

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
OFFICE OF THE CHIEF ADMINISTRATIVE HEARING OFFICER

July 8, 2015

UNITED STATES OF AMERICA,	)	
Complainant,	)	
	)	
v.	)	8 U.S.C. § 1324a Proceeding
	)	OCAHO Case No. 14A00008
	)	
HARTMANN STUDIOS, INC.,	)	
Respondent.	)	
_____	)	

FINAL DECISION AND ORDER

Appearances:

For the complainant:  
Sherry Nohara

For the respondent:  
Steven Bovarnick and John Lofton

I. PROCEDURAL HISTORY

This is an action pursuant to the employer sanctions provisions of the Immigration and Nationality Act (INA), as amended by the Immigration Reform and Control Act of 1986 (IRCA), 8 U.S.C. § 1324a (2012). The United States Department of Homeland Security, Immigration and Customs Enforcement (ICE or the government) filed a complaint alleging that Hartmann Studios, Inc. (Hartmann or the company) engaged in 818 violations of 8 U.S.C. § 1324a(a)(1)(B). ICE subsequently amended its complaint by categorizing the violations into five counts and by providing a more specific statement of the factual basis for the violations in each count.

Count I alleged that Hartmann failed to prepare and/or present Forms I-9 for Terrence Anderson, Roberto Barrera, Guillermo Gomez, and Ricardo Mendoza. Count II alleged that Hartmann failed to timely prepare and/or present I-9s for Grace E. Abad, Carlos E. Alba, Refugio Alba, Kenneth Bradford, Juan Ramon Cruz Miranda, Manuel T. Maldonado, Jose Javier Ponce

Castillo, and Greg Sullivan. Count III alleged that the company failed to ensure that Salvador Cruz, Veronica Huerta, Gerardo Mata, Richard E. Olson, Melchor Parra, and Jorge Milton Rivera Luna properly completed section 1 of Form I-9. Count IV alleged that Hartmann failed to properly complete section 2 of the I-9 forms for 797 named individuals. Count V alleged that the company failed to properly complete section 3 of the I-9 forms for Zonia Mirna Carillo, Carlos Orlando Suazo Zepeda, and Maria Silvia Urbina. ICE seeks penalties totaling \$812,665.25.

Hartmann filed an amended answer denying the material allegations and asserting thirteen affirmative defenses, including, inter alia, estoppel and limitations. Prehearing procedures were undertaken, in the course of which discovery disputes ensued. Hartmann produced one-page, unaudited statements of income and balance sheets for 2011, 2012, 2013, and part of 2014, but explicitly stated in a letter to ICE dated November 6, 2014, that it “has not put ability to pay a fine as . . . [an] issue in the case.” ICE sought to discover the underlying financial documents on which the financial reports were ostensibly based, and ultimately filed a motion to compel discovery. On February 20, 2015, I issued an order compelling Hartmann to produce, inter alia, the financial documents requested by ICE, *but only if it intended to raise an issue respecting the company’s ability to pay the proposed penalty*. The order explicitly stated that the issue of ability to pay would be waived if the documents were not produced. They were not produced, and the issue is waived. The order compelling discovery also directed Hartmann to respond to an interrogatory by providing a list of any individuals as to whom the company contends that the allegations are barred by limitations, together with the termination dates for those employees, or in the alternative, to state affirmatively that all such information has been provided. The order compelling discovery warned the company that its limitations defense would be deemed waived as to any individual for whom the information was not provided. Hartmann failed to produce the information and did not raise this defense in its response to ICE’s motion for summary decision. The limitations defense is also deemed waived.

Presently pending is the government’s motion for summary decision. In its response to ICE’s motion, the company proffered various exhibits related to its ability to pay, and also argued that the government should be estopped from fining the company. ICE filed a motion for leave to reply to Hartmann’s response, together with its proposed reply. Hartmann filed a response to the government’s motion in opposition to the reply, along with a surreply accompanied by the declaration of Steven H. Bovarnik and exhibits A, B, and C. The reply and surreply are accepted for the limited purpose of considering Hartmann’s defense of estoppel; they are not considered with respect to the waived issue of ability to pay.

## II. BACKGROUND INFORMATION

Hartmann Studios, Inc., incorporated in 1985, is an event design and production company, with its main office in Richmond, California, and a smaller office in Atlanta, Georgia. Hartmann

produces a variety of events including weddings, charitable fundraisers, corporate exhibitions, trade shows, and civic events like the parades in San Francisco following victories by the Giants in the World Series. The company operates in the United States, Asia, and Europe, and characterizes itself as having “a stellar reputation as a premier event design and production company.” In 2011, the year of the audit, Hartmann had gross revenues of about seventy-three million dollars. Matthew James Guelfi is the company’s vice president, and Steve Tanaka is its controller.

In approximately 1994, legacy Immigration and Naturalization Service conducted an audit of Hartmann’s I-9s. The company was not fined, but did terminate some employees who could not provide updated documentation. On February 17, 2011, ICE served Hartmann with a Notice of Inspection and agreed the next day to postpone the inspection until March 4, 2011, at which time Hartmann gave ICE an employee list, I-9 forms, payroll records, Articles of Incorporation, and other documents. At the time of this inspection, Hartmann employed 718 individuals. ICE served Hartmann with both a Notice of Suspect Documents and a Notice of Technical or Procedural Failures on October 12, 2011. ICE issued Hartmann a Notice of Intent to Fine (NIF) on May 14, 2013, and Hartmann requested a hearing on June 12, 2013. ICE filed its complaint on November 20, 2013, and all conditions precedent to the institution of this proceeding have been satisfied.

