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12 *First Amendment Coalition,*
13 *Los Angeles Public Press, and*
14 *The Southlander*

15
16 **UNITED STATES DISTRICT COURT**
17
CENTRAL DISTRICT OF CALIFORNIA

18 HUGO GONZALEZ, et al., on behalf of
19 themselves and all others similarly
20 situated,

21 Plaintiffs,

22 v.

23 The GEO Group, Inc., et al.

24 Defendants.

Case No.: 2:22-cv-04014-JGB-ACCV

**NOTICE OF MOTION AND
MOTION TO INTERVENE FOR
THE LIMITED PURPOSE OF
UNSEALING COURT RECORDS**

Date: March 2, 2026

Time: 9:00 a.m.

Courtroom: 1 (Riverside)

Judge: Hon. Jesus G. Bernal

NOTICE OF MOTION AND MOTION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Please take notice that on March 2, 2026 at 9:00 a.m., or as soon thereafter as the matter may be heard, at the George E. Brown, Jr. Federal Building and United States Courthouse, Riverside, 3470 Twelfth Street, Courtroom 1, Second Floor, proposed intervenors Inland Coalition for Immigrant Justice, First Amendment Coalition, Los Angeles Public Press, and The Southlander (collectively, “Proposed Intervenors”) will and hereby do move to intervene for the limited purposes of unsealing court records.

10 This Motion is based on (1) the accompanying Memorandum of Points and
11 Authorities, (2) the declarations of Proposed Intervenors filed in support of this
12 Motion, and (3) the entire record in this action.

13 On January 13, 2026, consistent with Local Rule 7-3, counsel for Proposed
14 Intervenors notified counsel for all Parties of their intent to move to intervene on or
15 about January 28, 2028. Plaintiffs did not respond. Defendant indicated that they
16 intend to oppose any efforts to unseal documents or other records. A declaration
17 setting forth Proposed Intervenors' efforts to confer with counsel is attached as
18 Exhibit A.

19 | Dated: February 2, 2026

Respectfully submitted,

PUBLIC JUSTICE

/s/ Jacqueline Arkush

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1 **TABLE OF CONTENTS**

3	TABLE OF AUTHORITIES	ii
4	MEMORANDUM OF POINTS AND AUTHORITIES.....	1
5	INTRODUCTION	1
6	INTERESTS OF MOVANTS	2
7	BACKGROUND	4
9	PROCEDURAL HISTORY	7
10	ARGUMENT.....	8
11	CONCLUSION.....	11

1 **TABLE OF AUTHORITIES**

		Page(s)
2	Cases	
4	<i>Beckman Indus., Inc. v. Int'l Ins. Co.,</i> 966 F.2d 470 (9th Cir. 1992)	8, 9
6	<i>In re Copley Press, Inc.,</i> 518 F.3d 1022 (9th Cir. 2008)	10
7	<i>Cosgrove v. Nat'l Fire & Marine Ins. Co.,</i> 770 Fed. App'x 793 (9th Cir. 2019)	8, 9
9	<i>Foltz v. State Farm Mut. Auto. Ins. Co.,</i> 331 F.3d 1122 (9th Cir. 2003)	10
10	<i>Greer v. Cty. of San Diego,</i> No. 19-CV-378-JO-DEB, 2023 WL 4479234 (S.D. Cal. July 10, 2023) (reversed on other grounds)	9
12	<i>Hernandez v. Cnty. of Monterey,</i> No. 13-CV-02354-BLF, 2023 WL 5418753 (N.D. Cal. Aug. 21, 2023)	9
15	<i>Kamakana v. City & Cnty. of Honolulu,</i> 447 F.3d 1172 (9th Cir. 2006)	10
16	<i>L. T. et al. v. U.S. Immigr. & Customs Enf't et al.,</i> No. 5:26-cv-00322, Dkt. 1	7
18	<i>Muhaymin v. City of Phoenix,</i> No. CV-17-04565-PHX-DLR, 2021 WL 5173767 (D. Ariz. Nov. 3, 2021)	10
20	<i>Noem v. Vasquez Perdomo,</i> 146 S. Ct. 1 (Sept. 8, 2025)	1, 7
22	<i>Roman v. Wolf,</i> No. 20-00768, 2020 WL 5797918 (C.D. Cal. Sept. 29, 2020)	5, 6
23	<i>San Jose Mercury News, Inc. v. U.S. Dist. Ct.,</i> 187 F.3d 1096 (9th Cir. 1999)	8, 9, 10
24		

1	Court Rules	
2	Civil L.R. 79-7.2	9
3	Fed. R. Civ. P. 24(b)(3)	8, 9
4	Other Authorities	
5	Ana Goñi-Lessan, <i>Immigrants Pepper Sprayed at Deportation Depot on Christmas Eve</i> , Tallahassee Democrat (Jan. 21, 2026), https://www.tallahassee.com/story/news/local/state/2026/01/21/immigrants-pepper-sprayed-at-deportation-depot-on-christmas-eve/88214244007/	6
8	Benjamin Purper, <i>Activists Rally Outside Adelanto ICE Processing Center</i> , KVCR News (May 29, 2020), https://www.kvcrnews.org/local-news/2020-05-29/activists-rally-outside-adelanto-ice-processing-center	5
11	Chantal Da Silva, <i>More Than 100 Detained Immigrants on Hunger Strike Allegedly Pepper-Sprayed</i> , Newsweek (Aug. 7, 2019), http://bit.ly/4rnsDar	6
13	Esther Yu Hsi Lee, <i>Why Immigrant Detainees In California Just Launched A Hunger Strike</i> , ThinkProgress (Nov. 2, 2015), https://archive.thinkprogress.org/why-immigrant-detainees-in-california-just-launched-a-hunger-strike-fa49f70cfcd9/	5
16	Gabriel Thompson, <i>Immigrant Detainees Accuse Guards of Chemical Attacks</i> , Capital & Main (June 25, 2020), https://capitalandmain.com/immigrant-detainees-accuse-guards-of-chemical-attacks-0625	6
19	Janny Jarvie & Nathan Solis, <i>Moldy food, dirty towels: Critics warn of inhumane conditions at California's largest detention center</i> , L.A. Times (June 20, 2025), https://www.latimes.com/california/story/2025-06-20/unsanitary-overcrowded-and-inhumane-red-flags-raised-about-conditions-in-adelanto-detention-center	7
22		
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4	Letter from Michael Kaufman, Sr. Staff Att'y, ACLU of S. Cal., to David A. Marin, Field Off. Dir., and Gabriel Valdez, Assistant Field Off. Dir., U.S. Immigr. & Customs Enf't, <i>Mistreatment of detainees participating in a hunger strike at Adelanto Det. Facility</i> (June 30, 2017), (https://bit.ly/4a8qqZl)	5
7	Meg James, <i>Deaths in ICE custody raise serious questions, lawmakers say</i> , L.A. Times (Nov. 22, 2025), https://www.latimes.com/california/story/2025-11-22/ice-custody-deaths-raise-congress-member-questions-ismael-ayala-uribe	7
10	Memo Torres, <i>Tear Gas, Censorship, and Medical Neglect At The GEO Owned Adelanto ICE Processing Center</i> , L.A. Taco (Dec. 19, 2025), https://lataco.com/neglect-geo-adelanto-ice?giftLink=782e7d39186349f8db5e47937db8207e	2
12	Paloma Esquivel, <i>'We don't feel OK here': Detainee deaths, suicide attempts and hunger strikes plague California immigration facility</i> , L.A. Times (Aug. 8, 2017), https://www.latimes.com/local/lanow/la-me-ln-adelanto-detention-20170808-story.html	5
16	Press Release, Laws.' Comm. for C.R. of S. F., <i>Immigrants in California ICE Det. Ctr. File Civil Rts. Complaint After Private Prison Guards Respond to Peaceful Protests with Violent Raid, Pepper Spray, Solitary Confinement</i> (Aug. 15, 2024)	6
19	Rep. Gil Cisneros, <i>Rep. Cisneros DENIED at Adelanto ICE Facility</i> , (YouTube, Jan. 17, 2026), https://youtu.be/m2fnngTpzSs ; Staff Report, <i>ICE blocks Rep. Ruiz from oversight visit at Adelanto Facility amid surge in custodial deaths</i> , Imperial Valley Press (Jan. 30, 2026), https://www.ivpressonline.com/news/ice-blocks-rep-ruiz-from-oversight-visit-at-adelanto-facility-amid-surge-in-custodial-deaths/article_8f33c3a9-04bb-48a2-8630-4db2a921990b.html	1
23		
24		

1 Roxana Kopetman, *Immigrant detainees stage hunger strike at*
2 *Adelanto facility*, San Bernadino Sun (Mar. 19, 2019)
3 <https://www.sbsun.com/2019/03/19/immigrant-detainees-stage-hunger-strike-at-adelanto-facility/> 5

4 Staff of H.R. Comm. on Homeland Sec., 116th Cong., *ICE Detention*
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MEMORANDUM OF POINTS AND AUTHORITIES

INTRODUCTION

3 The Adelanto ICE Processing Center (“Adelanto”) has been home to
4 continual dysfunction, abuse, and constitutional violations since it opened in 2011.
5 In 2020, members of the public rallied for its closure as conditions further
6 deteriorated during the COVID-19 global pandemic. Defendant GEO Group’s
7 (“GEO”) alleged mistreatment of people detained at Adelanto during the pandemic
8 resulted in no fewer than four lawsuits being filed, including this action arising from
9 GEO employees’ allegedly retaliatory and excessive use of chemical agents to quell
10 a peaceful protest by people entirely subject to GEO’s control.

