature for which the fair market value is less than the amount paid.
- C. Federal and state laws prohibit reimbursement of any person for campaign contributions.
- D. GEO's Legal Department reviews all requests for corporate political contributions to ensure compliance with applicable state and federal campaign laws.

## Approval Procedure

1. The authorized company representative requesting the political contribution will provide a completed Political Contribution Request Form, and any appropriate supplementary documentation to the Vice President with supervisory authority for approval. For example, a Facility Administrator would provide the completed form to the appropriate Regional or Corporate Vice President, who, if the contribution exceeded \$2,000, would forward it to the CEO for approval.
2. Once the Political Contribution Request Form has been signed by the Vice President with supervisory authority, all requests must be routed to the General Counsel's office. While all requests must be approved by the General Counsel's Office, any requests in excess of \$2,000 must also be approved by the CEO, the Legal Department, and the CFO, CAO or Vice President of Finance/Treasurer.
3. In no event may any employee, officer or director be reimbursed for making political contributions.



## Political Contributions Table\*

<b>Totals by Source of Funds:</b>	<b>2018</b>
• Combined- Corporate and GEO PAC	\$3,324,690
-Corporate	\$2,816,090
-GEO PAC	\$508,600
<b>Totals by Recipient Category (Source in Parenthesis):</b>	<b>2018</b>
• Federal Candidates, Parties & Committees (Combined)	\$1,235,500
• State/Local Candidates, Parties & Committees (Combined)	\$2,089,190

\* Totals reflected aggregate contributions made by corporate subsidiaries.

## Lobbying Disclosures

Engagement in legislative and regulatory proceedings at the federal, state and local levels of government is important to promoting the benefits of public-private partnerships. GEO participates in the political process and retains the services of consultant government relations professionals in jurisdictions where it has or may pursue the development of public-private partnerships. Federal and state laws, including the Lobbying Disclosure Act, require GEO to report expenditures associated with these activities. Political information on these activities and associated expenditures can be obtained at <http://disclosure.senate.gov/> or <http://lobbyingdisclosure.house.gov>. Each searchable site provides access to all of GEO's lobbyist's reports. The total expenditures disclosed on the federal forms include all of GEO's spending on federal, state and local lobbying.

Information on GEO's political contributions and lobbying disclosures can also be found in state agency websites, such as the respective Departments of State, Ethics Commissions and/or State Divisions of Election (e.g. [sos.ca.gov](http://sos.ca.gov), [www.ethics.state.tx.us](http://www.ethics.state.tx.us), [dos.myflorida.com](http://dos.myflorida.com)).

## Fees for Direct Lobbying

In 2018, GEO paid an aggregate amount of approximately \$4.3 million to consultant government relations professionals for direct lobbying (as defined by the Internal Revenue Code (IRC) 162 (e)).

## Trade and Membership Associations, Chambers of Commerce and other Groups

GEO belongs to only one trade association as a member: the National Association of Real Estate Investment Trusts (NAREIT). From time to time, GEO may also contribute to other trade and membership associations, chambers of commerce, etc. Below is a list of such organizations to which GEO paid dues, fees, or contributions of \$25,000 or more in 2018.

**National Association of Real Estate Investment Trusts\* (NAREIT):** \$80,164

**EXHIBIT C**



## Query the Lobbying Disclosure Act Database

[Search Lobbying Database](#)
[Search Contributions Database](#)
[Search Giftrule Database](#)
[Disclosure Home](#)

Show: 100

Filter:

