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13 UNITED STATES DISTRICT COURT
 14 CENTRAL DISTRICT OF CALIFORNIA
 15

16 HUGO GONZALEZ, JOSE BACA,
 17 ERICK LOPEZ, MARIO
 MANJARREZ, and RICARDO
 18 SANDOVAL GUADARRAMA, on
 behalf of themselves and all others
 19 similarly situated,

20 Plaintiffs,

21 vs.

22 THE GEO GROUP, INC., et al.,

23 Defendants.
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 25
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 27
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Case No. 2:22-cv-04014-JGB-ACCV

[CLASS ACTION]

Honorable Jesus G. Bernal

**THE GEO GROUP, INC.'S
 OPPOSITION TO MOTION TO
 UNSEAL COURT RECORDS**

[To be filed concurrently with [Proposed
 SEALED] Declaration of James Janecka]

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Time: 9:00 a.m.

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Complaint Filed: 06/10/2022

Trial Date: 04/14/2026

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1 **I. INTRODUCTION**

2 Proposed Intervenor's seek to unseal records that the Court previously
3 determined should remain confidential after applying the relevant standards for
4 sealing. However, the Motion to Unseal does not identify any errors in those
5 rulings, any change in circumstances or law, or any other compelling reason to
6 justify overturning the Court's prior orders. Instead, it simply asks the Court to
7 revisit settled sealing determinations based on Proposed Intervenor's generalized
8 interest in detention-related issues.

9 That request should be denied, particularly in this context. Proposed
10 Interventors are public interest organizations that seek to unseal records in this
11 litigation involving The GEO Group, Inc. ("GEO"), a private company that
12 contracts with the federal government to operate immigration detention facilities,
13 such as the Adelanto Immigration and Customs Enforcement Processing Center (the
14 "Adelanto Facility" or "Facility"). Federal courts recognize a right of public
15 access—but that right is qualified, not absolute—and it yields where disclosure
16 would compromise national security, institutional and operational safety, threaten to
17 harm competitive standing, endanger employees, or expose the private and personal
18 identifying information of third parties such as the detainees at the Facility.

19 The sealed materials here implicate all of these concerns. Proposed
20 Intervenor's motion fails to balance these realities and the consequences of
21 disclosure. Proposed Intervenor's also sat idly for over fifteen months after the
22 parties first began requesting permission to seal limited records in this action. Given
23 the parties' reliance on the sealing orders, disclosure at this late stage in the
24 proceedings would cause the parties significant prejudice. Accordingly, the Court
25 should deny the belated Motion to Unseal, consistent with its prior orders finding
26 good cause and compelling reasons to seal the records in the first instance.

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1 **II. FACTUAL AND PROCEDURAL BACKGROUND**

2 At the outset of this litigation, the parties entered into a Stipulated Protective
3 Order (“Protective Order”), which designates particular materials confidential.
4 Since then, the parties have sought permission to file limited materials under seal.
5 *See* Dkt. No. 29. The parties filed numerous Applications to Seal (collectively, the
6 “Sealing Applications”) in connection with Plaintiff’s Motion for Class Certification
7 and Defendants’ Motion for Summary Judgment. *See, e.g.*, Dkt. Nos. 56, 60, 71, 76,
8 85, 87 & 90. The sealing requests were narrowly tailored and did not encompass the
9 entirety of the parties’ filings but instead were limited to portions containing
10 sensitive information, such as declarations and particular exhibits. After review, the
11 Court granted the Sealing Applications and entered sealing orders. Those orders
12 have remained in effect since their entry.

