

**Memo to Form I-9 File**

**Employee Name:** [REDACTED]

Pursuant to [REDACTED] internal compliance measures, it was determined that the documents [REDACTED] (the “Employee”) presented on [REDACTED], the Employee’s first day of employment, were insufficient to meet [REDACTED] employment verification requirements under the Immigration Reform and Control Act of 1986 (the “IRCA”).

On [REDACTED], the Employee presented a Form I-9, Employment Eligibility Verification (the “Form I-9”), together with an original [REDACTED] and original, unexpired [REDACTED]. The Employee completed Section 1; the undersigned, as [REDACTED] authorized agent completed Section 2 of the Form I-9, noting the Employee’s unexpired [REDACTED] under List B and [REDACTED] under List C. Copies of the unexpired [REDACTED] and [REDACTED] were made and attached to the Form I-9, in accordance with [REDACTED] Form I-9 procedures.

Shortly thereafter and upon additional review of the original Form I-9 and copies of the supporting documents attached thereto, it was determined that the Employee’s [REDACTED] was insufficient to establish the List C requirements for the following reasons: [REDACTED]

Given that this was the first instance in which a matter of this sort presented itself and to ensure compliance with the IRCA’s anti-discrimination and documentation requirements, a legal determination on the question was requested on [REDACTED] from [REDACTED] outside immigration counsel, Raymond G. Lahoud, Esquire of Norris McLaughlin, P.A. On [REDACTED], immigration counsel issued a formal determination that the Form I-9 failed to meet the minimum IRCA requirements to establish the Employee’s eligibility to work in the United States, in the manner the Employee selected.

On [REDACTED], the Employee was provided Page 3 of the Form I-9, Employment Eligibility Verification, for purposes of selecting another manner to establish employment eligibility. On the same day, the Employee provided an original, unexpired [REDACTED] (the “[REDACTED]”). The original [REDACTED] was physically reviewed and deemed to relate to the Employee. The Form I-9 was corrected on [REDACTED] to reflect the [REDACTED] under List A, which alone was sufficient to establish both the Employee’s identity and employment eligibility. To ensure compliance with the IRCA, the documents noted under List A and List B were crossed-out and initials of the undersigned, as authorized agent for [REDACTED], were placed next to each, together with a notation of the date of correction.

Today’s Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Print: \_\_\_\_\_

Title: \_\_\_\_\_