Registrant Name	Client Name	Filing Type	Amount Reported	Date Posted	Filing Year
BALLARD PARTNERS	The Geo Group, Inc.	FIRST QUARTER REPORT	\$150,000.00	04/20/2018	2018
Bradley Arant Boult Cummings LLP	The GEO Group, Inc.	FIRST QUARTER REPORT	\$30,000.00	04/20/2018	2018
Capitol Counsel, LLC	The GEO Group, Inc.	FIRST QUARTER REPORT	\$30,000.00	04/20/2018	2018
DLA Piper LLP (US)	St. George's Group LP	FIRST QUARTER REPORT	\$100,000.00	04/20/2018	2018
Lionel "Leo" Aguirre	The Geo Group Inc.	FIRST QUARTER REPORT	\$30,000.00	04/20/2018	2018
Mack Strategies	GEO Group	FIRST QUARTER REPORT	\$30,000.00	04/20/2018	2018
Navigators Global LLC (Formerly DC Navigators, LLC)	The Geo Group, Inc.	FIRST QUARTER REPORT	\$90,000.00	04/20/2018	2018
STATE FEDERAL STRATEGIES	GEO GROUP INC (FORMERLY CAPITOL COUNSEL OF BEHALF OF THE GEO GROUP INC)	SECOND QUARTER REPORT	\$20,000.00	07/11/2018	2018
BALLARD PARTNERS	The Geo Group, Inc.	SECOND QUARTER REPORT	\$150,000.00	07/17/2018	2018
Capitol Counsel, LLC	The GEO Group, Inc.	SECOND QUARTER REPORT	\$30,000.00	07/19/2018	2018
DA VINCI GROUP	The GEO Group, Inc.	SECOND QUARTER REPORT		07/19/2018	2018
DLA Piper LLP (US)	St. George's Group LP	SECOND QUARTER REPORT	\$70,000.00	07/19/2018	2018

House ID	Registrant Name	Client Name	Filing Year	Filing Period	Lobbyist Full Name
<a href="#">436370002</a>	STATE FEDERAL STRATEGIES	Capitol Counsel of behalf of The GEO Group, Inc.	2018	3rd Quarter	Sullivan, Richard
<a href="#">436370002</a>	STATE FEDERAL STRATEGIES	Capitol Counsel of behalf of The GEO Group, Inc.	2018	4th Quarter	Sullivan, Richard
<a href="#">425290005</a>	Mack Strategies	GEO Group	2018	1st Quarter	Mack, Connie
<a href="#">425290005</a>	Mack Strategies	GEO Group	2018	2nd Quarter	Mack, Connie
<a href="#">425290005</a>	Mack Strategies	GEO Group	2018	3rd Quarter	Mack, Connie
<a href="#">425290005</a>	Mack Strategies	GEO Group	2018	4th Quarter	Mack, Connie
<a href="#">331680041</a>	DA VINCI GROUP	The GEO Group, Inc.	2018	1st Quarter	Smith, Mark
<a href="#">393840213</a>	Capitol Counsel, LLC	The GEO Group, Inc.	2018	1st Quarter	Cohen, Aaron
<a href="#">305900071</a>	Bradley Arant Boult Cummings LLP	The GEO Group, Inc.	2018	1st Quarter	Stewart, David
<a href="#">331680041</a>	DA VINCI GROUP	The GEO Group, Inc.	2018	2nd Quarter	Smith, Mark
<a href="#">393840213</a>	Capitol Counsel, LLC	The GEO Group, Inc.	2018	2nd Quarter	Cohen, Aaron
<a href="#">305900071</a>	Bradley Arant Boult Cummings LLP	The GEO Group, Inc.	2018	2nd Quarter	Stewart, David
<a href="#">331680041</a>	DA VINCI GROUP	The GEO Group, Inc.	2018	3rd Quarter	Smith, Mark
<a href="#">393840213</a>	Capitol Counsel, LLC	The GEO Group, Inc.	2018	3rd Quarter	Cohen, Aaron
<a href="#">305900071</a>	Bradley Arant Boult Cummings LLP	The GEO Group, Inc.	2018	3rd Quarter	Stewart, David
<a href="#">331680041</a>	DA VINCI GROUP	The GEO Group, Inc.	2018	4th Quarter	Smith, Mark
<a href="#">305900071</a>	Bradley Arant Boult Cummings LLP	The GEO Group, Inc.	2018	4th Quarter	Stewart, David
<a href="#">393840213</a>	Capitol Counsel, LLC	The GEO Group, Inc.	2018	4th Quarter	Cohen, Aaron
<a href="#">305900071</a>	Bradley Arant Boult Cummings LLP	The GEO Group, Inc.	2018	3rd Quarter	Stewart, David
<a href="#">400850000</a>	Aguirre, Lionel "Leo"	The Geo Group Inc.	2018	1st Quarter	Aguirre, Lionel "Leo"

