Essential Immigration Insights for Employers: How to Prepare for ICE Raids/Audits and I-9 Compliance

Ohio Hotel and Lodging Association

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October 9, 2025

Current Events in Immigration

Government Shutdown

- Employers will feel the sting of any government shutdown when it comes to immigration-related matters in a number of different ways:
- The Department of Homeland Security (DHS) and its sub-agencies generally stay open during government shutdowns. This includes US Citizenship and Immigration Services (USCIS), which adjudicates the vast majority of immigration processes. Because USCIS is a fee-based agency which requires petitions and applications be accompanied by filing fee checks, most services are not expected to be impacted.
- Although USCIS may function, it will not be operating at full capacity because several of its services depend on other agencies. Most critically for employers, the US Department of Labor (USDOL) will stop processing Labor Condition Applications, which are essential prerequisites for filing I-129 H-1B cap, H-1B extension, H-1B transfer, and E-3 applications. USCIS has accepted late I-129 petitions in the past once the government reopened, as long as the petition was submitted with evidence that the primary reason for failing to timely file an extension or change of status request was due to the government shutdown.

Government Shutdown

- The USDOL will also stop processing Prevailing Wage Determinations, which are needed to proceed with PERM Labor Certification Applications, H-2Bs, and Schedule A immigrant petitions.
- Moreover, the USDOL will stop processing PERM/Labor Certification Applications, which are the first step in the majority of the permanent residence/green card processes and are the most common basis for immigrant visa processing and seasonal worker applications. In addition, the State Department also could be affected by the government shutdown. Consulates and embassies are responsible for the issuance of visas which allow foreign nationals to travel into the United States. Although this is a fee-based system, previous shutdowns saw delays and temporary stoppages of visa services because the State Department depends on other agencies for services, such as calendaring appointments and background checks. Consular posts will generally only handle services for US citizens, diplomats, and life or death emergencies.
- Notably, E-Verify became temporarily unavailable during previous shutdowns. This means employers were unable to verify employee identities, enroll in the program, or take any action on cases in progress. If E-Verify is unavailable this time, USCIS will likely provide guidance to employers to reduce your liabilities. USCIS previously confirmed that employers may continue to use the new alternate review process for remote I-9 document verification if E-Verify is temporarily unavailable due to a government shutdown. It is expected that this will continue to be the case.
- Additionally, ICE worksite enforcement actions, including raids and I-9 Notices of Inspection, are expected to continue.

H-1B $100K Fee

- The $100,000 payment for an H-1B visa does not change any payments or fees required to be submitted in connection with any H-1B renewals. Rather, it's a one-time fee for a new H-1B petition.
- The fee will apply only to future applicants, possibly including in the FY2027 cap lottery (to occur in March 2026) and any H-1B petitions submitted on or after September 21
- It will not apply to anyone who participated in the FY2026 lottery (which occurred in March 2025).
- There may be exceptions for an individual, a company, or an industry, if DHS determines that it is in the national interest of the US and does not pose a threat to the security or welfare of the US.
- In a September 20 memo, USCIS announced that the move only applies prospectively to petitions that have not yet been filed. It doesn't apply to foreign nationals who have:
  - existing petitions filed prior to September 21;
  - currently approved petitions; or
  - validly issued H-1B non-immigrant visas.
  - Moreover, the memo states that the move does not impact the ability of any current visa holder to travel to or from the United States. However, we recommend not traveling.
- Lawsuits challenging this fee were filed 10/3/2025.

OBBB Act =Boosted ICE Budget = Increased Immigration Enforcement

- ICE's annual budget is tripled to nearly $30 billion for enforcement and deportation operations, with a total of about $170 billion allocated over the next decade for immigration enforcement and border security.
- That money will partially be used to hire 10,000 new ICE employees over the next five years, aiming to achieve the stated goal of doubling the current workforce.
- As a result, we should see an increase in mass deportations, expanded detention infrastructure, and crippling new financial barriers to legal immigration processes.

Impact on Employers

- ICE continues to ramp up workplace activities, including audits, I-9 inspections, and worksite raids

Current Executive Orders and Recent Federal Actions

- **Mass Deportation Initiatives:**
  - Large-scale deportations underway, aiming to remove millions of undocumented individuals from the country.
  - Building expansive detention facilities and deputizing local law enforcement to assist in federal immigration enforcement efforts.
  - ICE is conducting raids and arrests on a wide scale.
- **Revocation of Parole:**
  - The Trump administration terminated the CHNV (Cuba, Haiti, Nicaragua, and Venezuela) parole programs and revoked the parole status of anyone who entered under this program. Any beneficiaries who do not have another status are no longer eligible to work or remain in the U.S.
- **Increased data sharing between DHS, IRS, Medicare**
- **Revocation of Temporary Protected Status (TPS):**
  - DHS revoked TPS for approximately 600,000 Venezuelans residing in the United States, litigation is pending.
  - DHS terminated TPS for Honduras, Nicaragua, Afghanistan, Haiti, Nepal, Cameroon, and Syria are also impacted.

Immigration Raid at Hyundai EV Battery Plant (September 4, 2025)

- **Largest single-site immigration raid in U.S. history:** 475 workers detained at Hyundai's battery plant near Savannah, Georgia
- **Targeted subcontracted workers:** Mainly South Korean Nationals on restricted visas; no direct Hyundai employees detained
- **Investigation remains ongoing**
- **Wider impact:** Raises concerns over U.S. immigration enforcement's effect on foreign investment and international relations

UNITED STATES DISTRICT COURT

for the

Southern District of Georgia

In the Matter of the Search of
(Briefly describe the property to be searched or identify the person by name and address)
HL-GA BATTERY COMPANY, LLC, LOCATED AT 9730 US HIGHWAY 280, ELLABELL, GEORGIA 31308 AND CERTAIN PERSONS THEREIN

Case No. 4:25-MJ-81

WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

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

See Attachment A and Attachment A-1.

