Date of Submission: September 16, 2016

Subject of Review: Prisons and the Prison Industrial Complex

Summary of the Issue
Despite a reduction in crime, incarceration rates in the United States have soared by over 700% since the 1970s.\(^1\) Only one statistic among many, this study describes a phenomenon known as mass incarceration, which refers to the overwhelming increase in imprisonment since the late 20th century. Many have traced the roots of mass incarceration to the prison industrial complex, which describes "the overlapping interests of government and industry that use surveillance, policing, and imprisonment as solutions to economic, social and political problems."\(^2\) The complex relies on business arrangements between the government and private corporations, which contribute to the design, maintenance, and support of prisons. Minimum occupancy statutes that insure large incarcerated populations create conditions for enormous profit, which comes at the expense of caging people, disrupting families, and undermining communities.\(^3\) Affected groups are primarily Black, Brown, Indigenous, poor, undocumented, differently-abled, queer, and trans, and the prison industrial complex serves as one of many institutionalized methods to keep these populations oppressed.\(^4\)

Private prisons arose from concern over the growing costs of incarceration in the 1980s.\(^5\) These corporations contract with the government to operate specific facilities, and are now responsible for the care of 6% of state prisoners, 16% of federal prisoners,\(^6\) and 62% of people detained in immigration facilities.\(^7\) To maintain their margin of profit, private prisons rely on a variety of tactics, all of which are enabled through a broad system of banks, insurance companies, and

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\(^1\) Incarcerated America: https://www.hrw.org/legacy/backgrounder/usa/incarceration/
\(^2\) Critical Resistance: What is the PIC? What is Abolition?: http://criticalresistance.org/about/not-so-common-language/
\(^3\) Prisons are Big Businesses: https://www.hrw.org/legacy/backgrounder/usa/incarceration/
\(^5\) Emerging Issues on Privatized Prisons: https://www.ncjrs.gov/pdffiles1/bja/181249.pdf
\(^6\) ACLU: Private Prisons: https://www.aclu.org/issues/mass-incarceration/privatization-criminal-justice/private-prisons
other financial institutions. These institutions do not serve their supposed societal purpose—that is, maintaining public safety and wellbeing a providing a space for "criminals" to be rehabilitated. Rather, they create conditions that lead to a cycle of violence that discourages reintegration and fosters recidivism.

Prison should not be profitable, and there should be no state-sanctioned incentives that make it so. This request aims to highlight the consequences of what Michelle Alexander calls "The New Jim Crow," a system of mass incarceration implicitly supported by Stanford’s ongoing investment. As our peers at New York University have stated

If we invest in prisons, we are betting that prisons will continue to be profitable in the foreseeable future. For prisons to continue to be profitable, that means racialized mass incarceration...will need to continue. So a bet on private prison is a bet against the communities and even the very lives of many at [Stanford and beyond].

To address this moral and financial error, we request that the Trustees investigate and act on the University’s investments, divesting from private prison corporations and engaging its shareholder rights to better the practices of private prison corporation stakeholders, prison support industries, and prison labor beneficiaries.

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SUBMITTER INFORMATION

Name: [Redacted]
Email: [Redacted]
Phone Number: [Redacted]
University Affiliation: Undergraduate Student

Are you requesting this action on behalf of a Stanford organization? No
If Yes, which organization?
ACTION REQUESTED

Which of the following actions do you wish Stanford to take?

☐ Adopt a new proxy voting guideline on issues not covered by an existing guideline
☐ Revise an existing proxy voting guideline
☐ Initiate conversation with the company to encourage change
☐ Divest
☐ Other

If you are requesting a change in proxy voting guidelines, please identify which guideline by number and exactly how you would like it changed. Existing guidelines can be found in the Social Issue Voting Proxy Policy Statement and Guidelines.

The University's Labor guidelines establish a benchmark for the "principles, policies and standards of best business practices" in accordance with the International Labor Organization's (ILO's) Declaration on Fundamental Principles and Rights at Work.⁹

On this basis, corporations to which Stanford is a shareholder, and the investment choices of those corporations, must operate in a manner that is consistent with the ILO's principles. This includes "the elimination of all forms of forced or compulsory labour"¹⁰ and "the elimination of discrimination in respect of employment and occupation."¹¹ While corporations themselves may adhere to the ILO's labor principles, historically those same principles have not been invoked in defense of the rights of incarcerated peoples. Forced labor sustains the operations of prisons¹², and maximizes profits for big businesses by significantly diminishing the costs of labor¹³. Moreover, those with felony conviction history face subsequent employment discrimination and stark barriers towards reintegration into society.¹⁴

The University must extend the framework of its Labor guidelines to hold those entities that are directly and indirectly invested in prisons accountable to the ILO's labor principles. This necessitates an expanded definition of "business practices" to include investment choices, so that the University, in its assessment of said business practices, can also evaluate the investments of those entities to ensure that the ILO's standards are upheld.

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¹² The Prison Industry in the United States: Big Business or a New Form of Slavery?: http://www.globalresearch.ca/the-prison-industry-in-the-united-states-big-business-or-a-new-form-of-slavery/8289


¹⁴ ibid
As a result of its current direct investments, and possibly its indirect investments, Stanford is contributing to the systematic disregard for the rights of incarcerated people and the broader sustenance of the prison industrial complex. Thus, Stanford must demand that the corporations in which it is invested, divest from prisons both in the sense that they release their shares and that they cease to exploit the labor of the incarcerated.

If you are requesting engagement with companies or divestment, please identify the specific companies which you wish to be considered for engagement or divestment.

Please find a list of relevant corporations attached to this document. For the purpose of this request, we have defined four categories of interest.

Private Prison Corporations
These corporations are immediately responsible for operating, supplying, and staffing private prisons. Additionally, these corporations form contractual agreements with governments (to design, construct, and/or operate facilities), who pay based on occupation or number of beds (occupied or not), dependent on the contract. Thus, it is often in the economic interest of the state and legal system to incarcerate folks, keep them inside for as long as possible, and subsequently promote high recidivism rates to maintain the cycle.

Private Prison Corporation Stakeholders
These institutions are financially invested in, supply credit for, act as syndication agents with, or otherwise provide a support system for the aforementioned private prison corporations. Within this category, we have specifically highlighted the Million Shares Club, a collection of thirty-six corporations that own at least one million shares of the Corrections Corporation of America and The GEO Group, Inc., the two largest private prison corporations in the United States.