11 In June of 2025, Adelanto began receiving people swept up and detained by
12 Immigration and Customs Enforcement (ICE) agents performing mass raids across
13 Southern California—an operation three Supreme Court Justices described as
14 “unconscionably irreconcilable with our Nation’s constitutional guarantees.” *Noem*
15 *v. Vasquez Perdomo*, 146 S. Ct. 1, 17 (Sept. 8, 2025) (J. Sotomayor, dissent). Given
16 the alarming proliferation of unlawful federal immigration enforcement activity, the
17 public has a significant interest in learning what occurs and has occurred inside
18 Adelanto. Meanwhile, opportunities for the public to learn what happens inside the
19 facility grow increasingly limited as members of Congress are still being denied
20 access to Adelanto.¹

22 ¹Both Representatives followed the nonbinding oversight visit notice protocol
23 provided by ICE and were still turned away. Rep. Gil Cisneros, *Rep. Cisneros*
24 *DENIED at Adelanto ICE Facility*, (YouTube, Jan. 17, 2026),
<https://youtu.be/m2fnggTpzSs>; Staff Report, *ICE blocks Rep. Ruiz from oversight*
(footnote continued)

1 In particular, as new reports of tear gas deployment inside Adelanto emerge,²
2 the issues being litigated in this case are of increasing public concern. Yet the public
3 lacks critical access to information relating to GEO’s alleged pattern of using
4 excessive force to retaliate against incarcerated people protesting conditions. One
5 reason for that lack of public access is that this Court has sealed a number of
6 documents and videos fundamental to the public’s assessment of how the federal
7 government allows private contractors to run detention facilities. Because
8 transparency is necessary for accountability, the Inland Coalition for Immigrant
9 Justice, Los Angeles Public Press, The Southlander, and First Amendment Coalition
10 (collectively, “Proposed Intervenors”) seek to intervene for the limited purpose of
11 separately moving to unseal those court records. Proposed Intervenors’ motion is
12 timely and would not prejudice the parties. The Court should therefore grant this
13 motion.

INTERESTS OF MOVANTS

15 **Inland Coalition for Immigrant Justice** (“ICIJ”) is a group of over thirty-
16 five organizations that serve the immigrant community in the Inland Empire.
17 Exhibit B, Hernandez Decl. ¶ 4. ICIJ engages in policy advocacy, community
18 organizing and education, and community responses to ICE and border patrol

visit at Adelanto Facility amid surge in custodial deaths, Imperial Valley Press (Jan. 30, 2026), https://www.ivpressonline.com/news/ice-blocks-rep-ruiz-from-oversight-visit-at-adelanto-facility-amid-surge-in-custodial-deaths/article_8f33c3a9-04bb-48a2-8630-4db2a921990b.html.

²² Memo Torres, *Tear Gas, Censorship, and Medical Neglect At The GEO Owned Adelanto ICE Processing Center*, L.A. Taco (Dec. 19, 2025), <https://lataco.com/neglect-geo-adelanto-ice?giftLink=782e7d39186349f8db5e47937db8207e>.

1 operations. *Id.* ¶ 2. As a founding member of the Shut Down Adelanto Coalition,
2 ICIJ has been directly involved in the quest for accountability from GEO Group’s
3 deadly mismanagement and profiteering since at least 2019. *Id.* ¶ 8. Individual and
4 organizational members of ICIJ helped stage many peaceful protests around
5 conditions at Adelanto during the COVID-19 pandemic. *Id.* ¶ 10-11. ICIJ seeks to
6 intervene to obtain some transparency—and ultimately accountability—regarding
7 what takes place within the increasingly inaccessible facility caging members of
8 their community. *See id.* ¶ 11.

9 **The First Amendment Coalition** (“FAC”) is a nonpartisan public interest
10 nonprofit dedicated to protecting and promoting a free press, freedom of expression,
11 and the people’s right to know. Exhibit C, Loy Decl. ¶ 4. FAC believes that the
12 broadest range of engaged and informed communities is essential to the health of
13 our democracy, and that the values expressed by the First Amendment provide a
14 blueprint for an inclusive, equitable society and a responsive, accountable
15 government. *Id.* ¶ 5. Because information relating to incarceration, immigration
16 enforcement, and civil rights is of significant public concern, FAC has a
17 demonstrated commitment to ensuring law enforcement’s exercise of power is
18 exposed to public scrutiny. *Id.* ¶ 7. FAC seeks to intervene in this case to protect
19 the public’s right to see what information is before the court so the public can assess
20 for itself the true state of conditions in Adelanto and hold government contractors
21 accountable as the public sees fit. *Id.* ¶¶ 8, 10–11.

22 **Los Angeles Public Press** (“LAPP”) is an independent, non-profit newsroom
23 that publishes news in support of a healthier Los Angeles. Exhibit D, Tinoco Decl.
24 ¶ 2. LAPP uses journalism to interrogate systems of power while also supporting

1 those trying to build more equitable and resilient communities. *Id.* Their mission is
2 to provide news coverage tailored to Los Angeles, including its vibrant immigrant
3 community. *Id.* ¶ 3-4. Their coverage of escalating immigration raids, the
4 corresponding harms, and local government and community responses have been
5 crucial to maintaining an informed population of Southern California residents. *See*
6 *id.* ¶¶ 5-8. Because of their focus on providing people with the information they
7 need to meaningfully evaluate how officials perform their duties, LAPP seeks to
8 intervene to shed light on the generally opaque system of private corporations
9 performing public functions. *Id.* ¶ 9.

10 **The Southlander** is an independent investigative news cooperative
11 dedicated to critically examining the Greater Los Angeles area’s powerbrokers.
12 Exhibit E, Keith Decl. ¶ 2. Unlike traditional local newsrooms, their team spends
13 months on high-impact investigative projects, allowing them to peel back
14 bureaucracy, follow the money to its source, and map out power and influence. *Id.*
15 The Southlander approaches journalism with the belief that there is no such thing
16 as objectivity, but rather fairness, accuracy, and transparency. *Id.* ¶ 3. They
17 prioritize using data and documents, rather than skewed official narratives, while
18 centering the voices of people impacted by injustice. *Id.* The Southlander seeks to
19 intervene to investigate the physical and constitutional harms committed inside
20 Adelanto and on the public’s dime. *Id.* ¶ 10.

BACKGROUND

22 Adelanto is one of the most notorious immigration detention facilities in the
23 country. Issues at Adelanto have been well-documented since its doors opened.
24 Various oversight bodies within the Department of Homeland Security (DHS) have

1 repeatedly investigated the facility and written reports documenting extreme neglect
2 and deadly dysfunction.³ Over the years, both incarcerated people and the outside
3 community have staged protests to bring awareness to the deplorable conditions of
4 confinement and to demand change.⁴ But rather than listen to these demands, ICE
5 and GEO have continued their “troubling pattern of retaliation against [people in
6 their custody] exercising their constitutional right to free speech”⁵ by violently
7 responding to the peaceful protests. The COVID-19 pandemic brought new and
8 literally toxic conditions to Adelanto as the atmosphere filled with deadly virus and
9 a harmful pesticide. *Roman v. Wolf*, No. 20-00768, 2020 WL 5797918, at *4-*5
10 (C.D. Cal. Sept. 29, 2020). Despite judicial intervention and public outcry,⁶

11
12 ³ “ICE continues to utilize facilities that demonstrate a pattern of violating [their]
13 own detention standards. Adelanto is a perfect example.” Staff of H.R. Comm. on
14 Homeland Sec., 116th Cong., *ICE Detention Facilities: Failing to Meet Basic
Standards of Care* 11-12 (Sept. 21, 2020), <https://bit.ly/4c4CY6K> (summarizing
oversight bodies’ previous findings).