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)*:

See Attachment B and Attachment B-1.

YOU ARE COMMANDED to execute this warrant on or before September 14, 2025 *(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 Hon. Christopher L. Ray, U.S. Magistrate Judge .
(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: 08/31/2025 5:05 pm

Christopher L. Ray
Judge's signature

City and state: Savannah, Georgia

Christopher L. Ray, U.S. Magistrate Judge
Printed name and title

Application and affidavit submitted and received by electronic mail, sworn to by telephone, and warrant issued and transmitted to the applicant by electronic mail, all pursuant to Fed.R.Crim.P. 4.1(b)(6).

ATTACHMENT A

Property to be searched

The property to be searched is HL-GA Battery Company, LLC, located at 9730 US Highway 280, Ellabell, Georgia 31308, hereinafter "Target Premises." The Target Premises is located on the Hyundai Motor Group Metaplant American (HMGMA) campus in Ellabell, Georgia. The HMGMA campus is a sprawling campus and consists of multiple completed structures, while other structures are still under construction. The HMGMA campus is approximately 2,900 acres. The HMGMA is a large manufacturer of electric vehicles. The Target Premises is the lithium battery cell manufacturing plant on the HMGMA campus that is currently under construction. The Target Premises is approximately 35 acres and includes not only the building, but also the outbuildings and curtilages connected to the Target Premises.

Photographs of the Target Premises are on the Following Pages

Impact of Immigration Raids on California Labor (2025)

- California’s workforce shrank by **3.1%** overall; noncitizen labor dropped **7.2%** - biggest decline since the Great Recession
- Labor shortages have impacted key sectors like agriculture and construction, disrupting production and raising costs
- School attendance fell **22%** in CA’s Central Valley in January and February 2025
- Economic consequences include reduced productivity and heightened labor costs, threatening local stability
- Heightened fear of enforcement has led to community distrust and reduced participation in local economies

Worksite Investigations

U.S. Immigration
and Customs
Enforcement

Why Would ICE Be At The Worksite?
Raids vs. Audits

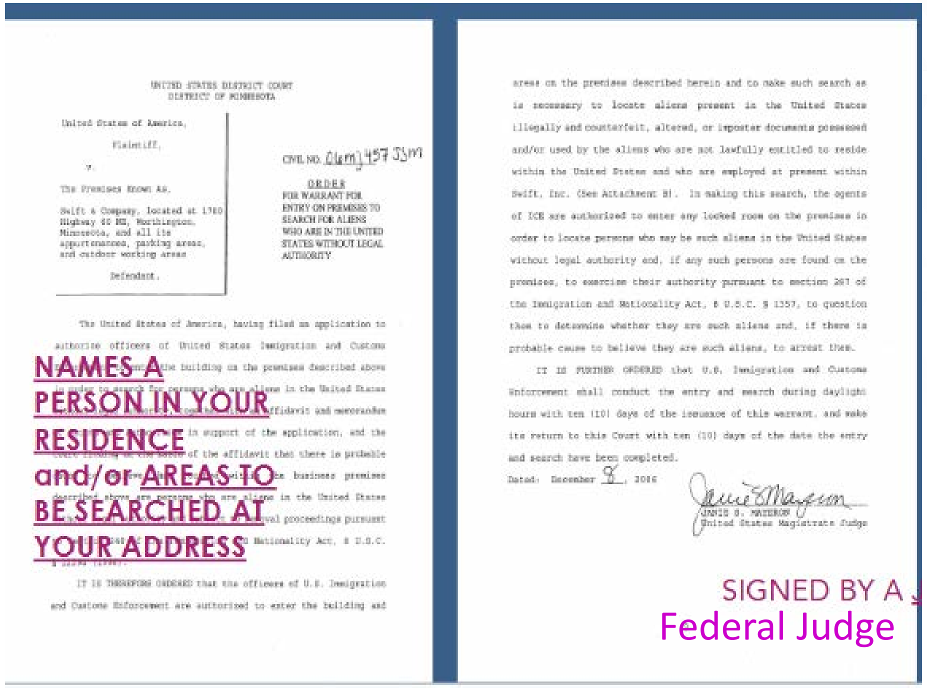
- ICE may come to the worksite to:
  - Start an **I-9 audit** (Document will be called “Notice of Inspection”);
  - **Workplace raid** – must have a judicial warrant;
  - Detain a specific person – must have a judicial warrant.

What protections are available?

