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October 7, 2024

**CONFIDENTIAL**

The Honorable Elizabeth Warren  
United States Senator  
309 Hart Senate Office Building  
Washington, DC 20510

The Honorable Tony Cárdenas  
Member of Congress  
2181 Rayburn House Office Building  
Washington, DC 20515

*Additional recipients listed on signature page*

Dear Senators and Representatives:

The GEO Group, Inc. (“GEO” or “the company”) welcomes the opportunity to respond to your letter dated July 26, 2024, and to share how the company provides its government agency partners with a variety of alternatives to the traditional tools of custodial supervision. Some information provided in connection with this response is business-sensitive and, if released, would cause injury to GEO. This letter has been marked “Confidential,” and GEO requests that it not be made public or disclosed beyond the signatories to the July 26, 2024 letter. If public release or further distribution is contemplated, GEO requests the opportunity to be heard before the proposed use.

GEO has been a trusted service provider to its public-sector partners for more than 40 years, and is proud to partner with local, state, and federal government agencies to provide rehabilitation, reintegration, and noncustodial supervision services. These government agencies continue to rely on GEO because GEO provides them with a diverse array of high quality, cost-effective services that deliver results. The company’s innovative, evidence-based offerings allow jurisdictions to tailor their remedial programs more closely to the specifics of an individual’s situation. More appropriately tailored rehabilitation and supervision solutions help the company’s agency partners reduce recidivism rates and improve public safety in ways that respect the dignity and fundamental rights of persons under government supervision.

Since its founding, GEO has sought to ensure that individuals under supervision are able to successfully return and reintegrate into their communities. GEO believes that this begins with in-custody programming. The company is committed to providing those in the custody of its state and federal agency partners with meaningful opportunities to improve their health and welfare by providing a wide array of programming options.

These programming options allow incarcerated individuals to prepare for a successful reintegration back into the broader community. They include:

- ❖ **Academic Programming:** GED and Pre-GED programs, adult basic education, special education, English as a Second Language courses, post-secondary programs, and library services.
- ❖ **Vocational Programming:** Licensing programs for custodial maintenance, barbering, horticulture, electrical, building trades, auto mechanics, upholstery, weaving, HVAC, small engine repair, masonry, plumbing, culinary arts, computer repair, carpentry, and welding; as well as mock interviews, job fairs, professional portfolio development, on-the-job training opportunities, and partnerships with community employers.
- ❖ **Cognitive Behavioral Treatment Programs:** Courses on Motivational Interviewing, Success Planning, Moral Reconciliation Therapy (MRT), Cognitive Restructuring, Problem Solving, Thinking for a Change (T4C), Emotional Regulation, and Cognitive Self Change; as well as Individual Cognitive Behavioral Treatment (ICBT) sessions and self-directed journaling.
- ❖ **Faith-Based Services:** Mentoring, religion-specific programming, pro-social modeling, faith- and character-based housing units, and modified therapeutic communities.
- ❖ **Substance Abuse:** Alcoholics Anonymous (AA) & Narcotics Anonymous (NA) programs, Residential Drug Abuse Program (RDAP), Living in Balance, Cognitive Behavioral Interventions-Substance Abuse (CBI-SA), and gender-responsive trauma-informed care; as well as general substance abuse education and treatment programs.

GEO works closely with its correctional agency partners to ensure that each offered program is focused on reducing recidivism and tailored to each agency's specific needs. This is accomplished by developing custom, evidence-based programs designed to give incarcerated individuals the tools they need for success in the outside world. GEO is particularly proud of its substance abuse programs, which equip those in need with the capabilities and resources to address addiction/substance use disorders. Over the past 10 years, ██████████ incarcerated individuals have taken advantage of GEO's substance use disorder and therapeutic treatment programs.

Additionally, GEO provides educational and vocational programs that equip those enrolled in the company's programs with marketable skills that they can use to find employment upon release. Over the past ten years, ██████████ individuals in correctional facilities across the country have been awarded GEDs through the company's GED program and ██████████ individuals have received certificates from a vocational program. This greatly expands the number of opportunities for those that complete these programs when they return to their communities.