13 The materials subject to the sealing orders include nonpublic, confidential
14 information relating to the operations and internal practices of the Adelanto Facility.
15 *See* Declaration of James Janecka (“GEO Decl.”) at ¶¶ 5-27 (a full chart of the
16 documents Proposed Intervenors seek to unseal is attached as **Exhibit A**).¹ The
17 sealed records reflect information not otherwise available on the public docket and
18 not disclosed publicly. They also contain information concerning detainees and
19 employees at the Facility. *See id.* With respect to detainees, the sealed materials
20 include personal and identifying information, including medical and HIPAA-

22 ¹ The Janecka Declaration describes in detail the contents of the exhibits the
23 Proposed Intervenors seek to unseal. It attaches all previously sealed exhibits in
24 this case. The previously sealed exhibits that are not conducive to electronic
25 filing have been manually lodged with the Court. Merely granting the Proposed
26 Intervenors’ Motion to Intervene does not grant the Proposed Intervenors’ a right
27 to review the sensitive and confidential Declaration filed in support of this
28 Opposition. *See In re Copley Press, Inc.*, 518 F.3d 1022, 1029 (9th Cir. 2008)
 (“[T]here are good reasons to keep secret the documents filed in connection with
 motions to seal. We agree with the D.C. Circuit that ‘affording public scrutiny’
 to such documents is ‘logically incompatible with the nature of the proceedings’
 and . . . hold[] that the public has no common-law right to read documents filed
 in connection with a motion to seal.” (citation and footnote omitted) (quoting
 United States v. El-Sayegh, 131 F.3d 158, 162 (D.C. Cir. 1997))).

1 protected information. *See, e.g., id.* at ¶¶ 6, 9-10, 12, 14, 21-22. With respect to
2 employees, the sealed records contain nonpublic information related to internal
3 matters and staff involvement in operations. *See, e.g., id.* at ¶¶ 7, 11-12, 14-15, 20
4 & 24. Disclosure of this information threatens the safety and privacy of these
5 individuals.

6 Following entry of the Protective Order, the parties produced documents and
7 subsequently filed submissions in reliance on the Court’s determination that the
8 identified materials would remain confidential. Further, the parties engaged in
9 discovery, motion practice, and overall litigation strategy with the understanding
10 that sensitive security and operational information, as well as private personal
11 information, would remain protected and shielded from disclosure.

12 **III. ARGUMENT**

13 Proposed Intervenors’ Motion to Unseal fails for two reasons. First, they
14 have not and cannot meet their burden to disturb the Court’s prior sealing orders.
15 No new facts, law, or circumstances have been identified or presented to the Court
16 to justify their request. Second, even if the Court were to revisit the issue, the
17 record confirms that the documents were properly sealed in the first instance. The
18 Court correctly found compelling reasons—grounded in security, safety, and
19 privacy concerns—to outweigh the public’s right to access the records at issue.
20 Those justifications continue to exist.

21 **A. INTERVENORS HAVE FAILED TO RAISE ANY**
22 **ARGUMENTS, FACT, OR CASE LAW THAT JUSTIFY**
23 **UNSEALING**

24 While there is a presumption of public access, a party may overcome this
25 presumption by demonstrating justifications for sealing that outweigh public
26 policies favoring disclosure. *See Kamakana v. City & Cnty. of Honolulu*, 447 F.3d
27 1172, 1178-79 (9th Cir. 2006). The court must then “conscientiously balance” the
28 competing interests of the public and the party who seeks to keep certain judicial

1 records confidential. *Id.* at 1179. The applicable standard turns on the nature of the
2 materials at issue. To overcome the presumption of public access, the showing
3 required depends on whether the documents relate to a motion that is “more than
4 tangentially related to the merits of the case.” *Ctr. for Auto Safety v. Chrysler Grp.,*
5 *LLC*, 809 F.3d 1092, 1102 (9th Cir. 2016). Therefore, when the underlying motion
6 is more than tangentially related to the merits, the “compelling reasons” standard
7 applies. *Id.* at 1096-98. Otherwise, the “good cause” standard applies. *Id.*

8 Under the compelling reason standard, a district court must weigh relevant
9 factors, base its decision on a compelling reason, and articulate the factual basis for
10 its ruling, without relying on hypothesis or conjecture. *See Pintos v. Pac. Creditors*
11 *Ass’n*, 605 F.3d 665, 679 (9th Cir. 2010). Compelling reasons sufficient to
12 outweigh the public’s interest in disclosure exist when such court files might
13 become a vehicle for improper purposes, such as the use of records to “gratify
14 private spite, promote public scandal, circulate libelous statements, or release trade
15 secrets.” *See Kamakana*, 447 F.3d at 1179.