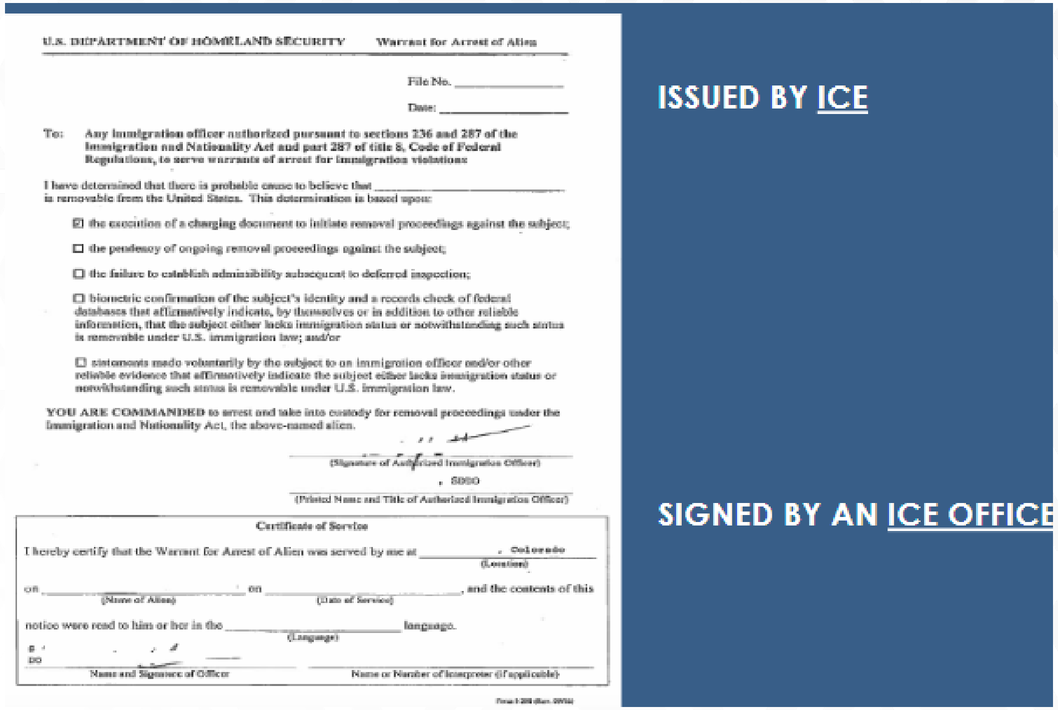
- **Employers and employees have rights under law, regardless of status**
  - 4th Amendment – protects people against unreasonable search and seizure of their home, person and belongings
    - "Am I free to go?" If yes, walk away calmly. If no, detained.
    - ICE can only detain if they have reasonable suspicion *(don't give any info that could lead to discriminatory suspicion (i.e. birth country)*
  - 5th Amendment – right to remain silent. "I want to remain silent."
- **Worksite Raids** must be accompanied by a Judicial Warrant signed by a judge and give a specific scope of search and seizure.
- **Warrants**
  - An administrative warrant authorizes an ICE agent to make an arrest or seizure, **but not to search**
  - An ICE warrant does not authorize an ICE agent to enter a private space without consent
  - An ICE warrant does not provide probable cause of a crime or meet Fourth Amendment

