February 13, 2020

VIA EMAIL (shareholderproposals@sec.gov)
Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, NE
Washington, DC 20549

Re: Shareholder proposal of the Service Employees International Union
Pension Plans Master Trust;
request by The GEO Group, Inc. for no-action determination

Dear Sir/Madam:

Pursuant to Rule 14a-8 under the Securities Exchange Act of 1934, the Service Employees International Union Pension Plans Master Trust (the “Fund”), submitted to The GEO Group, Inc. (“GEO” or “Company”) a shareholder proposal (the “Proposal”) asking the Company to provide an annual report disclosing its policies and procedures relating to lobbying as well as certain information regarding payments used for lobbying.

In a letter dated January 17, 2020 (the “No-Action Request”), GEO stated that it intends to omit the Proposal from its proxy materials being prepared for the 2020 annual meeting of shareholders. GEO claims that it may exclude the Proposal pursuant to Rule 14a-8(i)(7), as relating to GEO’s ordinary business, Rule 14a-8(i)(10), as substantially implemented, and Rule 14a-8(i)(4), as relating to an ongoing grievance against GEO. The Fund will address each of GEO’s arguments to exclude the proposal.

Corporate Lobbying is a Significant Social Policy Issue, Defeating Reliance on the Ordinary Business Exclusion

Rule 14a-8(i)(7) allows exclusion of a proposal that relates to the company’s ordinary business operations. The purpose of the exclusion is to keep stockholders from micromanaging the company’s day-to-day business decision making. The exclusion reflects the Commission’s judgment that shareholders generally do not have sufficient information to make ordinary business decisions and that stockholder oversight of such decisions is impractical because those decisions are made daily. The ordinary business exclusion does not apply, however, to a proposal dealing with a “significant social policy issue,” even if the subject matter of the proposal would otherwise be considered ordinary business. The Staff has repeatedly determined that similar proposals seeking lobbying disclosure focused primarily on a company’s “general political activities” and did “not seek to micromanage the company to such a degree that exclusion of the proposal would be appropriate.” (See, International Business Machines Corporation (Jan. 24, 2011), Bank of America (March 7, 2011), Raytheon (March 29, 2011), Devon Energy (March 27, 2012), FirstEnergy (February 19, 2015), Eli Lilly (March 2, 2018) and Citigroup (March 6, 2018)). As to GEO’s argument that “interacting with government officials” in some way makes its situation different from these determined precedents, the Fund notes that
Raytheon and presumably many of companies communicate with government entities and officials on a constant basis as well.

**GEO Has Not Substantially Implemented the Proposal Because the Proposal’s Essential Objective is to Obtain Coordinated and Comprehensive Disclosure Not Provided in GEO’s Current Disclosure Regime**

GEO’s request regarding omission of this Proposal for substantial implementation most closely resembles the staff decisions in Abbott Laboratories (February 8, 2012 and February 5, 2013), Goldman Sachs (March 14, 2013), Marathon Oil (January 22, 2013), Dominion Resources (February 28, 2014), Honeywell (March 1, 2019) and Walt Disney (December 6, 2019) where nearly identical proposals were filed with very similar arguments of substantial implementation by each of the companies. In these cases, the companies asserted that partial disclosure of policies and lobbying expenditure disclosures to government agencies sufficed to implement the proposals in question. The SEC Staff rejected the arguments that the companies’ partial measures constituted substantial implementation of the proposals. Similarly, GEO’s partial disclosures should not constitute substantial implementation of this Proposal and the Proposal should not be excluded from the 2020 Proxy Materials on this basis. The Company has provided no precedents in which a proposal that seeks a company disclosure report on lobbying or other company expenditures has been found to be substantially implemented based on data published elsewhere on the Internet that partially fulfills some of the data requests in a company report requested under a proposal.