16 The parties met their burden to seal these documents in the first instance.
17 Here, the sealed materials at issue were filed in connection with (1) Plaintiff’s
18 Motion for Class Certification and (2) Defendants’ Motion for Summary Judgment.
19 In multiple different orders related to these motions, the Court found good cause or
20 compelling reasons to seal targeted documents and portions of documents. As
21 discussed below, these documents implicate national security, the safety and
22 security of the Facility, and the safety and privacy of the detainees and employees at
23 the Facility, including medical records.

24 Now, the burden shifts to Proposed Intervenors to justify their request to
25 unseal a total of 66 documents. They have not met their burden. The Motion to
26 Unseal does not identify any change in fact or law, nor does it contend there was
27 any misuse of the sealing orders or any error therein. Instead, they summarily argue
28 that GEO did not provide sufficient factual justification to warrant sealing. *See Dkt.*

1 122-1 at 9-10. They also argue that safety and security is not a compelling reason
2 for sealing and that GEO must “connect the dots” between the specific materials it
3 seeks to seal and the alleged resulting harm. *Id.* at 11-16. However, GEO did
4 present the Court with sufficient information to warrant sealing, which specifically
5 states the consequences to safety and security if certain records are released
6 publicly. *See, e.g.*, Dkt. Nos. 60-2 & 71-1. In addition, the concurrently filed
7 Declaration in support of this Opposition provides specific bases tied to real-world
8 harms for each document the Proposed Intervenors seek to unseal. *See generally*
9 GEO Decl. Proposed Intervenors fail to provide evidence demonstrating otherwise.

10 Further, Proposed Intervenors waited fifteen months after the Sealing
11 Applications were first filed. Proposed Intervenors seek to unseal the records at
12 issue based on their interest in detention-related issues, rather than on any
13 development specific to this case or these circumstances. Absent changed
14 circumstances and given Proposed Intervenors’ delay, substantial weight should be
15 given to prior sealing determinations, particularly where parties have relied on them
16 throughout the litigation.

17 **B. COMPELLING REASONS CONTINUE TO JUSTIFY KEEPING**
18 **THE RECORDS UNDER SEAL**

19 Next, even if Proposed Intervenors had presented new facts or law justifying a
20 revisit to the Court’s prior sealing orders, GEO has and continues to meet its burden
21 warranting the sealing of the relevant materials.

22 Proposed Intervenors seek to unseal detention-center records that are textbook
23 examples of where the real world harm from disclosure outweighs the public’s right
24 to access court records. Not only do the documents present a security and safety
25 risk if disclosed, they also might be used to promote public scandal. This is
26 especially true in this context, which involves a federally contracted immigration
27 detention center and therefore implicates national security risks. On balance, the
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1 limited portions of the filings in this case that the parties have requested to be filed
2 under seal should remain confidential.²

3 **1. Documents That Implicate Facility Security and Safety Risks**
4 **Should Remain Sealed.**

5 Courts have found that documents that implicate facility security and safety
6 satisfy both the good cause standard as well as the compelling reasons standard.
7 *See, e.g., Ramirez v. GEO Group*, 2019 WL 6782920, at *3 (S.D. Cal. 2019)
8 (finding good cause to seal documents that contained policies related to weapon
9 locations, officer schedules and movements, officer training, security protocols,
10 emergency response policies, entrance and exit controls, and transfers of detention
11 facility keys, which “could jeopardize the safety of employees and detainees at the
12 facilities.”); *see also Fernandez v. Duarte*, 2025 WL 77056, at *2 (S.D. Cal. 2025)
13 (finding compelling reasons to seal documents that contained information that if
14 revealed publicly “would create a significant security threat to inmates, staff, the
15 correctional facility, and the public at large.”). In *Fernandez*, the court also held
16 that “highly confidential documents and intelligence that could jeopardize
17 institutional security” further demonstrated a compelling reason to seal. 2019 WL
18 77056 at *2. Courts have also found that releasing this kind of information “would
19 provide insight into ICE’s security measures, which could circumvent those
20 measures and compromise the safety of detainees and employees at its detention
21 facilities where its detainees are housed.” *ACLU v. DHS*, 738 F. Supp. 2d 93, 119
22 (D.D.C. 2010).³

