

PRIVATE PRISON DIVESTMENT CAMPAIGN TOOL KIT  
CUTTING ALL TIES WITH THE PRIVATE PRISON INDUSTRY

# **DUMP**

## **THE PRISON STOCK!**

**INVEST IN HUMANITY**



**PRISON INDUSTRY DIVESTMENT CAMPAIGN**

**ABOLISH PRISONS. FREE ALL IMMIGRANTS IN DETENTION.  
NO MORE DEPORTATIONS. STOP THE RAIDS. LEGALIZATION NOW!**

DESIGN: MELANIE CERVANTES | [DIGNIDADOREBELDE.COM](http://DIGNIDADOREBELDE.COM)

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## TABLE OF CONTENTS

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<b>Campaign Context .....</b>	<b>3</b>
Why Divestment? .....	5
Divestment Resolutions .....	6
<b>Understanding the Basics .....</b>	<b>6</b>
The Geo Group, Inc .....	6
Corrections Corporation of America (CCA) .....	8
<b>How to begin a Divestment Resolution .....</b>	<b>10</b>
<b>The Case of Wells Fargo .....</b>	<b>11</b>
<b>Faith Community Success Story: How the United Methodist Church Divested.....</b>	<b>16</b>
<b>End Notes .....</b>	<b>19</b>

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## Campaign Context

Anti-immigrant policies and legislation have led to the callous arrest, detention, and or deportation of more than 1.4 million men, women and children over the past four years. In addition to the implementation of new laws requiring local law enforcement to question and detain anyone suspected of lacking proper documentation in Arizona, Georgia, Alabama, and South Carolina, the federal government is utilizing initiatives that seek to oppress and harass communities of color. Initiatives such as the Department of Homeland Security's Secure Communities<sup>1</sup> which has ordered all state and local law enforcement in the country to compel local police to detain immigrants fingerprint them in U.S prisons and cross check them with the Department of Homeland Security database even if the person is yet convicted of any crime.

As a result of these new laws and changes in policies, families have been torn apart. According to a report released by the Immigration and Customs Enforcement (ICE) on March 26, 2012 more than 46,000 people with a child born in the United States were deported between January 1, 2011 and June 30, 2011,<sup>2</sup> meaning that by the end of 2011, those numbers were close to 100,000.

Under the Obama administration, deportations have been on the rise; during fiscal year 2011 there were 396,906 removals. The Department of Homeland Security prioritizes the detention and deportation of "criminal aliens" with their Criminal Alien Program (CAP)<sup>3</sup>. However, the department's definition and categorization of criminal offenses are not targeting violent crimes but instead grouping minor offenses and disguising them in reports as violent and threats to public safety and national security. For example, the departments FY 2011 report on removals states that 25.3% of all deportations accounted for are due to "dangerous drugs... examples comprise the manufacturing, distribution, sale and possession of illegal drugs"<sup>4</sup> which includes minor offenses of possession that are then categorized as serious crimes. Others include minor traffic offenses, and non-violent misdemeanors.<sup>5</sup>

To exacerbate the injustice, the majority of immigrants who are detained and deported are held in for-profit prisons run by either the Geo Group (GEO), or Corrections Corporation of America (CCA) whose combined revenue in 2011 totaled more than \$3.0 billion.<sup>6</sup>

Even while their profits are skyrocketing, abuses in these facilities have been widely documented<sup>7</sup> in several states: they include wrongful deaths (both from lack of medical care and from assault), rape and other sexual abuse, and other forms of harsh treatment of prisoners. There is also lack of training for staff and poor health and safety standards documented in several locations.

Nevertheless, profits for these companies have not always been as successful as they are now. According to a recent Associated Press Report, in the year 2000, CCA was on the verge of bankruptcy; the GEO Group's net income has jumped from \$16.9 million to \$78.6 million since 2000.<sup>8</sup>

There is extensive documentation of their involvement in the manufacture of felons resulting in the mass incarceration of communities of color. In the nineties, CCA and GEO successfully lobbied to secure passage of three strikes laws, "tough on crime laws", and drug laws in various states that criminalized communities of color to increase the business of the private prison industry.<sup>9</sup>

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In the case of immigrant detention, the private prison industry's lobby efforts have played a key role in legislation, policy, and implementation of government practice.<sup>10</sup>

In 2006, after millions of immigrants took to the street to defeat the Sensenbrenner bill, the private prison industry was in its boom. Investors were already profiting and in the fall of 2006, Vice President Dick Cheney had over \$50 million invested in the Vanguard Group<sup>11</sup> that financed and continues to finance the private prison industry. Vanguard then purchased nearly 300,000 shares of stock in GEO Group.<sup>12</sup>

In January 2007, following the Swift raids,<sup>13</sup> the Bush Administration announced the awarding of private immigrant detention center contracts to Geo and CCA. Over the next several months, the value of Geo stock tripled as immigrant raids increased by the thousands; the Department of Homeland Security (DHS) announced it was going to use no-match letters<sup>14</sup> to employers to step up enforcement of immigration law, and comprehensive immigration reform was killed in the Senate.

At the time of the Swift raids, the federal detention system was at 136% overcapacity. The only way to use detentions of immigrants as part of immigration law enforcement was for the federal government to contract with private prison companies. Because of staffing limitations at the federal level, the only way to maintain the steady flow of immigrant prisoners into the privatized detention system was to compel local governments to help provide prison companies with detainees through programs like Secure Communities.

Furthermore, the Swift raids helped to boost private prisons when workers who were picked up for using an incorrect Social Security number were then charged with Class B felonies carrying a minimum of two-year prison terms. This change was drastic since previously workers were charged with infractions or misdemeanors.

On a side note, on May 4<sup>th</sup>, 2009 the Immigrant Rights Movement had a huge victory when the Supreme Court ruled in *Flores-Figueroa v. United States*, stating that identify theft law could not be used against immigrant workers who used social security numbers to obtain employment if they did not know that the false social security belonged to another person.<sup>15</sup>

Continued organizing efforts to stop programs like secure communities and 287(g)<sup>16</sup> at the federal level were fragmented as CCA and GEO succeeded in getting the support of the Republican Governors Association and the American Legislative Exchange Council (ALEC) to push for laws in half of the states to accelerate the arrest and detention of immigrants, starting with Arizona's SB1070.<sup>17</sup>

Although GEO and CCA control nearly 80% of the private prison industry, they are relatively small companies<sup>18</sup>. These two companies' success in influencing the federal government to create a large market of private prisoners and then to award them contracts to build and house those prisoners is due, in part, to the fact their lobbying power has been boosted by lobbyists who represent some of their major investors<sup>19</sup>. Lobbyists for the private prisons and several of their major investors have played key roles in the Federal government's appropriation of funds for increased incarceration of immigrants in facilities run by CCA and GEO and for construction of new immigrant detention facilities to be build by CCA and GEO.

Revolving door lobbyist<sup>20</sup> relationships for the private prison industry and its financial backers involve both political parties and management staff of all the appropriations committees in both houses of Congress, as well

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as formerly high-placed appointees in the Departments of Justice, Treasury and Homeland Security; the Bureau of Prisons; the Offices of Management & Budget and Legislative Affairs in the White House, the US Marshall, and the campaigns of presidents Clinton, Bush and Obama.

