



Esther L. Moreno

Akerman LLP
Three Brickell City Centre
98 Southeast Seventh Street
Suite 1100
Miami, FL 33131

January 20, 2021

T: 305 374 5600
F: 305 374 5095

VIA E-MAIL (shareholderproposals@sec.gov)

Office of Chief Counsel
Division of Corporation Finance
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549

**Re: The GEO Group, Inc. —
Withdrawal of No-Action Request dated December 21, 2020**

Dear Sir or Madam:

We submit this letter on behalf of The GEO Group, Inc. ("GEO" or the "Company"). In a No-Action Request Letter previously submitted on December 21, 2020 ("December No-Action Letter"), the Company requested confirmation from the staff of the Division of Corporation Finance of the U.S. Securities and Exchange Commission that GEO could properly omit from its proxy materials for its 2021 Annual Meeting of Shareholders (the "2021 Proxy Materials") the shareholder proposal and supporting statement (the "Proposal") submitted by the Oregon State Treasury, by and through the Oregon Investment Council on behalf of the Oregon Public Employees Retirement Fund (the "Proponent").

In the December No-Action Letter, the Company requested that the Proposal be omitted pursuant to Rule 14a-8(i)(11) of the Securities Exchange Act of 1934 because the Proposal substantially duplicated another shareholder proposal that was previously submitted to the Company by The Service Employees International Union Pension Plans Master Trust (the "SEIU"), which the Company will include in its 2021 Proxy Materials. The Proposal and the SEIU Proposal are identical.

After the submission of the December No-Action Letter, the Proponent contacted the Company to request that it be included as a co-filer to the SEIU Proposal and provided a letter in writing to this effect on January 20, 2021, a copy of which is attached as Exhibit A. The Company has agreed to include the Proponent as a co-filer to the SEIU Proposal in its 2021 Proxy Materials. As a result, GEO is formally withdrawing the request submitted in the December No-Action Letter.

If you have any questions or need additional information regarding GEO's request, please do not hesitate to contact the undersigned at 305-982-5519 or esther.moreno@akerman.com.

Sincerely,

cc: Joseph Negron, The GEO Group, Inc.
Pablo Paez, The GEO Group, Inc.
Louis Carrillo, The GEO Group, Inc.
Michael Viteri, Oregon State Treasury
Maureen O'Brien, Segal Marco Advisor

akerman.com

EXHIBIT A



Tobias Read
Oregon State Treasurer

Michael Kaplan
Deputy State Treasurer

January 20, 2021

By overnight delivery and email:

Mr. Joe Negron
Senior Vice President, General Counsel and Corporate Secretary
The Geo Group, Inc.
One Park Place, Suite 700 621
Northwest 53rd Street
Boca Raton, Florida 33487-8242
jnegron@geogroup.com

cc: Esther L. Moreno, Akerman LLP

RE: Oregon State Treasury - Shareholder Proposal

Dear Mr. Negron:

In my capacity as Treasurer of the State of Oregon, by and through the Oregon Investment Council on behalf of the Oregon Public Employees Retirement Fund (the "Fund"), I write in response to the letter submitted by Ms. Esther L. Moreno from Akerman LLP to the U.S. Securities and Exchange Commission, dated December 21, 2020, requesting to exclude the Oregon State Treasury shareholder proposal (the "Proposal") from the 2021 Proxy Materials (the "Letter"). The Letter indicates that the Proposal "substantially duplicates another shareholder proposal submitted to" The Geo Group, Inc. (the "Company"). The Fund intended to co-file the Proposal at the 2020 annual meeting of shareholders (the "Annual Meeting") alongside the Service Employees International Union Pension Plans Master Trust ("SEIU"). The Fund respectfully requests that the Company include Oregon State Treasury as co-filing alongside SEIU in the Company's proxy statement for the Annual Meeting.