23

24 2 Upon review of the documents Proposed Intervenors request to be unsealed,
25 GEO agrees that the following documents may be unsealed. First, **Document**
26 **No. 29** is a photograph from inside a detainee’s room. Public disclosure of this
27 document does not appear to harm the interests of GEO, its detainees or officers,
28 or the federal government. *See* GEO Decl. at ¶ 19. Second, **Document No. 67** is
an excerpt from GEO’s PepperBall Instructor Course. Public disclosure of this
document does not appear to harm the interests of GEO, its detainees or officers,
or the federal government. *See* GEO Decl. at ¶ 27.

3 In addition to security and safety risks, revealing sensitive business information,
including the internal operations of the Facility, would also harm GEO’s

1 The following documents that Proposed Intervenors seek to unseal directly
2 implicate security and safety concerns and would lead to the specific harms
3 described below:

4 • **Document Nos. 1–6, 9–15, 23–27, 30–33, 36–50, 71 & 72:**⁴ These
5 documents are clips of CCTV footage and handheld cam-recorder
6 footage of the events on June 12, 2020. These specific records reveal
7 operational capacity and utilization levels, how GEO responds to
8 specific kinds of threats, staffing patterns or ratios, housing
9 configurations and practices, and emergency response patterns and
10 thresholds. *See* GEO Decl. at ¶ 5. Public disclosure of these details
11 would provide insight into the Facility’s security measures, tactics, and
12 policies and would give bad actors a roadmap to identify when the
13 Facility is most vulnerable, how many staff are likely to be present,
14 what the emergency response is likely to be, and what operational
15 stress points may exist. *See id.* This information could be exploited to
16 coordinate further disturbances, target staff, or incite violence. *See id.*
17 It would also compromise the safety of employees and detainees, as
18 well as frustrate the federal government’s interest in effective, efficient,
19 and safe management of its ICE processing centers. *See id.*

20 • **Document No. 16:** This is a Detainee Count Slip, which discloses the
21 number of detainees across different locations at the Facility. *See* GEO
22 Decl. at ¶ 9. This information is confidential and public disclosure may
23 endanger the safety of those at the Facility. *See id.* This information
24 also reveals operating procedures—such as the timing and frequency of
25

26 competitive standing and could threaten its contracts with the federal
27 government. *See Pule Electronics, Inc. v. U.D. Electronic Corp.*, 530 F. Supp.
3d 988, 1030–31 (S.D. Cal. 2021).

28 ⁴ To avoid confusion, the documents are referenced herein by the “Document No.”
identified in the furthest column to the left of Exhibit A rather than their docket
or exhibit numbers. *See* GEO Decl. at Ex. A.

1 counts—at the Facility, which if disclosed, would pose a security risk
2 to officers, detainees, and the Facility itself. *See id.*

- 3 • **Document Nos. 17, 23, 51, 56, 90 & 91:** These documents are pages
4 from Correctional Officer Logs, which list, in roughly 15 minute
5 increments, every action taken by certain officers for certain days
6 between June 8 and 25, 2020. *See* GEO Decl. at ¶ 10. The logs reveal
7 the routes and times of inter-facility officer patrols, as well as the usual
8 times when certain security and safety checks are completed, when
9 officers tend to enter and inspect certain units, and when officers
10 conduct detainee counts. *See id.* Public disclosure of these documents
11 would provide insight into the Facility’s security measures and
12 protocols, compromise the safety of employees and detainees, and
13 frustrate the interests of the federal government in effective, efficient,
14 and safe management of its ICE processing center. *See id.*
- 15 • **Document Nos. 18 & 57:** These documents also describe the protocols
16 and techniques used by detention officers during the June 12, 2020
17 incident. *See* GEO Decl. at ¶ 13. Disclosure of this information would
18 provide insight into the Facility’s security measures and protocols,
19 compromise the safety of employees and detainees, and frustrate the
20 interests of the federal government in effective, efficient, and safe
21 management of its ICE processing center. *See id.*
- 22 • **Document Nos. 19 & 28:** These documents are Incident Reports that
23 contain detailed descriptions of the protocols and techniques employed
24 by detention officers who responded to the incident on June 12, 2020.
25 *See* GEO Decl. at ¶ 14. Disclosure of this information would provide
26 insight into the Facility’s security measures and protocols, compromise
27 the safety of employees and detainees, and frustrate the interests of the
28

1 federal government in effective, efficient, and safe management of its
2 ICE processing center. *See id.* at ¶¶ 14-15.