Defeating these efforts will require a strategy that reduces the power of for-profit prison industry lobbying.

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## Why Divestment?

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The National Prison Divestment Campaign intends to bring the public's focus to the source of problems with immigration policy, namely the connection between major

financial institutions and the for-profit prison industry and their joint role in the accelerated incarceration of immigrants.

We have taken a page from the South Africa Anti-Apartheid Movement of the 1980s, which applied an effective divestment strategy in the United States.

Apartheid was the policy used by government of South Africa to brutally enforce White supremacy and racial segregation in residential areas, medical care, education, employment, and public services. South Africa's majority Black population were not allowed to be citizens under apartheid, nor were they allowed to travel outside areas where they lived for work without government-issued documents allowing them to do so. Starting in the 1950's the African National Congress (ANC) and others spearheaded an international campaign to end this brutal system in South Africa.

As a part of their campaign strategy, the ANC sought help in developed countries outside South Africa through what was called Anti-Apartheid Divestment. The focus of this effort was to push corporations, universities and governments with financial ties to the

South African government to divest all their holdings.

In the United States, these corporations included IBM, Hewlett Packard and General Motors as well as investors such as the University of California.

The Anti-Apartheid Divestment effort in the United States engaged students, churches, unions and other social activist groups. Beginning in the late 1970s, a growing number of religious, labor and higher education institutions started to divest their holdings in corporations with ties to the government of South Africa. It gained so much momentum that in 1988 the U.S. Congress passed, the Comprehensive Anti-Apartheid Act, which prohibited new investment in South Africa. President Ronald Reagan then vetoed it but the anti-apartheid divestment campaign had so much popular support that Congress voted to override President Reagan's veto by more than a two-thirds majority, and the Comprehensive Anti-Apartheid Act became law. South Africa's apartheid system ended in 1994.

The anti-apartheid divestment campaign inspires us because it is a concrete example of a powerful grassroots campaign that succeeded in the United States even though a popular U.S. president, Ronald Reagan, opposed it. It also inspires us because anyone who wanted to could participate, and so the campaign succeeded in engaging the participation of different kinds of groups including, but not limited to, students, churches, human rights, labor, and civil rights organizations.

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## Divestment Resolutions

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The National Private Prison Divestment Campaign aims to target the investors of both CCA and GEO to break the lobbying power that results in detaining immigrants as well as to make CCA and GEO's abuses so visible that public and private institutions will disavow any connection to private prisons. Furthermore, we aim to ensure that the public understands how the money flows in this system and to bring to light the fact that profiting from the separations of families, violations of human rights, and general pain caused by these prisons is inhumane and unacceptable.

Victories for our cause thus far:

- ☉ On May 16<sup>th</sup>, 2011 major hedge fund Pershing Square Capital Management, divested its CCA holdings of over 7 million shares.<sup>21</sup>
- ☉ On January 3, 2012, the Pension Board of the United Methodist Church announced the divestment all of its private prison holdings. The Church's General Board of Pension and Health Benefits is the largest faith-based pension fund in the United States and ranks among the top 100 pension funds in the country.
- ☉ The Podesta Group, a powerful lobbying firm in Washington D.C., dropped the Geo Group as a client.<sup>22</sup>
- ☉ On July 6<sup>th</sup>, 2012, The General Assembly of the Presbyterian Church (U.S.A) voted to affirm a statement they made in 2003 to oppose private prisons. The resolution also encourages individual Presbyterians and congregations to divest from private prisons.

Divestment resolutions give everyone a chance to be part of the campaign. All of us have a relationship with institutions, public or private – such as city and county government, universities, and religious organizations. We can all urge them to **cut financial ties** with the for-profit prison industry through a divestment campaign.

When enough institutions divest, the private prison industry will lose the lobbying power it has used to incarcerate more immigrants and to block just immigration policies.

## Understanding the Basics

Both Corrections Corporations of American (CCA) and the GEO Group, Inc (GEO) are publicly traded companies that rely on investors to acquire state and federal contracts. Therefore, investors have a direct responsibility in CCA's and GEO's efforts to create felons to fill our prison system. Both CCA and GEO rely on financing and other assistance from major investors to employ the powerful lobbying efforts in Congress and federal agencies, as well as lobbying in state capitols across the country.

A great deal of taxpayer money is invested in major shareholders of CCA and GEO stock. In the next few pages we will give snapshots of CCA and GEO and their investors.

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## The Geo Group, Inc

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The GEO group (GEO) has federal and state contracts to manage prisons which include maximum, medium and minimum security prisons, immigration detention centers, minimum security detention centers, mental health, residential treatment and community based re-entry facilities, and transportation of prisoners.<sup>23</sup> GEO is the second largest for-profit private

prison in the United States operating in 17 states. In their fiscal year ending January 2012 the GEO Group had revenue of \$1.6 billion. GEO also contracts with the Federal Government to transport prisoners.

#### 5% OWNERSHIP TOP INSTITUTIONAL HOLDERS

##### THE GEO GROUP INC, (GEO)

	AMOUNT	% OF OVERALL STOCK	SOURCE
Scopia Fund Management LLC	7,640,099	12.20%	SEC Form 13G filed 2/10/2012
Fidelity Management and Research LLC	9,077,937	14.8%	SEC Form 13G filed 5/10/2012
BlackRock Inc.	4,885,411	7.80%	SEC Form 13G filed 2/10/2012
Wells Fargo & Company*	3,061,855	4.68%	SEC Form 13G filed 10/10/2012
Eagle Asset Management, Inc.	3,342,506	5.34%	SEC Form 13G filed 1/20/2012
Vanguard Group, Inc	3,339,901	5.33%	SEC Form 13G filed 2/10/2012
River Road Asset Management, LLC	3,260,589	5.2%	SEC Form 13G filed 2/09/2012
Wellington Management Company, LLP	1,677,690	2.68%	SEC Form 13G filed 2/14/2012

**\*Wells Fargo & Company also filing on behalf of their subsidiaries:** Wells Fargo Advisors, LLC

Wells Fargo Securities, LLC, Wells Capital Management Incorporated, Wells Fargo Bank, N.A, and Wells Fargo Funds Management, LLC

The GEO group has been responsible for several human rights violations at many of their locations. On April 2012 the Southern Poverty Law Center, the American Civil Liberties Union, and attorney Robert McDuff brought a class action lawsuit on behalf of 13 youth incarcerated at Walnut Grove Youth Correctional Facility in Mississippi. Plaintiffs alleged that guards smuggled drugs to inmates, had sex with some of them, and denied others medical treatment and basic educational services.<sup>24</sup> In the midst of the litigation, the U.S. Department of Justice investigated the facility and released a report confirming many of the plaintiffs' allegations, stating "systemic, egregious and dangerous practices."<sup>25</sup> Days after the DOJ released the report; the State reached a settlement with plaintiffs in the form of a consent decree. Federal Judge Carlton Reeves approved the settlement, finding that: "WGYCF has allowed a cesspool of unconstitutional and inhuman acts and conditions to germinate..."<sup>26</sup>

The case in Mississippi was a snapshot into the company practices and the state ended their contract as of July 2012, but the conditions in other locations, including immigrant detention centers, have not improved; there are many stories of mistreatment and inhumane practices.