Sample Warrants

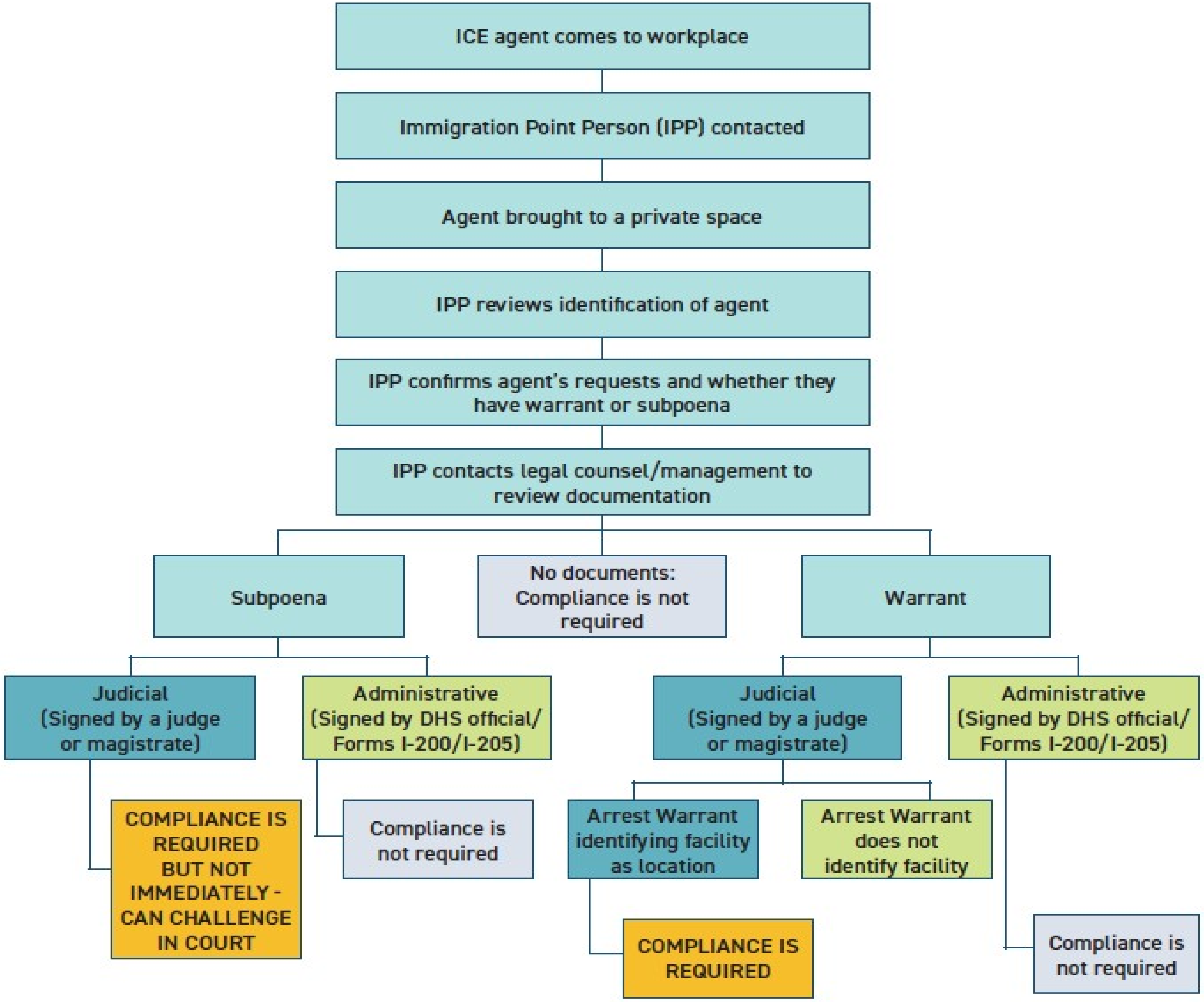
Judicial Warrant



Administrative Warrant



Worksite Enforcement Flow Chart



Best Practices

Preparation

Immigration Point Person

- Assign a staff member as the primary contact for all DHS/ICE/CBP correspondence.
- Ensure all employees are aware of who this person is and how to contact them.

Employee Awareness and Communication

- Train employees to immediately notify the Immigration Point Person in case of any contact from DHS/ICE/CBP.

Workplace Signage and Access Control

- Ensure proper signage is displayed on all private and non-public workspaces.
- Restrict unauthorized access to non-public areas unless legally required.

ICE or CBP Arrival

Handling ICE or CBP Agent Arrival

- Ask agents if they have a warrant.
- If no warrant is presented, deny access to employees, documents, and non-public areas.
- If a warrant is presented, carefully review its details.

Validating the Warrant

- Confirm it is a judicial warrant, issued by a federal court and signed by a judge.
- If it is an administrative warrant (issued by DHS/ICE/CBP), it does not grant access to non-public areas.

Managing the Search and Seizure Process

- Cooperate within the limits of the warrant.
- Do not interfere with officers' search and seizure within the scope of the warrant.
- Record details of the search, including items taken and persons spoken to or detained.

Documenting the Activity

Documentation and Evidence Collection

- Keep detailed records of all interactions, searches, and seizures.
- Request a copy of the warrant and any inventory of seized items.

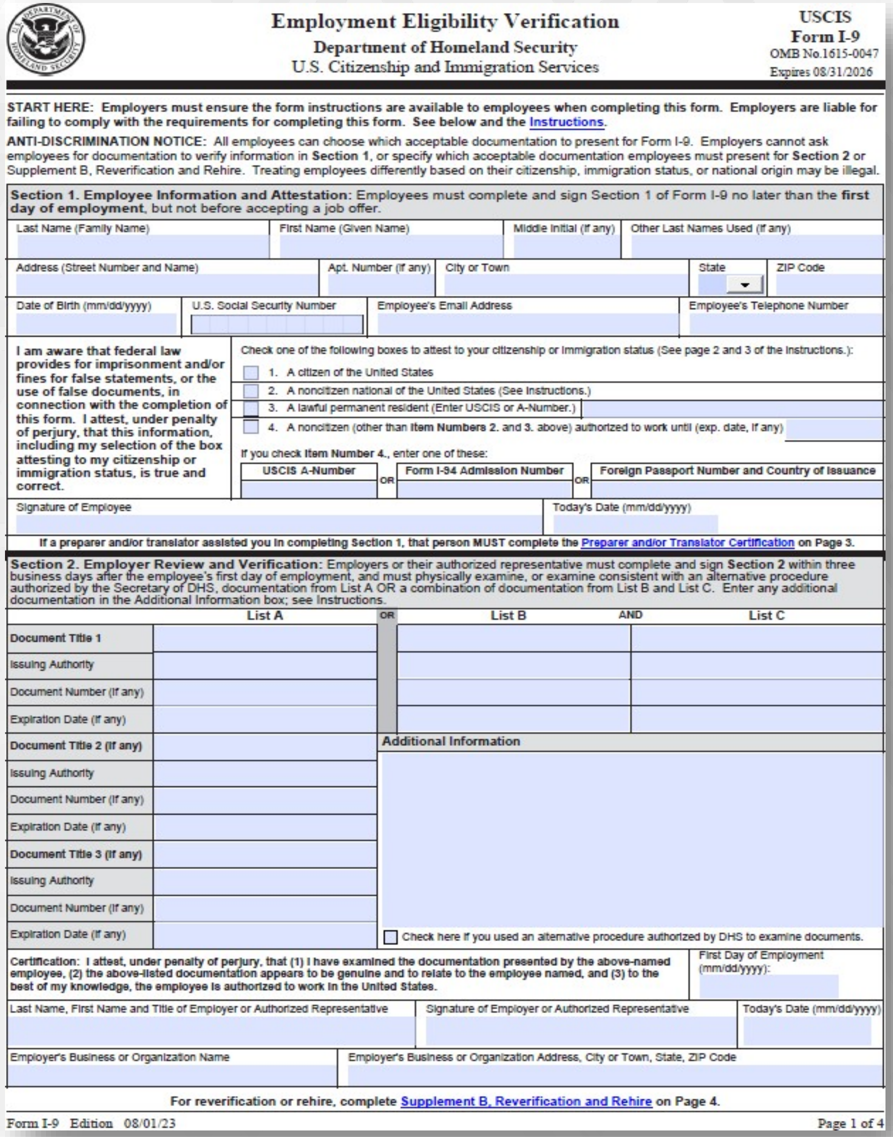
Protecting Business-Critical and Confidential Documents

- If agents attempt to seize confidential or critical business documents, request an accommodation to retain or copy them.
- Consult legal counsel immediately for guidance.

Post-Raid Review and Next Steps

- Conduct a debriefing with key personnel to document the event.
- Consult an immigration attorney to assess the situation and respond appropriately.
- Provide necessary support to affected employees.
- Revise and update this action plan based on new developments or legal requirements.

