



# **Political Activity And Lobbying Report (2021)**

## Overview

As a company whose services are based on public-private partnerships with government agencies in the United States and around the world, GEO strives to maintain the highest level of ethics and compliance with respect to its government relations activities and political contributions.

**Our political engagement efforts are largely educational, with the overarching objective of informing lawmakers and policymakers of the long-standing quality services we have delivered on behalf of federal and state government agencies for over three decades under both Democratic and Republican administrations.**

**Our government relations activities are focused on promoting the benefits of public-private partnerships in the delivery of support services for secure facilities and processing centers, as well as the provision of evidence-based rehabilitation and community reentry programs through the GEO Continuum of Care®. GEO has been a trusted service provider to the federal government for over 30 years and to state governments for several decades, and in that time, we have not advocated for or against, nor have we played a role in setting, criminal justice or immigration enforcement policies, such as whether to criminalize behavior, the length of criminal sentences, or the basis for or length of an individual's incarceration or detention.**

**GEO uses corporate resources to support the Company's political engagement and educational efforts, including expenditures for external entities who advocate on GEO's behalf.** Any such advocacy requires the prior approval of GEO's Senior Vice President, Client Relations; is overseen and managed by GEO's Client Relations Department; and is conducted in accordance with applicable law. GEO's General Counsel's office supports the Company's reporting and compliance obligations. Please see the Board Oversight section of this report for a discussion of the oversight roles of GEO's Board of Directors and the Board's Nominating and Corporate Governance Committee.

**Furthermore, GEO also sponsors The GEO Group, Inc. Political Action Committee (GEO PAC), a non-partisan political action committee, which is funded solely through voluntary employee contributions, and which makes contributions to federal candidates and to candidates in certain jurisdictions where contributions from political action committees are allowed.**

**Corporate funds may be used to make political contributions where permitted by law. Political contributions using corporate funds are governed by GEO's Political Activities and Contributions Policy and their expenditure requires authorization and approval by GEO's General Counsel's office, and by GEO's Chief Executive Officer and Chief Financial Officer for any contributions in excess of \$5,000.**

**Political contributions made by GEO entities or the GEO PAC should not be construed as an endorsement of all policies or positions adopted by any given candidate.**



## Board Oversight

GEO’s Board of Directors (the “Board”) routinely engages with GEO’s management, ensuring proper oversight. **At a minimum once per calendar year, the Board’s Nominating and Corporate Governance Committee, composed entirely of independent directors, reviews GEO’s Political Activities and Contributions Policy and undertakes a review of the Company’s lobbying activities and political contributions.**

The Nominating and Corporate Governance Committee may adjust the review, approval and disclosure thresholds in GEO’s Political Activities and Contributions Policy from time to time.

**Additionally, the Nominating and Corporate Governance Committee receives presentations on the Company’s lobbying activities and political contributions, including any payments, if applicable, for direct or indirect lobbying or grassroots lobbying communications; any membership in and payments to any tax-exempt organization that writes and endorses model legislation; and a breakdown of the political contributions made by GEO entities and the non-partisan, employee-funded GEO PAC.**

This Political Activity and Lobbying Report for 2021 was reviewed and approved by the Nominating and Corporate Governance Committee of the Board of Directors of The GEO Group in February 2022.



## The GEO Group, Inc. Political Action Committee (GEO PAC)

**GEO sponsors a non-partisan federal political action committee that is funded solely by voluntary employee contributions.**

The GEO PAC is a federally registered PAC that may make contributions in connection with federal elections, subject to contribution limits defined by the Federal Election Campaign Act. The GEO PAC may also make state-level political contributions, in compliance with state contribution limitations, registration and reporting requirements where applicable.

**The Company does not penalize in any way GEO employees who do not contribute to the GEO PAC.** As permitted by law, corporate funds and facilities are used to provide administrative support for the GEO PAC, including the solicitation of contributions and the distribution of funds.

All GEO PAC contributions must be approved by the GEO PAC board of directors. **Detailed information on the GEO PAC's contributions to candidate campaigns and other political committees is publicly disclosed in the GEO PAC's regular reports to the Federal Election Commission ("FEC").** Disbursements from the GEO PAC to state-level candidates and committees are also reported on these FEC filings.

**All of the GEO PAC's filings with the FEC are available for public review on the FEC's website at [www.fec.gov](http://www.fec.gov).**



## The GEO Group's Policy on Political Contributions:

As stipulated in GEO's Political Activities and Contributions Policy, where lawfully permitted, GEO is authorized to contribute corporate funds to political candidates and political parties.