Prison Support Industries
These corporations provide support to prisons in the form of services including health care, laundry, food services, telephone and information technology support. As mentioned above, it is in the direct economic interests of prisons and their stakeholders to have full occupancy of prisons at all times, and to create conditions that lead to high rates of recidivism and longer sentences. Prison support industries, which are contracted by prison companies and state

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15 Two-Thirds of Private Prison Contracts Include “Lockup Quotas”
16 Recidivism Rates: https://californiainnocenceproject.org/issues-we-face/recidivism/
agencies, are often complicit in the processes that make the prison industrial complex at large so lucrative, and thus often provide substandard services and resources, or make them inaccessible through scarcity and high prices to maintain the systems of mass incarceration and recidivism which are essential for the financial success of prisons.  

**Prison Labor Beneficiaries**

These corporations produce and sell products that are manufactured wholly or in part by incarcerated laborers. **Workers in prisons perform mandatory labor and receive compensation as little as twenty three cents per hour.** Corporations benefitting from incarcerated labor are taking advantage of a system that values incarceration, and not the lives and rehabilitation of incarcerated people. They provide another incentive for correctional facilities to maintain high prison populations and rates of recidivism, because prisoners are an easy source of forced, minimal wage labor.

**If you are requesting engagement, please describe the exact action you wish Stanford to take.**

**Private Prison Corporations**

To condemn the violent practices of private prison corporations and encourage peer institutions to do the same, the University must divest from any holdings in the Corrections Corporation of America, The GEO Group, Inc., G4S, and Sodexo.

**Private Prison Corporation Stakeholders**

To reduce the harm done by prisons, the University has a moral and financial obligation to demand engagement with private prison corporation stakeholders. In engaging with shareholders Stanford should take the following actions:

1. The University must ask private prison corporation stakeholders, listed above, to confirm the size of their investments in private prisons, if any.
2. The University must ask private prison corporation stakeholders, listed above, to divest from private prison corporations due to significant social injury.
3. In the case that a private prison corporation stakeholder refuses divestment, the University must ask the corporation to release a public statement justifying continued investment, with specific attention to the significant social injury caused by private prisons. This statement, and especially the stakeholder’s understanding of its own role in the perpetuation of private prison-related violence, will inform how the University should engage with the stakeholder going forward.
4. Once a stakeholder has refused divestment and released a statement, the University must divest from the corporation.

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18 Inhumane Prison Conditions in California: http://www.globalresearch.ca/inhumane-prison-conditions-in-california/25155
19 23 cents an hour: The perfectly legal slavery happening in modern-day America: http://www.salon.com/2015/07/07/23_cents_an_hour_the_perfectly_legal_slavery_happening_in_modern_day_america_partner/
5. The University should exercise discretion when holding institutions accountable to keep in mind the direct impacts on students (for example with Wells Fargo understanding the need for the bank on campus).

Prison Support Industries
If invested, the University has a crucial opportunity to hold prison support industries to a standard of basic human rights and guard against the further exploitation of incarcerated people. Given the inaccessible and abusive practices of many support sectors, especially calling services^20 and mental health providers,^21 Stanford should take the following actions:

1. The University must ask prison support industries to confirm their role in supporting prisons, and require the provision of verification documents.
2. The University must ask these industries to provide evidence that their support services are in compliance the Universal Declaration of Human Rights^22
3. In the case of violations of the Universal Declaration of Human Rights, the University must require that companies rectify their practices and receive approval from the American Civil Liberties Union's National Prison Project. If this is not done by November 2016, the University must withdraw its financial investments from this company until this approval is received.

Prison Labor Beneficiaries
To preserve the intrinsic relationship between labor conditions and the maintenance of human rights, the University has a responsibility to confront the prison labor beneficiaries that make the continued incarceration of predominantly Black, Brown, Indigenous, queer, trans, poor, and undocumented people broadly profitable.^23 In exercising shareholder rights, Stanford should take the following actions:

1. The University must ask prison labor beneficiaries to account for and release a public statement addressing the extent of their prison labor usage in terms of number of workers, hours per worker, and worker salaries.
2. The University must ask prison labor beneficiaries to eliminate compulsory jobs, which are to be replaced by exclusively voluntary jobs paid at minimum or above-minimum wage at a rate determined by the higher of either state or federal minimum wage.
   a. Additionally, to provide funding and / or staffing for job training at active facilities.
   b. Additionally, to commit to hiring individuals employed by the corporation following their return home, with the expectation that their job training will allow them to enter a promotion track. More broadly, hiring of formerly incarcerated people will

^20 The High Cost of Calling the Imprisoned:
^21 Cruel Confinement: Abuse, Discrimination and Death Within Alabama’s Prisons:

^23 Criminal Justice Fact Sheet: http://www.naacp.org/pages/criminal-justice-fact-sheet
require the removal of all questions pertaining to conviction history during the hiring process.

2. The University must ask prison labor beneficiaries to move jobs to the surrounding communities, paying minimum or above-minimum wage at a rate determined by the higher of either state or federal minimum wage. This practice should include affirmative action hiring of Black, Brown, Indigenous, poor, undocumented, differently-abled, queer, and trans individuals seeking employment.

3. The University must ask prison labor beneficiaries to adopt corporation-wide equitable labor policies that extend behind bars and outside the borders of the United States. Should these corporations not complete these actions by November 2016, and if they allow their financial interests to dominate their moral obligation to end complicity in violence done by prisons, Stanford’s Trustees must divest.

Please describe the rationale for the requested action.

As a leading, highly-visible institution of higher learning, Stanford University prides itself on setting trends and being an innovative institution.\(^1\) Indeed, every student admitted is done so with the expectation that they will have a positive impact on the world around them. Our university is also praised for being one that engages in ethical intellectual pursuits. As stated in our university Code of Conduct, “As members of the Stanford University community, all faculty, staff, students, members of the Board of Trustees, University Officers and affiliates are responsible for sustaining the highest ethical standards of this institution, and of the broader community in which we function” [emphasis added].\(^2\) By investing university funds (including those funds provided by Stanford students and their families) in companies engaged in privatized prisons and the perpetuation of systems of mass incarceration, we, as an institution, condone and promote the stripping of individuals’ civil rights and social securities. We are complicit in upholding unethical practices by association. It is for this reason that we request the review of University investments. We demand that our institution strives to uphold its standard of ethics, in keeping with its mission, daily practice, and broader influence.