**EXHIBIT D(1)**

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# Client Profile: GEO Group

[Summary](#)

[Hired Firms](#)

[Lobbyists](#)

[Issues](#)

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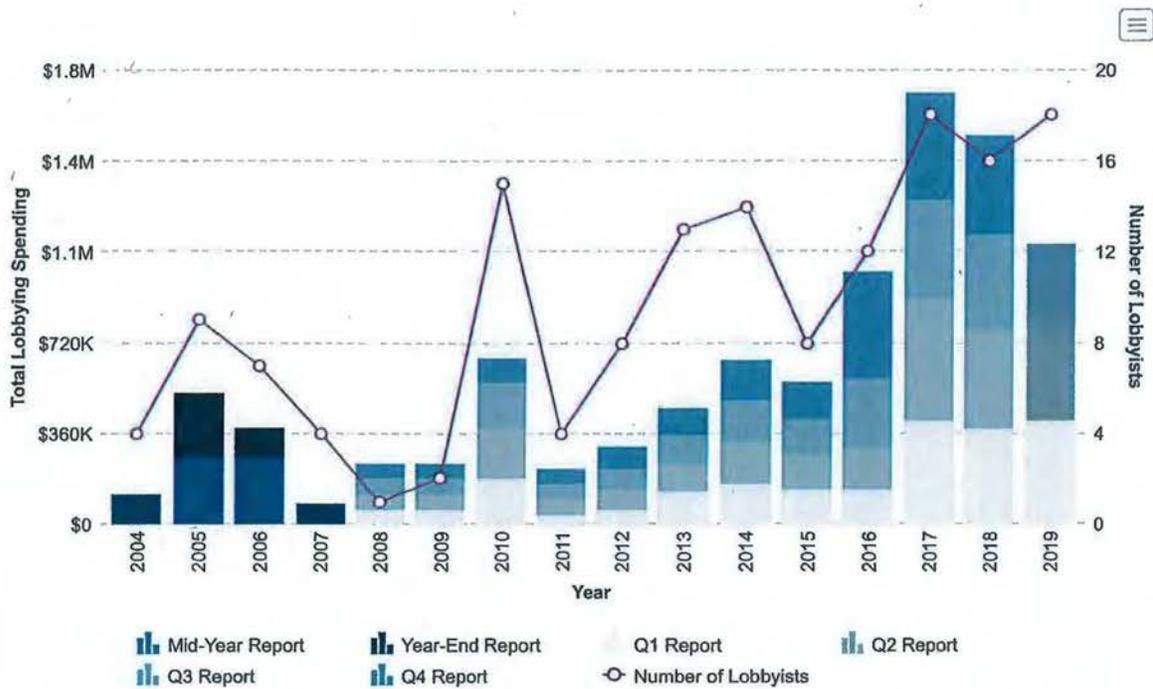
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A special interest's lobbying activity may go up or down over time, depending on how much attention the federal government is giving their issues. Particularly active clients often retain multiple lobbying firms, each with a team of lobbyists, to press their case for them.

**\$1,110,000**

**Total Lobbying Expenditures, 2019**

## **Annual Lobbying by GEO Group**



**GEO Group Lobbying by Industry**

[Export to CSV](#)

Industry	Total
Misc Business	\$1,110,000

NOTE: Figures on this page are calculations by the Center for Responsive Politics based on data from the Senate Office of Public Records. Data for the most recent year was downloaded on October 23, 2019 and includes spending from January 1 - September 30. Prior years include spending from January through December.