### Guidelines

- A. Federal campaign laws prohibit corporate contributions to federal candidates and most political committees.
- B. Federal law prohibits any entity that contracts with the federal government from making a political contribution to any federal political party, federal political committee, or candidate for federal office.
- C. Political contributions may include direct monetary contributions of corporate funds, in-kind contributions of corporate funds such as disbursement of funds to pay for candidate or party expenses, contributions of goods and services and all monetary contributions of a political nature for which the fair market value is less than the amount paid.
- D. Federal and state laws prohibit reimbursement of any person for campaign contributions.
- E. GEO's General Counsel's office and outside counsel review all requests for corporate political contributions to ensure compliance with applicable state and federal campaign laws.

### Approval Procedure

1. The authorized company representative requesting the political contribution will provide a completed Political Contribution Request Form, and any appropriate supplementary documentation, to the Senior Vice President, Client Relations for approval.
2. Once the Political Contribution Request Form has been signed by the Senior Vice President, Client Relations, all requests must be routed to the General Counsel's office. The political contribution is reviewed by in-house and outside counsel to ensure compliance with applicable laws. While all requests must be approved by the General Counsel's office, any requests in excess of \$5,000 must also be approved by the CEO and the CFO.
3. In no event may any third-party, including any employee, officer or director be reimbursed for making political contributions.

For more information on GEO's Political Activities and Contributions Policy, visit [geogroup.com/Portals/0/GEO\\_Political\\_Activities\\_and\\_Contributions\\_Policy.pdf](http://geogroup.com/Portals/0/GEO_Political_Activities_and_Contributions_Policy.pdf)

## Political Contributions in 2021

The following tables contain aggregate political contributions made by GEO corporate subsidiaries and GEO PAC broken down by Source of Funds and by Recipient Category.

Aggregate Contributions by Source of Funds	2021
Corporate	\$1,203,150
GEO PAC	\$228,250
<b>Combined Totals - Corporate and GEO PAC</b>	<b>\$1,431,400</b>

Aggregate Contributions by Recipient Category	2021
Federal / National Candidates and Committees	\$361,750
State / Local Candidates and Committees	\$769,650
527 Organizations	\$300,000
<b>Combined Totals</b>	<b>\$1,431,400</b>

The following tables contain breakdowns for Federal/National and State/Local political contributions by recipient category, including candidates, committees, and national 527 organizations. Additional disclosure on political contributions is publicly available and can be found on the website links provided under each respective jurisdiction in the tables below.

Federal / National	Type	GEO PAC	Corporate
Candidates, Committees, 527 Organizations ( <a href="http://www.fec.gov">www.fec.gov</a> )	Candidates	\$51,750	-
	Committees	\$105,000	\$205,000
	527 Organizations	-	\$300,000
	<b>Total</b>	<b>\$156,750</b>	<b>\$505,000</b>

### National 527 Organizations

The GEO Group contributed to the following National 527 Organizations in 2021:

- Republican Governors Association
- Republican Attorneys General Association

State / Local	Type	GEO PAC	Corporate
<b>Arizona</b> <a href="https://azsos.gov/elections/campaign-finance-reporting">https://azsos.gov/elections/campaign-finance-reporting</a>	Candidates	\$32,500	
	Committees	-	\$60,000
	<b>AZ Total</b>	<b>\$32,500</b>	<b>\$60,000</b>
Florida <a href="https://dos.elections.myflorida.com/campaign-finance/contributions/">https://dos.elections.myflorida.com/campaign-finance/contributions/</a>	Candidates	-	\$161,000
	Committees	-	\$215,000
	<b>FL Total</b>	<b>-</b>	<b>\$376,000</b>
Georgia <a href="https://efile.ethics.ga.gov/#/index">https://efile.ethics.ga.gov/#/index</a>	Candidates	-	\$37,500
	<b>GA Total</b>	<b>-</b>	<b>\$37,500</b>
Indiana <a href="https://campaignfinance.in.gov/PublicSite/Homepage.aspx">https://campaignfinance.in.gov/PublicSite/Homepage.aspx</a>	Candidates	-	\$1,000
	<b>IN Total</b>	<b>-</b>	<b>\$1,000</b>
Louisiana <a href="https://ethics.la.gov/campfin-home.aspx">https://ethics.la.gov/campfin-home.aspx</a>	Candidates	-	\$1,000
	<b>LA Total</b>	<b>-</b>	<b>\$1,000</b>
New Jersey <a href="https://www.elec.state.nj.us/publicinformation/searchdatabase.htm">https://www.elec.state.nj.us/publicinformation/searchdatabase.htm</a>	Candidates	-	\$16,650
	<b>NJ Total</b>	<b>-</b>	<b>\$16,650</b>
Oklahoma <a href="https://pay.apps.ok.gov/ethics/crs/index.php">https://pay.apps.ok.gov/ethics/crs/index.php</a>	Candidates	\$39,000	\$95,000
	<b>OK Total</b>	<b>\$39,000</b>	<b>\$95,000</b>
Virginia <a href="https://www.elections.virginia.gov/candidatepac-info/reporting/">https://www.elections.virginia.gov/candidatepac-info/reporting/</a>	Candidates	-	\$111,000
	<b>VA Total</b>	<b>-</b>	<b>\$111,000</b>

