



10 Burton Hills Boulevard
Nashville, TN 37215

POLITICAL ACTIVITY REPORT

Political Activity and Lobbying Report 2012

Transparency is a critical part of the relationships we have with our government partners and the taxpayers we ultimately serve, as well as our shareholders, and we are committed to transparency regarding our government relations and political efforts. In addition to complying with applicable disclosure laws, CCA is going a step further to produce this annual report, which we believe will bring further clarity to our activities. We believe it is the right thing to do for our business, our partners and our shareholders.

CCA's political and government relations activities are designed to educate federal, state and local officials on the benefits of partnership corrections, CCA's ability to assist them in meeting their corrections needs and our track record of success. Our company does not, under longstanding policy, lobby for or against policies or legislation that would determine the basis for an individual's incarceration or detention.

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Overview

Corporate funds are used to make political contributions where allowed by law and where management has determined that such contributions will be an effective use of the funds. CCA also sponsors a political action committee (CCA PAC) that makes contributions to federal candidates and to candidates in certain jurisdictions where contributions with corporate funds are not allowed.

CCA's political contributions and lobbying activities are subject to robust oversight, approval and compliance procedures. Political contributions using corporate funds require approval by our Chief Executive Officer, Chief Development Officer or a Vice President Partnership Relations and, for compliance purposes, the Office of General Counsel.

Government relations engagements and expenditures require Vice President-level or above approval. The Office of General Counsel and external compliance experts provide support for the company's reporting and other compliance obligations, as well as periodic compliance training for internal partnership development personnel and contract government relations professionals.

The Nominating and Governance Committee of CCA's Board of Directors provides Board -level oversight of the Company's political and government relations activities and compliance procedures. Compliance policies and procedures are addressed in CCA's Code of Ethics and Business Conduct and in greater detail in our "Government Relations" policy*.

CCA's government relations activities are focused on government actions (legislative, regulatory and executive) that impact the construction and operation of privately operated prisons and detention facilities. The disclosures in the lobbying reports filed by the company under the Federal Lobbying Disclosure Act of 1995, as amended by the Honest Leadership and Open Government Act of 2007 ("LDA"), are representative of the types of matters on which the company lobbies. As stated in CCA's most recent LDA report,** and as a matter of longstanding corporate policy and practice, CCA does not lobby for or against policies or legislation that would determine the basis for an individual's incarceration or detention.

* <http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9NjExMjN8Q2hpbGRJRDR0tMXxUeXBIPtM=&t=1>

** <http://disclosures.house.gov/ld/ldxmlrelease/2013/Q1/300555796.xml>

Political Contributions

Table A-1

Totals by Source of Funds		2012
Combined - Corporate and CCA PAC		\$956,135.86
Corporate		\$773,275.86
CCA PAC		\$182,860.00
Totals by Recipient Category (Source in Parenthesis)		
Federal Candidates, Parties & Committees (CCA PAC)		\$177,100
State Candidates, Parties & Committees (Combined)		\$407,960
National 527 (Corporate)		\$366,500
Local Candidates (Corporate)		\$4,575.86

Table A-2

State	Type	CCA-PAC	CCA
AL	Candidate	2,500	
	AL Total	2,500	
CA	Candidate	9,500	72,000
	Candidate (Local)		500
	Political Committee	5,000	80,000
	Political Party		30,000
	Ballot Measure		50,000
	CA Total	14,500	232,500
CO	Political Committee		24,050
	CO Total		24,050
DC	Candidate		1,000
	DC Total		1,000
FL	Candidate		3,500
	Candidate (Local)		1,750
	Political Committee		16,000
	Political Party		20,000
	FL Total		41,250
GA	Candidate	6,000	19,250
	Candidate (Local)		1,076
	Political Committee	3,500	
	GA Total	9,500	20,326
ID	Candidate		7,250
	Political Committee		2,250
	ID Total		9,500
IN	Candidate	2,500	5,000
	IN Total	2,500	5,000
KS	Candidate	1,000	
	Political Committee	2,500	2,000
	KS Total	3,500	2,000
KY	Candidate	10,000	
	Political Committee	5,000	
	Political Party	2,000	
	KY Total	17,000	
MA	Candidate	2,500	
	MA Total	2,500	