We welcome the opportunity to discuss the Proposal with you in more detail. Please reach out to Michael Viteri, Senior Public Equity Investment Officer at Oregon State Treasury or Maureen O'Brien, Vice President and Corporate Governance Director at Segal Marco Advisors. Mr. Viteri can be reached at (503) 689-6035 or Michael.Viteri@ost.state.or.us. Ms. O'Brien can be reached at 312-612-8446 or mobrien@segalmarco.com.

Sincerely,

Tobias Read



Investment Division
16290 SW Upper Boones Ferry Road
Tigard, OR 97224
503.431.7900

Main Office
350 Winter Street, Suite 100
Salem, OR 97301-3896
503.378.4000

oregon.gov/treasury
oregon.treasurer@state.or.us



Esther L. Moreno

Akerman LLP
Three Brickell City Centre
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Miami, FL 33131

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December 21, 2020

VIA E-MAIL (shareholderproposals@sec.gov)

Office of Chief Counsel
Division of Corporation Finance
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549

**Re: The GEO Group, Inc. —
Shareholder Proposal Submitted by
Oregon State Treasury**

Dear Sir or Madam:

We submit this letter and enclosed materials on behalf of The GEO Group, Inc. ("GEO" or the "Company") to request confirmation from the staff of the Division of Corporation Finance (the "Staff") of the U.S. Securities and Exchange Commission ("SEC" or the "Commission") that GEO may properly omit from its proxy materials for its 2021 Annual Meeting of Shareholders (the "2021 Proxy Materials") the shareholder proposal and supporting statement (the "Proposal") submitted by the Oregon State Treasury, by and through the Oregon Investment Council on behalf of the Oregon Public Employees Retirement Fund (the "Proponent"). This letter sets forth the reasons why GEO believes it is justified in taking this action.

Pursuant to Rule 14a-8(j) promulgated under the Securities Exchange Act of 1934, as amended (the "Exchange Act"), and Staff Legal Bulletin No. 14D (Nov. 7, 2008) ("SLB 14D"), we make this submission to the SEC via email to shareholderproposals@sec.gov and are simultaneously providing a copy of this submission to the Proponent as notice of GEO's intention to omit the Proposal from its 2021 Proxy Materials. GEO will promptly forward to the Proponent any Staff responses regarding the no-action request sent solely to GEO and reminds the Proponent that if correspondence is submitted to the Staff by the Proponent with respect to the Proposal, a copy of that correspondence should be concurrently sent to the undersigned, pursuant to Exchange Act Rule 14a-8(k).

Pursuant to Rule 14a-8(j), we are submitting this letter and enclosed materials not less than 80 days before the Company intends to file its definitive 2021 Proxy Materials. This letter constitutes the Company's statement of the reasons it deems the omission of the Proposal as proper.

THE COMPANY

GEO is a fully-integrated real estate investment trust ("REIT") specializing in the ownership, leasing and management of secure facilities, processing centers and community reentry centers in the United States, Australia, South Africa and the United Kingdom. GEO owns, leases and operates a broad range of facilities, including maximum, medium and minimum security facilities, processing centers, as well as community-based reentry facilities and offers an expanded delivery of rehabilitation services under its 'GEO Continuum of Care[®]' platform. The 'GEO Continuum of Care[®]' program integrates enhanced rehabilitative programs, which are evidence-based and include cognitive behavioral treatment and post-release services, and provides academic and vocational classes in life skills and treatment programs while helping individuals reintegrate into their communities. GEO develops new facilities based on contract awards, using its project development expertise and experience to design, construct and finance what it believes are state-of-the-art facilities that maximize security and efficiency. GEO provides innovative compliance technologies, industry-leading monitoring services, and evidence-based supervision and treatment programs for community-based parolees, probationers and pretrial defendants. GEO also provides secure transportation services for individuals as contracted domestically and in the United Kingdom through its joint venture, GEO Amey PECS Ltd.

At September 30, 2020, our worldwide operations include the management and/or ownership of approximately 93,000 beds at 123 facilities, including idle facilities, projects under development and recently awarded contracts, and also include the provision of community supervision services for more than 210,000 individuals, including approximately 100,000 through an array of technology products including radio frequency, GPS, and alcohol monitoring devices.

