

# **Audit-Proof Your I-9s: Hands-On Training for Compliance Success**

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Presented By:

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## Goals

- Understand the current landscape
- Understand the difference between a Notice of Inspection and an ICE Raid
- Understand the Risk
  - Notice of Inspection
  - ICE Raid
- Understand how to complete Form I-9 to minimize fines and decrease the likelihood of employing undocumented employees
- Understand the I-9 Audit Process so that you can pre-emptively review documents and decrease risk



## The Current Landscape

- Birthright Citizenship Order
  - Prospective in nature, applying to people born after February 19, 2025
  - Restricts any state, local, or federal government from issuing documentation recognizing citizenship to any person whose mother was unlawfully present in the United States whose father is not a U.S. citizen at the time of the child's birth, or whose mother was lawfully temporarily in the United States but whose father is not a U.S. citizen or lawful permanent resident at the time of birth
  - Enforcement has been enjoined.

# Current Landscape Continued

- Protecting the United States from Foreign Terrorists and other National Security and Public Safety Threats
  - Directs the Secretary of State to work with Homeland Security and the Director of National Intelligence to identify ways to screen and vet aliens seeking admission to the United States or who are already in the United States to the maximum extent possible to verify identity and create uniform baselines for screening and vetting.

## What the Current Landscape Means for Employers

While DHS and ICE may be seeking to locate individuals who may not have work authorizations or be in the country legally at home/in public, a faster and easier way to do so will likely be to focus enforcement efforts in work environments.

This could be in the form of ICE raids or through ICE or DHS I-9 Notices of Inspection. Failing to have appropriate documentation during a Notice of Inspection, would likely result in increased scrutiny and possible raids. The purpose of this presentation will be responding to I-9 Notices of Inspection.

## I-9 Notice of Inspection versus an ICE raid

- I-9 Notice of Inspection
  - DHS or ICE sends an employer a notice requesting to review company I-9 documents and ensure paperwork is completed correctly and documents are legitimate
- ICE raid
  - Immigration enforcement officials arrive unannounced at a home, place of employment, or public area with the intent to locate, detain, and deport individuals suspected of violating U.S. immigration laws

## • Subpoena

1. To (Name, Address, City, State, Zip Code)	DEPARTMENT OF HOMELAND SECURITY <b>IMMIGRATION ENFORCEMENT SUBPOENA</b> to Appear and/or Produce Records 8 U.S.C. § 1225(d), 8 C.F.R. § 287.4
Subpoena Number	
2. In Reference To	
(Title of Proceeding)	(File Number, if Applicable)

By the service of this subpoena upon you, **YOU ARE HEREBY SUMMONED AND REQUIRED TO:**

- (A)  **APPEAR** before the U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), or U.S. Citizenship and Immigration Services (USCIS) Official named in Block 3 at the place, date, and time specified, to testify and give information relating to the matter indicated in Block 2.
- (B)  **PRODUCE** the records (books, papers, or other documents) indicated in Block 4, to the CBP, ICE, or USCIS Official named in Block 3 at the place, date, and time specified.

Your testimony and/or production of the indicated records is required in connection with an investigation or inquiry relating to the enforcement of U.S. immigration laws. Failure to comply with this subpoena may subject you to an order of contempt by a federal District Court, as provided by 8 U.S.C. § 1225(d)(4)(B).

3. (A) CBP, ICE or USCIS Official before whom you are required to appear	(B) Date
Name	
Title	
Address	(C) Time <input checked="" type="checkbox"/> a.m. <input type="checkbox"/> p.m.
Telephone Number	

4. Records required to be produced for inspection
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If you have any questions regarding this subpoena, contact the CBP, ICE, or USCIS Official identified in Block 3.