15 ⁴ Esther Yu Hsi Lee, *Why Immigrant Detainees In California Just Launched A
Hunger Strike*, ThinkProgress (Nov. 2, 2015), <https://archive.thinkprogress.org/why-immigrant-detainees-in-california-just-launched-a-hunger-strike-fa49f70cfcd9/>;
16 Paloma Esquivel, ‘We don’t feel OK here’: Detainee deaths, suicide attempts and
17 hunger strikes plague California immigration facility, L.A. Times (Aug. 8, 2017),
<https://www.latimes.com/local/lanow/la-me-ln-adelanto-detention-20170808-story.html>; Roxana Kopetman, *Immigrant detainees stage hunger strike at Adelanto
18 facility*, San Bernadino Sun (Mar. 19, 2019)
<https://www.sbsun.com/2019/03/19/immigrant-detainees-stage-hunger-strike-at-adelanto-facility/>.

19 ⁵ Letter from Michael Kaufman, Sr. Staff Att’y, ACLU of S. Cal., to David A.
20 Marin, Field Off. Dir., and Gabriel Valdez, Assistant Field Off. Dir., U.S. Immigr.
21 & Customs Enf’t, *Mistreatment of detainees participating in a hunger strike at
22 Adelanto Det. Facility* (June 30, 2017), (<https://bit.ly/4a8qqZl>).

23 ⁶ Benjamin Purper, *Activists Rally Outside Adelanto ICE Processing Center*, KVCR
24 News (May 29, 2020), <https://www.kvcrnews.org/local-news/2020-05-29/activists-rally-outside-adelanto-ice-processing-center>.

1 COVID-19 prevention measures remained inadequate. *Id.* at *6. Instead, in
2 response to outside protests, GEO instituted lockdowns⁷ that trapped people in
3 crowded cells that this Court had already found likely violated their “constitutional
4 right to be housed in reasonable safety.” *Id.* When a group of incarcerated people
5 decided to peacefully protest the lockdowns, they were again met with violence.⁸
6 This time, GEO staff retaliated against entire units for the constitutionally protected
7 protest activity of a few individuals.

8 Reporting shows that GEO employs the same suppressive tactics at their
9 other California facilities.⁹ Indeed, this pattern of retaliation stretches across the
10 country, with GEO consistently deploying chemical agents and physical force to
11 silence peaceful demonstrations inside their immigration detention facilities.¹⁰

12 As ICE agents “seize anyone who looks Latino, speaks Spanish, and appears
13 to work a low wage job,” the rapid influx of people has caused conditions inside

15 ⁷ Gabriel Thompson, *Immigrant Detainees Accuse Guards of Chemical Attacks*,
16 Capital & Main (June 25, 2020), <https://capitalandmain.com/immigrant-detainees-accuse-guards-of-chemical-attacks-0625>.

17 ⁸ *Id.*

18 ⁹ Press Release, Laws.’ Comm. for C.R. of S. F., [*Immigrants in California ICE Detention Center File Civil Rights Complaint After Private Prison Guards Respond to Peaceful Protests with Violent Raid, Pepper Spray, Solitary Confinement*](#) (Aug. 15, 2024).

20 ¹⁰ A new GEO facility in Florida has had two pepper spray incidents since it opened
21 in September 2025, at least one of which was in response to a protest. Ana Goñi-
22 Lessan, *Immigrants Pepper Sprayed at Deportation Depot on Christmas Eve*,
23 <https://www.tallahassee.com/story/news/local/state/2026/01/21/immigrants-pepper-sprayed-at-deportation-depot-on-christmas-eve/88214244007/>. In a Louisiana GEO
24 facility, protestors have had less-than-lethal weapons and chemical agents deployed
on them. Chantal Da Silva, *More Than 100 Detained Immigrants on Hunger Strike Allegedly Pepper-Sprayed*, Newsweek (Aug. 7, 2019), <http://bit.ly/4rnsDar>.

1 Adelanto to *again* reach deadly levels. *Noem*, 146 S. Ct. at 6 (J. Sotomayor, dissent).
2 Two people have died since the “massive increase” in population at the “woefully
3 unprepared” facility.¹¹ People detained at Adelanto, like so many across the
4 country,¹² continue to lawfully “protest the conditions and speak out, but are met
5 with retaliation or punishment.” *L. T. et al. v. U.S. Immigr. & Customs Enf’t et al.*,
6 No. 5:26-cv-00322, Dkt. 1 ¶ 8. The public deserves to know how GEO may respond.

7 PROCEDURAL HISTORY

8 Plaintiffs are five individuals who were detained at Adelanto in 2020 and
9 subjected to a major use of force incident that unfolded across multiple units. On
10 behalf of themselves and all others similarly situated, Plaintiffs allege violations of
11 the First, Fourth, Fifth, and Fourteenth Amendments, as well as state tort law. Dkt.
12 1. In July 2025, the Court granted Plaintiffs’ motion for class certification and
13 denied GEO’s motion for summary judgment. Dkt. 113. In conjunction with those
14 two motions, the Parties applied to file materials under seal on five occasions, Dkts.
15 56, 60, 71, 87, 90, resulting in over fifty sealed documents and files. Dkts. 55, 57,
16 64, 73, 74, 81, 88, 91. The sealed court records include video footage, movement
17 logs showing when people were finally allowed to shower or receive medical
18

19 ¹¹Meg James, *Deaths in ICE custody raise serious questions, lawmakers say*, L.A.
20 Times (Nov. 22, 2025), <https://www.latimes.com/california/story/2025-11-22/ice-custody-deaths-raise-congress-member-questions-ismael-ayala-uribe>; Janny Jarvie
21 & Nathan Solis, *Moldy food, dirty towels: Critics warn of inhumane conditions at California’s largest detention center*, L.A. Times (June 20, 2025),
22 <https://www.latimes.com/california/story/2025-06-20/unsanitary-overcrowded-and-inhumane-red-flags-raised-about-conditions-in-adelanto-detention-center>.

23 ¹² “*Let Us Out*”: ICE Detention of Kids Sparks Protests at Immigration Jail in
24 Texas, Democracy Now! (Jan. 29, 2026),
https://www.democracynow.org/2026/1/29/dilley_tx_ice_jail_family_detention.

1 treatment, and GEO’s internal reports following the incident. Even GEO’s brief
2 opposing Plaintiffs’ motion for class certification is sealed. Dkt. 72. This case is
3 currently set for trial on April 14, 2026. Dkt. 116.

4 **ARGUMENT**

5 Proposed Intervenors seek access to sealed court records. The Court should
6 permit Proposed Intervenors to intervene in this action for the limited purpose of
7 asserting their First Amendment and common law rights of access.

8 In this Circuit, it is well-established that “[n]onparties seeking access to a
9 judicial record in a civil case may do so by seeking permissive intervention under
10 Rule 24(b)(2).” *San Jose Mercury News, Inc. v. U.S. Dist. Ct.*, 187 F.3d 1096, 1100
11 (9th Cir. 1999). Ordinarily, a court may grant permissive intervention under Rule
12 24(b) if the movant presents “(1) an independent ground for jurisdiction; (2) a
13 timely motion; and (3) a common question of law and fact between the movant’s
14 claim or defense and the main action.” *Beckman Indus., Inc. v. Int’l Ins. Co.*, 966
15 F.2d 470, 473 (9th Cir. 1992). Consistent with the requirements of Rule 24(b), the
16 court must also “consider whether the intervention will unduly delay or prejudice
17 the adjudication of the original parties’ rights.” Fed. R. Civ. P. 24(b)(3).