Rule 14a-8(i)(10) permits a company to omit a shareholder proposal if the company has “substantially implemented” the proposal. The company’s actions need not be precisely the same ones requested in proposal, but the proposal’s essential objective must be satisfied and the company’s actions must “compare favorably” to the steps requested in the proposal. (See Texaco, Inc. (publicly available Mar. 28, 1991))

GEO claims it “publicly discloses virtually all of the information regarding its lobbying activities that the Proposal seeks to have published in an annual report.” GEO points to publishing a document entitled “Political Activity and Lobbying report (2018)”. However the information in this single report fails to satisfy the essential objective of the Proposal, which is to obtain a coordinated report that comprehensively discloses to shareholders the company’s lobbying policies, procedures, and expenditures (both direct and indirect), for the following reasons:

- The Proposal requests that GEO bring together for its shareholders in a single report information about all of GEO’s lobbying activities, direct and indirect. The provision of piecemeal disclosure which, as discussed below, does not cover all of the lobbying expenditures identified in the Proposal, does not accomplish this objective, as it forces shareholders to engage in extensive research to assemble, analyze, and coordinate information, all of which is already in GEO’s possession.

- The Proposal requests that GEO make disclosures regarding its federal lobbying activities. GEO fails to disclose any details on the amount of its lobbying on the federal level.

- The Proposal requests that GEO make disclosures regarding all state lobbying activities. GEO fails to disclose any details on the amounts and the states lobbied in for its lobbying on the state level.
• The Proposal seeks full disclosure of trade association lobbying expenditures based on GEO’s contributions. GEO fails to do this.

This list of deficiencies demonstrates that GEO has not substantially implemented the Proposal. Both the form of GEO’s current disclosures and the substance of GEO’s disclosures fall significantly short of what the Proposal seeks. Accordingly, GEO should not be permitted to exclude the Proposal under Rule 14a-8(i)(10).

**The Proposal Is Not Part of a Grievance**

The Company has not presented facts to argue the Proposal is “a tactic designed to redress a personal grievance or further a personal interest.” The Proposal is nearly identical to the 136 proposals filed in the past three years on lobbying disclosure. Voting support for these proposals have ranged from 5.7 percent to 79.7 percent. The Proposal does not debate the merits of privatization. Rather, it makes a specific request of GEO to disclose lobbying information. The Company has provided no precedents in which a similar proposal or another filing by the same entity has been found to be part of a personal grievance.

Indeed, in 2019 the Proponent submitted a different proposal to GEO requesting it report on Human Rights Policy Implementation. That proposal received record investor support of 87.9 percent at the 2019 shareholder meeting. Surely, such support makes clear that the issue was of general interest to all but 12 percent of the Company’s investors who opted to vote on the matter.

GEO argues the “Proposal is the latest effort in a multi-front campaign mounted by the Proponent against GEO.” The Company is disingenuous in creating its own narrative on the Proponent’s motives in filing the Proposal. The Proponent is a shareholder of the Company not an adversary. The Company operates in an industry that presents certain risks for investors. The Proponent’s perspective is that GEO can mitigate risk by creating stronger internal accountability mechanisms such as publicly reporting on lobbying activities and human rights policy implementation. The Proponent’s perspective on risk mitigation strategies is likely shared by many investors who file similar proposals as well as those that vote in support of them. A precise tally of that support is only possible when shareholders are able to cast a proxy vote on the issue.

***

The Fund appreciates the opportunity to be of assistance in this matter. If you have any questions or need further information, please do not hesitate to contact me.

Very truly yours,

Arun Ivatury
Trustee, SEIU Pension Plans Master Trust
cc: Esther Moreno
Akerman LLP

Joseph Negron
The GEO Group, Inc.
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 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.1

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 proposal...

1 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 "influencing 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 “relate[s] 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 (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—“encourage[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/PoliticalEngagement/Poltical_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." 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."

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/WaPd2nIH5Eu400GHIf1XFA2?emci=3b0e8b4f-7a9a-e811-bc6a-000d3a1b800&emdi=9298ba9-3ba2-e811-bc6a-000d3a1b800&ceid=125499&smartlinkdata=ImZuPVJveSZsbj1OaXR6YmVyZyZlbT1ybml0eJlcm1NDyBaW5ke3ByaW5nLmNvbSZhZGQxPTY3MTYrU2VsZaJ (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,


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.