5. Authorized Official
(Signature)
(Printed Name)
(Title)
(Date)

## • Warrants

AO 93 (Rev. 11/13) Search and Seizure Warrant

**UNITED STATES DISTRICT COURT**

for the

In the Matter of the Search of )  
(Briefly describe the property to be searched )  
(or identify the person by name and address) ) Case No. )  
) )  
) )  
) )

### SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the \_\_\_\_\_ District of \_\_\_\_\_  
(Identify the person or describe the property to be searched and give its location):

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (Identify the person or describe the property to be seized):

**YOU ARE COMMANDED** to execute this warrant on or before \_\_\_\_\_ (not to exceed 14 days)  
 in the daytime 6:00 a.m. to 10:00 p.m.  at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to \_\_\_\_\_  
(United States Magistrate Judge)

Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)

for \_\_\_\_\_ days (not to exceed 30)  until, the facts justifying, the later specific date of \_\_\_\_\_

Date and time issued: \_\_\_\_\_  
Judge's signature

City and state: \_\_\_\_\_  
Printed name and title

### U.S. DEPARTMENT OF HOMELAND SECURITY Warrant for Arrest of Alien

File No. \_\_\_\_\_

Date: \_\_\_\_\_

To: Any immigration officer authorized pursuant to sections 236 and 287 of the Immigration and Nationality Act and part 287 of title 8, Code of Federal Regulations, to serve warrants of arrest for immigration violations

I have determined that there is probable cause to believe that \_\_\_\_\_ is removable from the United States. This determination is based upon:

- the execution of a charging document to initiate removal proceedings against the subject;
- the pendency of ongoing removal proceedings against the subject;
- the failure to establish admissibility subsequent to deferred inspection;
- biometric confirmation of the subject's identity and a records check of federal databases that affirmatively indicate, by themselves or in addition to other reliable information, that the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law; and/or
- statements made voluntarily by the subject to an immigration officer and/or other reliable evidence that affirmatively indicate the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law.

**YOU ARE COMMANDED** to arrest and take into custody for removal proceedings under the Immigration and Nationality Act, the above-named alien.

\_\_\_\_\_  
(Signature of Authorized Immigration Officer)

\_\_\_\_\_  
(Printed Name and Title of Authorized Immigration Officer)

#### Certificate of Service

I hereby certify that the Warrant for Arrest of Alien was served by me at \_\_\_\_\_ (Location)

on \_\_\_\_\_ on \_\_\_\_\_, and the contents of this  
(Name of Alien) (Date of Service)

notice were read to him or her in the \_\_\_\_\_ language.  
(Language)

\_\_\_\_\_  
Name and Signature of Officer

\_\_\_\_\_  
Name or Number of Interpreter (if applicable)

## ICE Raids—How to Prepare

- Identify public and private spaces and use signage/security processes for private spaces
- Place a copy of *How to Respond to a U.S. Immigration and Customs Enforcement Raid* at points of entry or with points of contact
- Prepare and train your team—identify a coordinator, second in command, and first contact employees.
  - Inform managers of company expectations and inform employees of their rights should a raid occur
- Prepare ICE visit policy



## ICE Raids—During and After a Raid

- During: Refer to *How to Respond to a U.S. Immigration and Customs Enforcement Raid*
- After:
  - Contact counsel.
  - Document all ICE interactions. Ask employees to provide written statements. Identify and segregate documents requested by ICE.
  - Secure any video footage of the worksite during the time of the raid
  - Meet with employees to alleviate any concerns or stress.
  - If employees were removed during the raid, call their emergency contact.
  - If employees were detained during the raid and it does not appear they will be released before the end of their shift, call their emergency contact.

*Materials available by request*



## NOTICE OF INSPECTION

# Notice of Inspection

[Date]

[Name of Company Official]  
[Company Name]  
[Company Address]

Dear Sir/Madam:

Section 274A of the Immigration and Nationality Act, as amended by the Immigration Reform and Control Act of 1986, requires employers to hire only United States citizens and aliens who are authorized to work in the United States. Employers must verify employment eligibility of persons hired after November 6, 1986 using the Employment Eligibility Verification Form I-9.

U.S. Immigration and Customs Enforcement (ICE) regulations require the provision of three days notice prior to conducting a review of an employer's Forms I-9. This letter serves as advance notice that ICE has scheduled a review of your forms for *insert date and time*. You may, however, waive the three-day period, should you wish to do so, by annotating and signing the bottom of this letter and advising this office of your decision.