ICE I-9 Audits



Employment Eligibility Verification
Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-9
OMB No.1615-0047
Expires 08/31/2026

START HERE: Employers must ensure the form instructions are available to employees when completing this form. Employers are liable for failing to comply with the requirements for completing this form. See below and the Instructions.

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) | First Name (Given Name) | Middle Initial (if any) | Other Last Names Used (if any)

Address (Street Number and Name) | Apt. Number (if any) | City or Town | State | ZIP Code

Date of Birth (mm/dd/yyyy) | U.S. Social Security Number | Employee's Email Address | Employee's Telephone Number

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.

Check one of the following boxes to attest to your citizenship or immigration status (See page 2 and 3 of the instructions.):

1. A citizen of the United States
2. A noncitizen national of the United States (See Instructions.)
3. A lawful permanent resident (Enter USCIS or A-Number.)
4. A noncitizen (other than **Item Numbers 2.** and **3.** above) authorized to work until (exp. date, if any)

If you check **Item Number 4.**, 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)

If a preparer and/or translator assisted you in completing Section 1, that person MUST complete the Preparer and/or Translator Certification on Page 3.

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)			**Additional Information**		
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.		

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):

Last Name, First Name and Title of Employer or Authorized Representative | Signature of Employer or Authorized Representative | Today's Date (mm/dd/yyyy)

Employer's Business or Organization Name | Employer's Business or Organization Address, City or Town, State, ZIP Code

For reverification or rehire, complete Supplement B, Reverification and Rehire on Page 4.

Form I-9 Edition 08/01/23 Page 1 of 4

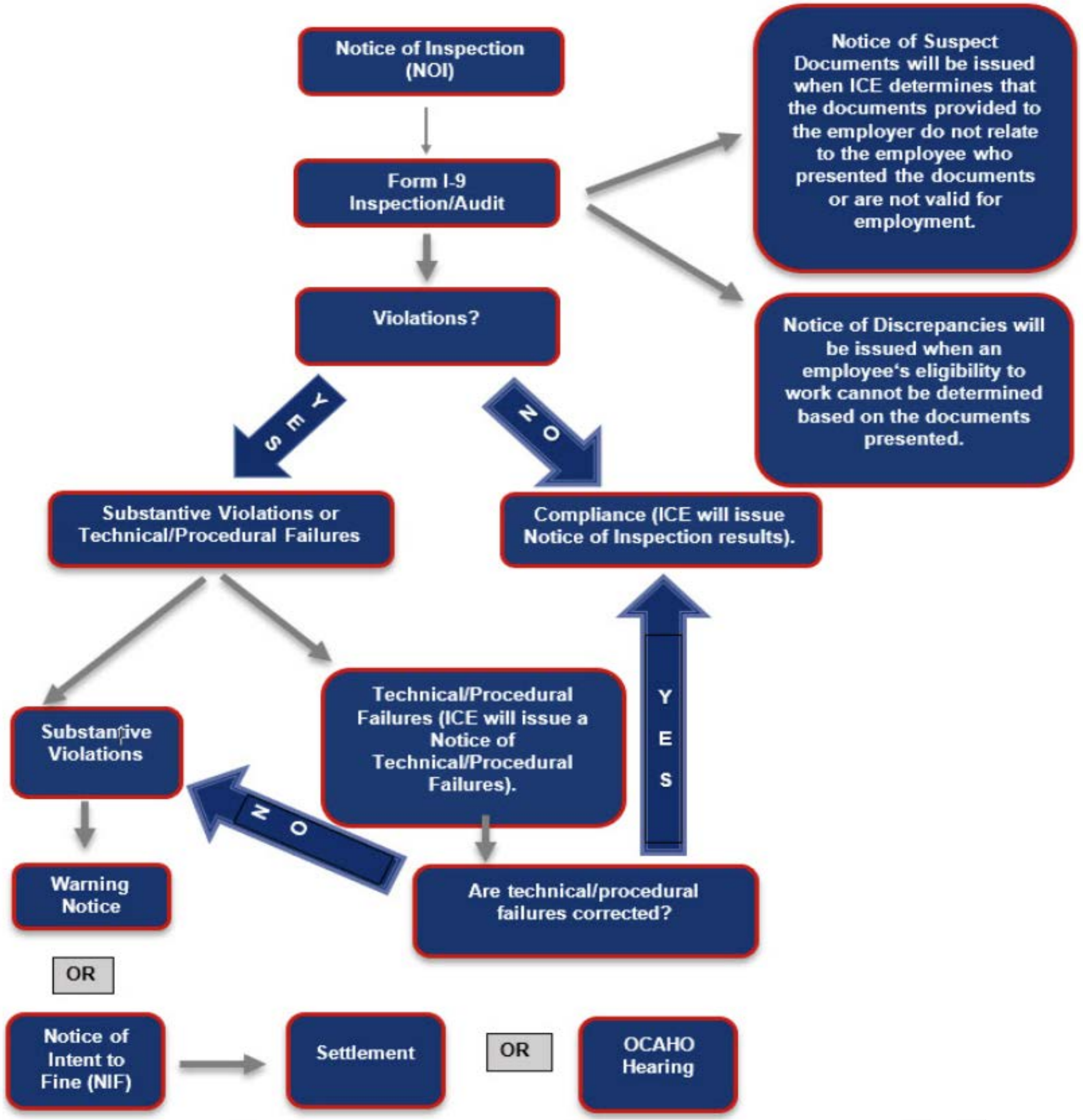
ICE I-9 Audits

- An I-9 audit (Notice of Inspection) may arrive by mail or hand delivered by an ICE officer
- The company will have 3 days to produce the requested I-9s and other documents
- Do not waive the 3 days – take the time to prepare the submission with legal counsel
- Extensions may be requested though are not often given for more than a few days
- Arrange with requesting officer where to produce the documents – either onsite at the workplace, via hand delivery to the officer or electronic submission
- If onsite inspection is required, provide the officer a place to review the documents that is separate from major areas of operations or other documents/items that could lead to further investigations