Sincerely,

[Signature]

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

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.

Sincerely,

Arun Ivatury
Trustee, SEIU Pension Plans Master Trust

1800 Massachusetts Ave NW
Suite 301
Washington DC 20036-1202
202-730-7542
800-458-1010
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. 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 and $3,995,000 on lobbying in Florida from 2012 – 2017. And GEO’s lobbying over how long immigrant children in Texas can be detained has attracted negative scrutiny.

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. 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.

3 https://www.followthemoney.org/research/blog/private-prisons-pour-millions-into-lobbying-state-lawmakers
4 https://theintercept.com/2017/05/02/private-prison-corporation-wrote-texas-bill-extending-how-long-immigrant-children-can-be-detained/
5 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.
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*

<table>
<thead>
<tr>
<th>Totals by Source of Funds:</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Combined- Corporate and GEO PAC</td>
<td>$3,324,690</td>
</tr>
<tr>
<td>-Corporate</td>
<td>$2,816,090</td>
</tr>
<tr>
<td>-GEO PAC</td>
<td>$508,600</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Totals by Recipient Category (Source in Parenthesis):</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Federal Candidates, Parties &amp; Committees (Combined)</td>
<td>$1,235,500</td>
</tr>
<tr>
<td>• State/Local Candidates, Parties &amp; Committees (Combined)</td>
<td>$2,089,190</td>
</tr>
</tbody>
</table>

* Totals reflected aggregate contributions made by corporate subsidiaries.