## **The GEO Group's Policy on Lobbying Activities:**

As stipulated in GEO's Political Activities and Contributions Policy, GEO's Client Relations Department manages GEO's lobbying activities. **GEO's political and lobbying activities focus on promoting the benefits of public-private partnerships in the delivery of support services in secure correctional and detention facilities, community reentry and supervision programs, and electronic and location monitoring services, as well as the provision of evidence-based rehabilitation, both in-custody and post-release, through the GEO Continuum of Care®.**

**GEO does not take a position on nor advocate for or against criminal justice or immigration policies such as whether to criminalize behavior, the length of criminal sentences, or the basis for or length of an individual's incarceration or detention.**

**All GEO employees interacting with government or engaging lobbyists are responsible for understanding and complying with all lobbying laws that affect their business activities, including registration, reporting and recordkeeping requirements. Before hiring a lobbyist, engaging in direct lobbying, or communicating with public officials on GEO's behalf, GEO employees must consult with GEO's Client Relations Department.**

Examples of "lobbying" include communicating with lawmakers and other public officials to inform and help shape public policy on issues, and in many jurisdictions also includes "grassroots" or indirect lobbying contacts, as well as lobbying for public procurements and contracts. Lobbying is highly regulated and often contains detailed reporting requirements. GEO, its directors, officers, employees, and anyone acting on its behalf must comply with all lobbying laws, wherever GEO does business.

**For more information on GEO's Political Activities and Contributions Policy, visit [geogroup.com/Portals/0/GEO\\_Political\\_Activities\\_and\\_Contributions\\_Policy.pdf](http://geogroup.com/Portals/0/GEO_Political_Activities_and_Contributions_Policy.pdf)**

## Lobbying Expenditures in 2021

Direct Lobbying Expenditures	2021
Federal	\$720,000
State / Local	\$2,924,909
<b>Total</b>	<b>\$3,644,909</b>

In 2021, GEO paid an aggregate amount of approximately \$3.6 million in fees and expenses to consultant government relations professionals for direct lobbying (as defined by the Internal Revenue Code (IRC) 162 (e)). Of this amount, approximately \$0.7 million was attributable to Federal lobbying-related activities and the remainder \$2.9 million to state and local activities.

### Grassroots Lobbying

**In 2021, GEO did not make any payments used for “grassroots lobbying communications,” which is defined as a communication directed to the general public that refers to specific legislation or regulation at the federal, state, and local levels; reflects a view on such legislation or regulation; or encourages the recipients to take action with respect to such legislation or regulation.**

### Consultant Government Relations Professionals

**Engagement in legislative and regulatory proceedings at the federal, state, and local levels of government is important to GEO’s political engagement and educational efforts. GEO participates in the political process and retains the services of consultant government relations professionals in jurisdictions where it has or may pursue the development of public-private partnerships.**

**While as a matter of practice GEO has not included in this report an itemized list of direct lobbying payment recipients, federal and state laws, including the Lobbying Disclosure Act, require the disclosure of expenditures and activities associated with direct lobbying.**

At the federal level, information on these activities and associated expenditures can be obtained at <http://disclosure.senate.gov/> and <http://lobbyingdisclosure.house.gov>. Information on state lobbying disclosures can be found in state agency websites, such as the respective Departments of State, Ethics Commissions, and/or State Divisions of Election.

The website links for each respective jurisdiction are provided in the following table, which contains a list of GEO’s consultant government relations professionals as of December 31, 2021, by jurisdiction.