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If this is a request for divestment, please describe how each of the six requirements in Stanford's Statement on Investment Responsibility are met, for each company, including references to research sources and supporting material.

1) The company's action or inaction directly causes social injury.

The Statement on Investment Responsibility states that "social injury" is defined as injury to a significant number of individuals resulting directly from specific action or inaction by a company. Included in this category, among other things, are company behaviors that violate, subvert, or frustrate the enforcement of laws, rules, or regulations intended to protect against deprivation of health, safety, basic freedoms, or human rights.26 Many examples of social injury are inherent to the processes of imprisonment. For example, they violate the rights of incarcerated people to livable conditions, mobility, and self-determination, first by way of imprisonment, and secondly through corporations that profit from their coerced labor. Prisoners are not afforded the same constitutional rights as other citizens. For one, they lack a constitutional right to choose whether or not to work, as explicitly stated in the Thirteenth Amendment.27 Solitary confinement punishment is often administered for years and decades at a time, which leads to severe mental health effects.28 Overcrowding, physical assault, sexual abuse, and discrimination based on race, gender identity, and physical and mental disability are exceedingly common in prisons.29 On that note, physical and mental health services are often inadequate or non-existent in prisons, demonstrating that prisons are often run in direct defiance of the mandates of the constitution, as shown in the Estelle v. Gamble Supreme Court ruling.30 Finally, basic human rights, including the right to free speech, to practice religion, and access courts and counsel are often breached, and prison officials often restrict access to religious texts and communities through policies that restrict communication. These violations can have several impacts when prisoners are released, and contributes to high rates of recidivism.31 The four types of companies previously listed are all complicit in varying degrees to the processes of mass incarceration, and are thus responsible for the aforementioned.

Private Prison Corporations
As previously explained, prisons are complicit in the violation of humans rights and private prisons are no exception. In fact, private prison corporations are directly invested in harsher conditions and longer sentences. "Several reports have documented instances when private-prison companies have directly and indirectly supported policies that put more citizens

26 Statement on Investment Responsibility
27 "Free" Labor: The Law of Prison Labor
28 Solitary Confinement: https://www.aclu.org/issues/prisoners-rights/solitary-confinement
29 Cruel, Inhuman, and Degrading Living Conditions: https://www.aclu.org/issues/prisoners-rights/cruel-inhuman-and-degrading-conditions
30 Medical and Mental Health Care: https://www.aclu.org/issues/prisoners-rights/medical-and-mental-health-care
31 Civil Liberties in Prison: https://www.aclu.org/issues/prisoners-rights/civil-liberties-prison
and immigrants behind bars—such as California’s three-strikes rule and Arizona’s highly controversial anti-illegal immigration law. They do this by donating to politicians who support them, attending meetings with officials who back them, and lobbying for funding for Immigration and Customs Enforcement. The Corrections Corporation of America itself wrote in its 2014 annual report:

The demand for our facilities and services could be adversely affected by the relaxation of enforcement efforts, leniency in conviction or parole standards and sentencing practices or through the decriminalization of certain activities that are currently proscribed by our criminal laws. For instance, any changes with respect to drugs and controlled substances or illegal immigration could affect the number of persons arrested, convicted, and sentenced, thereby potentially reducing demand for correctional facilities to house them. [...] Legislation has been proposed in numerous jurisdictions that could lower minimum sentences for some non-violent crimes and make more inmates eligible for early release based on good behavior.

Racial disparity between U.S. and Incarcerated populations

Evidently, it is in the direct financial interest of prison companies to increase the number of prisoners, keep them inside for as long as possible, and create conditions to increase the chances of their return. These corporations have extensive track records of engaging in all of these things at the expense of the people with whose custody they are entrusted; they consistently demonstrate the willingness to violate human rights or standby as rights are violated in the name of profit.

Private Prison Corporation Stakeholders
In addition to committing social injuries, private prison corporation stakeholders also commit other injustices including predatory lending (primarily to Mexican immigrants and Black

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35 How for-profit prisons have become the biggest lobby: https://www.washingtonpost.com/posteverything/wp/2015/04/28/how-for-profit-prisons-have-become-the-biggest-lobby-no-one-is-talking-about/
37 Million Shares Club Member Profile: Wells Fargo: http://afrikankblackcoalition.org/wp-content/uploads/2015/12/MillionSharesClubMemberProfileWellsFargo.docx
communities in the case of Wells Fargo), subprime mortgage for racial minorities, and foreclosure. These practices of displacement and financial inaccessibility lock people into poverty and put them at higher risk of incarceration. Thus, these shareholders have demonstrated a commitment to discrimination and the disproportionate mass incarceration of certain demographics, which has been reflected in mass incarceration population statistics. These corporations also participate in lobbying and other practices which lead to longer sentences and more severe charges for minor drug activity. These practices and their racial enforcement pointedly attack and oppress communities of color and other marginalized communities.

**Prison Support Industries**

The purpose of the services provided by these industries is to ensure that prisoners are guaranteed human rights and basic services, including adequate food, communications, and health care. However, cutting expenses on these necessary provisions is fiscally profitable and is therefore a common practice. The substandard quality of service which prison support industries provide ought to be understood not only as a human rights violation, but as a valuation of monetary profit over the prisoners in need of support. Furthermore, these industries consistently demonstrate their commitment to maintaining and expanding systems of incarceration through lobbying for harsher criminal sentencing and supporting lawmakers offering limited rehabilitation programs.

**Prison Labor Beneficiaries**

One of the many injustices that prisoners face is mandatory, coerced labor. On top of this, many conditions and circumstances of prison labor violate both the Universal Declaration of Human Rights and the International Labor Organization.

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38 [Major American Banks That Got Caught Discriminating Against Black People](http://atlantablackstar.com/2015/03/03/8-major-american-banks-that-got-caught-discriminating-against-black-people/)

39 [Private Prison Companies Want You Locked Up](http://www.justicepolicy.org/news/2615)

40 [Prison Conditions in the United States](https://www.hrw.org/sites/default/files/reports/US91N.pdf)

Rights and the United States Department of Labor Employee Rights. According to a study by the Progressive Labor Party, the private contracting of prisoners for work not only fosters incentives to further incarcerate, but also encourages the corporate stockholders, who make money off prisoners’ work, to lobby for longer sentences to expand their workforce. Meanwhile, in addition to the labor rights violation that is low pay, if a prisoner refuses to work they can be locked up in isolation cells. Additionally, after release, formerly incarcerated individuals have trouble re-entering society because they face employment discrimination on the basis of their conviction history. As a result these prisoners are on the one hand unable to provide for themselves and their families, because they are unable to find work and in many cases return to a life of crime to provide for themselves and their loved ones. This leads far too often to high rates of recidivism, and is an affront to human dignity and clear example of social injury.