During the review, *insert name and title of ICE point of contact* will discuss the requirements of the law with you and inspect your Forms I-9. The purpose of this review is to assess your compliance with the provisions of the law. ICE will make every effort to conduct the review of records in a timely manner so as not to impede your normal business routine.

Sincerely,

*insert name*  
*insert title (GS or above)*

I wish to waive the three day notice to which I am entitled by regulation.

\_\_\_\_\_  
(Printed Name)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

## I-9 Employer Obligations

### EMPLOYERS MUST

- Verify the identity and employment authorization of each person hired after Nov. 6, 1986.
- Complete and retain Form I-9, Employment Eligibility Verification, for each employee required to complete the form.

### EMPLOYERS MUST NOT

- Discriminate against individuals
- Request more or different documents than are required to verify employment eligibility.
- Reject reasonably genuine-looking documents or specify certain documents over others.
- Retaliate against or intimidate individuals
- Hire, recruit for a fee, or refer for a fee individuals they know to be unauthorized to work in the U.S.

## I-9 Notice of Inspection—Process Initiation

- I-9 compliance is enforced by ICE. However, any DHS agent acting under subpoena power can inspect an employer's I-9 Forms.
- ICE may issue a Notice of Inspection to employers for any reason, including a random Form I-9 audit.
- Audits may be initiated by complaints, ICE's own initiative, or a referral from another government agency.
- The Employer must be provided at least three business days' notice if an agency is looking to inspect Form I-9s
- Employers must notify ICE if the forms are kept in a different location than was identified in the Notice of Inspection

## Scope of Form I-9 Inspections

- ICE will check to make sure
  - A Form I-9 exists for each person hired by the employer after 11/6/1986
  - Forms were timely and properly completed
  - Whether the documents presented by employees were authentic
  - Employer's E-Verify participation
  - How the employer handles social security no-match letters and the employees identified in the letters

## Section One

**ANTI-DISCRIMINATION NOTICE:** All employees can choose which acceptable documentation to present for Form I-9. Employers cannot ask employees for documentation to verify information in **Section 1**, or specify which acceptable documentation employees must present for **Section 2** or Supplement B, Reverification and Rehire. Treating employees differently based on their citizenship, immigration status, or national origin may be illegal.

**Section 1. Employee Information and Attestation:** Employees must complete and sign Section 1 of Form I-9 no later than the **first day of employment**, but not before accepting a job offer.

Last Name (Family Name) <b>Doe</b>		First Name (Given Name) <b>John</b>		Middle Initial (if any) <b>L</b>	Other Last Names Used (if any) <b>N/A</b>				
Address (Street Number and Name) <b>123 Maine Street</b>			Apt. Number (if any) <b>N/A</b>	City or Town <b>Portland</b>		State <b>ME</b> <input type="button" value="v"/> ZIP Code <b>04101</b>			
Date of Birth (mm/dd/yyyy) <b>09/01/1965</b>	U.S. Social Security Number <b>0 0 1 3 8 1 1 1 1</b>		Employee's Email Address <b> johndoe@yahoo.com</b>		Employee's Telephone Number <b>(207) 338-4000</b>				
<p>I am aware that federal law provides for imprisonment and/or fines for false statements, or the use of false documents, in connection with the completion of this form. I attest, under penalty of perjury, that this information, including my selection of the box attesting to my citizenship or immigration status, is true and correct.</p>	Check one of the following boxes to attest to your citizenship or immigration status (See page 2 and 3 of the instructions.):								
	<input checked="" type="checkbox"/> 1. A citizen of the United States								
	<input type="checkbox"/> 2. A noncitizen national of the United States (See Instructions.)								
	<input type="checkbox"/> 3. A lawful permanent resident (Enter USCIS or A-Number.)								
<input type="checkbox"/> 4. A noncitizen (other than <b>Item Numbers 2.</b> and <b>3.</b> above) authorized to work until (exp. date, if any)									
If you check <b>Item Number 4.</b> , enter one of these:									
USCIS A-Number		OR		Form I-94 Admission Number		OR		Foreign Passport Number and Country of Issuance	
Signature of Employee						Today's Date (mm/dd/yyyy) <b>01/22/2025</b>			