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Political Contributions (continued)

Table A-2 (continued)

State	Type	CCA-PAC	CCA
MS	Candidate.	2,000	.800
	MS Total	2,000	800
MT	Candidate.	7,260	
	Political Party.	1,100	
	MT Total	8,360	
NV	Candidate.	6,000	
	NV Total	6,000	
NM	Candidate.	2,000	.9,500
	NM Total	2,000	9,500
NC	Candidate.	500	
	NC Total	500	
ND	Candidate.	2,500	
	ND Total	2,500	
OH	Candidate.	4,000	
	Political Committee	24,500	
	OH Total	28,500	
OK	Candidate.	1,000	
	OK Total	1,000	
PR	Candidate.	2,500	
	PR Total	2,500	
SC	Candidate.3,500
	Political Committee	2,500	
	SC Total	2,500	3,500
TN	Candidate.	14,000	.28,100
	Candidate (Local)1,250
	Political Committee	8,500	.4,000
	Political Party.20,000
	TN Total	22,500	53,350
TX	Candidate.	6,000	
	Political Committee	8,500	
	TX Total	14,500	
VA	Candidate.	4,500	.1,000
	VA Total	4,500	1,000
VT	Candidate.1,200
	Political Committee1,800
	VT Total		3,000
WI	Candidate.	3,500	
	WI Total	3,500	
	National Parties		30,000
	National 527's		366,500
	GRAND TOTAL	182,860	773,276



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527 Organizations

CCA contributed to the following national 527 organizations in 2012:

- Democratic Governors Association
- Republican Governors Association
- Republican State Leadership Committee

The aggregate total of contributions to these organizations is included in the summary data listed above.

Additional information regarding recipient candidate and political committees, as well as the laws, rules and regulations applicable to political contributions by corporations and corporate affiliated political action committees, is available publicly through Internet sites maintained by the relevant Federal (i.e., the Federal Election Commission and Internal Revenue Service websites, www.fec.gov and www.irs.gov) and state agencies (e.g., www.sos.ca.gov).

Lobbying Information

CCA retains the services of consultant government relations professionals in jurisdictions where it does or may in the future do business. CCA employees also register as lobbyists in jurisdictions where their activities meet the statutory definition. The list below shows CCA's consultant registered lobbyists in 2012 by jurisdiction.

Table B-1

Jurisdiction	Firm Name	Jurisdiction	Firm Name
Federal	Akin Gump Strauss Hauer & Feld LLP Mehlman Vogel Castagnetti, Inc. McBee Strategic Consulting, LLC	Maine Tardy Minnesota	Michtell * Hill Capitol Strategies
Alabama	Capitol Resources LLC	Mississippi	Buddy, Medlin & Associates * Capitol Resources LLC
Arizona	Policy Development Group Inc. Molera Alvarez LLC Highground Inc. *	Montana	Anderson, Baker & Swanson PLLC
Arkansas	The Capitol Group *	New Hampshire	Rath, Young & Pignatelli PC
California	Capitol Advocacy	New Jersey	Princeton Public Affairs Group *
Colorado	Brownstein Hyatt Farber Schreck, LLP Christiansen Corporate Resources	New Mexico	Edwin Mahr
Connecticut	The O'Leary Group *	Ohio	The Credo Company
Florida	Smith, Bryan & Myers	Oklahoma	Fried Kipatrick Guinn LLC Scott Adkins Consulting, Inc.
Georgia	McKenna Long & Akridge LLP Piedmont Public Affairs	Tennessee	Johnson Poss Government Relations
Hawaii	Capitol Consultants of Hawaii LLP *	Texas	The Texas Lobby Group
Idaho	Lobby Idaho, LLC	Vermont	McLean, Meehan & Rice LLC
Indiana	Barnes & Thornburg LLP	Washington	Bogard & Johnson LLC
Illinois	Dorgan-McPike & Associates	West Virginia	Capitol Advocates
Kentucky	MML&K Government Solutions	Wisconsin	The Welch Group *
Louisiana	Haynie & Associates	District of Columbia	Group 360, LLC
		Los Angeles County	Ek & Ek

* Firm with which CCA no longer contracts for government relations services.