2) Stanford’s Trustees have exhausted all practicable shareholder rights in seeking to modify the company’s behavior, or pursuing these rights would be futile.

Private Prison Corporations
These corporations depend on a system of government grants to privately-run facilities, which have discretion to cut costs in attempts to increase profit. This profitability comes at the expense of those incarcerated, who are subjected to increasingly abusive conditions resulting in guard misconduct, health and safety violations, and greater rates of recidivism. As a shareholder in these corporations, Stanford’s demands to alter practices would be futile, as adequately addressing the needs of those incarcerated would reduce or eliminate the corporations’ profit margins. To adequately condemn the violence done by these institutions, Stanford must therefore divest.

Private Prison Corporation Stakeholders
As private prison corporation stakeholders do not immediately facilitate the violence done by prisons, Stanford’s Trustees have not yet exhausted all practicable shareholder rights, and should demand that these institutions similarly divest from private prison corporations. However, should these institutions refuse, Stanford must recognize that it remains complicit and remove its investments from them as well.

42 United States Department of Labor Employee Rights: https://www.dol.gov/general/topic/disability/employeerights
43 The Prison Industry in the United States: Big Business or a New Form of Slavery?: http://www.globalresearch.ca/the-prison-industry-in-the-united-states-big-business-or-a-new-form-of-slavery/8289
45 Federal Bureau of Prisons: Contact Prisons: https://www.bop.gov/about/facilities/contract_facilities.jsp
Prison Support Industries
The University has not yet exercised its shareholder rights to pressure prison support industries to change their behavior. However, given Stanford’s commitment to “[promoting] the public welfare by exercising an influence in behalf of humanity,” the University cannot continue to implicitly support the abusive practices of many prison support industries. Following the action of incarcerated people and free world allies, Stanford must engage with these industries according to the aforementioned guidelines.

Prison Labor Beneficiaries
Industries ranging from retail to defense utilize unpaid and underpaid labor provided by prisons, both public and private, making the continued incarceration of Black, Brown, Indigenous, poor, and undocumented people broadly profitable. However, as these corporations do not immediately facilitate the violence done by prisons, Stanford’s Trustees have an opportunity to exercise practicable shareholder rights and encourage these corporations to change their practices. Should these corporations allow their financial interests to dominate their moral obligation to end complicity in violence done by prisons, Stanford’s Trustees must divest.

3) The desired change in the company's behavior will diminish the social injury.

The ways in which prisons are inherently socially injurious have already been explicitly stated above. To summarize, private prison corporations profit off of mass incarceration, which disproportionately affects marginalized populations—communities of color, poor communities, queer and trans communities, immigrants and undocumented communities, and those who are differently-abled. Prisoners are not afforded basic human rights and are treated differently under the Constitution. Other social injuries include breaking families and maintaining socio-economic disparities through imprisonment, creating environments that lead to high rates of recidivism, and actively inhibiting rehabilitative processes in prisons, such that prisons become factories run on cheap and forced labor, with the purpose of maintaining high occupancy and overpopulation to incentivize the creation of more prisons. The following sections detail the ability for these corporations to diminish the social injury they engender.

Private Prison Corporations
No change in the behavior of private prison corporations will diminish the social injury that they perform and perpetuate. These corporations are inherently injurious to the people whom they incarcerate and to the communities from which their populations hail disproportionately. The

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48 Call for Boycott: https://pcnjl.org/2015/04/09/call-for-boycotts-request-for-immediate-action/#more-76
49 Identifying Businesses which Benefit from Prison Labor: https://www.popularresistance.org/identifying-businesses-that-profit-from-prison-labor/
private prison system is a predatory business model, using prisoners as its market to incentivize its propagation (which has been extremely successful based on incarceration rates over the last few decades).

It is in the interest of businesses that build and maintain prisons to ensure the imprisoned population grows. The expansion of a business such as this means the expansion of the legal system to make more criminals. This principle is evidenced by the powerful lobbies these corporations have. The Corrections Corporation of America, The GEO Group, Inc., and G4S have contributed over $7 million to state and federal politicians in the year of 2007 alone, and have co-sponsored immigration laws to put more immigrants behind bars, detailed earlier. Thus these corporations have concretely demonstrated their commitment to continuing mass incarceration and the oppression of marginalized communities, leaving Stanford with no ethical choice other than divestment.

Private Prison Corporation Shareholders

If those companies who hold shares in private prison corporations sell their shares and publicly indicate the reason for their action, they contribute to a political climate that makes the socially injurious existence of private prison corporations shameful, and as a result, less profitable and less sustainable. The political climate wherein a private prison corporation is no longer profitable is already being created, and is evidenced by the outspokenness of democratic frontrunners on the need to ban privatized incarceration, along with other successful private prison divestment campaigns, including those of Columbia University and the University of California Afrikan Black Coalition.

Furthermore, corporations’ divestment must include the rescinding of lines of credit which invested corporations extend to private prison companies. This rescindment would diminish the leeway which prison companies have and exercise with reckless abandon in performing daily functions and expanding business and facilities. Ultimately, this shift in political climate would

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54 Bernie Sanders is Leading the War on For-Profit Prisons: http://observer.com/2015/12/bernie-sanders-is-leading-the-war-on-for-profit-prisons/
require us as a university and a country to examine what the central purpose of prisons is in our society, and why they are a source of profit, oppressing marginalized communities, incentivizing incarceration.

**Prison Support Industries**

Though support industries commit social injury on various counts and are intimately complicit in various others, their adherence to our requested actions creates the possibility of redressing *some* of the harms of incarceration. Not only would they be positioned to treat some of the most immediate wounds caused by years of discriminatory and marginalizing policy, but they could contribute to sustainable change that would positively affect communities to which they are inextricably tied. By providing prisoners with substantial support systems and resources, these corporations could help prisoners better navigate the immense task of surviving prison with physical and mental health intact. Furthermore, they could contribute to a cultural shift to remove the obstacles to the successful integration of the formerly incarcerated. Marginalized communities could be effectively supported by this network of industries, which to this point has been interested in these communities only as a source of profit. Increased accountability for these industries is our goal, as it would ensure that the services and resources offered in prisons would be sufficient. This would contribute to healing with regard to the immediate wounds of the prison industrial complex, and could eventually contribute to the reversal of the perceptions and policies that are the root causes of this social injury.

