

September 20 2017 9:34 AM

KEVIN STOCK
COUNTY CLERK
NO: 17-2-11422-2

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8 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**
9 **FOR PIERCE COUNTY**

10 STATE OF WASHINGTON,

NO.

11 Plaintiff,

COMPLAINT

12 v.

13 THE GEO GROUP, INC.,

14 Defendant.

15 **I. INTRODUCTION**

16 **1.1** The State of Washington files this action against Defendant The GEO Group, Inc.
17 (“Defendant” or “GEO”) to enforce Washington’s minimum wage laws and to remedy the unjust
18 enrichment that results from Defendant’s long standing failure to adequately pay immigration
19 detainees for their work at the privately owned and operated Northwest Detention Center
20 (“NWDC”).

21 **1.2** The enforcement of minimum wage laws is of vital and imminent concern to the
22 people of Washington as the minimum wage laws protect Washington workers and create
23 employment opportunities.

24 **1.3** Each year Washington sets an hourly minimum wage, and employees protected by
25 Washington’s minimum wage laws must be paid at least the set hourly minimum wage.
26

1 **VII. PRAYER FOR RELIEF**

2 Wherefore, the State of Washington prays that the Court:

3 **7.1** Declare that detainees who work at NWDC are “employees” as defined by RCW
4 49.46.010(3);

5 **7.2** Declare that Defendant is an “employer” of detainee workers at NWDC as defined
6 by RCW 49.46.010(4);

7 **7.3** Declare that Defendant and must comply with RCW 49.46.020 for work
8 performed by detainees at NWDC;

9 **7.4** Enjoin Defendant from paying detainees less than the minimum wage for work
10 performed at NWDC;

11 **7.5** Find and declare that Defendant has been unjustly enriched by its practice of
12 failing to adequately pay detainee workers for their labor at NWDC;

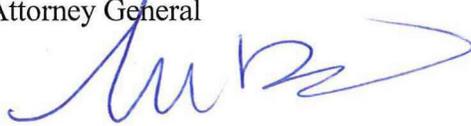
13 **7.6** Order Defendant to disgorge the amount by which it has been unjustly enriched;

14 **7.7** An award of reasonable attorneys’ fees and costs that the State incurs in
15 connection with this action; and

16 **7.8** Award such additional relief as the interests of justice may require.

17 DATED this 20th day of September 2017

18 ROBERT W. FERGUSON
19 Attorney General



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