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, www.ethics.state.tx.us, 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
<table>
<thead>
<tr>
<th>Registrant Name</th>
<th>Client Name</th>
<th>Filing Type</th>
<th>Amount Reported</th>
<th>Date Posted</th>
<th>Filing Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>BALLARD PARTNERS</td>
<td>The Geo Group, Inc.</td>
<td>FIRST QUARTER REPORT</td>
<td>$150,000.00</td>
<td>04/20/2018</td>
<td>2018</td>
</tr>
<tr>
<td>Bradley Arant Boult Cummings LLP</td>
<td>The GEO Group, Inc.</td>
<td>FIRST QUARTER REPORT</td>
<td>$30,000.00</td>
<td>04/20/2018</td>
<td>2018</td>
</tr>
<tr>
<td>Capitol Counsel, LLC</td>
<td>The GEO Group, Inc.</td>
<td>FIRST QUARTER REPORT</td>
<td>$30,000.00</td>
<td>04/20/2018</td>
<td>2018</td>
</tr>
<tr>
<td>DLA Piper LLP (US)</td>
<td>St. George's Group LP</td>
<td>FIRST QUARTER REPORT</td>
<td>$100,000.00</td>
<td>04/20/2018</td>
<td>2018</td>
</tr>
<tr>
<td>Lionel &quot;Leo&quot; Aguirre</td>
<td>The Geo Group Inc.</td>
<td>FIRST QUARTER REPORT</td>
<td>$33,000.00</td>
<td>04/20/2018</td>
<td>2018</td>
</tr>
<tr>
<td>Mack Strategies</td>
<td>GEO Group</td>
<td>FIRST QUARTER REPORT</td>
<td>$39,000.00</td>
<td>04/20/2018</td>
<td>2018</td>
</tr>
<tr>
<td>Navigators Global LLC (Formerly DC Navigators, LLC)</td>
<td>The Geo Group, Inc.</td>
<td>FIRST QUARTER REPORT</td>
<td>$65,000.00</td>
<td>04/20/2018</td>
<td>2018</td>
</tr>
<tr>
<td>STATE FEDERAL STRATEGIES</td>
<td>GEO GROUP INC (FORMERLY CAPITOL COUNSEL OF BEHALF OF THE GEO GROUP INC)</td>
<td>SECOND QUARTER REPORT</td>
<td>$250,000.00</td>
<td>07/11/2018</td>
<td>2018</td>
</tr>
<tr>
<td>BALLARD PARTNERS</td>
<td>The Geo Group, Inc.</td>
<td>SECOND QUARTER REPORT</td>
<td>$150,000.00</td>
<td>07/17/2018</td>
<td>2018</td>
</tr>
<tr>
<td>Capitol Counsel, LLC</td>
<td>The GEO Group, Inc.</td>
<td>SECOND QUARTER REPORT</td>
<td>$30,000.00</td>
<td>07/19/2018</td>
<td>2018</td>
</tr>
<tr>
<td>DA VINCI GROUP</td>
<td>The GEO Group, Inc.</td>
<td>SECOND QUARTER REPORT</td>
<td>$70,000.00</td>
<td>07/19/2018</td>
<td>2018</td>
</tr>
<tr>
<td>DLA Piper LLP (US)</td>
<td>St. George's Group LP</td>
<td>SECOND QUARTER REPORT</td>
<td>$70,000.00</td>
<td>07/19/2018</td>
<td>2018</td>
</tr>
<tr>
<td>House ID</td>
<td>Registrant Name</td>
<td>Client Name</td>
<td>Filing Year</td>
<td>Filing Period</td>
<td>Lobbyist Full Name</td>
</tr>
<tr>
<td>----------</td>
<td>----------------</td>
<td>-------------</td>
<td>-------------</td>
<td>---------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>4363700002</td>
<td>STATE FEDERAL STRATEGIES</td>
<td>Capitol Counsel of behalf of The GEO Group, Inc.</td>
<td>2018</td>
<td>3rd Quarter</td>
<td>Sullivan, Richard</td>
</tr>
<tr>
<td>4363700002</td>
<td>STATE FEDERAL STRATEGIES</td>
<td>Capitol Counsel of behalf of The GEO Group, Inc.</td>
<td>2018</td>
<td>4th Quarter</td>
<td>Sullivan, Richard</td>
</tr>
<tr>
<td>4252900005</td>
<td>Mack Strategies</td>
<td>GEO Group</td>
<td>2018</td>
<td>1st Quarter</td>
<td>Mack, Connie</td>
</tr>
<tr>
<td>4252900005</td>
<td>Mack Strategies</td>
<td>GEO Group</td>
<td>2018</td>
<td>2nd Quarter</td>
<td>Mack, Connie</td>
</tr>
<tr>
<td>4252900005</td>
<td>Mack Strategies</td>
<td>GEO Group</td>
<td>2018</td>
<td>3rd Quarter</td>
<td>Mack, Connie</td>
</tr>
<tr>
<td>4252900005</td>
<td>Mack Strategies</td>
<td>GEO Group</td>
<td>2018</td>
<td>4th Quarter</td>
<td>Mack, Connie</td>
</tr>
<tr>
<td>331680041</td>
<td>DA VINCI GROUP</td>
<td>The GEO Group, Inc.</td>
<td>2018</td>
<td>1st Quarter</td>
<td>Smith, Mark</td>
</tr>
<tr>
<td>393840213</td>
<td>Capitol Counsel, LLC</td>
<td>The GEO Group, Inc.</td>
<td>2018</td>
<td>1st Quarter</td>
<td>Cohen, Mark</td>
</tr>
<tr>
<td>305900071</td>
<td>Bradley Arant Boult Cummings LLP</td>
<td>The GEO Group, Inc.</td>
<td>2018</td>
<td>1st Quarter</td>
<td>Stewart, David</td>
</tr>
<tr>
<td>331680041</td>
<td>DA VINCI GROUP</td>
<td>The GEO Group, Inc.</td>
<td>2018</td>
<td>2nd Quarter</td>
<td>Smith, Mark</td>
</tr>
<tr>
<td>393840213</td>
<td>Capitol Counsel, LLC</td>
<td>The GEO Group, Inc.</td>
<td>2018</td>
<td>2nd Quarter</td>
<td>Cohen, Aaron</td>
</tr>
<tr>
<td>305900071</td>
<td>Bradley Arant Boult Cummings LLP</td>
<td>The GEO Group, Inc.</td>
<td>2018</td>
<td>2nd Quarter</td>
<td>Stewart, David</td>
</tr>
<tr>
<td>331680041</td>
<td>DA VINCI GROUP</td>
<td>The GEO Group, Inc.</td>
<td>2018</td>
<td>3rd Quarter</td>
<td>Smith, Mark</td>
</tr>
<tr>
<td>393840213</td>
<td>Capitol Counsel, LLC</td>
<td>The GEO Group, Inc.</td>
<td>2018</td>
<td>3rd Quarter</td>
<td>Cohen, Aaron</td>
</tr>
<tr>
<td>305900071</td>
<td>Bradley Arant Boult Cummings LLP</td>
<td>The GEO Group, Inc.</td>
<td>2018</td>
<td>3rd Quarter</td>
<td>Stewart, David</td>
</tr>
<tr>
<td>331680041</td>
<td>DA VINCI GROUP</td>
<td>The GEO Group, Inc.</td>
<td>2018</td>
<td>4th Quarter</td>
<td>Smith, Mark</td>
</tr>
<tr>
<td>305900071</td>
<td>Bradley Arant Boult Cummings LLP</td>
<td>The GEO Group, Inc.</td>
<td>2018</td>
<td>4th Quarter</td>
<td>Stewart, David</td>
</tr>
<tr>
<td>393840213</td>
<td>Capitol Counsel, LLC</td>
<td>The GEO Group, Inc.</td>
<td>2018</td>
<td>4th Quarter</td>
<td>Cohen, Aaron</td>
</tr>
<tr>
<td>305900071</td>
<td>Bradley Arant Boult Cummings LLP</td>
<td>The GEO Group, Inc.</td>
<td>2018</td>
<td>3rd Quarter</td>
<td>Stewart, David</td>
</tr>
<tr>
<td>400850000</td>
<td>Aguirre, Lionel &quot;Leo&quot;</td>
<td>The Geo Group Inc.</td>
<td>2018</td>
<td>1st Quarter</td>
<td>Aguirre, Lionel &quot;Leo&quot;</td>
</tr>
</tbody>
</table>
EXHIBIT D(1)
Client Profile: GEO Group