Jurisdiction	Firm Name (2021)
<b>Federal</b> <a href="http://disclosure.senate.gov/">http://disclosure.senate.gov/</a>  <a href="http://lobbyingdisclosure.house.gov">http://lobbyingdisclosure.house.gov</a>	Bradley Arant Boult Cummings LLP
	Capitol Counsel, LLC
	Da Vinci Group
	Navigators Global, LLC
	State Federal Strategies
<b>Alabama</b> <a href="https://ethics.alabama.gov/lobbyists.aspx">https://ethics.alabama.gov/lobbyists.aspx</a>	Bradley Arant Boult Cummings LLP
	Jones Group, LLC
	Swatek & Associates
<b>Alaska</b> <a href="https://aws.state.ak.us/ApocReports/Lobbying/">https://aws.state.ak.us/ApocReports/Lobbying/</a>	Ray Matiashowski and Associates
<b>Arizona</b> <a href="https://azsos.gov/elections/lobbyists">https://azsos.gov/elections/lobbyists</a>	Compass Strategies
	Pivotal Policy Consulting, LLC
<b>California</b> <a href="https://cal-access.sos.ca.gov/">https://cal-access.sos.ca.gov/</a>	Platinum Advisors
	Presidio PAG, Inc.
	Western Pacific Research, Inc.
	WPSS, LLC
<b>Colorado</b> <a href="https://www.sos.state.co.us/lobby/SearchLobbyist.do">https://www.sos.state.co.us/lobby/SearchLobbyist.do</a>	JLH Consulting & Public Affairs, LLC
<b>Florida</b> <a href="https://floridalobbyist.gov/">https://floridalobbyist.gov/</a>	Capital City Consulting, LLC
	Ron L. Book, PA
<b>Georgia</b> <a href="https://media.ethics.ga.gov/search/Lobbyist/Lobbyist_Menu.asp">https://media.ethics.ga.gov/search/Lobbyist/Lobbyist_Menu.asp</a>	The Southern Group
	JL Morgan
<b>Idaho</b> <a href="https://sos.idaho.gov/elections-division/lobbyist-information/">https://sos.idaho.gov/elections-division/lobbyist-information/</a>	Taylor + Company, LLC



Jurisdiction	Firm Name (2021)
<b>Illinois</b> <a href="https://www.ilsos.gov/departments/index/lobbyist/lobbyist_search.html">https://www.ilsos.gov/departments/index/lobbyist/lobbyist_search.html</a>	Chicago/Springfield Consultants LLC
<b>Louisiana</b> <a href="https://ethics.la.gov/lobbyinghome.aspx">https://ethics.la.gov/lobbyinghome.aspx</a>	The Cowart Group, Inc.
<b>New Jersey</b> <a href="https://www.elec.state.nj.us/publicinformation/gaa_annual.htm">https://www.elec.state.nj.us/publicinformation/gaa_annual.htm</a>	AFT Associates LLC
<b>New Mexico</b> <a href="https://www.cfis.state.nm.us/media/">https://www.cfis.state.nm.us/media/</a>	Lawrence J Horan, Ltd
	New Mexico Government Affairs
	John Thompson Consulting
<b>New York</b> <a href="https://webapps.jcope.ny.gov/public/">https://webapps.jcope.ny.gov/public/</a>	Brown & Weinraub, PLLC
<b>North Carolina</b> <a href="https://www.sosnc.gov/online_services/search/by_title_lobbying">https://www.sosnc.gov/online_services/search/by_title_lobbying</a>	McGuire Woods Consulting, LLC
<b>Oklahoma</b> <a href="https://www.ok.gov/ethics/State_Officers_&amp;_Employees/Lobbying/">https://www.ok.gov/ethics/State_Officers_&amp;_Employees/Lobbying/</a>	Capitol Gains, LLC
	Jordan Strategies, LLC
	Lee Consulting
<b>Pennsylvania</b> <a href="https://www.palobbyingservices.pa.gov/Public/wfSearch.aspx">https://www.palobbyingservices.pa.gov/Public/wfSearch.aspx</a>	David Scott Partners, LLC
	Greenlee and Partners, LLC
<b>Texas</b> <a href="https://www.ethics.state.tx.us/search/lobby/">https://www.ethics.state.tx.us/search/lobby/</a>	Target Texas
<b>Virginia</b> <a href="http://ethicssearch.dls.virginia.gov/">http://ethicssearch.dls.virginia.gov/</a>	McGuire Woods Consulting, LLC
<b>Washington</b> <a href="https://www.pdc.wa.gov/browse">https://www.pdc.wa.gov/browse</a>	Stauffer Communications