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CCA's contracts with its outside government relations professionals contain strict conflict of interest clauses that permit CCA to terminate the relationship if the professional or his or her firm engages in activities that conflict with CCA's commitment not to lobby for or against policies or legislation that would determine the basis for an individual's incarceration or detention.

Reported Lobbying-Related Expenses

In 2012, CCA and its consultant lobbyists reported approximately \$2.6 million in fees and other expenditures relating to lobbying on behalf of CCA at the Federal, state and local levels. This amount includes fees paid to consultant lobbyists (see *Fees for Direct Lobbying*, below), compensation paid to CCA employees who engage in lobbying or lobbying-related activities and lobbying-related expenses (such as travel expenses), as required by applicable Federal, state and local rules regarding lobbying disclosure. Of this amount, \$970,000 was attributable to Federal lobbying-related activities and the remainder (\$1.6 million) to state and local activities. None of this amount related to "grassroots lobbying" communications (communications directed to the general public that refer to specific legislation or regulation, reflects a view on such legislation or regulation or encourages the recipient to take action with respect to such legislation or regulation).

Fees for Direct Lobbying

In 2012, CCA paid an aggregate amount of approximately \$1.6 million to consultant government relations professionals for direct lobbying (as defined in Internal Revenue Code (IRC)162(e)). Of that amount, \$ 0.8 million was for lobbying at the Federal level and \$0.8 million was for lobbying at the state and local levels.

Trade and Membership Associations, Chambers of Commerce and Other Groups

CCA, its facilities and employees also are members of certain trade and membership associations, chambers of commerce and other groups. Below is a list of such organizations to which CCA paid dues or fees of \$25,000 or more in 2012, of which a portion were not tax deductible as a result of being used by the organization for lobbying purposes:

Table B-2

Trade Association, Membership Association & Chamber	Total Paid	% Non-Deductible for Lobbying	Non-Deductible Portion for Lobbying
Florida Chamber of Commerce	\$75,000	est. 35%	\$26,250
US Chamber of Commerce	\$25,000	55%	\$13,750
Combined Other State & Local Chambers of Commerce	\$66,500	est. 10%	\$6,650
TOTAL	\$166,500		\$46,650



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CCA contributes or pays dues to other tax exempt organizations that engage in advocacy or educational efforts on behalf of their constituencies. CCA has not been made aware that any dues paid by CCA are used for lobbying or other political activities. For example, CCA supported the National and Southern Governors Associations in 2012. CCA did not contribute \$25,000 or more to any such organization in 2012.

In 2012, CCA was not a member of any partnership corrections-related or similar trade association that engages in political activities on behalf of its members. Many CCA employees are members of the American Correctional Association (“ACA”), which is a 501(c)(3) charitable organization. CCA also pays audit and accreditation related fees to the ACA. 501(c)(3) organizations are subject to strict limitations on political activities, and CCA has not been made aware that any dues or fees paid by CCA or its member employees are used for lobbying. In connection with the company’s conversion to a real estate investment trust beginning in fiscal year 2013, CCA has become a member of NAREIT, the National Association of Real Estate Investment Trusts.

CCA is not currently a member of the American Legislative Exchange Council (“ALEC”) or any similar organization that writes and endorses model legislation, and neither the company nor any of its employees has been a member of ALEC since 2010. For additional background, visit: <http://thecca360.com>.



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This report is not a supplement to any other report filed or required to be filed by the company with any governmental agency. To the extent the report contains information about CCA-PAC, it is not intended as a solicitation for contributions to CCA-PAC from any person. The report has not been audited and the company undertakes no obligation to issue any updates or corrections.

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