Penalties

- Paperwork violation fines now range between
- $288 to $2,861 per violation
- Knowingly hiring or employing unauthorized workers have fines ranging from $716 – $5,724 per employee for the first violation.
- Second- and third-violation of knowingly hiring/employing range between $5,724 up to $28,619 per employee.
- Arrests and criminal convictions for knowingly hiring or employing unauthorized workers are on the rise as well.
- Can result in loss of federal contracts & asset forfeiture

Anatomy of an ICE Audit



Conducting Internal I-9 Audits to Protect the Company and Minimize Penalties

Form I-9

Form I-9

Employment Eligibility Verification
Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-9
OMB No.1615-0047
Expires 08/31/2026

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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)	First Name (Given Name)	Middle Initial (if any)	Other Last Names Used (if any)

Address (Street Number and Name)	Apt. Number (if any)	City or Town	State	ZIP Code

Date of Birth (mm/dd/yyyy)	U.S. Social Security Number	Employee's Email Address	Employee's Telephone Number

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.

Check one of the following boxes to attest to your citizenship or immigration status (See page 2 and 3 of the instructions.):

- ☐ 1. A citizen of the United States
- ☐ 2. A noncitizen national of the United States (See instructions.)
- ☐ 3. A lawful permanent resident (Enter USCIS or A-Number.)
- ☐ 4. A noncitizen (other than **Item Numbers 2. and 3.** above) authorized to work until (exp. date, if any)

If you check **Item Number 4.**, 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)

If a preparer and/or translator assisted you in completing Section 1, that person MUST complete the Preparer and/or Translator Certification on Page 3.

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)		Additional Information			
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.			

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):

Last Name, First Name and Title of Employer or Authorized Representative	Signature of Employer or Authorized Representative	Today's Date (mm/dd/yyyy)

Employer's Business or Organization Name	Employer's Business or Organization Address, City or Town, State, ZIP Code

For reverification or rehire, complete Supplement B, Reverification and Rehire on Page 4.

Lists of Acceptable Documents

LISTS OF ACCEPTABLE DOCUMENTS

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.
Examples of many of these documents appear in the Handbook for Employers (M-274).

LIST A Documents that Establish Both Identity and Employment Authorization	OR	LIST B Documents that Establish Identity	AND	LIST C Documents that Establish Employment Authorization
1. U.S. Passport or U.S. Passport Card 2. Permanent Resident Card or Alien Registration Receipt Card (Form I-551) 3. Foreign passport that contains a temporary I-551 stamp or temporary I-551 printed notation on a machine-readable immigrant visa 4. Employment Authorization Document that contains a photograph (Form I-766) 5. For an individual temporarily authorized to work for a specific employer because of his or her status or parole: a. Foreign passport; and b. Form I-94 or Form I-94A that has the following: (1) The same name as the passport; and (2) An endorsement of the individual's status or parole as long as that period of endorsement has not yet expired and the proposed employment is not in conflict with any restrictions or limitations identified on the form. 6. Passport from the Federated States of Micronesia (FSM) or the Republic of the Marshall Islands (RMI) with Form I-94 or Form I-94A indicating nonimmigrant admission under the Compact of Free Association Between the United States and the FSM or RMI		1. Driver's license or ID card issued by a State or outlying possession of the United States provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address 2. ID card issued by federal, state or local government agencies or entities, provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address 3. School ID card with a photograph 4. Voter's registration card 5. U.S. Military card or draft record 6. Military dependent's ID card 7. U.S. Coast Guard Merchant Mariner Card 8. Native American tribal document 9. Driver's license issued by a Canadian government authority **For persons under age 18 who are unable to present a document listed above:** 10. School record or report card 11. Clinic, doctor, or hospital record 12. Day-care or nursery school record		1. A Social Security Account Number card, unless the card includes one of the following restrictions: (1) NOT VALID FOR EMPLOYMENT (2) VALID FOR WORK ONLY WITH INS AUTHORIZATION (3) VALID FOR WORK ONLY WITH DHS AUTHORIZATION 2. Certification of report of birth issued by the Department of State (Forms DS-1350, FS-545, FS-240) 3. Original or certified copy of birth certificate issued by a State, county, municipal authority, or territory of the United States bearing an official seal 4. Native American tribal document 5. U.S. Citizen ID Card (Form I-197) 6. Identification Card for Use of Resident Citizen in the United States (Form I-179) 7. Employment authorization document issued by the Department of Homeland Security For examples, see Section 7 and Section 13 of the M-274 on uscis.gov/i-9-central. The Form I-766, Employment Authorization Document, is a List A, **Item Number 4.** document, not a List C document.
Acceptable Receipts May be presented in lieu of a document listed above for a temporary period. For receipt validity dates, see the M-274.				
• Receipt for a replacement of a lost, stolen, or damaged List A document. • Form I-94 issued to a lawful permanent resident that contains an I-551 stamp and a photograph of the individual. • Form I-94 with "RE" notation or refugee stamp issued to a refugee.	OR	Receipt for a replacement of a lost, stolen, or damaged List B document.		Receipt for a replacement of a lost, stolen, or damaged List C document.

*Refer to the Employment Authorization Extensions page on I-9 Central for more information.