In the last GEO shareholder meeting the GEO Group had the opportunity to vote on a resolution proposed by the Dominican Sisters and The Mercy Investment Services, Inc. to address these issues:

*"Mercy Investment Services is engaging with GEO Group on human rights policy. We recommend that the policy be framed in the context of the Universal Declaration on Human Rights and we suggest GEO use the United Nations Guiding Principles on Business and Human Rights as the standard as it reviews existing policies," says Sister Valerie Heinonen, Director of Shareholder Advocacy. "We also believe a [third-party] audit independent of its government regulators should be done to ensure compliance with best practices, not minimal standards, in all of the facilities managed by GEO."*<sup>27</sup>

However, the shareholders did not approve the proposal even while the news of the Mississippi abuse was in all the major television networks. Only 13,260,668 votes were in favor, 32,311,790 voted against, 9,626,417 abstained from voting, and 3,121,134 were broker non-votes. However, the resolution won enough votes to be introduced again at the next shareholder meeting.

## Corrections Corporation of America (CCA)

Corrections Corporation of America (CCA) is the largest for-profit in the United States. As of their latest filing, December 31, 2011, the Company operated 66 correctional and detention facilities, including 46 facilities that it owned, with a total capacity of approximately 91,000 beds in 20 states and the District of Columbia. In that same filing CCA show earnings of \$162,510,000.<sup>28</sup>

### 5% OWNERSHIP TOP INSTITUTIONAL HOLDERS

#### Corrections Corporation of America (CXW)

	AMOUNT	% OF OVERALL STOCK	SOURCE
Lazard Asset Management LLC	4.29%	4,291,551	7/10/2012 SEC 13G
The Vanguard Group, Inc	5.38%	5,357,908	2/28/2012 SEC 13G
BlackRock, Inc	4.99%	4,994,335	10/10/2012 SEC 13G

Corrections Corporations of America is also responsible for repeated violations of human rights.

On July 16<sup>th</sup>, 2008 in Tennessee Plaintiff Frank D. Horton had a history of psychiatric treatment and was considered a special needs inmate when he arrived in 2005 at the Metro Davidson County Detention Facility, a prison operated by CCA. Because of behavioral problems, he was placed in the segregation unit, where he was isolated from most of the prison population.

Officer Patrick Perry from the detention facility noticed something was wrong with Mr. Horton. His cell was filthy with food trays on the floor, bacteria growing in the toilet, and Mr. Horton himself dirty and speaking 'gibberish'.

Perry read the reports when he realized Mr. Horton had not left his cell for nine months; he immediately took copies of the records and photos to the facility's quality assurance manager. Subsequently when Perry realized nothing was done he brought the records to the County Health Department and the next day he was fired.

Mr. Horton was transferred to a Special Needs Facility, diagnosed with schizophrenia and is now in a mental health facility. "[His conservator Mary] Braswell filed her complaint on July 16, 2008, alleging that CCA violated Horton's Eighth



Amendment rights by failing to provide him with mental health care, subjecting him to inhumane conditions of confinement, and failing to protect him from other inmates and CCA employees.”<sup>29</sup> The district court granted CCA’s motion for summary judgment, but the 6<sup>th</sup> Circuit reversed that decision. The case is still active.

Corazon de Tucson, a campaign partner, in its report, *The Corrections Corporation of America, How CCA abuses prisoners, manipulates the public and destroys communities*<sup>30</sup> and the ACLU in its report, *Banking on Bondage* document the abuses of prisoners by CCA. Some of the findings include:

- ☉ *“CCA has exposed untold numbers of inmates to extreme and dangerous violations of their most basic rights. Prisoners routinely experience physical abuse, sexual violence, medical negligence and poor conditions and overcrowding.*
- ☉ *CCA expends hundreds of thousands of dollars annually to exert its political will through lobbying, campaign donations and partnering with the American Legislative Exchange Council. CCA’s political activities amount to shameless profiteering designed to secure new revenue for the company regardless of the cost to society.*
- ☉ *CCA has damaged the health of communities wherever it operates, with a particularly negative impact in Arizona. The Eloy Detention Center and SB 1070 are two examples of the profound ways in which CCA facilities and political interventions negatively impact community, family and individual health.”<sup>31</sup>*

Both reports document egregious abuses of prisoners, including the following examples of what the ACLU terms a “culture of brutality”, caused in part by CCA’s failure to provide adequate staffing in its facilities and to take action against the employees who perpetrated abuse. Below are two examples from the reports:

- ☉ Idaho Correctional Center in Boise: this prison became so violent that both prisoners and guards referred to it as “Gladiator School”. Guards exposed prisoners to beatings by other prisoners as a disciplinary action and then denied them medical care.
- ☉ Torrance County Detention Facility: The Bureau of Justice Statistics, in a 2007 survey, found that it had the highest rate of sexual violence in the country, estimating that 13.4 percent of prisoners suffered from sexual assault, compared to 3.2 percent of prisoners held in local jails. In the years since this study, CCA has failed to rein in its employees. In one case a CCA staff person abused a prisoner in her cell while her infant slept in a nearby crib.

A July 2012 report by Truthout details the work done by detainees in private detention facilities at the rate of \$1 per day.<sup>32</sup> Immigration and Customs Enforcement (ICE) terms this “voluntary” and the payment an “allowance.” People who are denied the right to work on the outside are employed in detention facilities as manual laborers, in the kitchens and libraries. The money they “earn” is paid into their commissary account and used, for the most part, to buy food, phone cards and personal care items (soap, shampoo, toothbrushes). This money, provided by ICE, makes its way back into the pockets of the owners of the prison.

## How would Divestment work?

As mentioned earlier, the campaign’s focus to divest or as we prefer cut all ties from private prisons aims to target investors to break CCA and GEO’s lobbying power. Because these companies are publicly traded the ownership is divided among institutions, mutual funds, trust funds, pensions and individual ownership.

Universities, churches, cities, and states can invest in these for-profit private prisons through investment management companies such as Blackrock, Lazard, and Vanguard without even knowing. Thus, many of us have a direct relationship with them either through employment, tuition, taxes, and/or donations.

These institutional investors hold a great deal of power and can exercise voting rights in CCA and GEO because they have the freedom to buy and sell shares and leave private prisons without leverage to capitalize.