Summary
Hired Firms
Lobbyists
Issues
Agencies
Bills
Report Images

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

<table>
<thead>
<tr>
<th>Industry</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Misc Business</td>
<td>$1,110,000</td>
</tr>
</tbody>
</table>

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.

Feel free to distribute or cite this material, but please credit the Center for Responsive Politics. For permission to reprint for commercial uses, such as textbooks, contact the Center: info@crp.org
Today’s Mortgage Rate

3.09% APR

15-Year Fixed 2.88% 3.09% APR
30-Year Fixed 3.38% 3.51% APR
5/1 ARM 3.50% 4.04% APR

$225,000 (5/1 ARM) $1,010/mo 4.04%
$350,000 (5/1 ARM) $1,476/mo 4.00%

Select year: 2019

Search our lobbying database

e.g. Comcast or Jiri Krol

We follow the money. You make it possible.

Select an amount to make a donation.
Count Cash & Make Change

Sign up for our newsletter to track money's influence on U.S. elections and public policy.

Email address

Follow us on Twitter

Follow us on Facebook
EXHIBIT D(2)
Client Profile: GEO Group

Summary

Hired Firms
Navigators Global $270,000
State Federal Strategies $120,000
Bradley, Arant et al $100,000

Total Lobbying Expenditures, 2019 $1,110,000

$1,110,000

Report Images

Itemized Lobbying Expenses for GEO Group

<table>
<thead>
<tr>
<th>Hired Firms</th>
<th>Total Reported by Filer</th>
<th>Reported Contract Expenses (included in Total Reported by Filer)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ballard Partners</td>
<td>-</td>
<td>$330,000</td>
</tr>
<tr>
<td>Navigators Global</td>
<td>-</td>
<td>$270,000</td>
</tr>
<tr>
<td>State Federal Strategies</td>
<td>-</td>
<td>$120,000</td>
</tr>
<tr>
<td>Bradley, Arant et al</td>
<td>-</td>
<td>$100,000</td>
</tr>
</tbody>
</table>

