



FEDERAL ELECTION COMMISSION
 Washington, DC 20463

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 2 **MEMORANDUM**
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4 TO: The Commission
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 6 FROM: Lisa J. Stevenson
 7 Acting General Counsel
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 9 BY: Charles Kitcher *CK by SJ*
 10 Acting Associate General Counsel for Enforcement
 11
 12 Stephen Gura *SG*
 13 Deputy Associate General Counsel for Enforcement
 14
 15 Mark Allen *MA*
 16 Assistant General Counsel
 17
 18 Nicholas O. Mueller *NO*
 19 Attorney
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 21 SUBJECT: MUR 7180 (GEO Corrections Holdings, Inc.)
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 23 RE: Circulation of Discovery Document
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 26 Attached for the Commission's approval on a 48-hour no-objection basis is a subpoena
 27 for GEO Corrections Holdings, Inc. ("GC Holdings") to produce one or more designated
 28 representatives for deposition in a manner akin to Federal Rule of Civil Procedure 30(b)(6).
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30 On January 23, 2018, the Commission found reason to believe that GC Holdings violated
 31 52 U.S.C. § 30119(a)(1) and 11 C.F.R. § 115.2(a) by making contributions prohibited by GC
 32 Holdings' status as a federal contractor.¹ At the time of the reason-to-believe findings, the
 33 Commission commenced an investigation into the details surrounding GC Holdings' status as a
 34 federal contractor. Subsequently, GC Holdings filed a response to the reason-to-believe finding
 35 and twice provided responses to informal inquires and document requests.²
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37 These responses have provided additional information about GC Holdings' status as a
 38 federal contractor but do not provide certain information such as information regarding internal

¹ See Certification, MUR 7180 (Jan. 23, 2018).

² See GEO RTB Resp. (Mar. 5, 2018); GEO Discovery Resp. (June 25, 2018); GEO Discovery Resp. (Sept. 6, 2018).

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1 policies relating to federal contracting that would be most effectively and efficiently obtained
2 through the deposition of a corporate representative. The attached subpoena requests that GC
3 Holdings make available for deposition one or more representatives able to further explain GC
4 Holdings' involvement in federal contracts, as well as its relationship to related entities such as
5 The GEO Group, Inc. and GEO Reentry Services, LLC, that hold federal contracts.

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7 Accordingly, we request that the Commission approve the attached deposition subpoena
8 directed to GEO Corrections Holdings, Inc. on a 48-hour no-objection basis.

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11 Attachment:

12 Subpoena for Deposition

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 7180
GEO Corrections Holdings, Inc.)	
)	

DEPOSITION SUBPOENA

TO: GEO Corrections Holdings, Inc.
 c/o Jason Torchinsky, Esq.
 Holtzman Vogel Josefiak Torchinsky, PLLC
 45 North Hill Drive, Suite 100
 Warrenton, VA 20186

Pursuant to 52 U.S.C. § 30107(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to produce one or more designated representatives for deposition in a manner akin to Federal Rule of Civil Procedure 30(b)(6) to address the topics identified in the attached addendum. Notice is hereby given that the deposition is to be taken on May ___, 2019, or another mutually agreeable date, at the offices of the Federal Election Commission, 1050 First Street, NE, Washington, DC, beginning at 10:00 a.m. and continuing each day thereafter as necessary.

WHEREFORE, the Chair of the Federal Election Commission has hereunto set her hand in Washington, DC, on this ___ day of April, 2019.

For the Commission,

 Ellen L. Weintraub
 Chair

ATTEST:

 Dayna C. Brown
 Secretary of the Commission

MUR 7180
Addendum
GEO Corrections Holdings, Inc.

ADDENDUM TO SUBPOENA

The topics to be addressed at the deposition are set forth below:

- (1) The management structure and creation of internal company policies at GEO entities, including but not limited to GEO Corrections Holdings, Inc., The GEO Group, Inc. and GEO Reentry Services, LLC; this topic includes the composition, function, and practices of the corporate boards at GEO entities;
- (2) The corporate structure and tax structure of GEO entities, including but not limited to GEO Corrections Holdings, Inc., The GEO Group, Inc. and GEO Reentry Services, LLC; this topic includes how these entities fit into GEO's Real Estate Investment Trust ("REIT") structure;
- (3) The formation and practical application of employee-sharing agreements between GEO entities and particularly those involving GEO Corrections Holdings, Inc. including the work done by employees pursuant to these agreements; this topic includes the negotiation and substance of contracts negotiated by GEO Corrections Holdings, Inc. (or its employees) on its own behalf or on behalf of other GEO entities including but not limited to The GEO Group, Inc., Cornell Companies, GEO Reentry, Inc., and GEO Reentry Services, LLC;
- (4) The joint credit agreements between GEO Corrections Holdings, Inc. and The GEO Group, Inc. as referenced in The GEO Group, Inc.'s filings with the Securities and Exchange Commission as well as any other debts of GEO Corrections Holdings, Inc. incurred jointly with or otherwise in connection with any other GEO entity;
- (5) The sources of GEO Corrections Holdings, Inc.'s revenues and distributions of its profits; and
- (6) Political contributions made by GEO entities, including but not limited to GEO Corrections Holdings, Inc., The GEO Group, Inc., and GEO Group, Inc. PAC.

Questions on these topics will focus on, though not be limited to, the 2015-2016 time frame.