Use N/A if no answer

There should always be 8 numbers here

They can provide it or not, but something needs to be here

## Section One *Continued*

<p>I am aware that federal law provides for imprisonment and/or fines for false statements, or the use of false documents, in connection with the completion of this form. I attest, under penalty of perjury, that this information, including my selection of the box attesting to my citizenship or immigration status, is true and correct.</p>	<p>Check one of the following boxes to attest to your citizenship or immigration status (See page 2 and 3 of the instructions.):</p>	
	<input type="checkbox"/> 1. A citizen of the United States	
	<input type="checkbox"/> 2. A noncitizen national of the United States (See Instructions.)	
	<input type="checkbox"/> 3. A lawful permanent resident (Enter USCIS or A-Number.) <input type="text"/>	
	<input type="checkbox"/> 4. A noncitizen (other than <b>Item Numbers 2.</b> and <b>3.</b> above) authorized to work until (exp. date, if any) <input type="text"/>	
<p>If you check <b>Item Number 4.</b>, enter one of these:</p>		
<input type="text"/> USCIS A-Number	OR	<input type="text"/> Form I-94 Admission Number
	OR	<input type="text"/> Foreign Passport Number and Country of Issuance
<p>Signature of Employee</p> <input type="text"/>		<p>Today's Date (mm/dd/yyyy)</p> <input type="text"/>
<p>If a preparer and/or translator assisted you in completing Section 1, that person <b>MUST</b> complete the <a href="#">Preparer and/or Translator Certification</a> on Page 3.</p>		

You cannot request to see any of these documents; you can only view documentation to verify information in Section 2.

Should be signed with HR during onboarding

This document can't be completed and signed prior to the start of employment

## Guidance for Documents

- Refer to USCIS List of Acceptable Documents
- Generally:
  - List A—Documents that Establish Both Identity and Employment Authorization (e.g., U.S. Passport or Passport Card)
  - OR
  - List B—Documents that Establish Identity (e.g., Driver's License)
  - AND
  - List C—Documents that Establish Employment Authorization (e.g., Original or certified copy of birth certificate)



## Guidance for Documents *Continued*

- All documents containing an expiration date must be unexpired
- Documents extended by the issuing authority are considered unexpired
- Employees may present one selection from List A or a combination of one selection from List B and one selection from List C

## Section Two

Document Title and Issuing Authority  
Should be Written Out

Timing = Within 3  
days of start of  
employment

**Section 2. Employer Review and Verification:** Employers or their authorized representative must complete and sign **Section 2** within three business days after the employee's first day of employment, and must physically examine, or examine consistent with an alternative procedure authorized by the Secretary of DHS, documentation from List A OR a combination of documentation from List B and List C. Enter any additional documentation in the Additional Information box; see Instructions.

	List A	OR	List B	AND	List C
Document Title 1					
Issuing Authority					
Document Number (if any)					
Expiration Date (if any)					
Document Title 2 (if any)		<b>Additional Information</b>			
Issuing Authority					
Document Number (if any)					
Expiration Date (if any)					
Document Title 3 (if any)					
Issuing Authority					
Document Number (if any)					
Expiration Date (if any)					

Check here if you used an alternative procedure authorized by DHS to examine documents.

If there is no  
expiration  
date, put N/A

## Section Two *Continued*

Certification: I attest, under penalty of perjury, that (1) I have examined the documentation presented by the above-named employee, (2) the above-listed documentation appears to be genuine and to relate to the employee named, and (3) to the best of my knowledge, the employee is authorized to work in the United States.		First Day of Employment (mm/dd/yyyy): <input type="text"/>
Last Name, First Name and Title of Employer or Authorized Representative <input type="text"/>	Signature of Employer or Authorized Representative <input type="text"/>	Today's Date (mm/dd/yyyy) <input type="text"/>
Employer's Business or Organization Name <input type="text"/>	Employer's Business or Organization Address, City or Town, State, ZIP Code <input type="text"/>	

↑  
Write it out; do not use abbreviations

↑  
Write it out; do not use abbreviations

## Previously Referred to as Section Three; Now Supplement B, Reverification and Rehire

### Rehires

If you rehire an employee within three years from the date that the Form I-9 was previously executed, you may either rely on the employee's previously executed Form I-9 or complete a new Form I-9.