18 However, when a party seeks to intervene solely for the purpose of seeking
19 access to court records, the requirements for permissive intervention are relaxed.
20 First, “an independent jurisdictional basis is not required because intervenors do not
21 seek to litigate a claim on the merits.” *Beckman*, 966 F.2d at 473; *see Cosgrove v.*
22 *Nat’l Fire & Marine Ins. Co.*, 770 Fed. App’x 793, 795 (9th Cir. 2019) (explaining
23 that a “third party seeking permissive intervention purely to unseal a court record
24 does not need to demonstrate independent jurisdiction”); *Hernandez v. Cnty. of*

1 *Monterey*, No. 13-CV-02354-BLF, 2023 WL 5418753, at *2 (N.D. Cal. Aug. 21,
2 2023) (same). Second, “[t]here is no reason to require [] a strong nexus of fact or
3 law when a party seeks to intervene only for the purpose” of promoting court
4 transparency. *Beckman*, 966 F.2d at 474; *see Cosgrove*, 770 Fed. App’x at 795
5 (explaining that a “third party seeking permissive intervention purely to unseal a
6 court record does not need to demonstrate . . . a common question of law or fact”);
7 *Hernandez*, 2023 WL 5418753, at *2 (same). Accordingly, “a party who seeks to
8 intervene solely to unseal filed documents only needs to show timeliness.” *Greer v.*
9 *Cty. of San Diego*, No. 19-CV-378-JO-DEB, 2023 WL 4479234, at *3 (S.D. Cal.
10 July 10, 2023) (reversed on other grounds).

11 In determining whether the motion is timely, a court must consider “(1) the
12 stage of the proceeding at which an applicant seeks to intervene; (2) the prejudice
13 to other parties; and (3) the reason for and length of [any] delay,” *San Jose Mercury*
14 *News*, 187 F.3d at 1101. These same considerations also satisfy Rule 24(b)(3)’s
15 required undue delay and prejudice analysis, *see Fed. R. Civ. P. 24(b)(3)*.

16 Here, Proposed Intervenors’ Motion to Intervene is timely. It comes just five
17 months after this Court granted the applications to seal most of the documents
18 Proposed Intervenors now seek to unseal. ECF 113. For comparison, “delays
19 measured in years have been tolerated where an intervenor is pressing the public’s
20 right of access to judicial records.” *San Jose Mercury News*, 187 F.3d at 1101
21 (collecting cases). And this Court’s local rules do not limit the time by which “[a]
22 nonparty seeking access to a sealed document may intervene in a case for the
23 purpose of” unsealing. Civil L.R. 79-7.2.

24

1 Further, granting this Motion to Intervene will not prejudice the parties
2 because Proposed Intervenors seek only to enforce GEO’s existing obligation to
3 demonstrate why records should be sealed. As explained in Proposed Intervenors’
4 Motion to Unseal, GEO bears the burden of establishing that there are compelling
5 reasons for keeping court records sealed. *See, e.g., In re Copley Press, Inc.*, 518
6 F.3d 1022, 1026 (9th Cir. 2008) (explaining the First Amendment presumption of
7 access can only be “overcome by a compelling governmental interest”); *Foltz v.*
8 *State Farm Mut. Auto. Ins. Co.*, 331 F.3d 1122, 1135 (9th Cir. 2003) (explaining
9 the common law “strong presumption in favor of access to court records,” which
10 can only be overridden if the party seeking to seal can establish there are
11 “sufficiently compelling reasons for doing so”).

12 As explained in Proposed Intervenors’ motion to unseal, filed concurrently,
13 GEO has failed to carry its existing burden. In fact, it failed to assert any reason at
14 all for sealing many of the court records at issue here. Importantly, “[t]he mere fact
15 that Defendants will need to explain why the relevant records should remain sealed
16 is not, itself, unduly prejudicial.” *Muhaymin v. City of Phoenix*, No. CV-17-04565-
17 PHX-DLR, 2021 WL 5173767, at *2 (D. Ariz. Nov. 3, 2021). Even if it were, once
18 an intervenor asserts “a legitimate, presumptive right to open the court record . . . ,
19 the potential burden or inequity to the parties should affect not the right to intervene
20 but, rather, the court’s evaluation of the merits” of a motion to unseal. *San Jose*
21 *Mercury News*, 187 F.3d at 1101 (quoting *Pub. Citizen v. Liggett Grp., Inc.*, 858
22 F.2d 775, 787 (1st Cir. 1988)). Therefore, any concerns about potential prejudice to
23 the parties can be addressed when the Court balances the public’s interest in
24 disclosure against GEO’s interest in secrecy. *See Kamakana v. City & Cnty. of*

1 *Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006) (quoting *Foltz*, 331 F.3d at 1135)
2 (“[T]he court must ‘conscientiously balance[] the competing interests’ of the public
3 and the party who seeks to keep certain judicial records secret.”).

4

5 **CONCLUSION**

6 Because Proposed Intervenors satisfy the requirements for permissive
7 intervention under Rule 24(b), the Court should grant their Motion and allow them
8 to assert their First Amendment and common law right of access to court records.

9

10 Dated: February 2, 2026 Submitted,
11 PUBLIC JUSTICE
12 /s/ Jacqueline Arkush
13 Jacqueline Arkush (SBN 365861)
Leslie Bailey (SBN 232690)
14 *Counsel for Proposed Intervenors*
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EXHIBIT A

1 Jacqueline Arkush (SBN 365861)
2 jarkush@publicjustice.net
3 Leslie Bailey (SBN 232690)
4 lbailey@publicjustice.net
5 PUBLIC JUSTICE
6 475 14th St., Suite 610
7 Oakland, CA 94612
8 Telephone: (510) 622-8150

9 *Counsel for Intervenors*

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

HUGO GONZALEZ, et al., on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

The GEO Group, Inc., et al.

Defendants.

Case No.: 2:22-cv-04014-JGB-ACCV

**DECLARATION OF
JACQUELINE ARKUSH IN
SUPPORT OF MOTION TO
INTERVENE FOR LIMITED
PURPOSE OF UNSEALING
COURT RECORDS AND
MOTION TO UNSEAL COURT
RECORDS**

Date: March 2, 2026
Time: 9:00 a.m.
Courtroom: 1 (Riverside)
Judge: Hon. Jesus G. Bernal

DECLARATION OF JACQUELINE ARKUSH

I, Jacqueline Arkush, declare under penalty of perjury as prescribed in 28 U.S.C. § 1746 that the following is true and correct:

4 1. I am an attorney duly admitted to practice before this Court. I am a
5 Justice Catalyst Fellow at Public Justice, attorneys of record for Inland Coalition
6 for Immigrant Justice, First Amendment Coalition, Los Angeles Public Press, and
7 The Southlander (collectively, “Proposed Intervenors”). I have personal
8 knowledge of the facts set forth herein, and if called as a witness, I could and
9 would competently testify hereto.

10 2. I make this declaration in support of Proposed Intervenors' motion to
11 intervene for the limited purpose of unsealing court records and motion to unseal
12 court records.

13 3. I attempted to meet and confer with Plaintiffs' counsel and Defendant's
14 about our intent to file both motions, as required by the Central District of
15 California, Civil Local Rule 7-3, but we were unable to reach a resolution. Our
16 email exchange is attached to this declaration as Exhibit A1.

17 4. On January 13, 2026, I contacted both parties' counsel by email and
18 explained our intention to move to intervene to unseal specific records, which I
19 identified by docket number. We offered a range of times for meeting to discuss
20 the substance of our intended motions and provided our then-intended date of
21 filing, January 28, 2026. Ex. A1 at 5.

22 | //

23 | //

24

1 5. On January 27, 2026, at 10:02 p.m., we received a response from Deann
2 R. Rivard, counsel for Defendant.. *Id.* at 2.

3 6. Defendant's counsel informed us that Defendant GEO Group, Inc., will
4 oppose both motions and any attempts "to unseal/access/make public any and all
5 records" previously approved for filing under seal. *Id.*

6 7. In their email, Defendant's counsel raised new arguments for maintaining
7 court records under seal and inquired if we still intended to file our motions after
8 reviewing their new arguments. *Id.* at 2–4.

9 8. Defendant's counsel additionally inquired if we intended to "notify real-
10 party-in-interest" the Department of Homeland Security "such that it can
11 potentially file a response motion in opposition, as it likely has an equal interest in
12 ensuring that the confidentiality of some of the records you are seeking to
13 unseal/access remain confidential/under seal." *Id.* at 4.

14 9. On January 28, 2026, I responded to Defendant's counsel via email and
15 informed them that we intended to move forward with our motions and would not
16 be notifying any nonparties. I also informed them that some of the records they
17 maintain should be sealed were already publicly filed. *Id.* at 1.

18 ///

19 ///

20 ///

21 ///

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1 10. On January 29, 2026, I emailed Plaintiffs' counsel once more to try to
2 determine their position regarding our intended filings. *Id.* As of February 2, 2026,
3 Plaintiffs' counsel has not responded.