- 3 • **Document Nos. 55 & 85:** This is an internal company email that
4 reveals security protocols and emergency response policies at the
5 Facility. *See* GEO Decl. at ¶ 17. Disclosure of this information would
6 provide insight into the Facility’s security measures and protocols,
7 compromise the safety of employees and detainees, and frustrate the
8 interests of the federal government in effective, efficient, and safe
9 management of its ICE processing center. *See id.*
- 10 • **Document No. 22:**⁵ This document is the Facility’s Emergency Plans
11 Manual Correctional Emergency Response Team (CERT) Activation
12 Plan. *See* GEO Decl. at ¶ 18. It describes actions to be taken by
13 detention officers in the event of an emergency, discusses policies
14 related to tactical gear and weapons, officer movements, and officer
15 training security response policies. *See id.* It also describes the number
16 of detention officers who respond to an emergency, measures taken to
17 address an emergency, and post-emergency procedures. *See id.* This
18 document further displays the Facility’s security protocols, emergency
19 response policies, and entrance and exit controls. *See id.* Disclosure of
20 this information would provide insight into the Facility’s security
21 measures and protocols, compromise the safety of employees and
22 detainees, and frustrate the interests of the federal government in
23 effective, efficient, and safe management of its ICE processing center.
24 *See id.*

26 ⁵ Upon review, this confidential document was inadvertently filed on the public
27 docket at Dkt. No. 60-4 without proper redactions (the highlighted version of this
28 document was filed by mistake). GEO respectfully requests that the Court strike
Dkt. No. 60-4 from the public record or otherwise remove public access to it.
The Court had already granted the request to seal this document in its entirety
when it was inadvertently filed on the public docket.

- 1 • **Document No. 34:** This is a document containing Shift Summaries,
2 which are internal documents describing the detainee-room search
3 policies and the Facility’s Professionalism and Ethics policies. *See*
4 GEO Decl. at ¶ 20. The document includes population figures for its
5 buildings as well as detainee-room checklists, showing when detention
6 officers check rooms and whether the facilities in those rooms were
7 satisfactory or not. *See id.* This information further reveals operating
8 procedures and policies at the Facility, which if disclosed, would pose a
9 security risk to detainees, officers, and the Facility itself. *See id.*
- 10 • **Document No. 58:** This is an internal document that discusses security
11 measures and protocols with the Department of Homeland Security.
12 *See* GEO Decl. at ¶ 23. Public disclosure of these policies and
13 communications would provide insight into the Facility’s security
14 measures and protocols, compromise the safety of employees and
15 detainees, and frustrate the interests of the federal government in the
16 effective, efficient, and safe management of its ICE processing centers.
17 *See id.*
- 18 • **Document No. 60:** This document contains two Monthly Water
19 Temperature tests dated June 15, 2020 and July 19, 2020. *See* GEO
20 Decl. at ¶ 25. It discloses the routine maintenance operating
21 procedures at the Facility and would come entirely without context,
22 doing little more than gratify public spite and promote public scandal.
23 *See id.*
- 24 • **Document Nos. 61-66:** These documents appear to be duplicates of
25 Document Nos. 55-60. *See* GEO Decl. at ¶ 26. This appears to be the
26 result of Plaintiff filing its Application to Seal Exhibits 87, 90, 92, 93,
27 98 & 99 twice (once at Dkt. No. 85 and once at Dkt. No. 87). *See id.*
- 28

1 These documents should remain sealed for the same reasons as
2 Document Nos. 55-60, enumerated above. *See id.*

3 **2. Documents that Implicate Detainees’ and GEO Employees’**
4 **Privacy Interests Should Remain Sealed.**

5 Personal identifying information and sensitive medical or HIPAA-protected
6 information are routinely treated as confidential.⁶ Consistent with this approach,
7 courts have found compelling reasons to keep under seal limited portions of briefing
8 and documents to protect individual privacy interests.