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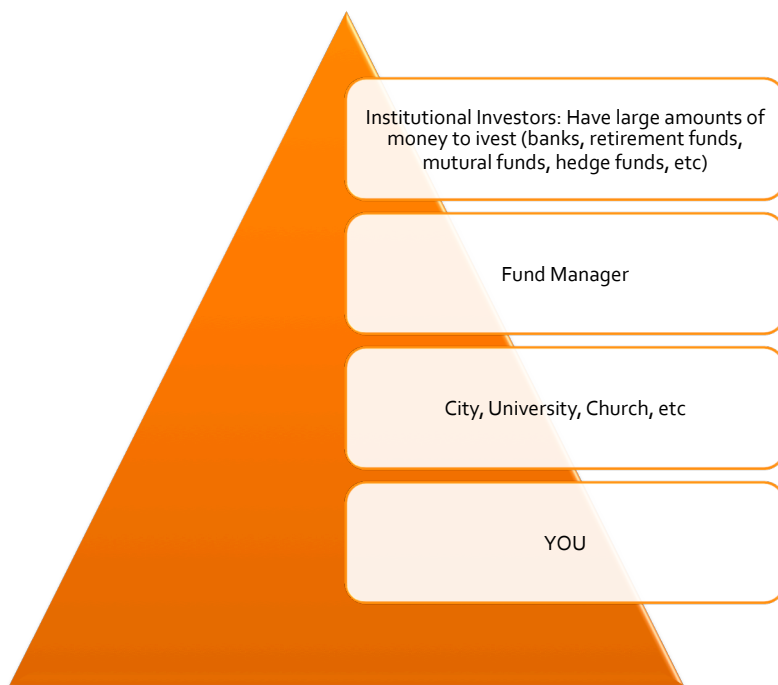
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## HOW YOU FIT IN

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Due to the complexity of the financial system, individuals are often disempowered to make any decisions on their retirement funds or mutual funds. Investment institutions manage your money and are the ones that make all the decisions, unless you have a portfolio of over \$50 million where your voice is often heard; investors with those types of portfolios are usually universities, states, cities, and some large denominations.

As an individual investor you or your institutional entity does have one intermediary who is often called the fund manager. Your contact is usually a person who is going to give you a choice of portfolios to invest in, but often you cannot pick and choose from one portfolio.



Divestment then is at the hands of the top institutional investors. We can pressure our fund manager to pressure the institutional investors to divest from private prisons. The real impact in the industry will be on their ability to underwrite their debt and access capital; therefore we must demand that they cut all ties to the private prisons industry.

## How to begin a Divestment Resolution

1. Have an initial meeting with your group to brainstorm a plan that includes a list of resources needed, timeline, and people power.
  2. Identify your target: Who can help you pass a resolution in your state, city, church, university, city council, union?
  3. Do your research:
    - a. Find the list of the governing body of your target and research individual members.
    - b. Find information about a direct relationship between the institution and CCA and/or GEO. Are they directly invested in these private prisons?
    - c. If they are not directly invested into CCA and/or GEO, do they have ties with any of the other top investors in the private prison industry? You can find the most recent top institutional holders, individuals, and mutual funds by going to Yahoo Finance and searching for both GEO and CCA.
  4. Identify your allies and opponents
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5. Recruit a person from the list of governing body members who you think might be sympathetic with our campaign and prepare with him/her a resolution that can be introduced.
6. Find other governing body members who can support you.
7. Get your group in gear and begin the divestment campaign: Be prepared for online petitions, house parties, and workshops to build support for your campaign.
8. Concentrate on getting media attention at all times: utilize social media outlets such as facebook, twitter, your website and the prison divestment site. Write letters to the editor, get people to write op-eds, write press releases, and let them know we will win.

## The Case of Wells Fargo



Since the Prison Divestment Campaign began in May of 2011, we have been targeting Wells Fargo, demanding that they divest from private prisons. Enlace has coordinated synchronized actions across the country and the actions had a high turnout of media attention. Additionally, the campaign has grown to over 21 states and the organization's actions also received media attention.

In an attempt to hide the ugly truth of Wells Fargo's support of the private prison and immigrant incarceration system, Wells Fargo executives around the country have tried to mislead reporters and concerned communities by stating that Wells Fargo is not involved in the for-profit immigration detention system, which is dominated by the Geo Group (GEO) and Corrections Corporation of America (CCA).

However, the March 23, 2012 GEO Group 14A filing with the U.S. Securities and Exchange Commission (SEC) listed Wells Fargo as owning 4,446,026 shares of GEO stock, which constitutes 7.24% of all GEO stock. The Wells Fargo 13G filing with

the U.S. Securities Exchange Commission (SEC), dated January 24, 2012, reported that, as of December 31, 2011, it beneficially owned 4,446,026 shares with sole voting power over 4,398,614 of such shares, shared voting power over 794 of such shares, sole dispositive power over 4,300,251 of such shares and shared dispositive power over 80 of such shares.

Three separate communications from Wells Fargo to Campaign's partners were bluntly denying the fact that Wells Fargo and Company is in fact an investor with legal authority to divest from the Private Prison Industry



Our partner organization Iowa Citizens for Community Improvement put an add in El Enfoque, a Spanish language newspaper, inviting community members to change their bank account from Wells Fargo because of their private prison involvement. It also mentioned an action done on June 15<sup>th</sup>, 2012 where community members moved \$30000 out of Wells Fargo; both Spanish language newspapers, El Enfoque and El Latino, picked up the actions.

Marta Codina, President of Wells Fargo Community Banking Services in Central Iowa responded to the invitation by writing a letter to the

editor to the El Latino Newspaper.

Don Pearson, EVP Regional President in Oregon, responded to members of the Portland Central American Solidarity Committee (PCASC), We are Oregon, and Enlace, after delivering letters to eight Wells Fargo branches throughout Portland.



After a protest in San Antonio Texas, organized by Students United for the Dream Act and other groups, Alan Elias, a Wells Fargo Vice President, also responded.

**This is what they had to say:**

*"... Currently the Wells Fargo Advantage mutual funds hold a small place in GEO Group that we administer as fiduciary agents representing the shareholders of the funds. Wells Fargo is not the owner. The public documents and those listed on websites can give the false impression that Wells Fargo is the owner of the shares in the company. We are not. We simply administer the funds in the role of assessors in the name of the real owners..." Marta Codina*

*"We do not invest our own assets in either company..." Don Pearson*

*"Wells Fargo Advantage Funds currently holds a small position in the GEO Group as part of mutual funds that we administer as advisor on behalf of fund shareholders..." invests on behalf of clients and customers in thousands of domestic and foreign companies." Alan Elias*

**Our Response:** On March 23, 2012 the U.S. Securities and Exchange Commission (SEC) listed Wells Fargo as owning 4,446,026 shares of GEO stock, which constitutes 7.24% of all GEO stock. Those same filings show that Wells Fargo controls over 33 thousand shares in CCA. This can be hardly called a "small position" since it exceeds the number of shares held by over 90% of GEO Group's investors.

**What they had to say:**

*"Wells Fargo & Company has zero ownership of either the GEO Group or Corrections Corporation of America ..." Don Pearson, EVP Regional President in Oregon*

*"Wells Fargo & Company does not hold shares in any of the two private prison companies mentioned by the activist groups: Corrections Corporation of America and GEO Group, Inc..." Marta Codina, President of Wells Fargo Community Banking Services in Central Iowa*

**Our Response:** The fact that Wells Fargo invests in Geo Group primarily through its mutual funds is more immoral than it would be if Wells Fargo invested in Geo Group primarily through its commercial bank.