**Prison Labor Beneficiaries**

If corporations currently using products manufactured by prisoners cease doing so, they would reduce social injury by refraining from blatant labor rights violations. While this would be a move in the right direction toward upholding prisoners' rights, it would not diminish the larger social injuries of mass incarceration. To do so, companies would need to seize the opportunity to speak out against the atrocities of the system. They cannot do so, however, until they take responsibility for the parts they play in the prison industrial complex. Increased accountability from these companies and the reform we advocate would ensure fair wages and conditions for incarcerated workers, diminishing an important component of prisoners' social injury.

4) The benefit created by the company does not outweigh the injury it is causing.

**Private Prison Corporations**

The dominant rhetoric and imagery surrounding prisons presents them as correctional facilities that provide rehabilitation and secure public safety. While this narrative is appealing at face, it masks the harrowing reality that currently exists behind and beyond bars. Prisons are statistically and historically socially injurious institutions, greatly reproducing, and only minimally rehabilitating, the actions and conditions that lead to criminal activity. A study of 62 prison contracts in 21 states showed that:

57 Prison doesn't work 50% of the time, so why do we keep sending people there?: http://www.mirror.co.uk/authors/ampp3d-from-mirror/prison-doesnt-work-50-time-3748230
The majority of these contracts guarantee that the state will supply enough prisoners to keep between 80 and 100 percent of the private prisons' beds filled. If the state fails to fulfill this 'bed guarantee', it must pay a fine to the company running the prisons – in effect, paying for each prison bed regardless of whether it holds a prisoner. This incentivizes states to send prisoners to private prisons rather than state-run prisons in order to meet the bed guarantee, regardless of the prisons' distance from families, their security level, or health conditions. In effect, this 'bed guarantee' payment structure penalizes taxpayers for low incarceration rates. This is a system that hurts both taxpayer and prisoner.

Bed guarantees funnel taxpayer money into private prison profits at a time when states should see overall cost savings from successful attempts at curbing crime.\(^{58}\)

Further, the prison industrial complex endangers Black and Brown, poor and disabled, and queer and transgender bodies, as an institution that has historically been used to disproportionately incarcerate, disenfranchise, profit from, and target black communities, other communities of color, and any individuals deemed threatening or unprofitable to the State.\(^{59}\)

Currently, "public safety" and "rehabilitation" manifest as realignment policies that increase jailed populations in communities,\(^{60}\) increased policing in schools, and life without parole sentences that prevent any possibility of recovery.\(^{61}\) About 70% of people released from prison return within three years, and the majority of those who return in some states do so in a matter of months because the challenges associated with mere survival are so immense.\(^{62}\)

These practices can never be beneficial, as they attempt to utilize legal and criminal solutions to solve fundamentally social problems of racial discrimination, economic inequity, and lack of institutional access.

Given the triviality of positive outcomes of prisons, the social injury caused by these facilities and broader systems significantly outweighs any benefits. Stanford cannot remain complicit in

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61 Life Without Parole: https://www.themarshallproject.org/2015/07/10/life-without-parole#CU6ESV7N

imprisonment, policing, and surveillance justified by neoliberal frameworks of general welfare and hidden by systemic power and privilege so long as prisons continue to do such enormous harm to entire communities, many of which are represented on Stanford's own campus.

**Private Prison Corporation Stakeholders**

Many of these are banks. While they provide loans for people to finance their lives, their investments in private prisons, allow private prisons to function on a daily basis. Their discriminatory lending practices and contributions to redlining are also injurious. Banks could continue their operations and stay financially solvent without engaging in such behaviors.

**Private Prison Support Industries**

Their sole benefit is providing incarcerated people with necessities and comforts. Should private prisons cease to exist, there would be no use for private prison support industries.

**Private Prison Labor Beneficiaries**

Many of private prison labor beneficiaries are retailers. They could create a product without relying on incredibly underpaid prison labor.

5) The company has been afforded a reasonable amount of time to alter its behavior.

A historical descendant of slavery, the prison system is similarly founded on principles of white supremacy and anti-Black racism. However, for as long as race-based violence has formed a foundation for American society, agents of change have been active against it. For example, convict leases, from which prison privatization is directly derived, were strongly opposed by organized labor, manufactures, and farmers, as well as by reformers and religious groups that protested the scandalous conditions found in labor lease systems. Today's prisons are no different, and have been publicly denounced not only by academic institutions and political candidates but also by corporations like Pershing Square Capital Management and Systematic

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64 Pershing Square Capital Management DIVESTS: https://prisondivest.com/2011/06/30/pershing-square-capital-management-divests/
Financial Management as well as social organizations like the United Methodist Church, the Presbyterian Church, and the Portland City Council, among many others. The Department of Justice even announced that they will stop using private prisons, citing issues with private prison operations.

Given this action and its historical antecedents, corporations that feel they have not had reasonable time to alter their behavior are guilty of ignoring and silencing resistance, most of which is rooted in Black, Brown, Indigenous, poor, undocumented, differently-abled, queer, and trans communities. The following sections will provide background on some of the opportunities implicit corporations have had to investigate and remedy their practices.

Private Prison Corporations
A 2011 report from the American Civil Liberties Union describes the scope and impact of private prison corporations, especially the Corrections Corporation of America, that profit from mass incarceration and other forms of societal inequity. The United Nations Working Group of Experts on People of African Descent shared in a 2016 statement that “African American communities highlighted that the privatization of prisons might tend to privilege the earning of profits, by sacrificing adequate detention conditions.” Furthermore, both Bernie Sanders and Hillary Clinton have affirmed commitments to end private incarceration should they be elected to the presidency; and they are joined by other politicians (including Ted Cruz and Rand Paul) as contributors to an anthology, Solutions: American Leaders Speak Out on Criminal Justice, which reveals the reality that “mass incarceration is a threat to American democracy.” Additionally, the Department of Justice has announced plans to end their private prison usage.