8 Best Practices for Employers to Maximize Compliance

Here are eight steps you can take to create a culture of compliance:

1. Provide updated training for all managers, human resources personnel, and staff involved in the I-9 process;
2. Provide updated training for all involved in the E-Verify process, including training on fraud awareness and anti-discrimination;
3. Update immigration policies in handbooks;
4. If your company does not have an immigration compliance policy, now is the right time to consider implementing one;
5. Update internal business processes associated with I-9s and E-Verify;
6. If your company uses an electronic I-9 provider, contact the provider now to ensure its system incorporates the new changes and complies with DHS requirements, including audit trails;
7. Enlist outside immigration counsel to conduct an attorney-client privileged audit of your I-9s; and
8. Evaluate E-Verify advantages and disadvantages with your immigration counsel to determine if your company should take advantage of the remote verification option for E-Verify employers.

Employers’ Rapid Response Team: Who We Are and How We Can Help

How Can the Rapid Response Team Help?

- **Immediate Legal Counsel**, consisting of attorneys with expertise in a number of related areas
- **Corporate Representation** during a raid or audit
- **Documentation and Compliance Review**, including I-9 audits and trainings
- **Post-Raid Support and Strategy**, including document requests and employee issues
- **Crisis Communications**, including PR and media outreach

Employers' Rapid Response Team Hotline

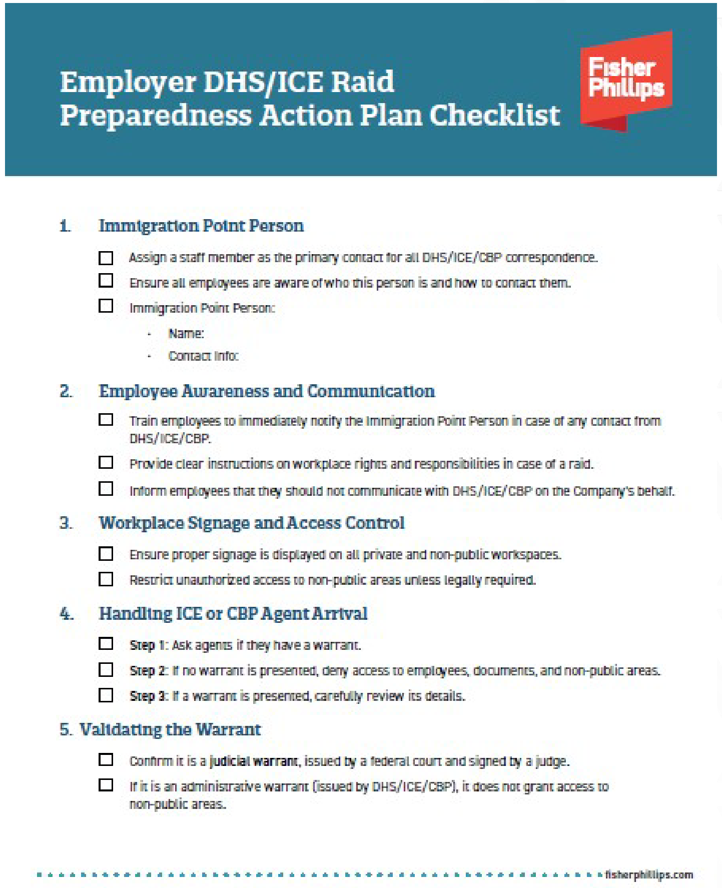
24/7 Emergency Hotline:

In the event of an active ICE enforcement action, call us at **877-483-7781** for immediate assistance.

DHSRaid@fisherphillips.com

Employers' Rapid Response Webpage

Complimentary checklist available on the **[Employers' Rapid Response webpage]**



Employer DHS/ICE Raid Preparedness Action Plan Checklist

Fisher Phillips

1. **Immigration Point Person**
   - ☐ Assign a staff member as the primary contact for all DHS/ICE/CBP correspondence.
   - ☐ Ensure all employees are aware of who this person is and how to contact them.
   - ☐ Immigration Point Person:
     - Name:
     - Contact Info:
2. **Employee Awareness and Communication**
   - ☐ Train employees to immediately notify the Immigration Point Person in case of any contact from DHS/ICE/CBP.
   - ☐ Provide clear instructions on workplace rights and responsibilities in case of a raid.
   - ☐ Inform employees that they should not communicate with DHS/ICE/CBP on the Company's behalf.
3. **Workplace Signage and Access Control**
   - ☐ Ensure proper signage is displayed on all private and non-public workspaces.
   - ☐ Restrict unauthorized access to non-public areas unless legally required.
4. **Handling ICE or CBP Agent Arrival**
   - ☐ **Step 1**: Ask agents if they have a warrant.
   - ☐ **Step 2**: If no warrant is presented, deny access to employees, documents, and non-public areas.
   - ☐ **Step 3**: If a warrant is presented, carefully review its details.
5. **Validating the Warrant**
   - ☐ Confirm it is a **judicial warrant**, issued by a federal court and signed by a judge.
   - ☐ If it is an administrative warrant (issued by DHS/ICE/CBP), it does not grant access to non-public areas.