$1,110,000

Export to CSV
<table>
<thead>
<tr>
<th>Hired Firms</th>
<th>Total Reported by Filer</th>
<th>Reported Contract Expenses (included in Total Reported by Filer)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Capitol Counsel</td>
<td></td>
<td>$90,000</td>
</tr>
<tr>
<td>Aguirre, Lionel 'Leo'</td>
<td></td>
<td>$90,000</td>
</tr>
<tr>
<td>Mack Strategies</td>
<td></td>
<td>$90,000</td>
</tr>
<tr>
<td>Avant, Bishop et al</td>
<td></td>
<td>$20,000</td>
</tr>
<tr>
<td>Da Vinci Group</td>
<td></td>
<td>$0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>$1,110,000</td>
</tr>
</tbody>
</table>

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.

Feel free to distribute or cite this material, but please credit the Center for Responsive Politics. For permission to reprint for commercial uses, such as textbooks, contact the Center: info@crp.org
We follow the money. You make it possible.

Select an amount to make a donation.

$25  $50
$100 Other

Count Cash & Make Change

Sign up for our newsletter to track money's influence on U.S. elections and public policy.

Email address

Follow us on Twitter
EXHIBIT D(3)
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

Filter by Revolving Door Profiles:
All

Filter by Former Members of Congress:
All
<table>
<thead>
<tr>
<th>Lobbying Firm Hired</th>
<th>Total Amount*</th>
<th>Client</th>
<th>Lobbyist</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aguirre, Lionel 'Leo'</td>
<td>$90,000</td>
<td>GEO Group</td>
<td>Lionel Aguirre</td>
</tr>
<tr>
<td>Avant, Bishop et al</td>
<td>$20,000</td>
<td>GEO Group</td>
<td>Lanier Avant</td>
</tr>
<tr>
<td>Ballard Partners</td>
<td>$330,000</td>
<td>GEO Group</td>
<td>Brian D Ballard</td>
</tr>
<tr>
<td>Ballard Partners</td>
<td>$330,000</td>
<td>GEO Group</td>
<td>Rebecca Benn</td>
</tr>
<tr>
<td>Ballard Partners</td>
<td>$330,000</td>
<td>GEO Group</td>
<td>Pam Bondi</td>
</tr>
<tr>
<td>Ballard Partners</td>
<td>$330,000</td>
<td>GEO Group</td>
<td>Sylvester Lukis</td>
</tr>
<tr>
<td>Ballard Partners</td>
<td>$330,000</td>
<td>GEO Group</td>
<td>Dan McFaul</td>
</tr>
<tr>
<td>Ballard Partners</td>
<td>$330,000</td>
<td>GEO Group</td>
<td>Justin J Sayfie</td>
</tr>
<tr>
<td>Bradley, Arant et al</td>
<td>$100,000</td>
<td>GEO Group</td>
<td>Paul Kavinoky</td>
</tr>
<tr>
<td>Bradley, Arant et al</td>
<td>$100,000</td>
<td>GEO Group</td>
<td>David O Stewart</td>
</tr>
<tr>
<td>Bradley, Arant et al</td>
<td>$100,000</td>
<td>GEO Group</td>
<td>J David Stewart</td>
</tr>
<tr>
<td>Capitol Counsel</td>
<td>$90,000</td>
<td>GEO Group</td>
<td>Aaron K Cohen</td>
</tr>
<tr>
<td>Da Vinci Group</td>
<td>$0</td>
<td>GEO Group</td>
<td>Mark R Smith</td>
</tr>
<tr>
<td>Mack Strategies</td>
<td>$90,000</td>
<td>GEO Group</td>
<td>Connie IV Mack</td>
</tr>
<tr>
<td>Navigators Global</td>
<td>$270,000</td>
<td>GEO Group</td>
<td>Ryan Berger</td>
</tr>
<tr>
<td>Navigators Global</td>
<td>$270,000</td>
<td>GEO Group</td>
<td>Chris C Cox</td>
</tr>
<tr>
<td>Navigators Global</td>
<td>$270,000</td>
<td>GEO Group</td>
<td>Sarah Beatty Rogers</td>
</tr>
<tr>
<td>State Federal Strategies</td>
<td>$120,000</td>
<td>GEO Group</td>
<td>Richard Lyles Sullivan</td>
</tr>
</tbody>
</table>

೫ Revolving Door Profile  ♾ Former Member of Congress

Showing 1 to 18 of 18 entries
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.

