EXHIBIT A

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT
07/30/2024 - 9:56AM
Linda Myhre Enlow

Thurston County Clerk

1	Hearing date:	
	Hearing time:	
2	Judge/Čalendar:	

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STATE OF WASHINGTON THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON, DEPARTMENT OF HEALTH,

NO. 24-2-02712-34

Plaintiff,

COMPLAINT FOR INJUNCTIVE RELIEF

v.

THE GEO GROUP, INC.,

Defendant.

Plaintiff, State of Washington, Department of Health, Environmental Public Health Program, alleges as follows:

I. DESCRIPTION OF ACTION

1.1 The Department of Health (Department), Environmental Public Health Program, brings this action under RCW Title 7 and RCW 43.70.190. The Department seeks an order restraining The GEO Group, Inc. (GEO). GEO has refused entry to Department staff who are authorized to investigate threats to public health under RCW 43.70.170. The Department seeks to restrain further refusal of entry.

II. JURISDICTION

2.1 This Court has jurisdiction over the subject matter and over the parties. RCW 43.70.190 directs the Department to bring an action to enjoin a violation or threatened violation of any of the provisions of the public health laws, rules, or regulations in the superior

1	court in the county in which such violation occurs or is about to occur or in the superior court of
2	Thurston County. GEO owns and operates the detention facility on the Tacoma tideflats in Pierce
3	County. Based upon 722 complaints the Department has received to-date, the Department has
4	concerns about threats to public health at the facility.
5	2.2 The Department has the authority to investigate public health threats and to enter
6	buildings to do so under RCW 43.70.170.
7	III. PARTIES
8	3.1 Plaintiff Department of Health is an agency of the State of Washington.
9	3.2 Defendant is The GEO Group, Inc. GEO contracts with the U.S. Immigration and
10	Customs Enforcement (ICE) to provide detention management services at its Tacoma facility.
11	GEO has named its facility the "Northwest ICE Processing Center" (NWIPC).
12	IV. FACTUAL ALLEGATIONS
13	4.1 The Department has received more than 700 hundred complaints from detainees
14	at the NWIPC alleging poor conditions, unsanitary bathrooms, dirty water, poor air quality,
15	COVID outbreaks, animal-grade food quality, and a spate of suicides. Muniz Decl. ¶¶ 5-11.
16	4.2 Soleil Muniz is a Complaint Enforcement Lead and also works in the
17	Environmental Public Health Program. Ms. Muniz's primary work is to investigate health and
18	safety complaints, including those made by detainees.
19	4.3 On July 18, 2024, Ms. Muniz attempted to investigate the public health
20	complaints from the NWIPC. After identifying herself to GEO's front desk personnel, Bruce
21	Scott, GEO's facility administrator, arrived and met her in the lobby area.
22	4.4. At Mr. Scott's request, Ms. Muniz filled out a form indicating that she sought to
23	inspect the facility under RCW 43.70.170. Ms. Muniz wrote that she was investigating public
24	health concerns related to "water quality, air quality COVID/disease infection, suicide/mental
25	health, and living conditions/hygiene."
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I	l e e e e e e e e e e e e e e e e e e e

1	4.4.	Instead of allowing the Department inspector's entry, Mr. Scott said he would		
2	confer with IC	CE. Mr. Scott later returned with Jeffrey White and Michael Knight. Together, they		
3	denied Ms. M	funiz access to the NWIPC. GEO allowed the Department to take water samples on		
4	the "non-secu	are" side of the facility, i.e., the lobby area, but otherwise denied Ms. Muniz entry		
5	to the facility	. Muniz Decl. ¶¶ 13-16.		
6	4.5	To date, the Department has been unable to enter the NWIPC to investigate		
7	complaints it has received from detainees.			
8	4.6	The Department believes, based upon the complaints, that the health and safety		
9	of detainees is	s at risk.		
10	4.7	The Department believes GEO, by refusing entry, is preventing the Department		
11	from carrying	g out its statutory obligation to investigate public health threats.		
12		V. CAUSES OF ACTION		
13	5.1	RCW 43.70.190 permits the Department to bring an action to enjoin a violation		
14	or threatened	violation of the public health laws.		
15	5.2	The Department has statutory authority under RCW 43.70.170 to investigate		
16	violations or t	hreatened violations of public health laws and to have free and unimpeded access to		
17	all buildings t	o do so.		
18	5.3	GEO has refused the Department from entering the NWIPC to conduct its		
19	investigation.			
20	5.4	The Department is unable to investigate complaints from detainees at NWIPC		
21	under RCW 4	3.70.170 because of GEO's refusal to permit entry.		
22	5.5	GEO is in violation of RCW 43.70.170 by refusing to permit entry for the purposes		
23	of investigating	ng complaints.		
24	5.6	GEO is in violation of RCW 43.70.170 by refusing to permit entry for the purpose		
25	of unannounc	ed inspection.		
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1	5.7	Because of the actions of GEO, the Department is unable to carry out its statutory
2	obligations u	nder RCW 43.70.170.
3		VI. PRAYER FOR RELIEF
4	6.1	The Department asks this Court to grant relief by enjoining The GEO Group,
5	Inc., from ref	fusing entry for the purposes of inspections and investigations.
6	6.2	The Department further requests that this Court retain jurisdiction to enforce the
7	terms of its or	der.
8	DATI	ED this 30th day of July 2024.
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