As a growing body of academic research has shown, these programs are critical for ensuring the safety of our communities as program graduates are less likely to reoffend. *See Lois M. Davis, et al., Evaluating the Effectiveness of Correctional Education: A Meta-Analysis of*

*Programs That Provide Education to Incarcerated Adults* 39 (2013) (“[T]he majority of studies we identified showed lower rates of recidivism among inmates receiving correctional education than among inmates who did not receive correctional education.”). By providing this quality programming, GEO is helping to ensure that those under the supervision of its federal and state agency partners are given the opportunity to develop the skills necessary for a successful reintegration into the broader community.

GEO’s commitment to ensuring that individuals under the supervision of state and federal agencies are able to successfully reenter and reintegrate into their communities does not end after an individual successfully completes his or her custodial sentence. To meet the needs of its public-sector partners, GEO offers a wide array of post-incarceration services as part of its award-winning Continuum of Care initiative. This evidence-based treatment model begins with an individualized risks and needs assessment and offers programs designed to address the specific risks and needs of each participant based on his or her assessment. Depending on the individual, key program components may include: individual counseling, group counseling, reentry planning and preparation, family reunification programs, academic services, career and technical education, onsite job assignments and skill training, cognitive behavioral treatment, substance use disorder treatment, motivational enhancement, 24/7 program services, employment or educational support services for financial independence, alumni and peer mentoring, and post-release services.

The holistic and individualized nature of the Continuum of Care program has been broadly recognized as a new and thoughtful approach to community reintegration. In 2018, the American Correctional Association awarded GEO with its “Innovation in Corrections” award for GEO’s Continuum of Care program. The award was a direct reflection of the steadfast commitment, dedication, and professionalism GEO employees exhibit to deliver these diversified services and programs that help those in the criminal justice system reenter society.

As part of the Continuum of Care initiative, GEO operates residential and non-residential reentry centers. Residential reentry centers are transitional housing—colloquially referred to as “halfway houses”—that provide safe, structured, and supervised environments for residents and offer various programs and services, helping residents develop tools they need to better themselves and rebuild ties to their communities. Federal and state courts use residential reentry centers as: an alternative to pretrial detention, incarceration, and probation; a transition stage for pre-release custody and post-conviction supervision; and an intermediate sanction for noncompliance with terms of supervised release. Non-residential reentry centers—also known as day reporting centers, community resource centers, or reentry service centers—provide many of the same programs and services as residential reentry centers but allow for participants to live within the broader community while finishing out their transition from incarceration. At these centers, GEO delivers specialized treatment, training, and targeted services for individuals being supervised in the community, including:

- ❖ **Cognitive Behavioral Treatment:** Case managers guide participants through the program, applying evidence-based practices and cognitive behavioral treatment throughout group and individual services. A mix of curricula is applied, such as Moral

Recreation Therapy, Thinking for a Change, and Individual Cognitive Behavioral Treatment, and these principles run through various center modules, including Life Skills, Anger Management, Parenting, Substance Use Treatment, and more.

- ❖ **Community Connections:** The centers help participants navigate and achieve long-term sustainability, and local resources play a major role. The centers partner with local community-based organizations, law enforcement, and nonprofits to connect participants with valuable services.
- ❖ **Employment Readiness Training:** Upon completion of one of GEO's community reentry programs, many individuals will have found work. The programs teach individuals strategies for finding and retaining work that will help them to stabilize in the community.
- ❖ **Transition Celebrations:** Several times annually, the centers organize "graduations" that bring together program participants, family, and others to mark a major milestone: program completion.

Most importantly, these centers deliver positive outcomes. GEO's structured system of treatment provides those utilizing their reentry centers with the tools to make better decisions that reduce recidivism; confront problematic personal attitudes or behaviors; assess relationships; develop positive self-identity; and enhance self-concept and self-esteem.

At GEO, assisting with successful reentry is more than just a business—it is a mission. That is why, in addition to more structured offerings, GEO allocated ██████████ in company funding during 2023 to its voluntary and free-of-charge Post-Release Services program, which assists those released from custody in obtaining housing, transportation, food, and other necessities. Providing these services and necessities to individuals returning from incarceration increases the probability that they will successfully reintegrate into society and minimizes the risk that they will reoffend.