Private Prison Corporation Shareholders

69 Portland Committee Recommends City Divestment from Wells Fargo Due to For-Profit Prison Link: http://www.portlandoccupier.org/2016/03/02/portland-committee-recommends-city-divestment-from-wells-fargo-due-to-for-profit-prison-link/
In addition to some of the bodies mentioned above who have committed to divestment, the Granite Peak Unitarian Universalist Church,75 the New York State United Teachers,76 the Afrikan Black Coalition,77 and others have engaged in conversation about the moral, ethical, and financial implications of continued involvement with institutions that provide support systems for corporations like the Corrections Corporation of America, The GEO Group, Inc., and G4S.78 The Afrikan Black Coalition has gone as far as to demand that Wells Fargo itself divest shares in private prison corporations.79 As a result, Wells Fargo and its peers have had ample opportunities to consider their behavior, and should be accordingly considered complicit in the human rights violations occurring with their backing.

Prison Support Industries
Examples of attention drawn to the abuses of prison support industries are too numerous to list. However, University committees should be aware that the opposition to the exploitative practices of these industries has gone beyond solely news coverage. Calls for boycott, both from within prisons and in the free world, have come from groups like the Interfaith Prison Coalition,80 which mobilizes the family and community members of incarcerated people.81 Pressure from these groups, other advocates, and from news media have also resulted in increased federal attention, which have led to the implementation of systems like the California Prison Health Care Services, also known as the federal receiver, designed to guard against the life-threatening medical neglect taking place behind the walls of California prisons.82 These measures have made prison support industries aware time and time again of their abuses, and their lack of behavioral change across the board indicates that they will not remedy their wrongs until they are pressured to do so by institutions like the University.

Prison Labor Beneficiaries
In addition to the numerous available examples of news media coverage of corporate profiteering in prisons, other popular media sources have also picked up on the issue. One well-known example is the Netflix series Orange is the New Black, which portrays many of the

76 New York Teachers Take Stand to End Immigrant Detention: https://prisondivest.com/2015/05/19/new-york-teachers-take-stand-to-end-immigrant-detention/
80 CALL FOR BOYCOTTS: Request for immediate action: https://pcanj.org/2015/04/09/call-for-boycotts-request-for-immediate-action/#more-76
82 California Prison Health Care Services Fact Sheet: http://www.cphcs.ca.gov/docs/resources/factsheet.pdf
realities of prison life, including that of private corporation use of prison labor.\textsuperscript{83} The pressure exerted by this and other public attention must be matched by the University, calling for engagement and change in corporate behavior by November 2016.

6) Divestment is not likely to impair the University’s capacity to carry out its mission.

While prisons are frequently justified by invoking the concept of “public welfare,” the current nature of prisons and mass incarceration is evidently in opposition to the safety, security, and even survival of affected communities. On paper, the University’s mission prioritizes [promoting] the public welfare by exercising an influence in behalf of humanity.\textsuperscript{64} Current investments, however, indicate a faith in the long-term viability of institutions that divide families and communities; reduce access to education, housing, employment, and other resources; and perpetuate collective and generational trauma.

For these moral reasons, and due to the growing anti-prison political and financial climate, the University’s ability to adhere to and implement its mission depends on engagement with and divestment from prisons.

**Private Prison Corporations**

Private prisons in their current form originated in the 1980s as the public became increasingly frustrated with the apparent failure, costs, and growth of the penal system.\textsuperscript{65} At the same time private prisons were beginning to take hold, Stanford University was achieving greater gender parity, finalizing policies on investment in South Africa apartheid, and making significant curricular changes.\textsuperscript{66} Much of this and other work done at the University was in direct opposition to the very strategy of private prisons, which can be summarized as cost reduction, often at the expense of quality of life for incarcerated people and especially through lower labor expenses.\textsuperscript{67} This simultaneity indicates that the University is not dependent on the existence of private prisons. Similarly, the University does not require their maintenance, especially as private prisons become an increasingly irresponsible financial decision. Both Bernie Sanders\textsuperscript{68} and Hillary Clinton\textsuperscript{69} have indicated their commitment to ending privately-managed incarceration, and Cornell has recently adopted policies to distance itself from G4S because of the corporation’s ties to the prison industry.\textsuperscript{70} As with its peer institutions, including the University of

\textsuperscript{83} Orange Is the New Black and Prison Labor: http://www.huffingtonpost.com/anita-sinha/orange-is-the-new-black-prison-labor_b_3743927.html
\textsuperscript{84} Stanford’s Mission: http://exploreddegrees.stanford.edu/stanfordsmission/
\textsuperscript{85} Emerging Issues on Privatized Prisons: https://www.ncjrs.gov/pdffiles1/bja/181249.pdf
\textsuperscript{86} History of Stanford: Changing Times & Campus: https://www.stanford.edu/about/history/history_ch4.html
\textsuperscript{87} Emerging Issues on Privatized Prisons [repeated]: https://www.ncjrs.gov/pdffiles1/bja/181249.pdf
\textsuperscript{88} Bernie Sanders on Private Prisons: http://fusion.net/story/275832/private-prisons-bernie-sanders/
\textsuperscript{89} Clinton To Cut Ties With Private Prison Industry: http://thinkprogress.org/politics/2015/10/23/3715544/clinton-private-prisons/
\textsuperscript{90} Cornell Cancels Contract with G4S due to its ties to Prison Industry: https://prisondivest.com/2016/03/23/victory-cornell-cancels-contract-with-g4s-due-to-its-ties-to-prison-industry/
California\textsuperscript{91} and Columbia University,\textsuperscript{92} investment in private prison corporations is not in Stanford's moral and financial best interest, and the University must act accordingly or risk falling behind, being held accountable, and suffering the consequences.

Private Prison Corporation Shareholders
While divestment from Wells Fargo could have a significant impact on the viability of the University, not in the least because Wells Fargo provides extensive financial services to the institution and student body, the University remains morally and financially obligated to engage in shareholder advocacy with Wells Fargo and other private prison corporation shareholders. In one of their campus organizing publications, authors from Enlace, the Responsible Endowments Coalition, and the Transnational Institute for Grassroots Research and Action point out that "without the financial support of major investors, CCA and GEO alone would not be strong enough to successfully lobby for policies that increase the federal government's demand for private prisons." As a potentially significant investor in these financial institutions, the University has a responsibility to adhere to its mission of promoting general welfare and [inculcating] reverence for the great principles of government\textsuperscript{93} by challenging these institutions as some of the "root causes of anti-immigrant and other racist legislation."\textsuperscript{94}