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15-Year Fixed	2.88%	3.09% APR
30-Year Fixed	3.38%	3.51% APR
5/1 ARM	3.50%	4.04%
\$225,000 (5/1 ARM)	\$1,010/mo	4.04%
\$350,000 (5/1 ARM)	\$1,476/mo	4.00%

Select year: 2019

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\$100

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**EXHIBIT D(2)**

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# Client Profile: GEO Group

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[Lobbyists](#)

[Issues](#)

[Agencies](#)

[Bills](#)

[Report Images](#)

**\$1,110,000**

Total Lobbying Expenditures, 2019

## Itemized Lobbying Expenses for GEO Group

[Export to CSV](#)

Hired Firms	Total Reported by Filer	Reported Contract Expenses (included in Total Reported by Filer)
Ballard Partners	-	\$330,000
Navigators Global	-	\$270,000
State Federal Strategies	-	\$120,000
Bradley, Arant et al	-	\$100,000
		<b>\$1,110,000</b>

Hired Firms	Total Reported by Filer	Reported Contract Expenses (included in Total Reported by Filer)
Capitol Counsel	-	\$90,000
Aguirre, Lionel 'Leo'	-	\$90,000
Mack Strategies	-	\$90,000
Avant, Bishop et al	-	\$20,000
Da Vinci Group	-	\$0
		<b>\$1,110,000</b>

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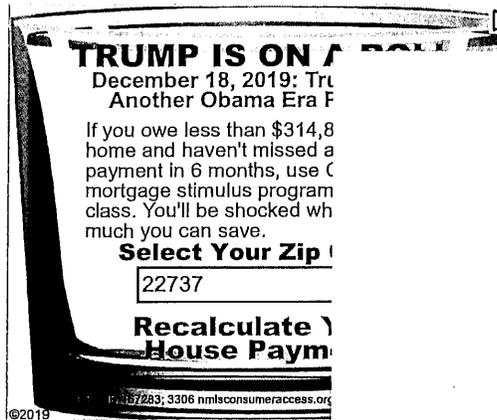
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**EXHIBIT D(3)**

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# Client Profile: GEO Group

[Summary](#)

[Hired Firms](#)

[Lobbyists](#)

[Issues](#)

[Agencies](#)

[Bills](#)

[Report Images](#)

\$1,110,000

Total Lobbying Expenditures, 2019

18

Number of Lobbyists

16 (88.89%)

Number of Revolvers ?

Lobbyists representing GEO Group, 2019

[Export to CSV](#)

[Reset Filters](#)

Filter by Revolving Door Profiles:

All

Filter by Former Members of Congress:

All

Lobbying Firm Hired	Total Amount*	Client	Lobbyist
Aguirre, Lionel 'Leo'	\$90,000	GEO Group	Lionel Aguirre 
Avant, Bishop et al	\$20,000	GEO Group	Lanier Avant
Ballard Partners	\$330,000	GEO Group	Brian D Ballard 
Ballard Partners	\$330,000	GEO Group	Rebecca Benn 
Ballard Partners	\$330,000	GEO Group	Pam Bondi 
Ballard Partners	\$330,000	GEO Group	Sylvester Lukis 
Ballard Partners	\$330,000	GEO Group	Dan Mcfaul 
Ballard Partners	\$330,000	GEO Group	Justin J Sayfie 
Bradley, Arant et al	\$100,000	GEO Group	Paul Kavinoky 
Bradley, Arant et al	\$100,000	GEO Group	David O Stewart 
Bradley, Arant et al	\$100,000	GEO Group	J David Stewart 
Capitol Counsel	\$90,000	GEO Group	Aaron K Cohen 
Da Vinci Group	\$0	GEO Group	Mark R Smith 
Mack Strategies	\$90,000	GEO Group	Connie IV Mack  
Navigators Global	\$270,000	GEO Group	Ryan Berger
Navigators Global	\$270,000	GEO Group	Chris C Cox 
Navigators Global	\$270,000	GEO Group	Sarah Beatty Rogers 
State Federal Strategies	\$120,000	GEO Group	Richard Lyles Sullivan 

 Revolving Door Profile  Former Member of Congress

Showing 1 to 18 of 18 entries



\$100

Other



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**EXHIBIT D(4)**

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# Client Profile: GEO Group

[Summary](#)