GEO also understands the value of providing second chances to those involved in the criminal justice system. The structural barriers and stigma associated with a criminal record create collateral consequences that can affect the rest of an individual's life. That is why GEO's Continuum of Care program works diligently to remove those barriers by providing individuals with the resources they need (including housing, food, and clothing resources), vocational and educational training, and job placement and employment services.

These are not merely programs that GEO offers; these are programs that GEO truly believes in. GEO believes that these programs help assist returning individuals with the transition back into the community and make them more job-ready.

And GEO practices what it preaches. For instance, the GEO Continuum of Care Post Release Call Center is ██████████ staffed by returning individuals. GEO is committed to continuing

these effective reentry programs and continuing to work with its public-sector partners to ensure that returning individuals have the tools they need for success.

GEO also offers its public-sector partners alternatives to incarceration through its subsidiary, BI Incorporated (“BI”). For more than 45 years, BI has delivered innovative electronic monitoring products and services to government agencies supervising individuals on parole, probation, pretrial release, and immigration supervision. These offerings enable agencies to apply the least restrictive and most appropriate option to support compliance with court-imposed conditions of release. By releasing individuals to community supervision with the support of these innovative tools, these individuals are able to live in the community and support themselves and their families.

BI also assists U.S. Immigration and Customs Enforcement with carrying out the Intensive Supervision Appearance Program (“ISAP”). This program was developed to address the fact that many individuals fail to appear for immigration hearings or comply with judicial removal orders. Non-detained immigrants participating in the ISAP program, by contrast, appear at [REDACTED] of their Immigration Court hearings, and comply with the conditions of their release [REDACTED] of the time. As with all of BI’s public agency partners, the exclusive authority to identify program participants, choose the method and length of supervision, and to make other supervision-related decisions belongs exclusively to ICE, as the agency that administers the program.

Specific information related to GEO’s finances and corporate structure can be found in the company’s publicly available investor correspondence and SEC filings.

The company takes pride in the fact that nearly all of BI’s products are made in the USA—designed, engineered, and manufactured [REDACTED]. BI employs more than [REDACTED] professionals, including technicians, software engineers, assembly professionals, and call center representatives, and its supply chain includes thousands of additional American workers.

Not every supervisee presents the same level of risk, and many need only minimal supervision to ensure successful reentry. Some may not need any supervision at all, and instead need help accessing government resources for successful reintegration. BI’s broad range of product and service offerings gives agencies the flexibility to accommodate individual differences and tailor transition plans to maximize the likelihood of success.

One innovative supervision product BI offers is SmartLINK®, a mobile app that supervisees can download on their phone or on a BI-supplied handheld device. This is the least restrictive supervision tool on the market. The app offers a variety of check-in options for supervising agencies to choose from, depending on the particular circumstances of each case. A check-in can be as simple as a user tapping a button, texting a supervision officer via the SmartLINK® secure messenger, or completing a video call through the app.

By reducing the need for in-person meetings, the app reduces interruptions to daily life during supervision and minimizes agencies' costs and officers' time spent completing check-ins. SmartLINK® makes compliance easier—for supervisees and government agencies alike. Unsurprisingly, smartphone monitoring apps are becoming an increasingly popular supervision tool for jurisdictions to use for parole, probation, and pre-trial release supervision. The app offers several advantages over traditional electronic monitoring devices, such as:

- ❖ **Improved Communication:** SmartLINK® allows for direct communication between officers and supervisees via voice, text, email, vibration, and popup display.
- ❖ **Remote Reporting and Document Management:** SmartLINK®'s self-reporting portal enables supervisees to notify their supervising officer of changes to their address or employment status remotely, which can save time and resources for both parties. And the app's file management system allows supervisees to access and upload key documents relevant to their release without having to go into a government building.
- ❖ **Compliance Notifications:** SmartLINK® has real-time calendar and push notification functionality that allows officers to notify supervisees of upcoming compliance obligations, such as check-ins, drug tests, and restitution payments.
- ❖ **Stabilization Support Functionality:** Supervising officers can use SmartLINK® to provide supervisees with positive reinforcement, appointment and event reminders, access to community providers, and other support services.