### Trade and Membership Associations and Chambers of Commerce

The GEO Group and some of its subsidiaries, facilities, and employees are also members of certain trade and membership associations and chambers of commerce. Below is a list of such organizations to which GEO made payments of \$25,000 or more in 2021 (as well as an aggregate total for other chambers of commerce with individual annual payments below the \$25,000 threshold). The table below provides the estimated portion of these payments that were not tax deductible as a result of this portion being used for lobbying purposes. **In 2021, GEO made total combined payments of \$262,419 to trade and membership associations and chambers of commerce, of which an estimated 15 percent, or \$39,904, was not tax deductible as a result of this portion being used for lobbying purposes.**

Trade Association, Membership Association & Chamber of Commerce	Total Paid in 2021	% Non- Deductible for Lobbying	Non-Deductible Portion for Lobbying
Day 1 Alliance	\$100,000	0%	\$0
National Association of Real Estate Investment Trusts (NAREIT)	\$82,994	25%	\$20,749
Boulder Chamber of Commerce	\$37,625	0%	\$0
Combinded Other State & Local Chambers of Commerce	\$41,800	46%	\$19,155
<b>Total</b>	<b>\$262,419</b>	<b>15%</b>	<b>\$39,004</b>

#### Day 1 Alliance (<https://day1alliance.org/>)

The Day 1 Alliance describes itself as a trade association dedicated to educating and informing Americans on the limited but valued role the private sector plays in addressing corrections and detention challenges in the United States. GEO is a member of the Day 1 Alliance. In 2021, GEO made payments of \$100,000 to the Day 1 Alliance, none of which was used for lobbying purposes.

#### National Association of Real Estate Investment Trusts (NAREIT) (<https://www.reit.com/>)

NAREIT describes itself as the worldwide representative voice for real estate investment trusts (“REITs”) and real estate companies with an interest in U.S. real estate. Between 2013 and 2021, GEO was a member of NAREIT. In 2021, GEO made payments of \$82,994 to NAREIT, of which an estimated 25 percent, or \$20,749, was not tax deductible as a result of this portion being used by NAREIT for lobbying purposes. In December 2021, GEO announced a change in corporate structure from a REIT to a taxable C corporation and will therefore discontinue its membership in NAREIT beginning in 2022.

### **Boulder Chamber of Commerce** (<https://boulderchamber.com/>)

The Boulder Chamber of Commerce describes itself as the region’s flagship business advocacy and support organization, which has innovative programs to help local businesses succeed while sustaining an economy that preserves Boulder’s high quality of life, including its environmental and cultural assets. GEO’s wholly owned subsidiary, BI, Inc., is a member of the Boulder Chamber of Commerce, and in 2021 made payments of \$37,625, none of which was used for lobbying purposes.

### **Other State and Local Chambers of Commerce**

In 2021, GEO contributed to other state and local Chambers of Commerce with individual annual payments below the \$25,000 threshold. The aggregate payments to these state and local Chambers of Commerce totaled \$41,800, of which an estimated 46 percent, or \$19,155, was not tax deductible as a result of this portion being used for lobbying purposes.

### **Other Organizations**

GEO contributes or pays dues to other tax-exempt organizations that engage in advocacy or educational efforts on behalf of their constituencies. Except as listed in the table above, GEO has not been made aware that any amounts paid or contributed by GEO are used for lobbying or other political activities.

Additionally, many GEO employees are members of the American Correctional Association (“ACA”), which is a 501(c)(3) charitable organization. GEO also pays audit and accreditation related fees to the ACA. 501(c)(3) organizations are subject to strict limitations on political activities, and GEO has not been made aware that any dues or fees paid by GEO or its member employees are used for lobbying.

### **Tax-Exempt Organizations that Write or Endorse Model Legislation**

**GEO is not a member of any tax-exempt organizations that write or endorse model legislation. In 2021, GEO did not make any payments to any tax-exempt organizations that write or endorse model legislation.**

## Disclosure and Reports

GEO's Political Activities and Contributions Policy is publicly available on GEO's website at [geogroup.com/Portals/0/GEO\\_Political\\_Activities\\_and\\_Contributions\\_Policy.pdf](https://www.geogroup.com/Portals/0/GEO_Political_Activities_and_Contributions_Policy.pdf). In addition to complying with all reporting requirements under applicable law, GEO will publish this Political Activity and Lobbying Report annually on its website at [https://www.geogroup.com/Political\\_Engagement](https://www.geogroup.com/Political_Engagement).

This report is not a supplement to any other report filed or required to be filed by GEO with any governmental agency. To the extent the report contains information about GEO PAC, it is not intended as a solicitation for contributions to GEO PAC from any person. The report has not been audited and GEO undertakes no obligation to issue any updates or corrections.