If you choose to rely on a previously completed Form I-9, follow these guidelines.

- If the employee remains employment authorized as indicated on the previously executed Form I-9, the employee does not need to provide any additional documentation. Provide in Section 3 the employee's rehire date, any name changes if applicable, and sign and date the form.
- If the previously executed Form I-9 indicates that the employee's employment authorization from Section 1 or employment authorization documentation from Section 2 that is subject to reverification has expired, then reverification of employment authorization is required in Section 3 in addition to providing the rehire date. If the previously executed Form I-9 is not the current version of the form, you must complete Section 3 on the current version of the form.
- If you already used Section 3 of the employee's previously executed Form I-9, but are rehiring the employee within three years of the original execution of Form I-9, you may complete Section 3 on a new Form I-9 and attach it to the previously executed form.

Employees rehired after three years of original execution of the Form I-9 must complete a new Form I-9.

# Reverification and Rehire

Last Name ( <i>Family Name</i> ) from <b>Section 1</b> .	First Name ( <i>Given Name</i> ) from <b>Section 1</b> .	Middle initial (if any) from <b>Section 1</b> .

**Instructions:** This supplement replaces Section 3 on the previous version of Form I-9. Only use this page if your employee requires reverification, is rehired within three years of the date the original Form I-9 was completed, or provides proof of a legal name change. Enter the employee's name in the fields above. Use a new section for each reverification or rehire. Review the Form I-9 instructions before completing this page. Keep this page as part of the employee's Form I-9 record. Additional guidance can be found in the [Handbook for Employers: Guidance for Completing Form I-9 \(M-274\)](#)

Date of Rehire ( <i>if applicable</i> )	New Name ( <i>if applicable</i> )		
Date ( <i>mm/dd/yyyy</i> )	Last Name ( <i>Family Name</i> )	First Name ( <i>Given Name</i> )	Middle Initial

**Reverification:** If the employee requires reverification, your employee can choose to present any acceptable List A or List C documentation to show continued employment authorization. Enter the document information in the spaces below.

Document Title	Document Number (if any)	Expiration Date (if any) ( <i>mm/dd/yyyy</i> )

**I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented documentation, the documentation I examined appears to be genuine and to relate to the individual who presented it.**

Name of Employer or Authorized Representative	Signature of Employer or Authorized Representative	Today's Date ( <i>mm/dd/yyyy</i> )

Additional Information (Initial and date each notation.)	<input type="checkbox"/> Check here if you used an alternative procedure authorized by DHS to examine documents.

## A note on E-Verify

- Does NOT replace the Form I-9
- Free software
- Checks information from an employee's Form I-9 to available records at the U.S. Department of Homeland Security and the Social Security Administration to confirm work eligibility
- Can be a useful tool, but be mindful of deadlines for completing I-9 paperwork and follow them

## I-9 Inspection Dispositions

- ICE will issue a notice of the results, which may include the employer's available actions such as becoming compliant with IRCA, responding to ICE's determinations regarding worker documents and violations
- Notice of Suspect Documents
- Notice of Discrepancies
- Notice of Technical or Procedural Failures Warning Notice
- Notice of Intent to Fine

# Consequences—Civil

Type of IRCA Violation	Old Fine	New Fine
Substantive Form I-9 violations—minimum	\$281	\$288
Substantive Form I-9 violations—maximum	\$2,789	\$2,861
Knowingly employing undocumented—1 <sup>st</sup> order	\$698 to \$5,579	\$716–\$5,724
Knowingly employing undocumented—2 <sup>nd</sup> order	\$5,579 to \$13,946	\$5,724–\$14,308
Knowingly employing undocumented—subsequent	\$8,369 to \$27,894	\$8,586–\$28,619
Document Fraud (USC 1324c(a)((1)-(4))—1 <sup>st</sup> order	\$575 to \$4,610	\$590–\$4,730
Document Fraud (USC 1324c(a)((1)-(4)) – subsequent order	\$4,610 to \$11,524	\$4,730–\$11,823
Document Fraud (USC 1324c(a)((5)-(6))—1 <sup>st</sup> order	\$487 to \$3,887	\$500–\$3,988
Document Fraud (USC 1324c(a)((5)-(6))—subsequent order	\$3,887 to \$9,718	\$3,988–\$9,970