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[Lobbyists](#)

[Issues](#)

[Agencies](#)

[Bills](#)

[Report Images](#)

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## Issues Lobbied By GEO Group, 2019

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Issue	Specific Issues
Law Enforcement & Crime	8
Homeland Security	8
Immigration	3
Fed Budget & Appropriations	3
Government Issues	1

Showing 1 to 5 of 5 entries

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**EXHIBIT D(5)**

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# Client Profile: GEO Group

[Summary](#)

[Hired Firms](#)

[Lobbyists](#)

[Issues](#)

[Agencies](#)

[Bills](#)

[Report Images](#)

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## Agencies Lobbied By GEO Group, 2019

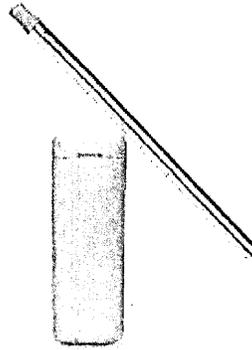
- **Dept of Homeland Security**
- **Dept of Justice**
- **Dept of Labor**
- **White House**

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**EXHIBIT D(6)**

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# Client Profile: GEO Group

[Summary](#)

[Hired Firms](#)

[Lobbyists](#)

[Issues](#)

[Agencies](#)

[Bills](#)

[Report Images](#)

## Bills Lobbied By GEO Group, 2019

NOTE: Occasionally, a lobbying client may refer to a bill number from a previous Congress, either in error or because they are lobbying on a bill that has not yet been assigned a number. **+ Read more**

[📄 Export to CSV](#)

Bill Number	Congress Number	Bill Title	No. of Reports & Specific Issues*
H.R.3055	116	Science Appropriations Act, 2020	2
H.R.3931	116	Department of Homeland Security Appropriations Act, 2020	1
S.2582	116	Department of Homeland Security Appropriations Act, 2020	1
S.2584	116	Science Appropriations Act, 2020	1
H.J.RES.31	116	Consolidated Appropriations Act, 2019	1

Showing 1 to 5 of 5 entries

\*Each quarterly filing is treated as a separate report.

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Another Obama Era Progr

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home and haven't missed a m  
payment in 6 months, use Cor  
mortgage stimulus program fo  
middle class. Yc  
shocked when y  
how much you c

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22737

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**EXHIBIT D(7)**

Subsidiary	Lobbying Firm Hired	Report Type (Click to view report. Opens in new window.)	Amount
GEO Group	Bradley, Arant et al	THIRD QUARTER REPORT	\$30,000
GEO Group	Capitol Counsel	FIRST QUARTER REPORT	\$30,000
GEO Group	Capitol Counsel	SECOND QUARTER REPORT	\$30,000
GEO Group	Capitol Counsel	THIRD QUARTER REPORT	\$30,000
GEO Group	Da Vinci Group	FIRST QUARTER REPORT	\$0
GEO Group	Da Vinci Group	SECOND QUARTER REPORT	\$0
GEO Group	Da Vinci Group	THIRD QUARTER REPORT	\$0
GEO Group	Mack Strategies	FIRST QUARTER REPORT	\$30,000
GEO Group	Mack Strategies	SECOND QUARTER REPORT	\$30,000
GEO Group	Mack Strategies	THIRD QUARTER REPORT	\$30,000
GEO Group	Navigators Global	FIRST QUARTER REPORT	\$90,000
GEO Group	Navigators Global	SECOND QUARTER REPORT	\$90,000
GEO Group	Navigators Global	THIRD QUARTER REPORT	\$90,000
GEO Group	State Federal Strategies	FIRST QUARTER REPORT	\$40,000
GEO Group	State Federal Strategies	SECOND QUARTER REPORT	\$40,000
GEO Group	State Federal Strategies	THIRD QUARTER REPORT	\$40,000

Showing 1 to 25 of 25 entries

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Select year: 2019

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### Today's Mortgage Rate <sup>Ⓜ</sup>

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Select Loan Am

\$225,000

Calcula

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