1. Wells Fargo controls the investment in Geo Group without consulting its mutual funds' customers. This means Wells Fargo votes the millions of shares it controls on resolutions in Geo Group's annual shareholder meeting without consulting its mutual funds' customers. Wells Fargo uses its customers' money to exert tremendous influence on the Geo Group on matters such as who will be on Geo's Board of Directors, and therefore, on who controls the company and on whether or not Geo Group will adopt a new policy to conduct its operations in accordance with the Universal Declaration of Human Rights.
2. Wells Fargo's mutual funds' customers have no say in Wells Fargo's decision to invest or not invest their money in private prisons.
3. Wells Fargo makes risk-free money on the mutual funds it invests in GEO Group by charging fees to its customers for managing the investment.
4. If GEO's stock value crashes, Wells Fargo's customers lose money, but Wells Fargo still profits because Wells Fargo gets its management fee. So Wells Fargo risks its customers' money by financing private prisons through its mutual funds' investments.
5. Wells Fargo's shareholders also have no say in any of the ways that Wells Fargo finances private prisons. For example, Wells Fargo is the chief underwriter for a \$700+ million line of credit for Corrections Corporation of America (CCA), which enables CCA to bid on contracts to build new immigrant detention centers.

**What they had to say:**

*"...we are a bank- we accept deposits and make loans ." Don Pearson, EVP Regional President in Oregon*

*"We are a bank. We accept deposits and we offer loans. It is regrettable that groups that defend certain causes issue mistaken opinions about us to push a political or social agenda." Marta Codina, President of Wells Fargo Community Banking Services in Central Iowa*

**Our Response:** It is a fact that Wells Fargo Bank accepts deposits and makes loans. However, Wells Fargo & Company is the parent company of Wells Fargo Bank, which means that it controls Wells Fargo Bank and has voting power to divest from the GEO Group.

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Wells Fargo & Company is a parent of thousands of companies who serve as subsidiaries, affiliates, and units, all under the umbrella of Wells Fargo & Company.

**What they had to say:**

*"The truth is that Wells Fargo does not support any political opinion about immigration nor about the operation of private prisons". Marta Codina, President of Wells Fargo Community Banking Services in Central Iowa*

*"The fact remains Wells Fargo plays no role in advocating a policy view on immigration or on the operation of private prisons"*  
Don Pearson, EVP Regional President in Oregon

*"Allegations that the company has worked with GEO to lobby for immigrant detention is a complete and utter fabrication."*  
Alan Elias, Wells Fargo Vice President

**Our response:** Federal registered lobbyist reports filed with the U.S. Senate and the U.S. House of Representatives for 2010 show that influential lobbyists, Elizabeth Morra, Randall Gerard, Paul Brathwaite, David Marin, Tony Podesta and Nicole Young were lobbying for Wells Fargo and the GEO Group at the same time.

If that were not all...

Recent filings with the Securities and Exchange Commission by Wells Fargo & Company, GEO Group and Corrections Corporation of America reveal that Wells Fargo is extensively involved in financing the private prison companies involved in the massive incarceration of immigrants.

WELLS FARGO & COMPANY is a financial services holding company located in San Francisco, California which owns subsidiaries that are securities brokers and dealers, finance companies, data processing servers, foreign banking organizations, banks, national banks, agreement corporations, international networks of domestic (U.S.) companies, bank holding companies, non-deposit trust companies, edge corporations, and other kinds of domestic and international companies that, in turn own over 4,000 subsidiaries registered with the U.S. Federal Reserve Board.<sup>33</sup>

WELLS FARGO & COMPANY owns the following companies,<sup>34</sup> which themselves own investments and financing instruments in U.S. private prison companies<sup>35</sup> as described below:

1. WELLS FARGO INVESTMENT GROUP INC. located in Minneapolis, Minnesota;
    - a. WELLS FARGO INVESTMENT GROUP INC. owns WELLS FARGO FUNDS MANAGEMENT, LLC in San Francisco, which owns 45,248 voting shares in the GEO Group. Wells Fargo Funds Management voted its shares for Management-recommended candidates for GEO's board of directors in GEO's 2010 and 2011 annual shareholder meetings.<sup>36</sup>
    - b. WELLS FARGO INVESTMENT GROUP INC. owns WELLS FARGO ADVISORS LLC (St. Louis, Missouri), which owns 5,928 voting shares in GEO and 1,004 voting shares in CCA. WELLS FARGO ADVISORS LLC is also the broker/dealer for the sale of 154,722 shares of GEO stock.<sup>37</sup>
  2. WELLS FARGO NATIONAL BANK, NA located in Sioux Falls, South Dakota owns only 126 voting shares and 80 non voting shares in GEO and 32,616 voting shares and 722 shared vote shares and 485 non-voting shares in CCA. WELLS FARGO NATIONAL BANK, NA is the syndicator of a \$748 million line of credit to CCA,<sup>38</sup> and the Trustee for the creditors that GEO owes \$571,141,000 under the terms of two loans.<sup>39</sup>
    - a. WELLS FARGO NATIONAL BANK, NA owns WELLS CAPITAL MANAGEMENT INCORPORATED in Los Angeles, which owns 830,240 voting shares and 3,843,443 non-voting shares in GEO.
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3. WFC HOLDINGS CORPORATION located in San Francisco, California
  - a. WFC HOLDINGS CORPORATION is part owner of WELLS FARGO DELAWARE TRUST COMPANY, NA in Wilmington, Delaware, which owns 418 voting shares in CCA.
4. EVEREN CAPITAL CORPORATION located in Charlotte, North Carolina
  - a. EVEREN CAPITAL CORPORATION owns WELLS FARGO SECURITIES LLC in Charlotte, North Carolina, which owns 2,531 voting shares in GEO.
  - b. EVEREN CAPITAL CORPORATION also owns WELLS FARGO DELAWARE TRUST COMPANY, NA in Wilmington Delaware, which owns 418 voting shares in CCA.

Wells Fargo's support for companies that directly profit from ICE's Secure Communities Program is a humiliation to all the families Wells tries to say they are supporting.

Wells Fargo has large investments in five companies that have received S-Comm contracts, and has provided financing for three of those companies. The companies with Secure Communities contracts that Wells Fargo has invested in are CCA, SAIC, IBM, Booz Allen Hamilton, and GEO. The three that received financing directly from Wells Fargo are CCA, SAIC, and GEO.<sup>40</sup>

As we were finishing this tool kit and in a major boost to the efforts to the campaign, its partners and allies, new SEC filings reveal that, as of September 30, 2012, Wells Fargo and Company and its subsidiaries divested nearly 75% of its aggregate holdings in the Geo Group.

According to an SEC filing made public on October 10<sup>th</sup>, 2012, Wells Fargo and Company and its subsidiaries had aggregate holdings of 3,061,851 shares, or 4.98% of Geo Group's common stock as of September 30, down from the 9,185,823 shares or 19.56% of Geo Group's common stock reported as in the December 31, 2011 SEC filing of the same required report. (Wells Fargo and Geo Group SEC filings can be found under the SEC tab at <http://wfdetentions.wordpress.com/lobbyist/>)

Although we congratulated Wells Fargo on its well advised decision to dump the private prison stock we will continue to call on the financial industry giant to rid itself of the rest of its private prison holdings and to cease financing private prison companies' efforts to build, fill and manage immigrant detention centers and other private prisons.