## Consequences—Criminal

- Criminal Violations
  - Engaging in a pattern or practice of knowingly hiring or continuing to employ unauthorized noncitizens
    - Fines plus six months imprisonment
  - Engaging in fraud or false statements or otherwise misusing visas, immigration permits, and identity documents
    - Fines and/or imprisonment for up to five years
      - Make a false statement or attestation to satisfy the employment eligibility verification requirements;
      - Use fraudulent identification or employment authorization documents; or
      - Use documents that were lawfully issued to another person.

## Consequences—Operational

- If a federal contractor—debarment from future contracts\*\*
- General interference with work/operations
- Possible loss of workforce

\*\*Currently, it is unclear how federal contractor obligations will change under the current administration.

## I-9—Best Practices

- Thoroughly review I-9 forms to make sure they are complete and include the correct information.
- Identify a manager to oversee the I-9 process and periodically conduct an internal audit of the documents to make sure they are appropriately completed.
- Train and retrain employees responsible for completing I-9 documents.
- Create standard operating procedures to complete the document, make copies of identification, and, if using E-Verify, follow standard work instructions for every case aligned to system prompts.
- Create a template or calendar to timely review documents that may need to be re-examined over the course of employment

## What would an audited I-9 look like?

**ANTI-DISCRIMINATION NOTICE:** All employees can choose which acceptable documentation to present for Form I-9. Employers cannot ask employees for documentation to verify information in **Section 1**, or specify which acceptable documentation employees must present for **Section 2** or Supplement B, Reverification and Rehire. Treating employees differently based on their citizenship, immigration status, or national origin may be illegal.

JLD 1/4/25

**Section 1. Employee Information and Attestation:** Employees must complete and sign Section 1 of Form I-9 no later than the **first day of employment**, but not before accepting a job offer.

*Dowe*

Last Name (Family Name) <b>Doe</b>		First Name (Given Name) <b>John</b>		Middle Initial (if any) <b>L</b>	Other Last Names Used (if any) <b>N/A</b>	
Address (Street Number and Name) <b>123 Maine Street</b>			Apt. Number (if any) <b>N/A</b>	City or Town <b>Portland</b>		State <b>ME</b> <input type="checkbox"/>
Date of Birth (mm/dd/yyyy) <b>09/01/1965</b>		U.S. Social Security Number <b>0 0 1 3 8 1 1 1 1</b>		Employee's Email Address <b>johndoe@yahoo.com</b>		Employee's Telephone Number <b>(207) 338-4000</b>
<p><b>I am aware that federal law provides for imprisonment and/or fines for false statements, or the use of false documents, in connection with the completion of this form. I attest, under penalty of perjury, that this information, including my selection of the box attesting to my citizenship or immigration status, is true and correct.</b></p>			Check one of the following boxes to attest to your citizenship or immigration status (See page 2 and 3 of the instructions.):			
			<input checked="" type="checkbox"/> 1. A citizen of the United States			
			<input type="checkbox"/> 2. A noncitizen national of the United States (See Instructions.)			
<input type="checkbox"/> 3. A lawful permanent resident (Enter USCIS or A-Number.)						
<input type="checkbox"/> 4. A noncitizen (other than <b>Item Numbers 2.</b> and <b>3.</b> above) authorized to work until (exp. date, if any)						
If you check <b>Item Number 4.</b> , enter one of these:						
USCIS A-Number		OR		Form I-94 Admission Number		OR
						Foreign Passport Number and Country of Issuance
Signature of Employee					Today's Date (mm/dd/yyyy) <b>01/22/2025</b>	

# Thank you

Tawny Alvarez [talvarez@verrill-law.com](mailto:talvarez@verrill-law.com)  
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