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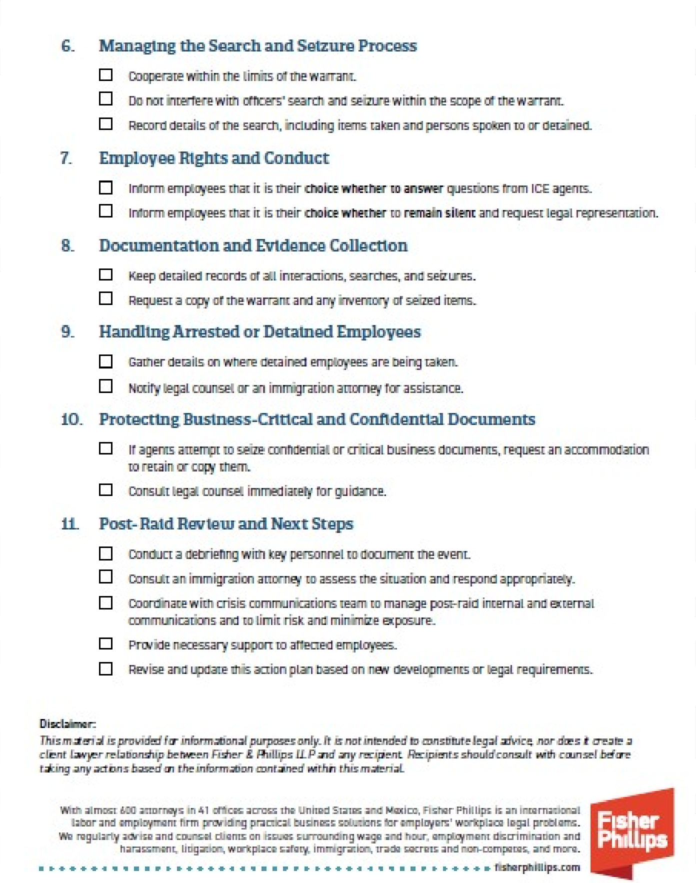

6. **Managing the Search and Seizure Process**
   - ☐ Cooperate within the limits of the warrant.
   - ☐ Do not interfere with officers' search and seizure within the scope of the warrant.
   - ☐ Record details of the search, including items taken and persons spoken to or detained.
7. **Employee Rights and Conduct**
   - ☐ Inform employees that it is their **choice whether to answer** questions from ICE agents.
   - ☐ Inform employees that it is their **choice whether to remain silent** and request legal representation.
8. **Documentation and Evidence Collection**
   - ☐ Keep detailed records of all interactions, searches, and seizures.
   - ☐ Request a copy of the warrant and any inventory of seized items.
9. **Handling Arrested or Detained Employees**
   - ☐ Gather details on where detained employees are being taken.
   - ☐ Notify legal counsel or an immigration attorney for assistance.
10. **Protecting Business-Critical and Confidential Documents**
    - ☐ If agents attempt to seize confidential or critical business documents, request an accommodation to retain or copy them.
    - ☐ Consult legal counsel immediately for guidance.
11. **Post-Raid Review and Next Steps**
    - ☐ Conduct a debriefing with key personnel to document the event.
    - ☐ Consult an immigration attorney to assess the situation and respond appropriately.
    - ☐ Coordinate with crisis communications team to manage post-raid internal and external communications and to limit risk and minimize exposure.
    - ☐ Provide necessary support to affected employees.
    - ☐ Revise and update this action plan based on new developments or legal requirements.

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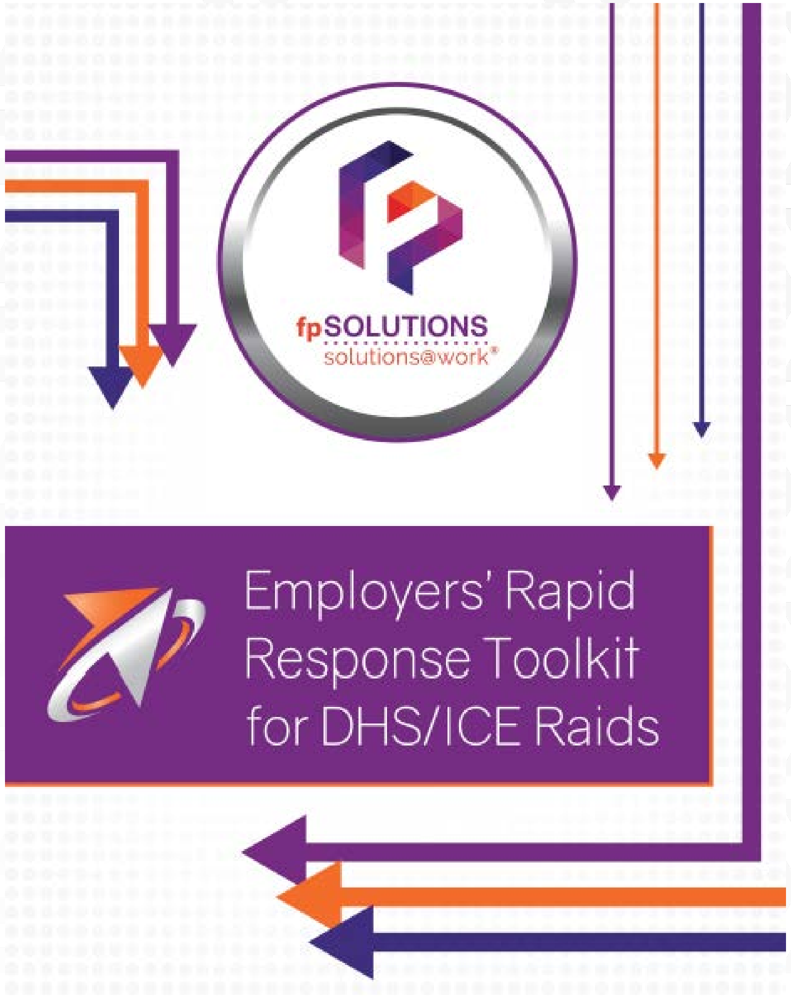

THANK YOU

For Joining Fisher Phillips

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