### **Faith Community Success Story: How the United Methodist Church Divested**

*An interview with Laura Markle Downton, National Organizer for Restorative Justice with the General Board of Church and Society of the United Methodist Church, sheds light on their experience of successfully divesting nearly \$1 million in stock in Corrections Corporation of America (CCA) and the Geo Group (GEO) and the*



*establishment of a permanent social screen preventing future investment in for-profit prison corporations.*

Laura serves as a national organizer working to support a growing network of United Methodists who are seeking to end mass incarceration and the criminalization of communities of color in the US. "The work is grounded in a restorative justice framework that calls for the healing of all involved when harm is committed. We recognize that the current justice system does not achieve the goals of restoration in the community and frankly is causing more harm, particularly through over-incarceration, over-policing efforts disproportionately targeting communities of color, through the criminal justice and immigration systems."<sup>41</sup>

The United Methodist Church has done extensive work in mobilizing United Methodists in immigration reform issues and supporting efforts to end mass incarceration. Their immigration work has what they called "Rapid Response Teams, which are comprised of persons tasked with forming teams or task forces to mobilize their annual (regional) conferences in support of just, humane immigration reform. There are 40 Rapid Response teams in 31 U.S. states."<sup>42</sup> In the past year, hundreds of United Methodist congregations have engaged in study of Michelle Alexander's *The New Jim Crow: Mass Incarceration in the Age of Colorblindness*, exposing the ways the US criminal justice system functions as a new form of social control and legal discrimination against communities of color. Teams of people of faith are mobilizing to support sentencing reform, an end to private prisons, and a just re-entry for those returning home following incarceration.

*"Teams of people of faith are mobilizing to support sentencing reform, and end to private prisons, and a just re-entry for those returning home following incarceration"*

In 2011, Laura was part of a delegation convened by Carol Barton from the United Methodist Women<sup>43</sup> to attend the Detention Watch Network annual gathering in Austin, Texas. At the conference they attended a workshop facilitated by Detention Watch Network and Grassroots Leadership<sup>44</sup> titled *Money Trail to your Jail* that focused on the private prison industry's relationship to immigration detention and on the clear connections between lobbyists, public officials, and rise of immigrants detained in private prisons.

The United Methodist delegation was inspired and had many conversations about how to respond. Once they returned home, their research about their own investments as a denomination began. Laura described the steps they took.

*"Initially we engaged in a process of communications with our colleagues at the General Board of Pension and Health Benefits, an agency of the denomination tasked with managing the pension portfolios of pastors and lay leaders in the church. The investment information about the shareholdings in the pension fund is public information. Because the information is not simple to decipher, we made inquiry to our colleagues who manage the funds about whether the shareholdings of the church included Corrections Corporation of America and GEO Group, the two largest for-profit private prison corporations. When our colleagues at the GBPHB confirmed that we were indeed shareholders in nearly \$1 million stock in the two corporations, we then inquired about the amount of profit that the denomination had made in the past years from those investments. It was a very sad and frustrating day, and also a day to take action."*

*"When our colleagues...confirmed that we were indeed shareholders in nearly \$1 million stock in the two corporations, we then inquired about the amount of profit that the denomination had made in the past years from those investments. It was a very sad and frustrating day, and also a day to take action."*

There was an amazing excitement running through Laura's voice when she described the process that finally led to the actual divestment

Laura, Bill Mefford, the Director of Civil and Human Rights of the United Methodist Church's General Board of Church and Society, Carol Barton, David Wildman, the executive secretary for Human Rights & Racial Justice with the [United Methodist Church's General Board of Global Ministries](#) began conversations with Bishop Minerva Carcaño, and many who had been involved in the immigration and prison work.

There were conversations about the most effective routes they could take, including whether engagement in shareholder advocacy would be the primary response, or whether seeking divestment for the Church funds was the most faithful response. Laura and I spoke about engaging shareholders in advocacy and the dramatic impact that work can have when

engaged in a strenuous way. They chose to work on the route of divestment because for them, they "... *felt that the contradiction of making another dollar from the incarceration of our sisters and brothers as a denomination rooted in the Wesleyan tradition was simply indefensible. We [the church] held about 1 million dollars in both CCA and GEO and had made \$241,000 on the investment in the past several years.* "

**After that decision was made, the organizing began!**

*humane immigration policy, an end to deportation, detention and mass incarceration. We [they]... were struck by the profound contradiction between our advocacy for justice for our neighbors while profiting from their incarceration. We [they] needed... to make a change!"*



1) Organizers spread the word in Methodist Churches across the United States. They told congregations that they were "... *profiting from private prison and private detention facilities at the same time [they]... were advocating for just and*

2) They also created a petition to alert church members that they were shareholders in CCA and GEO Group. The petition had three asks:

*"a) Divest immediately from CCA and GEO group*

*b) Establish a screen to permanently prevent us at any time in the future from profiteering in caging of people and profiteering from prisons*

*c) That the money that had been made, the profits that the denomination had received that shareholding in CCA and GEO, that the money actually go directly to organizations or collective work of folks who themselves had been in detention."*

3) They drew upon Methodist efforts underway for advancing justice. "*Congregations hosted what they called Internet Justice Cafes<sup>45</sup>. Around Christmastime each year, many churches host a program called Angel Tree<sup>46</sup> in which congregants buy Christmas gifts for children whose parents are incarcerated. In conjunction with hosting an Angel Tree to remember the children of the incarcerated, churches also hosted Internet Justice Cafés in which laptops were provided for congregants to sign the private prison divestment petition.*" Internet Justice Cafés served as an online organizing tool mobilizing Methodists and supporters to sign the petition.

**Over a thousand Methodists very quickly signed the petition!**

*"What we came to agree upon was that despite the fact that financially this is a high growth industry, [it] is in total violation of our theological commitments as people of faith. To profit from incarceration is in total contradiction of our Social Principles. Therefore we must divest!"*

The United Methodist community came forward and mobilized quickly. At the same time that people were making phone calls and bringing awareness to the issue, there were conversations within the different branches of the Church. "*What we came to agree upon was that despite the fact that financially this is a high growth industry, [it] is in total violation of our theological commitments as people of faith. To profit from incarceration is in total contradiction of our Social Principles. Therefore we must divest!"*

It was the work of those who had come before this effort who paved the way for this important victory. The team of advocates drew upon previous statements about restorative justice found in the *Social Principles*. Laura cited Harmon Wray, a lifelong criminal justice advocate who worked as a tireless advocate calling for restorative justice for those inside and outside the walls of prison,<sup>47</sup> as well as one worked to expose "the dangers of private prisons."

Laura also mentioned John Wesley, the founder of the Methodist movement, who "spent a majority of his time visiting those in prison, paying off the debts of those held in debtors prison."