9 This applies to the personal identifying information of the detainees at the
10 Facility at the time. *See Owino v. CoreCivic, Inc.*, 2019 WL 11770623, at *2 (S.D.
11 Cal. 2019) (finding compelling reasons exist to file under seal identifying
12 information concerning detainees). This also applies to personal identifying
13 information of GEO’s employees. *See, e.g., Hernandez v. County of Monterey*,
14 2023 WL 5418753, at *3 (N.D. Cal. 2023); *see also Al Otro, Inc. v. McAleenan*,
15 2019 WL 6220898, at *4 (S.D. Cal. 2019) (protecting immigration officers’ phone
16 numbers and email addresses).

17 The following documents Proposed Intervenors request to be unsealed contain
18 personal identifying information of detainees and employees, including medical
19 information, and would lead to the specific harms described below:

- 20 • **Document Nos. 1–6, 9–15, 23–27, 30–33, 36–50, 71 & 72:** These
21 documents disclose the faces and actions of detainees at the Facility.
22 *See* GEO Decl. at ¶ 6. These documents may subject certain detainees
23 to increased risks of persecution if their whereabouts become public
24 knowledge, may subject those detainees to additional delay in their
25 removal proceedings, and may further undermine trust between
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28 ⁶ Indeed, Local Rule 5.2-1 requires that all filing parties redact personally
identifying information from all publicly filed documents.

1 immigrant communities and law enforcement. *See id.* Disclosure of
2 these videos would frustrate the detainees’ interest in privacy.

- 3 • **Document Nos. 1–6, 9–15, 23–27, 30–33, 36–50, 71 & 72:** These
4 documents also disclose the faces and actions of the detention officers
5 at the Facility. *See* GEO Decl. at ¶ 7. Individuals associated with ICE
6 have been facing increased harassment and violence from other
7 members of the public, including doxing (i.e., where an officer’s name
8 and address or other identifying information is made public
9 knowledge). *See id.* Disclosure may subject officers to violence,
10 public humiliation, and other harms, frustrating their safety and
11 privacy interests. *See id.*
- 12 • **Document No. 16:** This document is a Detainee Count Slip, which
13 contains the names of detention officers who conducted detainee
14 counts on June 12, 2020. *See* GEO Decl. at ¶ 9. The officers’ interest
15 in privacy would be frustrated if their names and faces were made
16 public in connection with this incident. *See id.*
- 17 • **Document Nos. 17, 23, 51, 90 & 91:** These documents are pages from
18 Correctional Officer Logs, which list, in roughly 15 minute
19 increments, every action taken by certain officers for certain days
20 between June 8 and 25, 2020. *See* GEO Decl. at ¶ 10. The logs
21 contain names of detainees and the contents of their conversations with
22 detention officers. *See id.* Disclosure would frustrate the detainees’
23 interest in privacy. *See id.*
- 24 • **Document Nos. 17, 23, 51, 90 & 91:** These documents also disclose
25 the names of detention officers at the Facility. *See* GEO Decl. at ¶ 11.
26 Disclosure of the names and emergency responders who were involved
27 in the June 12, 2020 incident may subject those individuals to
28 violence, public humiliation, and other harms. *See id.*