4 I declare under penalty of perjury that the foregoing is true and correct.

5 Executed on February 2, 2026 in Los Angeles, CA.

6

7

/s/ Jacqueline Arkush

8 Jacqueline Arkush (SBN 365861)
9 PUBLIC JUSTICE
10 475 14th St., Suite 610
11 Oakland, CA 94612

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15

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17

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21

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23

24

Counsel for Proposed Intervenors

EXHIBIT A1



Re: GONZALEZ - Access to Court Records in Gonzalez v. GEO, 2:22-cv-04014-JGB-SHK

From Jacqueline Arkush <jarkush@publicjustice.net>

Date Thu 1/29/2026 3:49 PM

To csweetser@sshhzlaw.com <csweetser@sshhzlaw.com>

Cc lbattles@mbllegal.com <lbattles@mbllegal.com>; jwashington@sshhzlaw.com <jwashington@sshhzlaw.com>; sshanbhag@law.uci.edu <sshanbhag@law.uci.edu>; Cathy Sweetser <catherine.sdshhh@gmail.com>; ohta@law.ucla.edu <ohta@law.ucla.edu>; blitt@mbllegal.com <blitt@mbllegal.com>; hoffpaul@aol.com <hoffpaul@aol.com>; Leslie Bailey <lbailey@publicjustice.net>

Bcc Jackie Aranda Osorno <JAOsorno@publicjustice.net>

Good afternoon,

We plan on moving forward with our filings on Monday and would like to state your position in our motions.

Thank you,

Jacqueline Arkush

Public Justice

Justice Catalyst Fellow, Access to Justice Project

She/Her

From: Jacqueline Arkush <jarkush@publicjustice.net>

Sent: Wednesday, January 28, 2026 5:37 PM

To: Rivard, Deann R. <DRivard@bwslaw.com>

Cc: csweetser@sshhzlaw.com <csweetser@sshhzlaw.com>; Coleman, Susan E. <SColeman@bwslaw.com>; lbattles@mbllegal.com <lbattles@mbllegal.com>; McGeady, Joseph <jmcgeady@allenmatkins.com>; Sessions, Matthew <msessions@allenmatkins.com>; Strauss, Naomi <nstrauss@allenmatkins.com>; Larsen, Madison <mlarsen@allenmatkins.com>; Antle, Bernadette <BAntle@bwslaw.com>; van Daalen Wetters, Dee <DWetters@bwslaw.com>; Leslie Bailey <lbailey@publicjustice.net>

Subject: Re: GONZALEZ - Access to Court Records in Gonzalez v. GEO, 2:22-cv-04014-JGB-SHK

Counsel,

Thank you for letting me know what GEO's position is. We intend to move forward with our filing and will not be notifying any nonparties of our intent to do so.

Regarding which court records are under seal, please be advised that ECF 72 (GEO's Opposition to Plaintiffs' Class Certification) is not publicly accessible as, according to PACER, "no matter of public record has been filed." Relatedly, please be advised that many of the records you argue should remain sealed are already accessible on PACER.

Thank you,

Jacqueline Arkush

Public Justice

Justice Catalyst Fellow, Access to Justice Project

She/Her

From: Rivard, Deann R. <DRivard@bwslaw.com>
Sent: Tuesday, January 27, 2026 10:02 PM
To: Jacqueline Arkush <jarkush@publicjustice.net>
Cc: Jackie Aranda Osorno <JAOsorno@publicjustice.net>; csweetser@sshhzlaw.com <csweetser@sshhzlaw.com>; Coleman, Susan E. <SColeman@bwslaw.com>; lbattles@mbllegal.com <lbattles@mbllegal.com>; McGeady, Joseph <jmcgeady@allenmatkins.com>; Sessions, Matthew <msessions@allenmatkins.com>; Strauss, Naomi <nstrauuss@allenmatkins.com>; Larsen, Madison <mlarsen@allenmatkins.com>; Antle, Bernadette <BAntle@bwslaw.com>; van Daalen Wetters, Dee <DWetters@bwslaw.com>
Subject: RE: GONZALEZ - Access to Court Records in Gonzalez v. GEO, 2:22-cv-04014-JGB-SHK

Greetings Ms. Arkush:

Susan Coleman and I are one of two teams of attorneys that represent The GEO Group, Inc. in this matter. The class action litigation firm Allen Matkins, including attorneys Matthew Sessions and Joseph McGeady among others, also represent The GEO Group, Inc. Please include them in any correspondence in future.

We understand from your email (see below email thread) that you intend to move to intervene in the above-referenced case, *Hugo Gonzalez, et al. v. GEO Group, Inc., et al.*, case number 2:22-cv-04014-JGB-SHK, for the purpose of seeking to unseal most or all of those court records that do not contain personal identifying information. You referenced specific records including documents and video filed under seal, including ECF Nos.: 55, 57, 72 (GEO's Opposition to Plaintiffs' Class Certification Motion which was NOT filed under seal), 73, 74, 64, and 88.

The GEO Group, Inc., will oppose any motion/application to unseal/access/make public any and all records regarding which it and/or Plaintiffs received judicial approval to file under seal at any stage of litigation in the above-referenced action, the bases for which were previously provided to the court in moving papers and declarations in support thereto. Below are some but not necessarily all the arguments GEO will make in opposing your motion to intervene to unseal/access/make public confidential under seal-filed records.

VIDEO RECORDINGS:

Each of the video recordings manually lodged were either handheld video or surveillance video camera recordings that captured images of secured immigration detainee housing units and other secured areas of the facility adjacent thereto. The recordings not only depict the policies and procedures that were implemented by The GEO Group, Inc., but they equate to visual schematics of areas within the facility that are the most secure and thus pose the greatest security risk to both The GEO Group, Inc., and the United States, a real party-in-interest regarding your impending motion.

GEO houses immigration detainees facing removal proceedings instituted by the United States of America's Department of Homeland Security's Immigration and Customs Enforcement's Enforcement and Removal Operation section, which is tasked with the detention and eventual removal of aliens, including large classes of aliens with criminal records or national security concerns. 8 U.S.C. §§ 1226, 1231. Providing documentation about the layout, schematics, and dimensions of the places—which are

revealed in the video footage—where people are detained exposes the facility's security operations and places the staff and detainees at risk. The information requested exposes: Adelanto's layout and floorplans designed to promote operational security; secure entrances and exits to and from the housing area; and allows examination to determine the most effective positioning of staff, cameras, control centers, and controlled access points. Exposure would also facilitate potential assaults on staff and other detainees, property damage, and detainee escape. The information would provide viewers with a roadmap into the techniques, systems, and designs that are used to operate Adelanto securely that can then be used to frustrate or prevent its secure operation. This concern is not speculative or overblown, as evidenced by two instances in 2020 when detainees at Adelanto attempted to hack into the computer system at Adelanto to take pictures in an Adelanto housing unit and distribute them, which created a security breach that exposed the identify of at least one staff member, revealed the layout of the housing unit, and possibly revealed the identities of fellow detainees who had filed for asylum protection and were entitled to the asylum confidentiality provisions under 8 U.S.C. § 1367. Affording the public, and/or third-party counsel and others with whom they may share this information, access that reveals the sort of detailed information which invites extensive study so as to potentially exploit perceived weaknesses at Adelanto, and additionally violates the privacy of each detainee who has not consented to exposure of his identity to the public.

Moreover, the burden and risks on Adelanto operations to provide public and/or third parties visual access to Adelanto's secure floor housing layout is dangerous to Adelanto operations, excessive, lacks proportionality, and is unduly burdensome. See, e.g., *Gilmore v. Lockard*, 2017 WL 678278, at *4 (E.D. Cal. Feb. 16, 2017) ("the Court recognizes the potential dangers associated with inmates possessing photographs and diagrams of a particular prison" and "finds that the Defendants' interest in prison safety and security outweighs Plaintiff's marginal, if any, disadvantage from not being able to view these photographs and diagrams"); *Scott v. Palmer*, 2015 WL 1637781, at *4 (E.D. Cal. Apr. 13, 2015) (denying motion to compel production of prison layout because "Plaintiff's need for documents, diagrams, or photographs as evidence on this point is ... so minimal that it outweighs neither the burden and expense associated with [obtaining the documents] ... nor the security risk associated with the possession of such physical prison layout details by inmates"); *Allen v. Eckard*, 2019 WL 1099001, at *3 (M.D. Pa. Mar. 8, 2019) (denying motion to compel, floor plan or diagram of cell block because "disclosure of this kind of document poses a great security risk that outweighs any potential relevance to the plaintiff's case").