The divestment process from private prisons and establishment of a social screen to prevent future all future investment in private prisons required a process of conversation and listening in the church. Laura says "*conversation prioritized respect*

*and honest communication, with an emphasis on calling one to seek the most authentic expression of our faith. We found our primary model in Jesus who actually told us that what we do to those in prison, we actually do to him. Do we welcome him? Certainly [by] making money off his incarceration we are in complete contradiction to what we are called to do."*

The work of all the committed volunteers finally paid off in the New Year:

*"Just after celebrating the New Year, on January 3<sup>rd</sup> of this year [2012] the General Board of Pension and Health Benefits of the United Methodist Church publicly announced the establishment of a permanent social screen against profit from for-profit prisons, and immediately divested its nearly \$1 million in CCA and Geo Group. This was in response to very active and engaged United Methodists acting together and raising their voices together to say this is unjust and this cannot continue."*

The announcement inspired others to do the same! Having met in the summer of 2012, the Board of Directors and Funds Management Committee of The United Methodist Church Foundation also amended their social screen portfolio to screen against investment in for-profit prison and detention facilities. The UMC Foundation had held shares in Corrections Corporation of America, violating the new screen. As a result, the UMC Foundation also divested of private prison corporation funds.

The United Methodist Divestment Resolution and divestment is a great example of how you can begin to organize in your faith community.

#### You too can organize your faith community! This is the process

- 1) Research your faith community. What body holds the pensions and investments? Who is responsible for making decisions about those investments?
- 2) Ask the Chief Financial Officer of your faith community about the list of investments. Even if your faith community is not directly invested with CCA or the Geo Group, check for the top institutional investors of those private prisons. Does the organization have investments with those institutional investors, such as Wells Fargo, General Electric, BlackRock or Vanguard?
- 3) Identify other members you can recruit. Identify your allies and opponents. Many faith communities have a variety of ministries. Find which ones will be aligned with your work.
- 4) Once you have determined the answers regarding your organization's investments, begin to organize and connect with other congregations. Use social media, ministries, workshops, and media.

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<sup>1</sup> Waslin, Michele. "Secure Communities: A Fact Sheet." *Immigration Policy Center*. Nov. 2011. Web. 18 Oct. 2012. <<http://immigrationpolicy.org/just-facts/secure-communities-fact-sheet>>.

<sup>2</sup> *Deportation of Parents of U.S.-Born Citizens*. Homeland Security - U.S. Immigration and Customs Enforcement, 26 Mar. 2012. PDF. <<http://www.lirs.org/wp-content/uploads/2012/07/ICE-DEPORT-OF-PARENTS-OF-US-CIT-FY-2011.pdf>>.

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<sup>3</sup> Guttin, Andrea, Esq. *The Criminal Alien Program: Immigration Enforcement in Travis County, Texas*. Rep. Immigration Policy Center, Feb. 2010. Web. 25 Sept. 2012. <[http://www.immigrationpolicy.org/sites/default/files/docs/Criminal\\_Alien\\_Program\\_021710.pdf](http://www.immigrationpolicy.org/sites/default/files/docs/Criminal_Alien_Program_021710.pdf)>.

<sup>4</sup> *Immigration Enforcement Actions: 2010*. Rep. Homeland Security, Office of Immigration Statistics, June 2011. Web. 27 Sept. 2012. <<http://www.dhs.gov/xlibrary/assets/statistics/publications/enforcement-ar-2010.pdf>>.

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<sup>5</sup> Alonzo, Alexsa, Kristin Macleod-Ball, Greg Chen, and

Su Kim. *Immigration Enforcement Off Target - Minor Offenses with Major Consequences*. Rep. American Immigration Lawyers Association, Aug. 2011. Web. 20 Sept. 2012.  
<<http://www.aila.org/content/fileviewer.aspx?docid=36646&linkid=236762>>.

<sup>6</sup> *GEO Group Inc.* (2012). Form 10K for the fiscal year ended January 1, 2012. Retrieved from <http://www.sec.gov/edgar.shtm> & Correction Corp of America (2012). Form 10K for the Fiscal Year Ended December 31, 2011. Retrieved from <Http://www.sec.gov/edgar.shtm>

<sup>7</sup> In their own words; *In Their Own Words, Enduring Abuse in Arizona Immigration Detention Centers*. Rep. American Civil Liberties Union of Arizona, July 2011. Web. Sept. 15. <<http://www.acluaz.org/sites/default/files/documents/detention%20report%202011.pdf>>.

<sup>8</sup> Burk, Garance, and Laura Wides-Munoz. "FOCUS: Immigrants Prove Big Business for Prison Companies." *Http://www.heraldnews.com*. 04 Aug. 2012. Web. 18 Sept. 2012.  
<<http://www.heraldnews.com/news/x1225366688/FOCUS-Immigrants-prove-big-business-for-prison-companies>>.

<sup>9</sup> Ashton, Paul, and Amanda Petteruti. *Gaming the System, How the Political Strategies of Private Prison Companies Promote Ineffective Incarceration Policies*. Rep. Justice Policy Institute, June 2011. Web.  
<[http://www.justicepolicy.org/uploads/justicepolicy/documents/gaming\\_the\\_system.pdf](http://www.justicepolicy.org/uploads/justicepolicy/documents/gaming_the_system.pdf)>.

<sup>10</sup> "The Influence of the Private Prison Industry in Immigration Detention." *Detention Watch Network*. Grassroots Leadership, and Sarah V. Carswell. Web.  
<<http://www.detentionwatchnetwork.org/privateprisons>>.

<sup>11</sup> Executive Branch Personnel Public Financial Disclosure Report (2006 & 2007) Retrieved from <Http://www.opensecrets.org>

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<sup>12</sup> Vanguard Group (2006, 2007, 2012). Form 13F for the Period Ending June 30, 2006, 2007, 2012. Retrieved from <<http://www.sec.gov/edgar.shtm>>.

<sup>13</sup> "Swift Raid Collaborative." *Swift Raid Collaborative*. Center for Human Rights and Constitutional Law, 2007. Web. <<http://nationalimmigrationreform.org/>>.

<sup>14</sup> Department of Homeland Security Issues Final Rule on Social Security No-Match Letters, Announces Future Border Security Initiatives August 13, 2007. " *Morgan Lewis Immigration Alert*. Morgan, Lewis, & Bockius LLP. All Rights Reserved, 13 Aug. 2007. Web.  
<[http://www.morganlewis.com/pubs/ImmigrationAlert\\_SecurityNo-MatchLetters\\_13aug07.pdf](http://www.morganlewis.com/pubs/ImmigrationAlert_SecurityNo-MatchLetters_13aug07.pdf)>.

<sup>15</sup> Flores-Figueroa vs. United States. No. 08-108. Supreme Court of the US. 04 May 2009. Web.

<sup>16</sup> "Secure Communities." *National Immigration Forum*. Web.  
<[http://www.immigrationforum.org/images/uploads/Secure\\_Communities.pdf](http://www.immigrationforum.org/images/uploads/Secure_Communities.pdf)>.

<sup>17</sup> Sullivan, Laura. "Prison Economics Help Drive Ariz. Immigration Law." *NPR*. NPR, 28 Oct. 2010. Web.  
<<http://www.npr.org/2010/10/28/130833741/prison-economics-help-drive-ariz-immigration-law>>.