GEO provides its facilities and services exclusively to governmental entities at the federal, state, and local levels. Thus, as a government contractor, it has no non-affiliated private-sector clients.

THE PROPOSAL

The Proposal states in relevant part as follows:

Whereas, we believe in full disclosure of The GEO Group's ("GEO") direct and indirect lobbying activities and expenditures to assess whether GEO's lobbying is consistent with GEO's expressed goals and in the best interests of shareholders.

Resolved, the shareholders of GEO request the preparation of a report, updated annually, disclosing:

1. Company policy and procedures governing lobbying, both direct and indirect, and grassroots lobbying communications.
2. Payments by GEO used for (a) direct or indirect lobbying or (b) grassroots lobbying communications, in each case including the amount of the payment and the recipient.

3. GEO's membership in and payments to any tax-exempt organization that writes and endorses model legislation.

4. Description of management's and the Board's decision making process and oversight for making payments described in sections 2 and 3 above.

For purposes of this proposal, a "grassroots lobbying communication" is a communication directed to the general public that (a) refers to specific legislation or regulation, (b) reflects a view on the legislation or regulation and (c) encourages the recipient of the communication to take action with respect to the legislation or regulation. "Indirect lobbying" is lobbying engaged in by a trade association or other organization of which GEO is a member.

Both "direct and indirect lobbying" and "grassroots lobbying communications" include efforts at the local, state and federal levels."

The report shall be presented to the Audit Committee or other relevant oversight committees and posted on GEO's website.

Supporting Statement

We encourage transparency in GEO's use of funds to lobby. GEO spent \$8.63 million from 2010-2019 on federal lobbying, including \$1.7 million on lobbying in 2017 "to secure contracts and influence the nation's immigration policy."¹ This does not include state lobbying expenditures, where GEO also lobbies but disclosure is uneven or absent. For example, GEO had at least 124 lobbyists in 20 states in 2019 (followthemoney.org), and GEO was identified as the prison operator with worst COVID-19 safety record and having deep political roots in Florida.²

GEO is a member of the National Association of Real Estate Investment Trusts, which spent \$31,684,703 on lobbying from 2010-2019. GEO is also listed as a member of the Florida Chamber of Commerce, which had at least 25 lobbyists in Florida in 2017.³ GEO does not comprehensively disclose its members in, or payments to, trade associations, or the amounts used for lobbying. Absent a system of accountability, company assets could be used for objectives contrary to GEO's long-term interests.

GEO has faced negative publicity for its lobbying. For example, GEO's lobbying over how long immigrant children in Texas can be detained has attracted scrutiny,⁴ and a GEO lobbyist attracted scrutiny for gaining unauthorized access to a virtual Homeland Security subcommittee hearing.⁵ We believe the reputational damage stemming from GEO's direct and

¹ <https://www.opensecrets.org/news/2018/06/zero-tolerance-immigration-is-big-money-for-contractors-nonprofits/>

² <https://www.tampabay.com/news/health/2020/05/01/florida-prison-operator-with-worst-covid-19-safety-record-has-deep-political-roots/>

³ <https://www.flchamber.com/the-good-the-bad-and-the-ugly/>

⁴ <https://theintercept.com/2017/05/02/private-prison-corporation-wrote-texas-bill-extending-how-long-immigrant-children-can-be-detained/>

⁵ <https://thehill.com/policy/technology/507753-gop-lawmaker-raises-concern-over-lobbyist-gaining-unauthorized-access-to>

indirect lobbying efforts harms long-term value creation by GEO,⁶ and thus we urge the Board to institute comprehensive lobbying disclosure.

A copy of the Proposal and the accompanying letter from the Proponent is attached to this letter as Exhibit A.