Feel free to distribute or cite this material, but please credit the Center for Responsive Politics. For permission to reprint for commercial uses, such as textbooks, contact the Center: info@crp.org

Select year: 2019

Search our lobbying database

e.g. Comcast or Jiri Krol

TRUMP IS ON A
December 18, 2019: Ti
Another Obama Era
If you owe less than $314,82
home and haven't missed a
payment in 6 months, use Cc
mortgage stimulus program to
class. You'll be shocked when
much you can save.

Select You
22737
Recalculate Your Hou

We follow the money. You make it possible.

Select an amount to make a donation.

$25  $50
Count Cash & Make Change

Sign up for our newsletter to track money’s influence on U.S. elections and public policy.

Email address

Follow us on Twitter

Follow us on Facebook
Client Profile: GEO Group

Summary
Hired Firms
Lobbyists
Issues
Agendas
Bills
Report Images

### Issues Lobbied By GEO Group, 2019

<table>
<thead>
<tr>
<th>Issue</th>
<th>Specific Issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>Law Enforcement &amp; Crime</td>
<td>8</td>
</tr>
<tr>
<td>Homeland Security</td>
<td>8</td>
</tr>
<tr>
<td>Immigration</td>
<td>3</td>
</tr>
<tr>
<td>Fed Budget &amp; Appropriations</td>
<td>3</td>
</tr>
<tr>
<td>Government Issues</td>
<td>1</td>
</tr>
</tbody>
</table>

Showing 1 to 5 of 5 entries

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.

Feel free to distribute or cite this material, but please credit the Center for Responsive Politics. For permission to reprint for commercial uses, such as textbooks, contact the Center: info@crp.org

Select year: 2019

Search our lobbying database

e.g. Comcast or Jiri Krol

Download PDF

Printable PDF (Free)

Download Here
frompdftodoc.com

OPEN

We follow the money. You make it possible.

Select an amount to make a donation.

$25  $50

$100  Other
Count Cash & Make Change

Sign up for our newsletter to track money's influence on U.S. elections and public policy.

Email address

Follow us on Twitter

Follow us on Facebook
Client Profile: GEO Group

Agencies Lobbied By GEO Group, 2019

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

Feel free to distribute or cite this material, but please credit the Center for Responsive Politics. For permission to reprint for commercial uses, such as textbooks, contact the Center: info@crp.org
We follow the money. You make it possible.

Select an amount to make a donation.

$25   $50
$100   Other

Count Cash & Make Change

Sign up for our newsletter to track money's influence on U.S. elections and public policy.

Email address

Follow us on Twitter
EXHIBIT D(6)
**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

<table>
<thead>
<tr>
<th>Bill Number</th>
<th>Congress Number</th>
<th>Bill Title</th>
<th>No. of Reports &amp; Specific Issues*</th>
</tr>
</thead>
<tbody>
<tr>
<td>H.R.3055</td>
<td>116</td>
<td>Science Appropriations Act, 2020</td>
<td>2</td>
</tr>
<tr>
<td>H.R.3931</td>
<td>116</td>
<td>Department of Homeland Security Appropriations Act, 2020</td>
<td>1</td>
</tr>
<tr>
<td>S.2582</td>
<td>116</td>
<td>Department of Homeland Security Appropriations Act, 2020</td>
<td>1</td>
</tr>
<tr>
<td>S.2584</td>
<td>116</td>
<td>Science Appropriations Act, 2020</td>
<td>1</td>
</tr>
<tr>
<td>H.J.RES.31</td>
<td>116</td>
<td>Consolidated Appropriations Act, 2019</td>
<td>1</td>
</tr>
</tbody>
</table>

Showing 1 to 5 of 5 entries

Export to CSV

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

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.

