



Reviewing Form I-9 Saves Clients Money

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Saving Client in Fines - Cullen and Dykman Spearheaded Internal Audit Saving Client Thousands in Fines

We regularly advise our commercial clients to conduct in-house audits of their Forms I-9 to ensure complete compliance and to help minimize exposure in the event of an audit or investigation by Immigration and Customs Enforcement (ICE). We were retained by a client interested in conducting an in-house audit of its Forms I-9, as one had never been done and there had been a good deal of turnover in its human resources department. We reviewed all of the forms to determine which ones no longer had to be maintained under the law and then reviewed the maintained forms for any omissions, mistakes, "over" verification, etc. Our review turned up many problems that needed correcting in order to avoid fines if the client was ever audited or investigated by ICE and we advised the client on actions to take in order to rectify the errors on the Forms I-9. A few months after this in-house audit was conducted, ICE inspected the client's forms. As a result of the efforts undertaken during the in-house audit, the penalty fines assessed by ICE were greatly minimized, saving the client thousands of dollars.

Practices

- Internal Investigations Unit