REASONS FOR EXCLUDING THE PROPOSAL

We believe the Proposal may be properly omitted from the 2021 Proxy Materials pursuant to:

- Rule 14a-8(i)(11) because the Proposal substantially duplicates another shareholder proposal that was previously submitted to the Company, which the Company will include in its 2021 Proxy Materials.

ANALYSIS

The Proposal May be Omitted Under Rule 14a-8(i)(11) Because the Proposal substantially duplicates another shareholder proposal that was previously submitted to the Company, which the Company will include in its 2021 Proxy Materials.

Rule 14a-8(i)(11) provides that a shareholder proposal may be excluded if it "substantially duplicates another proposal submitted to the company by another proponent that will be included in the company's proxy materials for the same meeting." The Commission has stated that "the purpose of [Rule 14a-8(i)(11)] is to eliminate the possibility of shareholders having to consider two or more substantially identical proposals submitted to an issuer by proponents acting independently of each other." Exchange Act Release No. 34-12999 (Nov. 22, 1976) (the "1976 Release"). Two shareholder proposals need not be identical in order to provide a basis for exclusion under Rule 14a-8(i)(11). The standard that the Staff has traditionally applied in determining whether shareholder proposals are substantially duplicative is whether the shareholder proposals present the same "principal thrust" or "principal focus." Pacific Gas & Electric Co. (avail. Feb. 1, 1993). When two substantially duplicative proposals are received by a company, the Staff has indicated that the company may exclude the later proposal, assuming the company includes the first of the proposals in its proxy materials. See Great Lakes Chemical Corp. (avail. Mar. 2, 1998); see also Pacific Gas & Electric Co. (avail. Jan. 6, 1994).

On December 1, 2020, the Company received the Proposal submitted by the Proponent, dated December 1, 2020, by e-mail. On October 16, 2020, the Company had previously received by e-mail a shareholder proposal submitted by The Service Employees International Union Pension Plans Master Trust (the "SEIU"), dated October 16, 2020 (the "SEIU Proposal"). A copy of the SEIU Proposal and the accompanying letter from the SEIU is attached to this letter as Exhibit B. The Company will include the SEIU Proposal in its 2021 Proxy Materials. The Proposal and the

⁶ <https://boingboing.net/2019/08/04/geo-group-too-filthy-for-edelm.html>

SEIU Proposal are identical in wording, including the supporting statement used to support the Proposal and the SEIU Proposal, the request for a report, the content of the requested report, the annual frequency of the requested report, that the report be presented to the Audit Committee or other relevant oversight committees, and that the report be posted on GEO's website. Given the identical language in the Proposal and the SEIU Proposal, both proposals present the same "principal thrust" or "principal focus." As a result, GEO believes the Proposal may therefore be excluded as duplicative of the SEIU Proposal, which was the first of the two shareholder proposals received by the Company.

Because of the duplication, including both shareholder proposals in the Company's 2021 Proxy Materials would require the Company's shareholders to consider the same matter twice and would create the risk of confusing them. There is the risk that shareholders could assume incorrectly that there are substantive differences between the two proposals and the requested actions. This result would be in direct contradiction of the purpose of Rule 14a-8(i)(11) described above. Accordingly, the Company believes that the Proposal may be excluded from the 2021 Proxy Materials because the Proposal duplicates the SEIU Proposal that was previously submitted to the Company and will be included in the 2021 Proxy Materials.

CONCLUSION

For the reasons stated above, we respectfully request that the Staff concur that GEO may omit the Proposal from its 2021 Proxy Materials.

If you have any questions or need additional information regarding GEO's request, please do not hesitate to contact the undersigned at 305-982-5519 or esther.moreno@akerman.com.