Prison Support Industries
While many prison support industries, notably Global Tel-Link and Corizon, make a significant profit through the exploitation of incarcerated people, their profit-based commission relationship with federal and state governments make them less profitable than private prison corporations.\textsuperscript{95} As a result, the University may not be invested. However, if investments are present, the University must urge these corporations to provide accessible services, keeping with the University Code of Conduct, which states that Stanford affiliates "are responsible for sustaining the highest ethical standards...of the broader community in which we function."\textsuperscript{96} Following the work of government bodies like the Federal Communications Commission in limiting the abuses of prison support industries and acknowledging the "blessings of liberty regulated by law," the University has a responsibility to demand accountability.\textsuperscript{97}

Prison Labor Beneficiaries

\textsuperscript{91} Afrikan Black Coalition Accomplishes UC Prison Divestment: http://afrikanblackcoalition.org/2015/12/18/afrikan-black-coalition-accomplishes-uc-prison-divestment/
\textsuperscript{92} Columbia becomes first U.S. university to divest from prisons: http://www.cnn.com/2015/06/23/us/columbia-university-prison-divest/
\textsuperscript{93} Stanford's Mission: http://exploredegrees.stanford.edu/stanfordsmission/
\textsuperscript{94} Private Prison Divestment: A Toolkit for Campus Organizers: http://www.enlaceintl.org/?_escaped_fragment_=resources/c1km9
\textsuperscript{95} Here are 6 Companies That Get Rich off Prisoners: http://www. attn.com/stories/941/who-profits-from-prisoners
\textsuperscript{96} University Code of Conduct: https://adminguide.stanford.edu/chapter-1/subchapter-1/policy-1-1-1
\textsuperscript{97} FCC Continues Push To Rein In The High Cost Of Inmate Calling: https://www.fcc.gov/document/fcc-continues-push-rein-high-cost-inmate-calling-0
Like prison support industries, prison labor beneficiaries profit from the exploitation of incarcerated people. Utilized across industries, prison labor has been frequently compared to slave labor, and has resulted in actions like the 2010 strike in Georgia prisons for better conditions and compensation. Just and voluntary labor conditions are fundamental to the maintenance of human rights, as indicated in the International Labour Organization's 1998 Declaration, and the University must work to create opportunities that allow for the "personal success" of incarcerated people, just as it aims to do for its own students. While divestment will not give space for the creation of these opportunities, the aggressive shareholder advocacy described above should provide a starting place for greater conversation.

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SUPPORTING MATERIAL

Please attach in PDF format and list below all additional information and supporting evidence that you think APIRL will find useful in evaluating this Request for Review, including research, articles, reports and experts that have influenced your argument/recommendation for action. The APIRL will normally also conduct independent research with the aim of obtaining a balanced and complete view about these issues.

In addition to the information found in the footnotes of the request, we would like to propose the following documents to aid the APIRL in its investigations.
CORPORATIONS IMPLICATED IN THE PRISON INDUSTRIAL COMPLEX

PRIVATE PRISON CORPORATIONS
These corporations are immediately responsible for operating, supplying, and staffing private prisons. These corporations form contractual agreements with governments, who pay based either on occupation or number of spots (occupied or not), as per the terms of the contract. Thus, it is often in the economic interest of the government and legal system to incarcerate folks, keep them inside for as long as possible, and ensure high recidivism rates.

1. Corrections Corporation of America
2. The GEO Group, Inc.

PRIVATE PRISON CORPORATION STAKEHOLDERS
These institutions are financially invested in, supply credit for, act as syndication agents with, or otherwise act as a support system for the above private prison corporations. This list comes from research provided by Enlace¹, a collective at the forefront of “the national Private Prison Divestment Campaign.”

1. American Century Companies Inc.
2. Ameriprise Financial Inc.
3. Anchor Capital Advisors LLC
4. Bank of America
6. Blackrock Fund Advisors
7. Cramer Rosenthal McGlynn LLC
8. Diamond Hill Capital Management
9. Eagle Asset Management Inc.
10. Epoch Investment Partners, Inc.
11. First Trust Advisors LP
12. FMR LLC
13. Geode Capital Management, LLC
14. Hodges Capital Management, LLC
15. Hotchkis & Wiley Capital Management LLC
16. Invesco LTD.
17. Jennison Associates, LLC
18. Lazard Asset Management LLC
19. London Co. Of Virginia
20. Managed Account Advisors LLC
21. New South Capital Management INC
22. Northern Trust Corp
23. Nuance Investments, LLC

¹ http://www.enlaceintl.org/#1million-shares-club/cveb
24. Principal Financial Group Inc
25. Prudential Financial Inc
26. Raymond James & Associates
27. Reinhart Partners, Inc.
28. River Road Asset Management, LLC
29. State Street Corp
30. Vanguard Group INC
31. Waddell & Reed Financial Inc
32. Wells Fargo & Company

PRISON LABOR BENEFICIARIES
These corporations produce and sell products that are manufactured wholly or in part by incarcerated laborers. Workers in prisons perform mandatory labor and receive compensation as little as twenty-three cents per hour.² Corporations benefitting from incarcerated labor are taking advantage of a system that values incarceration, and not the lives and rehabilitation of incarcerated people. They provide another incentive for correctional facilities to maintain high prison populations and rates of recidivism, because prisoners are an easy source of forced, minimal wage labor.

1. ARCO³
2. AT&T⁴
3. Abbott Laboratories⁴
4. Allstate⁴
5. American Airlines⁴
6. American Electric Power Association⁴
7. American Express Company⁴
8. Bank of America⁴
9. American Gas Association⁴
10. American General Financial Group⁴
11. American Petroleum Institute⁴
12. American Plastics Council⁴
13. American Printing House for the Blind⁴
14. Ameritech⁴
15. Amoco Corporation⁴
16. Amway Corporation⁴
17. Archer Daniels Midland Corporation⁴
18. AutoZone, Inc. (aftermarket automotive parts)⁴
19. Aventis Pharmaceuticals, Inc.⁴
20. Avis⁴