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- **Document Nos. 18 & 57:** These documents are Detainee Grievance Forms and Appeal Paperwork, which contain confidential HIPAA-protected medical information of detainees, as well as personal identifying information of detention officers and detainees at the Facility. *See* GEO Decl. at ¶ 12. The officers’ and detainees’ interest in privacy would be frustrated if these documents were publicly disclosed. *See id.*
- **Document Nos. 19 & 28:** These documents are Incident Reports that contain the first and last name of detainees, officers, and emergency service responders who arrived at the Facility on June 12, 2020. *See* GEO Decl. at ¶ 14. This includes a list of the names of all detainees in each of the dormitories, the room numbers they occupy, their arrival dates, and their citizenships. *See id.* They also include medical reports of detainees, which is sensitive, personally identifying, and HIPAA-protected medical information. *See id.* at ¶¶ 14-15. Disclosure of this information would cause the detainees harm and violate their privacy rights. *See id.*
- **Document Nos. 20, 21, 55 & 85:** These are internal company emails that reveal names and email addresses of detention officers. *See* GEO Decl. at ¶ 16. Public disclosure of these names may subject officers to violence, public humiliation, and other harms, frustrating their interests in both safety and privacy. *See id.*
- **Document No. 34:** These internal records disclose names of certain detention officers at the Facility. *See* GEO Decl. at ¶ 20. Disclosure would frustrate the officers’ interest in privacy and could lead to violence, public humiliation, and other harms. *See id.*
- **Document No. 35:** This is an internal document containing excerpts of Electronically Stored Information maintained by GEO about

1 detainees at the Facility. *See* GEO Decl. at ¶ 21. It contains sensitive
 2 personal identifying information, including date of birth, location, and
 3 photographs of individual detainees. *See id.* Disclosure of this
 4 information may subject detainees to increased risks of persecution,
 5 may subject those detainees to additional delay in their removal
 6 proceedings, and may further undermine trust between immigrant
 7 communities and law enforcement. *See id.* The privacy interests of
 8 detainees will be frustrated if this document is made public. *See id.*

- 9 • **Document No. 54:**⁷ This is a Detainee Roster at the Facility, which
 10 contains a list of the names of all detainees in each of the dormitories
 11 involved in the June 12, 2020 incident, the room numbers they
 12 occupied, their arrival dates, and their citizenships. *See* GEO Decl. at
 13 ¶ 22. Disclosure of this information may subject detainees to
 14 increased risks of persecution, may subject those detainees to
 15 additional delay in their removal proceedings, and may further
 16 undermine trust between immigrant communities and law
 17 enforcement. *See id.* The privacy interests of detainees will be
 18 frustrated if this document is made public. *See id.*
- 19 • **Document No. 59:** This is an internal document that contains the
 20 names and email addresses of GEO employees. *See* GEO Decl. at
 21 ¶ 24. Disclosure of the names of GEO employees may subject them to
 22 violence, public humiliation, and other harms, and would frustrate
 23 their interest in privacy. *See id.*⁸

25 ⁷ Upon review, this confidential document was inadvertently filed on the public
 26 docket at Dkt. 76-2. GEO respectfully requests that the Court strike Dkt. No. 76-
 27 2 from the public record or otherwise remove public access to it. The Court had
 already granted the request to seal this document when it was inadvertently filed
 on the public docket.

28 ⁸ To the extent the Court agrees with Proposed Intervenors that on balance,
 disclosure of this document would serve the public interest, GEO requests that
 the personal identifying information be redacted prior to any disclosure.

1 **IV. CONCLUSION**

2 For the foregoing reasons, GEO respectfully requests that the Court deny
3 Proposed Intervenors' Motion to Unseal.

4
5 Dated: February 16, 2026

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

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7
8 By: /s/ Matthew T. Sessions

MATTHEW T. SESSIONS
Attorneys for Defendant
THE GEO GROUP, INC

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CERTIFICATE OF COMPLIANCE

The undersigned, counsel of record for Defendant The Geo Group, Inc., certifies that this brief contains 4,320 words (excluding the caption, the table of contents, the table of authorities and the signature block) which complies with the word limit of L.R. 11-6.1.

Dated: February 16, 2026

ALLEN MATKINS LECK GAMBLE
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By: /s/ Matthew T. Sessions
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Fax: (213) 236-2700

11 Attorneys for Defendant
12 THE GEO GROUP, INC.

**REDACTED VERSION OF
DOCUMENT PROPOSED TO BE
FILED UNDER SEAL**

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15

16 HUGO GONZALEZ, JOSE BACA,
17 ERICK LOPEZ, MARIO
MANJARREZ, and RICARDO
18 SANDOVAL GUADARRAMA, on
behalf of themselves and all others
19 similarly situated,

20 Plaintiffs,

21 vs.