Sincerely,



cc: Joseph Negron, The GEO Group, Inc.
Pablo Paez, The GEO Group, Inc.
Louis Carrillo, The GEO Group, Inc.
Michael Viteri, Oregon State Treasury
Maureen O'Brien, Segal Marco Advisors

EXHIBIT A



**OREGON
STATE
TREASURY**

Tobias Read
Oregon State Treasurer

December 1, 2020

By overnight delivery and email: jnegron@geogroup.com

Mr. Joe Negron
Senior Vice President, General Counsel and Corporate Secretary
The Geo Group, Inc.
One Park Place, Suite 700 621 Northwest 53rd Street
Boca Raton, Florida 33487-8242

RE: Oregon State Treasury - Shareholder Proposal

Dear Mr. Negron:

In my capacity as Treasurer of the State of Oregon, by and through the Oregon Investment Council on behalf of the Oregon Public Employees Retirement Fund (Fund) I write to give notice that pursuant to the 2020 proxy statement of The Geo Group, Inc. (the "Company"), the Fund intends to present the attached proposal (the "Proposal") at the 2020 annual meeting of shareholders (the "Annual Meeting"). The Fund requests that the Company include the Proposal in the Company's proxy statement for the Annual Meeting.

A letter from the Fund's custodian documenting the Fund's continuous ownership of the requisite amount of the Company's stock for at least one year prior to the date of this letter is being sent separately. The Fund also intends to continue its ownership of at least the minimum number of shares required by the SEC regulations through the date of the Annual Meeting. I represent that the Fund or its agent intends to appear in person or by proxy at the Annual Meeting to present the attached Proposal. I declare the Fund has no "material interest" other than that believed to be shared by stockholders of the Company generally.

We welcome the opportunity to discuss this proposal with you in more detail. Please reach out to Michael Viteri, Senior Public Equity Investment Officer at Oregon State Treasury or Maureen O'Brien, Vice President and Corporate Governance Director at Segal Marco Advisors. Mr. Viteri can be reached at 503-431-7918 or Michael.Viteri@ost.state.or.us. Ms. O'Brien can be reached at 312-612-8446 or mobrien@segalmarco.com.

Sincerely,

Tobias Read



Treasurer's Office - Capitol
900 Court Street NE, Room 159
Salem, OR 97301-3896
503.378.4329

Main Office
350 Winter Street, Suite 100
Salem, OR 97301-3896
503.378.4000

oregon.gov/treasury
oregon.treasurer@state.or.us

Whereas, we believe in full disclosure of The GEO Group’s (“GEO”) direct and indirect lobbying activities and expenditures to assess whether GEO’s lobbying is consistent with GEO’s expressed goals and in the best interests of shareholders.

Resolved, the shareholders of GEO request the preparation of a report, updated annually, disclosing:

1. Company policy and procedures governing lobbying, both direct and indirect, and grassroots lobbying communications.
2. Payments by GEO used for (a) direct or indirect lobbying or (b) grassroots lobbying communications, in each case including the amount of the payment and the recipient.
3. GEO’s membership in and payments to any tax-exempt organization that writes and endorses model legislation.
4. Description of management’s and the Board’s decision-making process and oversight for making payments described in sections 2 and 3 above.

For purposes of this proposal, a “grassroots lobbying communication” is a communication directed to the general public that (a) refers to specific legislation or regulation, (b) reflects a view on the legislation or regulation and (c) encourages the recipient of the communication to take action with respect to the legislation or regulation. “Indirect lobbying” is lobbying engaged in by a trade association or other organization of which GEO is a member.

Both “direct and indirect lobbying” and “grassroots lobbying communications” include efforts at the local, state and federal levels.

The report shall be presented to the Audit Committee or other relevant oversight committees and posted on GEO’s website.

Supporting Statement

We encourage transparency in GEO’s use of funds to lobby. GEO spent \$8.63 million from 2010 – 2019 on federal lobbying, including \$1.7 million on lobbying in 2017 “to secure contracts and influence the nation’s immigration policy.”¹ This does not include state lobbying expenditures, where GEO also lobbies but disclosure is uneven or absent. For example, GEO had at least 124 lobbyists in 20 states in 2019 (followthemoney.org), and GEO was identified as the prison operator with worst COVID-19 safety record and having deep political roots in Florida.²

GEO is a member of the National Association of Real Estate Investment Trusts, which spent \$31,684,703 on lobbying from 2010 – 2019. GEO is also listed as a member of the Florida Chamber of Commerce, which had at least 25 lobbyists in Florida in 2017.³ GEO does not comprehensively disclose its memberships in, or payments to, trade associations, or the amounts used for lobbying. Absent a system of accountability, company assets could be used for objectives contrary to GEO’s long-term interests.