<sup>18</sup> GEO is a small cap company with less than \$2 billion in assets. CCA is marginally a mid cap company with less than \$2.5 billion in assets.

<sup>19</sup> Lobbyists for Wells Fargo, General Electric and the Financial Services Roundtable have lobbied for policies and appropriations that have resulted in the creation, growth, and public financing of the massive private sector immigrant prisoner market.

<sup>20</sup> "The Influence of the Private Prison Industry in Immigration Detention." *Detention Watch Network*. Web.  
<<http://www.detentionwatchnetwork.org/privateprisons>>.

<sup>21</sup> Corrections Corporations of America, June 30th, 2012 Form 13G (Filed May 5th, 2011) United States Securities

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and Exchange Commission

[Http://www.sec.gov/Archives/edgar/data/1070985/000095012311050952/c17421sc13gza.htm](http://www.sec.gov/Archives/edgar/data/1070985/000095012311050952/c17421sc13gza.htm)

<sup>22</sup> As of this date, The last lobby report filed with the secretary of the U.S. Senate by the Podesta Group as a representative of the GEO Group was for lobbying in the U.S. House of Representatives, U.S. Senate, and Justice Department and the Bureau of Prisons budget appropriations issues during the 3<sup>rd</sup> Quarter of 2010.

<sup>23</sup> *GEO Group Inc.* (2012). Form 10K for the fiscal year ended January 1, 2012. Retrieved from <http://www.sec.gov/edgar.shtm> & Correction Corp of America (2012).

<sup>24</sup> Complaint, DePriest ex rel. C.B. v. Epps, No. 3:10-cv-00663-CWR-FKB (S.D. Miss. 2012), available at <https://www.aclu.org/files/assets/2010-11-16-WalnutGroveComplaint.pdf>; Holbrook Mohr, *Feds: Young Inmates Abused at Private Miss. Prison*, ASSOCIATED PRESS, Mar. 21, 2012

<sup>25</sup> U.S. DEPT. OF JUSTICE, INVESTIGATION OF THE WALNUT GROVE YOUTH CORRECTIONAL FACILITY, WALNUT GROVE, MISSISSIPPI (2012), available at <http://www.justice.gov/crt/about/spl/documents/walnutgrovefl.pdf>.

<sup>26</sup> Order Approving Settlement at 5, DePriest ex rel. C.B. v. Epps, No. 3:10-cv-00663-CWR-FKB (S.D. Miss. 2012), available at <https://www.aclu.org/files/assets/order.pdf>.

<sup>27</sup> Enlace and the Florida Immigrant Coalition. *PROFIT FROM PAIN IS INHUMANE: GEO Group Shareholders' Meeting in Palm Beach*. National Prison Divestment Campaign. Florida Immigrant Coalition, 4 May 2012. Web. 24 Oct. 2012.  
<<http://prisondivestment.wordpress.com/2012/05/03/profit-from-pain-is-inhumane-geo-group-shareholders-meeting-in-palm-beach/>>.

<sup>28</sup> Correction Corp of America (2012). Form 10K for the Fiscal Year Ended December 31, 2011. Retrieved from [Http://www.sec.gov/edgar.shtm](http://www.sec.gov/edgar.shtm)

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<sup>29</sup> *Braswell v. CCA*, 419 F. App'x 622, 623-24 (6th Cir. 2011); see also David Reutter, *Summary Judgment for CCA Reversed in Filthy Jail Conditions Case*, PRISON LEGAL NEWS, Nov. 11, at 18-19, available at [https://www.prisonlegalnews.org/\(S\(mhpqbarjly5jcz455uifs155\)\)/includes/\\_public/\\_issues/pln\\_2011/11pln11.pdf](https://www.prisonlegalnews.org/(S(mhpqbarjly5jcz455uifs155))/includes/_public/_issues/pln_2011/11pln11.pdf).

<sup>30</sup> *The Corrections Corporation of America How CCA Abuses Prisoners, Manipulates the Public and Destroys Communities*. Rep. Corazon De Tucson, Jan. 2012. Web. <[http://www.privateci.org/private\\_pics/corazon-cca-report.pdf](http://www.privateci.org/private_pics/corazon-cca-report.pdf)>.

<sup>31</sup> *Ibid*

<sup>32</sup> Kunichoff, Yana. "Voluntary" Work Program Run in Private Detention Centers Pays Detained Immigrants \$1 a Day." *Truthout*. N.p., 27 July 2012. Web. <<http://truthout.org/news/item/10548-voluntary-work-program-run-in-private-detention-centers-pays-detained-immigrants-1-a-day>>.

<sup>33</sup> United States Federal Reserve System Wells Fargo & Company (1120754) Hierarchy Report created June 16, 2011.

<sup>34</sup> *Ibid*

<sup>35</sup> 03/31/2012 filing of Wells Fargo & Company's U.S. Securities & Exchange Commission Form 13F-HR.

<sup>36</sup> 03/31/2012 filing of Wells Fargo & Company's U.S. Securities & Exchange Commission Form 13F-HR.

<sup>37</sup> 05/14/2012 filing of GEO Group's U.S. Securities & Exchange Commission Form 424B.

<sup>38</sup> Corrections Corporation of America U.S. Securities & Exchange Commission Form 10Q filing for the quarterly period ended March 31, 2012.

<sup>39</sup> GEO Group Inc. U.S. Securities & Exchange Commission Form 10-K filing for the fiscal year ended January 1, 2012.

<sup>40</sup> <http://wfdetentions.wordpress.com/>

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<sup>41</sup> Interview with Laura Markle Downton Interview  
*General Board of Church and Society of the United  
Methodist Church. June 18<sup>th</sup>, 2012*

<sup>42</sup> Journal documents United Methodist commitment to  
just, humane immigration policies. See:  
[http://www.umc-  
gbcs.org/site/apps/nlnet/content2.aspx?c=frLJK2PKLqF  
&b=3455813&ct=11775775](http://www.umc-gbcs.org/site/apps/nlnet/content2.aspx?c=frLJK2PKLqF&b=3455813&ct=11775775)

<sup>43</sup> United Methodist Women is the largest  
denominational faith organization for women with  
approximately 800,000 members whose mission is  
fostering spiritual growth, developing leaders and  
advocating for justice. See: [http://new.gbgs-  
umc.org/umw/about/mission/](http://new.gbgs-umc.org/umw/about/mission/)

<sup>44</sup> Both Grassroots leadership and Detention Watch  
Network are steering committee members of the Private  
Prison Divestment Campaign.

<sup>45</sup> A story about the Internet Justice Cafes, see:  
[http://www.umcgbcs.org/site/apps/nlnet/content3.aspx?  
c=frLJK2PKLqF&b=2952505&ct=11548451&notoc=1&pri  
ntmode=1](http://www.umcgbcs.org/site/apps/nlnet/content3.aspx?c=frLJK2PKLqF&b=2952505&ct=11548451&notoc=1&printmode=1)

<sup>46</sup> A sample of an Angel Tree:  
<http://www.swansboroumc.org/angeltree.html>

<sup>47</sup> See: <http://www.voma.org/docs/connect15.pdf>