22 THE GEO GROUP, INC., et al.,

23 Defendants.
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Case No. 2:22-cv-04014-JGB-ACCV
[PUTATIVE CLASS ACTION]
Honorable Jesus G. Bernal

**DECLARATION OF JAMES
JANECKA IN SUPPORT OF THE
GEO GROUP, INC.'S OPPOSITION
TO MOTION TO INTERVENE FOR
THE LIMITED PURPOSE OF
UNSEALING COURT RECORDS**

Date: March 2, 2026
Time: 9:00 a.m.
Ctrm: 1

Complaint Filed: 06/10/2022
Trial Date: 04/14/2026

DECLARATION OF JAMES JANECKA

I, James Janecka, declare as follows:

1. I am the Western Region Vice President, GEO Secure Services, with The GEO Group, Inc (“GEO”). I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. GEO is a publicly traded company contracted by governments around the world to provide correctional and community reentry services. It is contracted by the U.S. Immigration and Customs Enforcement (“ICE”) agency to provide detention and processing services at the Adelanto Immigration and Customs Enforcement Processing Center (the “Adelanto Facility” or “Facility”). GEO has housed ICE detainees at the Adelanto Facility since 2011.

3. Under its contract with the U.S. Government, GEO operates the Adelanto Facility as a highly controlled environment governed by ICE’s Performance-Based National Detention Standards as well as site-specific Standard Operating Procedures designed to maintain the safety of detainees, staff, and the public. The proposed Intervenor seeks to reveal records filed under seal by GEO and the Plaintiffs that threaten unique national security interests, the safety and security of the Adelanto Facility, and the privacy of detention officers and detainees housed at the Facility. Attached hereto as **Exhibit B** are all exhibits sealed to date.

4. I have reviewed the documents the proposed Intervenor seeks to reveal, a complete list of which is attached hereto as **Exhibit A**. In June 2020, there was an anti-ICE protest held outside the Facility. Protesters threw rocks through windows that hit GEO’s staff and caused injury. A future violent protest at the facility may be one orchestrated by individuals whose only intent is to harm detainees. Disclosure of many of these sealed records would make such nefarious conduct easier to accomplish and would impact the safety and security of current and future detainees. For this reason and those more specifically described below, GEO

1 respectfully requests that almost all of these documents remain sealed. To the extent
2 such documents are revealed, they will cause the following harms:¹

3 5. [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
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23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

26 _____
27 ¹ To avoid confusion, the documents are referenced herein by the “Document No.”
28 identified in the furthest column to the left of Exhibit A rather than their docket
or exhibit numbers.
2 [REDACTED]

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

8. [Intentionally Omitted.]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

26 _____

27 [REDACTED]

28 [REDACTED]

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[REDACTED]

1 [REDACTED]

2 [REDACTED]

3 19. Document No. 29 is a picture of a toilet in a detainee room. Upon
4 further review, public disclosure of this document does not appear to harm the
5 interests of GEO, its detention officers or detainees, or the U.S. Government.

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

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[REDACTED]

26. Document Nos. 61–66 appear to be duplicates of Document Nos. 55–60. This appears to be the result of Plaintiff filing its Application to Seal Exhibits 87, 90, 92, 93, 98 & 99 twice—once at Dkt. 85 and a second time at Dkt. 87. [REDACTED]

27. Document No. 67 is an excerpt from GEO’s PepperBall Instructor Course. This manual, put together by a company called PepperBall, is a certification course for the benefit of PepperBall Launching System instructors. Upon further review, public disclosure of this document does not appear to harm the interests of GEO, its detention officers or detainees, or the U.S. Government.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct.

Executed on February 16, 2026.



JAMES JANECKA

EXHIBIT A

EXHIBIT B

DOCUMENTS 1 – 15

[Documents 1 - 15 consist of videos and/or large files not conducive to e-filing and have been filed manually along with a Notice of Manual Filing or Lodging]

DOCUMENT 16