CORRECTIONAL EMERGENCY RESPONSE TEAM ACTIVATION PLAN / DORM LOGS / SHIFT SUMMARIES / RESPONSE PACKET

The Correctional Emergency Response Team Activation Plan describes in detail GEO's procedures for responding to emergencies in the facility that houses ICE detainees. If disclosed, the safety and security of GEO's facilities could be compromised, which could endanger the detainees, as well as GEO's staff.

The dorm logs and shift summaries may also provide an insight into how the facility operates, which could compromise its safety and security.

With respect to the response packet, that describes the policies and procedures that were implemented by GEO at the facility. If this information is made public, the safety and security of the facility may be compromised. This packet also contains medical reports related to the incident (which are subject to the right of privacy). Further, the packet contains personal information about the detainees (such as their citizenship).

COUNT LOGS / OFFICER LOGS / EMAILS FROM THE DATE OF THE INCIDENT

Count logs, officer logs, and emails sent on the date of the incident are not public records, were only disclosed pursuant to a protective order, and should continue to be kept confidential. There is no justifiable reason for revealing these records to the public or to third parties. Some of these records

which contain officer medical records are also subject to HIPAA medical privacy protection, and some would implicate privacy rights of other individuals including detainees, thus constituting good cause to maintain under seal confidentiality.

In addition to safety and privacy concerns, the disclosure of the information contained within sealed records could adversely affect GEO's ability to compete in the jail and prison management industry. Indeed, it is recognized that documents containing trade secrets may warrant sealing. See e.g., *In re Providian Credit Card Cases* (2002) 96 CA4th 292, 300, 116 (dictum); *McGuan v. Endovascular Tech., Inc.* (2010) 182 CA4th 974, 988 (quality control records and complaint handling procedures). Regarding discovery, the more "sensitive" the information (e.g., personal financial information, customers' lists, trade secrets, etc.), the greater the need for discovery must be shown. See e.g., *Hoffman Corp. v. Sup.Ct. (Smaystra)* (1985) 172 CA3d 357, 362; *Tien v. Sup.Ct. (Tenet Healthcare Corp.)* (2006) 139 CA4th 528, 540. Here, if sealing is not maintained, GEO's competitors could make use of the information to compete with GEO in the provision of its prison management services at its various facilities. As such, there is a substantial probability that GEO's overriding interests in protecting its trade secrets and its ability to compete in the jail and prison management industry may be prejudiced.

Please advise whether after reviewing the above arguments in opposition you still intend to move to intervene to seek access to the under seal records filed in the above matter.

Please also advise whether you intend to notify real-party-in-interest The United States of America's Department of Homeland Security of your upcoming motion such that it can potentially file a response motion in opposition, as it likely has an equal interest in ensuring that the confidentiality of some of the records you are seeking to unseal/access remain confidential/under seal.

Very truly yours,

Deann R. Rivard | Senior Associate

Burke, Williams & Sorensen, LLP

444 South Flower Street, 40th Floor, Los Angeles, CA 90071

D 213.236.2805 | O 213.236.0600 | F 213.236.2700

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From: Jacqueline Arkush <jarkush@publicjustice.net>
Sent: Tuesday, January 13, 2026 6:23 PM
To: Rivard, Deann R. <DRivard@bwslaw.com>; csweetser@sshhzlaw.com; Coleman, Susan E. <SColeman@bwslaw.com>; lbattles@mbllegal.com
Cc: JAOsorno@publicjustice.net
Subject: Access to Court Records in Gonzalez v. GEO, 2:22-cv-04014-JGB-SHK

[EXTERNAL]

Counsel,

I am writing on behalf of my clients, the Inland Coalition for Immigrant Justice and the Los Angeles Public Press, to inquire about records that have been sealed by the Court in *Hugo Gonzalez, et al. v. GEO Group, Inc., et al.*, case number 2:22-cv-04014-JGB-SHK. We intend to move to intervene for the limited purpose of unsealing most or all of those court records that do not contain personal identifying information. Specifically, we will seek to unseal the materials at ECF 55, 57, 72, 73, 74, 64, and 88.

Consistent with Local Rule 7-3, I am requesting the opportunity to discuss the substance of our request at your earliest convenience. We are available on Friday, January 16 from 3pm to 5:30pm, and Wednesday, January 21 from 9am to 12pm. Please note that we intend to move on January 28, 2026.

Thank you,



Jacqueline Arkush (she/her)

Justice Catalyst Fellow, Access to Justice Project

jarkush@publicjustice.net

Based in Los Angeles, CA [Pacific Time Zone]

publicjustice.net

1620 L Street NW, Suite 630, Washington, DC 20036

Public Justice is proud to be a leader in offering a flexible work environment, including a four-day workweek. Team members' availability and responsiveness may be dependent on their location, schedule and/or family or other obligations, and we recognize others' schedules may also vary.



EXHIBIT B

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5 PUBLIC JUSTICE
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Telephone: (510) 622-8150

6 *Counsel for Intervenors*
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

HUGO GONZALEZ, et al., on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

The GEO Group, Inc., et al.

Defendants.

Case No.: 2:22-cv-04014-JGB-ACCV

**DECLARATION OF JAVIER
HERNANDEZ IN SUPPORT OF
MOTION TO INTERVENE FOR
LIMITED PURPOSE OF
UNSEALING COURT RECORDS**

Date: March 2, 2026

Time: 9:00 a.m.

Courtroom: 1 (Riverside)

Judge: Hon. Jesus G. Bernal

DECLARATION OF JAVIER HERNANDEZ

I, Javier Hernandez, declare under penalty of perjury as prescribed in 28 U.S.C. § 1746 that the following is true and correct:

4 1. I am the Executive Director of the Inland Coalition for Immigrant Justice
5 (“ICIJ”). I have served in my current position as Executive Director since March
6 of 2015.

7 2. ICIJ engages in policy advocacy, community organizing and education,
8 and community responses to U.S. Immigration and Customs Enforcement (“ICE”)
9 and border patrol operations. Because of our focus on immigrant justice and the
10 Inland Empire region, we have a special interest in exposing what goes on inside
11 Adelanto ICE Processing Center (“Adelanto”) and the many negative impacts it
12 has on our community.

13 3. ICIJ originated in 2008, when Roman Catholic Auxiliary Bishop Rutilio
14 del Riego convened immigrant leaders in the Inland Empire Region. His call was
15 to unify leaders in the region to begin organizing collectively with a common
16 message of justice for immigrants. These meetings lead to the creation of the
17 Justice for Immigrants Coalition of Inland Southern California. Near the end of
18 2015, we began a process to assess our progress, to identify key opportunities and
19 threats, and to evaluate our capacity needs through a process of strategic planning.
20 We also adopted a new name—Inland Coalition for Immigrant Justice—to better
21 reflect our regional and unique identity.

22 4. We have continued to grow in strength and depth. We have evolved into
23 a dynamic, diverse, and prominent coalition—an engine for justice and change in

1 the Inland Region and California. Currently, over 35 grassroots, community, faith-
2 based, legal service, and workers' rights organizations are part of the Coalition.

3 5. Over the years, we have been influential in legislative advocacy for the
4 rights of all immigrants. Major victories include advocating for the passage of the
5 California Trust Act (AB 4) in 2013, which limits cooperation between
6 Immigration and Customs Enforcement (ICE) and local law enforcement. Also in
7 2013, we supported the statewide push for Driver Licenses for All (AB 60), which
8 has provided over 1 million drivers licenses to undocumented Californians. In
9 2017, we successfully advocated for the passage of a series of laws that would
10 protect immigrants under the new federal administration, including the California
11 Values Act (SB 54).

12 6. We have consistently fought against the abuses of for-profit immigration
13 detention companies at the local and state level. We were involved in the passage
14 of Dignity Not Detention (SB 29) that prevents the growth of immigrant prisons in
15 California by prohibiting cities and counties from entering into contracts that
16 expand private immigration detention beyond what existed in 2018. We also
17 helped rally community support for People Not Profits (AB 32) which would have
18 phased out all private operation of detention and correction facilities in the state.
19 After it was passed, GEO sued in early 2020 to enjoin its implementation and was
20 eventually successful.

21 7. ICIJ provided testimony to the California Attorney General's Office
22 about the human rights violations that occur at Adelanto, which helped push
23 through a budget amendment in 2017 (AB 103). The amendment gives the
24 Attorney General the power and resources to monitor immigration detention

1 facilities in California. It was passed just days after the 2017 hunger strike at
2 Adelanto ended with pepper spray and beatings.