Because the company believes so strongly in the effectiveness of this tool, it strives to make SmartLINK® as accessible as possible. The app is both iOS and Android compatible, and is currently available in four languages, with a single-button translation function for the app-based secure messenger.

Recognizing that some supervisees may lack access to a smartphone or might be unable or unwilling to download the app onto their personal device, BI also offers a limited-functionality BI Mobile® handheld device that comes with SmartLINK® pre-installed. This custom mobile device can hold a charge for up to 100 hours.

Courts and corrections agencies also employ wearable monitoring devices. To meet this need, BI offers both ankle and wrist worn monitors. BI's ankle monitors, the radio frequency-based HomeGuard® 20|20 and the GPS- and cellular-based LOC8® XT, have low-profile designs to increase user comfort and minimize the visibility of the device. The GPS ankle monitors can last up to 60 hours on a full charge and feature a portable charging adaptor that charges the monitor cordlessly while the wearer continues his or her daily activities. The radio frequency ankle monitor battery lasts up to two years in the field and does not require regular charging like a GPS device requires. The devices are also waterproof up to a depth of sixteen feet for thirty minutes.



The BI VeriWatch® wrist worn device combines the security benefits of a traditional ankle monitor with functionality similar to the BI SmartLINK® mobile app. These devices have a battery life of up to sixteen hours, extendable to a full 24-hour day when paired with a transfer battery. Moreover, the VeriWatch® takes only two hours to charge and can be charged on the go.

All of BI's devices are subject to rigorous safety and quality-control protocols. As a reflection of the company's commitment to quality and excellence in all its products, the design, production, installation, and support of its electronic monitoring solutions have been certified under ISO 9001-2015 following an independent audit by Det Norske Veritas, one of the world's most respected ISO certification bodies. ISO 9001-2015 is the international standard for quality management systems, and this certification is a demonstration of the company's ability to consistently provide products and services that meet or exceed users' expectations.

BI's commitment to quality does not end with product delivery. For agencies that purchase its devices, BI also offers a range of support services to make their operations more effective and efficient. Over the past 45 years, BI has helped agencies of every size ensure that individuals meet the court- or agency-imposed conditions of their release. For instance, BI provides 24/7 technical and administrative support for its electronic monitoring solutions. BI's U.S.-based call centers are staffed with specialists who are able to assist officers and supervisees on handling technical issues, scheduling appointments, and managing digital records. BI monitoring and support specialists are trained and certified to help public agency partners in various scenarios, ranging from equipment troubleshooting, to transcribing officer case notes, to check-in and appointment scheduling. The company's public-sector partners find that these support services can relieve officers of up to [REDACTED] of their time spent on administrative tasks, increasing agency coverage, and reducing costs for taxpayers. By freeing up supervision officers from these administrative duties, BI's support services enable jurisdictions to have their officers focus on their core law enforcement responsibilities.

In addition to agency support services, BI also offers law enforcement and corrections agencies training and guidance on how best to use BI's products and services. From initial program implementation to refresher courses, BI works hard to ensure that supervising officers are able to effectively implement their agency's supervision programs and can instruct supervisees on how to properly use BI devices. BI also helps agencies identify the best products and services to achieve the goals of their supervision programs.

Decisions about what remedial tools to use and how to use them are made entirely by public agency officials, supervising authorities, and the courts. GEO does not set the terms and conditions of any supervision program and does not determine whether any individual has violated those terms and conditions. GEO also does not decide whether electronic supervision for a particular individual should be shortened or extended, and does not evaluate requests from a supervised individual to leave home or to be temporarily exempted from the terms of his or her release. Those determinations and directives are made by the responsible public official, whether it be a judge or government agency official. GEO's solutions and services merely put appropriate tools in the public official's toolbox.

GEO's provision of reentry, rehabilitation, and supervision services makes the company privy to sensitive data relating to its public-sector partners and the individuals under their supervision. That data is owned solely and entirely by GEO's government agency partners, not by GEO. GEO does not take any action with respect to that data except as specifically instructed by the relevant government agency. GEO does not monitor individuals except as expressly provided by the lawfully imposed terms and conditions of a supervision program.