Feel free to distribute or cite this material, but please credit the Center for Responsive Politics. For permission to reprint for commercial uses, such as textbooks, contact the Center: info@crp.org

Select year: 2019

Search our lobbying database

e.g. Comcast or Jiri Krol

TRUMP IS ON A ROLL
December 18, 2019: Trump Ends Another Obama Era Progr

If you owe less than $314,827 home and haven't missed a m payment in 6 months, use Cor mortgage stimulus program fo middle class. Y shocked when y how much you c

Select Your Zip
22737

Recalculate Your House f

We follow the money. You make it possible.

Select an amount to make a donation.
Count Cash & Make Change

Sign up for our newsletter to track money's influence on U.S. elections and public policy.

Email address

Follow us on Twitter

Follow us on Facebook
<table>
<thead>
<tr>
<th>Subsidiary</th>
<th>Lobbying Firm Hired</th>
<th>Report Type (Click to view report. Opens in new window.)</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>GEO Group</td>
<td>Bradley, Arant et al</td>
<td>THIRD QUARTER REPORT</td>
<td>$30,000</td>
</tr>
<tr>
<td>GEO Group</td>
<td>Capitol Counsel</td>
<td>FIRST QUARTER REPORT</td>
<td>$30,000</td>
</tr>
<tr>
<td>GEO Group</td>
<td>Capitol Counsel</td>
<td>SECOND QUARTER REPORT</td>
<td>$30,000</td>
</tr>
<tr>
<td>GEO Group</td>
<td>Capitol Counsel</td>
<td>THIRD QUARTER REPORT</td>
<td>$30,000</td>
</tr>
<tr>
<td>GEO Group</td>
<td>Da Vinci Group</td>
<td>FIRST QUARTER REPORT</td>
<td>$0</td>
</tr>
<tr>
<td>GEO Group</td>
<td>Da Vinci Group</td>
<td>SECOND QUARTER REPORT</td>
<td>$0</td>
</tr>
<tr>
<td>GEO Group</td>
<td>Da Vinci Group</td>
<td>THIRD QUARTER REPORT</td>
<td>$0</td>
</tr>
<tr>
<td>GEO Group</td>
<td>Mack Strategies</td>
<td>FIRST QUARTER REPORT</td>
<td>$30,000</td>
</tr>
<tr>
<td>GEO Group</td>
<td>Mack Strategies</td>
<td>SECOND QUARTER REPORT</td>
<td>$30,000</td>
</tr>
<tr>
<td>GEO Group</td>
<td>Mack Strategies</td>
<td>THIRD QUARTER REPORT</td>
<td>$30,000</td>
</tr>
<tr>
<td>GEO Group</td>
<td>Navigators Global</td>
<td>FIRST QUARTER REPORT</td>
<td>$90,000</td>
</tr>
<tr>
<td>GEO Group</td>
<td>Navigators Global</td>
<td>SECOND QUARTER REPORT</td>
<td>$90,000</td>
</tr>
<tr>
<td>GEO Group</td>
<td>Navigators Global</td>
<td>THIRD QUARTER REPORT</td>
<td>$90,000</td>
</tr>
<tr>
<td>GEO Group</td>
<td>State Federal Strategies</td>
<td>FIRST QUARTER REPORT</td>
<td>$40,000</td>
</tr>
<tr>
<td>GEO Group</td>
<td>State Federal Strategies</td>
<td>SECOND QUARTER REPORT</td>
<td>$40,000</td>
</tr>
<tr>
<td>GEO Group</td>
<td>State Federal Strategies</td>
<td>THIRD QUARTER REPORT</td>
<td>$40,000</td>
</tr>
</tbody>
</table>

Showing 1 to 25 of 25 entries
Count Cash & Make Change

Sign up for our newsletter to track money's influence on U.S. elections and public policy.

Follow us on Twitter

Follow us on Facebook