3 8. We are part of the Shut Down Adelanto Coalition (“SDA”), a collective
4 we helped form in 2019 of over twenty organizations working to achieve the just
5 closure of Adelanto. One of the values of SDA is that impacted community
6 members should guide and be at the forefront of localized fights, meaning their
7 concerns should be at the center of decisions reached by the coalition. We amplify
8 the voices of people who have been directly impacted by GEO Group and ICE.
9 We have held rallies where directly impacted individuals can themselves speak of
10 their experiences, and have published reports detailing conditions inside Adelanto.
11 We do this to make sure that the people most harmed by GEO’s abuses do not
12 have to suffer in silence.

13 9. In 2020, SDA began to expose a list of environmental hazards that have
14 long existed in the facility, such as the misuse of a cleaning chemical (pesticide)
15 called HDQ Neutral, contaminated water, and horrible air quality coming from
16 other toxic sites in close proximity to the detention center. In May of 2020, we
17 submitted a complaint to the Department of Homeland Security Office of Civil
18 Rights and Civil Liberties after receiving reports from people detained in
19 Adelanto that harmful and irresponsible use of HDQ Neutral was causing major
20 physical ailments. Our advocacy led to congressional members, including Rep.
21 Norma Torres, Rep. Judy Chu, and Rep. Mark Takano, speaking out to demand
22 that ICE address the reports from immigrants who were affected by the pesticide.
23 SDA and ICIJ continue to be involved in the fight for accountability from GEO
24 for their inhumane misuse of HDQ Neutral.

1 10. At the onset of the COVID-19 pandemic, SDA demanded the release of
2 everyone inside Adelanto because of GEO and ICE's harmful practices. We held
3 car caravan protests outside the facility, gathered signatures on petitions, and
4 organized rallies where stories relayed from inside were shared. Besides the use of
5 HDQ Neutral, GEO and ICE endangered people inside Adelanto through
6 overcrowding and lockdowns. They did not enforce the measures recommended
7 by the Center for Disease Control and provided almost no personal protective
8 equipment. When a court ordered people be released because of the dangers inside
9 Adelanto, SDA and ICIJ helped facilitate reentry into the community.

10 11. In June of 2020, SDA helped organize multiple peaceful protests
11 outside of Adelanto. GEO responded by further restricting and endangering
12 people inside Adelanto, locking them down for days at a time. When people inside
13 the facility decided to exercise their own right to protest, GEO acted like they had
14 in 2017 and used brutal force. We, as longtime advocates for immigrants and
15 against for-profit immigration detention, seek to utilize our right to access the
16 records in this case. We intend to use these records and the stories of Plaintiffs to
17 continue calling for justice and divestment.

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Executed on January 27, 2026 in San Bernadino, California.

20

21

/s/ Javier Hernandez

22

Javier Hernandez, Executive Director
Inland Coalition for Immigrant Justice

23

24

EXHIBIT C

1 Jacqueline Arkush (SBN 365861)
jarkush@publicjustice.net
2 Leslie Bailey (SBN 232690)
lbailey@publicjustice.net
3 PUBLIC JUSTICE
475 14th St., Suite 610
4 Oakland, CA 94612
5 Telephone: (510) 622-8150

6 *Counsel for Intervenors*

7

8

9 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA

10

11 HUGO GONZALEZ, et al., on behalf of
themselves and all others similarly
12 situated,
13 Plaintiffs,
v.
14 The GEO Group, Inc., et al.
Defendants.

15 Case No.: 2:22-cv-04014-JGB-ACCV

16

17 **DECLARATION OF DAVID LOY**
IN SUPPORT OF MOTION TO
INTERVENE FOR LIMITED
PURPOSE OF UNSEALING
COURT RECORDS

18

19

20 Date: March 2, 2026

21 Time: 9:00 a.m.

22 Courtroom: 1 (Riverside)

23 Judge: Hon. Jesus G. Bernal

24

DECLARATION OF DAVID LOY

I, David Loy, declare under penalty of perjury as prescribed in 28 U.S.C. § 1746 that the following is true and correct:

1. I am the Legal Director of the First Amendment Coalition (“FAC”). I have served in my current position as Legal Director since February 2022.

2. FAC seeks to intervene in this case to protect its significant interests, as guaranteed by the First Amendment, in accessing records filed in this Court about the operations of the Adelanto ICE Processing Center (“Adelanto”) a privately-run, government-funded immigration detention facility.

3. I am an experienced free speech and open government litigator, having fought for public disclosure and governmental transparency for over twenty years. As a litigator, I have defended the First Amendment rights of reporters, photographers, bloggers, students, teachers, activists, protestors, musicians, Marines, and more. Before joining FAC, I served as Legal Director of the ACLU Foundation of San Diego & Imperial Counties for nearly sixteen years.

4. Founded and established in 1988 as the California First Amendment Coalition, the First Amendment Coalition (“FAC”) is a nonpartisan public interest nonprofit dedicated to protecting and promoting a free press, freedom of expression, and the people’s right to know. FAC advocates on behalf of the public through litigation (cases involving issues of censorship, rights of access to court and agency records, and access to proceedings of state and local governments), education (providing free legal information on the First Amendment and freedom-of-information issues), and public advocacy (op-eds and other articles, public speaking).

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1 5. FAC believes that the broadest range of engaged and informed communities is
2 essential to the health of our democracy, and that the values expressed by the First
3 Amendment provide a blueprint for an inclusive, equitable society and a responsive,
4 accountable government. We believe that to realize the promise of the values underlying
5 the First Amendment, we must reach and include as broad a range of voices as possible to
6 inform our policies, priorities, and programs. We recognize that there exist systemic
7 inequities rooted in, among other things, race and gender.

8 6. FAC believes journalists serve as government watchdogs, shining a light in dark
9 places despite frequent threats to their access to information, independence, and
10 resources.

11 7. Because information relating to incarceration, policing, and civil rights is of
12 significant public concern, FAC also has a demonstrated commitment to ensuring law
13 enforcement's exercise of its power is exposed to public scrutiny. For example, FAC
14 participated in litigation resulting in two published opinions establishing the California
15 Attorney General's obligation to disclose law enforcement records obtained from other
16 agencies. In 2022 FAC's legal advocacy resulted in the release of previously secret
17 recordings of a police shooting of a San Diego woman experiencing mental distress, and
18 the Ventura County Sheriff's Office's disclosure of previously secret records about
19 officer use of force and misconduct. In May 2023, FAC and Knock LA, an independent
20 news organization, prevailed in a legal battle against the Los Angeles County Sheriff's
21 Department ("LASD") over the unsealing of search warrant materials. Through this
22 victory, FAC ensured the public could finally examine LASD's stated rationale for
23 seizing and searching the cell phones and digital cameras of protesters demonstrating
24 against LASD deputies' killing of cyclist Dijon Kizzee on August 31, 2020 and

1 journalists covering the protest. More recently, in March 2024, FAC prevailed on the San
2 Bernardino County Sheriff's Department to release videos documenting the controversial
3 shooting of a fifteen-year-old girl who had been allegedly kidnapped by her father, and in
4 February 2025, FAC persuaded the California Department of Justice to disclose records
5 of its investigation into the same shooting. FAC is currently litigating cases seeking
6 disclosure of public records related to deaths in Riverside County jails, a police shooting
7 in Vallejo, and the use of beanbag shotgun rounds and a police dog against a Black man
8 in San Diego. FAC also filed an amicus brief in the California Court of Appeal
9 supporting disclosure of police videos depicting a shootout with a suspect in Roseville.

10 8. FAC is committed to enforcing the First Amendment's presumptive right of
11 public access to court records and court hearings because it believes there can be no real
12 accountability without transparency. When needlessly sealed documents are revealed and
13 hearings are opened, the public learns how government officials and government
14 contractors exercise their power and can decide for itself whether those acting on the
15 government's behalf are acting appropriately.

16 9. It is FAC's understanding that many documents in this case have been filed
17 under seal.

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1 10. FAC believes public access to court records in this case is essential to
2 transparency and accountability. This Court may decide whether GEO Group, Inc. indeed
3 violated incarcerated people's rights, as Plaintiffs allege, but the public has a compelling
4 interest in access to the information that is before the Court, so the public can assess
5 GEO's conduct for itself and hold elected officials accountable as the public sees fit.