GEO appreciates your concerns about the financial burdens imposed on supervised individuals. Like the other terms and conditions of a supervision program, how much supervisees pay, how payment is made, and the penalties for failing to pay on time are all determined by government agencies, not by GEO. Assessments of an individual's ability to pay are done directly by or in accordance with contractual requirements from the government agency. Some government agencies ask supervisees to pay an offset for the cost of their monitoring. If an individual fails to make these payments, GEO collects any unpaid balance from its government customer, rather than from any individual supervisee. GEO does not employ collection agencies or debt-purchasing firms in connection with supervision offset payments.

GEO takes seriously its responsibilities as a key provider for its government agency partners. GEO is committed to the protection of the fundamental rights of all persons in the custody or supervision of its public sector partners. This commitment is exemplified by GEO's Global Human Rights Policy, which is informed by the United Nation's Universal Declaration of Human Rights and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work. GEO's Global Human Rights Policy emphasizes the following principles:

- ❖ **Respect for the Rule of Law:** The GEO Group recognizes that it plays an important role in law enforcement and corrections, making it essential for the company and its stakeholders to promote, respect, and obey the law and the institutions that create and enforce it. GEO expects that its stakeholders, whether they be employees, business partners, inmates, detainees, or others served, share this philosophy, even if they may disagree with the law. It is the foundation upon which the company is built.
- ❖ **Respect for the Basic Rights of the Company's Workforce:** The GEO Group expects that stakeholders treat each other with mutual respect. The company respects the rights of its employees to work in an environment that is free from discrimination or harassment, and offers equal employment opportunities without respect to race, sex, color, national origin, creed, religion, pregnancy, age, disability, military/veteran status, sexual orientation, genetic information, marital status or any other legally protected status. Subject to applicable law, GEO respects the right of its employees to decide to join or to refrain from joining any lawful organization. GEO embraces and values the diverse backgrounds of its employees and seeks to create an atmosphere in which ideas can be expressed freely in an environment of mutual respect, trust and honesty. The company promotes a system of compensation and benefits that is fair and equitable for the type of work performed, the laws, regulations and contractual obligations that govern its operations, and the local business markets in which it operates.



- ❖ **Respect for Inmates, Detainees, and Supervisees:** GEO is serious about its responsibilities to inmates, detainees, and supervisees. To that end, it strives to uphold the health, welfare, and basic rights of these individuals by working to ensure their safety, security, and well-being while under the protection and care of the criminal justice system. It is important to establish and maintain an environment in which they are protected from unlawful physical and verbal abuse, injury, corporal punishment, damage or loss of property and harassment.
- ❖ **Respect for the Community:** The GEO Group strives to be a contributing member of the communities in which it operates. Not only does the company pride itself on the opportunities made available to the members of those communities, but it also seeks out ways to engage its communities directly as a partner and a citizen. GEO also works hard to continuously improve its operations and processes in order to minimize waste and protect the environment.

GEO believes there is a fundamental connection between the human rights principles set forth in its policies and their realization. To that end, the company ensures that its staff are made aware of the commitments made in this and other company policies, and to incorporate the principles embodied in those policies into its training protocols.

GEO is proud of the work that it has performed for its government agency partners for the past 40 years. It looks forward to continuing to work with these partners to provide proven and effective rehabilitation, reentry, and supervision solutions and services that are aimed at reducing recidivism rates and increasing public safety while respecting the humanity of all those in the criminal justice and immigration system.

Thank you for this opportunity to respond to your questions.

Sincerely,



William R. Levi

*Also sent to:* Hon. Cory Booker  
Hon. Kamlager-Dove  
Hon. Ron Wyden  
Hon. David J. Trone  
Hon. Peter Welch  
Hon. Rashida Tlaib  
Hon. Bernard Sanders  
Hon. Delia C. Ramirez

Hon. Jeffrey A. Merkley  
Hon. Pramila Jayapal  
Hon. Edward J. Markey  
Hon. Cori Bush  
Hon. Jasmine Crockett  
Hon. Alexandria Ocasio-Cortez  
Hon. Danny K. Davis  
Hon. Ayanna Pressley