² 23 cents an hour; The perfectly legal slavery happening in modern-day America: http://www.salon.com/2015/07/07/23_cents_an_hour_the_perfectly_legal_slavery_happening_in_modern_day_america_partner/
³ https://www.popularresistance.org/identifying-businesses-that-profit-from-prison-labor/
21. BP America, Inc.
22. Bank of America Corp.
23. Bayer Corporation
24. BellSouth Telecommunications, Inc.
25. Berkshire Hathaway Inc.
26. Boeing
27. Cabot Sedgwick
28. Caltex Petroleum
29. Cargill Inc.
30. Caterpillar Inc.
31. Cendant Corporation
32. Center for Braille and Narration Production
33. Center for Energy and Economic Development
34. Chevron Corporation
35. Commonwealth Edison Company
36. Community Financial Services Corporation
37. Consolidated Edison Company of New York, Inc.
38. Costco Wholesale Corporation
39. Credit Card Coalition
40. Credit Union National Association, Inc.
41. Deere & Company
42. Dresser Industries
43. Eddie Bauer
44. Edison Electric Institute
45. Eli Lilly & Company
46. ExxonMobil Corporation
47. Federated Department Stores
48. Chrysler
49. Fidelity Investments
50. Fruit of the Loom
51. GEICO
52. GTE Corporation
53. General Dynamics
54. Glaxo Wellcome, Inc.
55. GlaxoSmithKline
56. Harris Trust & Savings Bank

Footnotes:
7 http://www.alternet.org/story/150777/defense_contractors_using_prison_labor_to_build_high-tech_weapons_systems
57. Hoffman-LaRoche, Inc.
58. Honeywell
59. Household International
60. Independent Power Producers of New York
61. Inland Steel Industries, Inc.
62. International Business Machines (IBM) Corporation
63. International Game Technology
64. International Gold Corporation
65. International Paper Company
66. J.P. Morgan & Company
67. J.C. Penny
68. JanSport (VF Corporation)
69. Johnson & Johnson
70. KMART (Sears Holdings Corporation)
71. Keystone Automotive Industries
72. Koch Industries, Inc.
73. LaSalle National Bank
74. Limited Brands
75. Lockheed Martin
76. MCI
77. Macy's
78. Mary Kay Cosmetics
79. McDonald's Corporation
80. McDonnell Douglas
81. Merck & Company, Inc.
82. Merrill Lynch Wealth Management
83. MicroJet
84. Microsoft Corporation
85. Mid-American Energy Company
86. Motorola, Inc.
87. National Cable and Telecommunications Association
88. Natural Gas Supply Association
89. Newmont Mining Corporation

8 http://eliabakercenter.org/blog/2013/06/prison-labor-is-the-new-slave-labor
9 http://www.safetyandjustice.org/story/show-us-money-corporations-benefit-prison-build
12 http://www.wired.com/2011/03/prisoners-help-build-patriot-missiles/
13 http://groundswell.org/prison-industrial-complex/
14 http://www.globalresearch.ca/the-prison-industry-in-the-united-states-big-business-or-a-new-form-of-slavery?print=1
15 http://old.seattletimes.com/html/opinion/2001825583_prisonlabor30.html
90. Nintendo
91. Non-Bank Funds Transmitters Group
92. PG&E Corporation/PG&E National Energy Group
93. PepsiCo Inc.
94. Pfizer, Inc.
95. Pharmaceutical Research and Manufacturers of America (PhRMA)
96. Pharmacia Corporation
97. Phillips Petroleum Company
98. Prison Rehabilitative Industries and Diversified Enterprises (PRIDE)
99. Procter & Gamble
100. Quaker Oats
101. Raytheon
102. Revlon
103. Rhone-Poulenc Rorer, Inc.
104. Roebuck & Company
105. Royal Dutch Shell PLC
106. SBC Communications, Inc.
107. Sara Lee Corporation
108. Schering-Plough Corporation
109. Sears
110. Service Corporation International
111. Shearson Lehman
112. Signature Packaging Solutions
113. Smith, Kline & French
114. Sprint
115. Starbucks
116. State Farm Insurance
117. Taxpayers Network, Inc.
118. Texas Instruments
119. Textron Inc.
120. Third Generation
121. Turner Construction
122. U.S. Generating Company
123. UPS (United Parcel Service)
124. UST Public Affairs, Inc.
125. United Airlines

17 http://government-contracts.insidegov.com/l/685873/DJBP0515KVA110615
20 atlantablackstar.com/2014/10/12/me mainstream-companies-benefitting-from-the-prison-industrial-complex/3/
126. Verizon Communications, Inc.¹
127. Victoria’s Secret²
128. WYETH, a division of American Home Products Corporation.⁴
129. Wal-Mart Stores, Inc.²¹
130. Wendy’s²¹
131. Whole Foods²¹

SUPPORT INDUSTRIES
These corporations provide support to prisons in the form of services including health care, laundry, food services, telephone and information technology support. As mentioned above, it is in the direct economic interests of prisons and their stakeholders to have full occupancy of prisons at all times, and create conditions that lead to high rates of recidivism and longer sentences. Thus cutting expenses on necessary functions including medical services, rehabilitation programs, legal services, and prison staffing is fiscally profitable. This is consistently demonstrated by these industries through lobbying for harsher criminal sentencing and support of lawmakers offering limited rehabilitation programs (Anderson 2009). Their disregard for prisoners is not only a human right violation, but a reflection of their valuation of monetary profit over the circumstances of the prisoners they supposedly support.

1. ABRY Partners²³
2. American Securities²⁴
3. Aramark Correctional Services²⁵
4. Corizon²⁴
5. Embarq²⁷
6. FSH²⁸
7. Fairfax Financial Holdings Limited
8. Fairmont Specialty
9. Global Tel Link²⁹
10. Hawaii Telecom³⁰
11. ICN/PCS³¹
12. JPay³²
13. Keefer Group
14. Maine DOC³³

²⁴ http://hypo.com/2015/06/17/feds-want-to-curb-profits-on-prison-phone-systems/
²⁶ http://thinkprogress.org/health/2015/04/08/3643636/prison-nurses-california-threaten-strike/
²⁷ http://nationinside.org/campaign/prison-phone-justice/facts/
²⁸ http://nationinside.org/campaign/prison-phone-justice/facts/
³⁰ http://nationinside.org/campaign/prison-phone-justice/facts/
³¹ http://nationinside.org/campaign/prison-phone-justice/facts/
³² https://www.eff.org/deeplinks/2015/05/hidden-cost-jpays-prison-email-system
³³ http://nationinside.org/campaign/prison-phone-justice/facts/
15. McLeod
16. Pay Tel
17. Securus Technologies
18. Sysco
19. Telmate
20. Unisys
21. VAC

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34 http://nationinside.org/campaign/prison-phone-justice/facts/
38 http://nationinside.org/campaign/prison-phone-justice/facts/
SUPPORTING MATERIAL