6 I declare under penalty of perjury that the foregoing is true and correct.

7 Executed on January 27, 2026, in San Diego, California.

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David Loy (Jan 27, 2026 14:24:18 PST)

— 1 —

David Loy, Legal Director
First Amendment Coalition

EXHIBIT D

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6 *Counsel for Intervenors*

7

8 **UNITED STATES DISTRICT COURT**

9 **CENTRAL DISTRICT OF CALIFORNIA**

10 HUGO GONZALEZ, et al., on behalf of
themselves and all others similarly
11 situated,

12 Plaintiffs,

13 v.

14 The GEO Group, Inc., et al.

15 Defendants.

16 Case No.: 2:22-cv-04014-JGB-ACCV

17

18 **DECLARATION OF MATT
TINOCO IN SUPPORT OF
MOTION TO INTERVENE FOR
LIMITED PURPOSE OF
UNSEALING COURT RECORDS**

19 Date: March 2, 2026

20 Time: 9:00 a.m.

21 Courtroom: 1 (Riverside)

22 Judge: Hon. Jesus G. Bernal

DECLARATION OF MATT TINOCO

2 I, Matt Tinoco, declare under penalty of perjury as prescribed in 28 U.S.C.
3 § 1746 that the following is true and correct:

4 1. I am the Founder and CEO of the Los Angeles Public Press (“LAPP”). I
5 have served in my current position as CEO since 2022. I also sit on the board of
6 directors and have held that seat since 2022.

7 2. Founded in 2022, LAPP is an independent, non-profit newsroom that
8 publishes news in support of a healthier Los Angeles. We do journalism that
9 interrogates systems of power while supporting those trying to build more
10 equitable and resilient communities.

11 3. Our mission is to provide news coverage tailored to Los Angeles. Our
12 team comprises committed LA County residents who are dedicated to covering
13 the issues that most impact Angelenos. Renter and tenant protections,
14 environmental harms, law enforcement abuses, and local community histories and
15 events are all areas that LAPP covers in depth.

16 4. Our coverage of immigration has always focused on how communities
17 and individuals are impacted. We report on the local effects of national and
18 statewide policies and their corresponding harm. But, we also write about the
19 diverse ways Los Angeles's vibrant immigrant community are an inseparable part
20 of our beloved city. It is important to us to cover all the facets of immigrant life in
21 Los Angeles, in ways that humanize and individualize our fellow Angelenos.

22 5. We have been reporting on the effects of President Trump's new
23 immigration agenda since he was elected. In November of 2024, we published a

1 guide on navigating immigration during a second Trump presidency that included
2 explanations of sanctuary policies and what implementation of Trump's agenda
3 might look like. Immediately following his inauguration, we published a guide to
4 rights during encounters with immigration officers and how to identify a properly
5 executed warrant. We have also reported on how city and county authorities have
6 helped or impeded immigration enforcement attempts.

7 6. Much of our immigration coverage has been about the human and
8 community impact of the ICE raids that continue to bring trauma and sow fear
9 across LA County and the Inland Empire.

10 7. For example, we have covered how these raids devastate more than the
11 people being detained but also tear apart families. We reported about what
12 happens when ICE agents take parents who are the primary breadwinner,
13 worsening the often already precarious economic position of many mixed-status
14 families, and leaving teenage children to simultaneously attempt to navigate the
15 immigration legal system and somehow provide for the basic survival needs of
16 their younger siblings. We have also reported about how communities throughout
17 the region have been forced to defend themselves by developing "rapid response"
18 networks or add to existing ones, and about how fear of being racially profiled has
19 led to reduced foot traffic at community businesses, further reducing income for
20 many strained households.

21 8. We have also published in-depth coverage of individuals taken by ICE
22 and their experiences being detained. We have reported about Axel Pecero, a 25-
23 year-old father to a 4-year-old son, who is being held at Adelanto ICE Processing

1 Center and faces deportation back to Mexico, where he has not lived since he was
2 a toddler. Our two-part story details his childhood, teenage years, and how an
3 outstanding warrant from a minor traffic violation ultimately led to his
4 detainment. Our coverage includes his current experience at Adelanto and
5 highlights the overlapping systemic failures that contributed to his situation.

6 9. We seek to intervene to shed light on the generally opaque system of
7 private corporations performing public functions. Our focus on providing the
8 public with the information they need to meaningfully evaluate how public
9 officials perform their duties, especially in the context of immigration
10 enforcement, makes us particularly well-suited to intervene here.

11 I declare under penalty of perjury that the foregoing is true and correct.

12 || Executed on February 2, 2026 in Los Angeles, CA.



Matt Tinoco, CEO
Los Angeles Public Press

EXHIBIT E

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Counsel for Intervenors

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

HUGO GONZALEZ, et al., on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

The GEO Group, Inc., et al.

Defendants.

Case No.: 2:22-cv-04014-JGB-ACCV

**DECLARATION OF MORGAN
KEITH IN SUPPORT OF
MOTION TO INTERVENE FOR
LIMITED PURPOSE OF
UNSEALING COURT RECORDS**

Date: March 2, 2026

Time: 9:00 a.m.

Courtroom: 1 (Riverside)

Judge: Hon. Jesus G. Bernal

DECLARATION OF MORGAN KEITH

I, Morgan Keith, declare under penalty of perjury as prescribed in 28 U.S.C. § 1746 that the following is true and correct:

4 1. I am a co-founder and authorized signee for The Southlander, a worker-
5 led nonprofit newsroom that is organized as a collaborative without a top-down
6 structure. I am an investigative journalist for The Southlander.

7 2. The Southlander is the only investigative news cooperative serving the
8 Greater Los Angeles area. We spend months on high-impact investigative
9 projects, peeling back bureaucracy, following the money, and mapping out power
10 and influence. Our internal structure, independence from news conglomerates, and
11 nontraditional funding allows us to critically examine the region's powerbrokers.

12 3. We approach journalism with the belief that there is no such thing as
13 objectivity, but rather fairness, accuracy, and transparency. We prioritize using
14 data and documents, rather than skewed official narratives, while centering the
15 voices of people impacted by injustice.

16 4. Though the current form of our newsroom was founded in 2025, our
17 powerhouse collective of reporters, editors, photographers, and data experts bring
18 many years of experience to the table. Many of us have previously worked
19 together at other media outlets, and all of us have proven our dedication to the
20 type of reporting The Southlander promotes.

21 5. Our team members are based in Los Angeles, Long Beach, and Orange
22 County. Our journalists have spent years reporting from across the country, the
23 U.S./Mexico border, Honduras, Guatemala, and Nicaragua, covering various
24 topics, including immigration, international law, and presidential elections.

1 6. Our journalists have also covered local policy issues like law
2 enforcement misconduct, homelessness, the housing crisis, and the fight to protect
3 sacred indigenous land. These areas are united by the central concept of state-
4 sanctioned violence and the many forms that it takes. At the heart of our coverage
5 are the communities directly impacted by systemic violence.

6 7. Our team also includes multimedia journalists, such as photographers and
7 documentarians. Today, most people receive their news from digital sources.
8 Media like film and photography are powerful storytelling vehicles and provide a
9 platform for the people at the heart of our stories to speak for themselves. We
10 have produced multiple videos reporting on immigration raids and the lasting
11 trauma that follows.

12 8. Our overall mission is to revitalize local investigative journalism, which
13 is currently on the brink of extinction in the Southland. Once the cornerstone of
14 metro newspapers and scrappy weeklies, this time-consuming work is now seen as
15 more of a “luxury,” often worked on by reporters in spare time between regular
16 assignments. This means there are fewer reporters scanning through public
17 records, from legal filings to campaign finance disclosures, and less dissemination
18 of the incredibly important insights contained in them.

19 9. The vital role of public records in investigative journalism is why there
20 are multiple people in our cooperative with specialized first-hand experience
21 dealing with free press legal issues. They have been targets of SLAPP lawsuits
22 and attempts to censor their First Amendment freedoms of speech and press. We
23 are well-versed in public records requests at the state level and have previously
24 fought for the release of information that belongs in the hands of the public.

1 10. The Southlander seeks to intervene to investigate the physical and
2 constitutional harms committed inside the Adelanto ICE prison on the public's
3 dime. Given the international attention on immigration in the United States, the
4 information sought is both newsworthy and of the highest public interest.

5 I declare under penalty of perjury that the foregoing is true and correct.

6 Executed on January 3, 2026 in Los Angeles, CA.

Morgan Keith
Morgan Keith, Investigative Journalist
The Southlander