¹ <https://www.opensecrets.org/news/2018/06/zero-tolerance-immigration-is-big-money-for-contractors-nonprofits/>

² <https://www.tampabay.com/news/health/2020/05/01/florida-prison-operator-with-worst-covid-19-safety-record-has-deep-political-roots/>

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GEO has faced negative publicity for its lobbying. For example, GEO's lobbying over how long immigrant children in Texas can be detained has attracted scrutiny,⁴ and a GEO lobbyist attracted scrutiny for gaining unauthorized access to a virtual Homeland Security subcommittee hearing.⁵ We believe the reputational damage stemming from GEO's direct and indirect lobbying efforts harms long-term value creation by GEO,⁶ and thus we urge the Board to institute comprehensive lobbying disclosure.

⁴ <https://theintercept.com/2017/05/02/private-prison-corporation-wrote-texas-bill-extending-how-long-immigrant-children-can-be-detained/>

⁵ <https://thehill.com/policy/technology/507753-gop-lawmaker-raises-concern-over-lobbyist-gaining-unauthorized-access-to>

⁶ <https://boingboing.net/2019/08/04/geo-group-too-filthy-for-edelm.html>

EXHIBIT B



October 16, 2020

By overnight delivery and email: jnegron@geogroup.com

Mr. Joe Negron
Senior Vice President, General Counsel and Corporate Secretary
The Geo Group, Inc.
One Park Place, Suite 700
621 Northwest 53rd Street
Boca Raton, Florida 33487-8242

RE: Service Employees International Union Pension Plans Master Trust
Shareholder Proposal

Dear Mr. Negron:

In my capacity as Trustee on the Service Employees International Union Pension Plans Master Trust (the "Fund"), I write to give notice that pursuant to the 2020 proxy statement of The Geo Group, Inc. (the "Company"), the Fund intends to present the attached proposal (the "Proposal") at the 2020 annual meeting of shareholders (the "Annual Meeting"). The Fund requests that the Company include the Proposal in the Company's proxy statement for the Annual Meeting.

A letter from the Fund's custodian documenting the Fund's continuous ownership of the requisite amount of the Company's stock for at least one year prior to the date of this letter is being sent separately. The Fund also intends to continue its ownership of at least the minimum number of shares required by the SEC regulations through the date of the Annual Meeting. I represent that the Fund or its agent intends to appear in person or by proxy at the Annual Meeting to present the attached Proposal. I declare the Fund has no "material interest" other than that believed to be shared by stockholders of the Company generally.

We welcome the opportunity to discuss this proposal with you in more detail. Please reach out to Maureen O'Brien, Vice President and Corporate Governance Director at Segal Marco Advisors. Ms. O'Brien can be reached at 312-612-8446 or mobrien@segalmarco.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Arun Ivatury".

Arun Ivatury
Trustee, SEIU Pension Plans Master Trust

1800 Massachusetts Ave NW
Suite 301
Washington DC 20036-1202
202-730-7542
800-458-1010

Whereas, we believe in full disclosure of The GEO Group’s (“GEO”) direct and indirect lobbying activities and expenditures to assess whether GEO’s lobbying is consistent with GEO’s expressed goals and in the best interests of shareholders.

Resolved, the shareholders of GEO request the preparation of a report, updated annually, disclosing:

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⁵ <https://thehill.com/policy/technology/507753-gop-lawmaker-raises-concern-over-lobbyist-gaining-unauthorized-access-to>

⁶ <https://boingboing.net/2019/08/04/geo-group-too-filthy-for-edelm.html>