Four hundred of the employees whose I-9s Hartmann is responsible for preparing are members of International Alliance of Theatrical Stage Employees Union Local 16 (Local 16). Since September 2008, Hartmann and Local 16 have been parties to a Collective Bargaining Agreement (CBA) pursuant to which Local 16 supplies Hartmann with skilled stage technicians. Hartmann hires these union members on a project-by-project basis, and classifies them as “on-call workers.” Hartmann pays them in accordance with its regular pay periods, and the technicians are not terminated upon completion of a project, but remain “on-call.” These Local 16 workers are also available to work for any other employer with whom Local 16 has a CBA when the individual completes what the parties refer to as a “three-in-one” form. The three-in-one form is a one-page document developed by Local 16 that combines a portion of a W-4 form, parts of sections 1 and 2 of an I-9 form, and a “check-off authorization” that permits 3.5% of the employee’s wages to be deducted and paid to Local 16 for the individual’s union dues. The four hundred Local 16 workers, 399 of whom are named in the complaint,<sup>1</sup> each presented a three-in-one form to Rayna Peters, staff accountant for Hartmann. No separate I-9 was completed for any of them.

### III. STANDARDS APPLIED

<sup>1</sup> ICE says the complaint contains the names of 400 employees who presented three-in-one forms, but Count IV of the complaint actually contains the names of only 399 employees who did so. The name Bryan Hornbeck appears in the list of employees who presented three-in-one forms (Exhibit H with ICE auditor Gary Fong’s affidavit), but the name Bryan Hornbeck does not appear anywhere in the complaint, and no findings are made with respect to his I-9 or lack of it.

### A. Summary Decision

A motion for summary decision is granted under OCAHO regulations if a party demonstrates that there is no genuine issue of material fact and that the party is entitled to summary decision as a matter of law. 28 C.F.R. § 68.38(c) (2014). This rule is similar to and based upon Rule 56 of the Federal Rules of Civil Procedure, which permits the entry of summary judgment in federal cases. Accordingly, OCAHO jurisprudence looks to federal case law interpreting that rule for guidance in determining when summary decision is appropriate. See *United States v. Candlelight Inn*, 4 OCAHO no. 611, 212, 222 (1994).<sup>2</sup>

The party seeking summary decision bears the initial burden of showing the absence of a material factual dispute. See *Celotex, Corp. v. Catrett*, 477 U.S. 317, 323 (1986); *United States v. Primera Enters., Inc.*, 4 OCAHO no. 615, 259, 261 (1994). Once the moving party satisfies its burden, the burden shifts to the nonmoving party to come forward with evidence that a genuine issue of material fact does exist. See *Primera Enters.*, 4 OCAHO no. 615 at 261 (citing Fed. R. Civ. P. 56(e)). An issue of material fact is genuine only if it has a real basis in the record. See *Cormia v. Home Care Giver Servs., Inc.*, 10 OCAHO no. 1160, 5 (2012) (citing *Matsushita Elec. Indus. Co. v. Zenith Radio Corp.*, 475 U.S. 574, 586-87 (1986)). All facts must be viewed in favor of the nonmoving party. See *Primera Enters.*, 4 OCAHO no. 615 at 261.

### B. Proper Completion of Form I-9

The INA imposes an affirmative duty upon employers to prepare and retain certain forms for employees hired after November 6, 1986 and to make those forms available for inspection on at least three business days' notice. 8 C.F.R. § 274a.2(b)(2)(ii) (2015). Regulations designate the I-9 form as the Employment Eligibility Verification Form to be used by employers. 8 C.F.R. § 274a.2(a)(2).

An employer must ensure that a new employee completes section 1 of the I-9 form on the individual's date of hire, 8 C.F.R. § 274a.2(b)(1)(i)(A), and the individual must sign section 1 to attest under penalty of perjury that he or she is a U.S. citizen, lawful permanent resident, or alien authorized to work in the United States, 8 U.S.C. § 1324a(b)(2). The employer must then

<sup>2</sup> Citations to OCAHO precedents reprinted in bound Volumes 1 through 8 reflect the volume number and the case number of the particular decision, followed by the specific page in that volume where the decision begins; the pinpoint citations which follow are thus to the pages, seriatim, of the specific entire volume. Pinpoint citations to OCAHO precedents subsequent to Volume 8, where the decision has not yet been reprinted in a bound volume, are to pages within the original issuances; the beginning page number of an unbound case will always be 1, and is accordingly omitted from the citation. Published decisions may be accessed in the Westlaw database "FIM-OCAHO," or in the LexisNexis database "OCAHO," or on the website at <http://www.justice.gov/eoir/OcahoMain/ocahosibpage.htm#PubDecOrders>.

complete section 2 of the form within three business days of the hire, 8 C.F.R. § 274a.2(b)(1)(ii)(B), and sign section 2 to attest under penalty of perjury that it reviewed the appropriate documents to verify the individual's identity and employment authorization, 8 C.F.R. § 274a.2(a)(3), (b)(1)(ii). Acceptable documents include either a List A document, or both a List B and a List C document for each employee. 8 C.F.R. § 274a.2(b)(1)(v). List A documents establish both identity and employment eligibility, 8 C.F.R. § 274a.2(b)(1)(v)(A); List B documents establish identity only, 8 C.F.R. § 274a.2(b)(1)(v)(B); and List C documents establish only employment authorization, 8 C.F.R. § 274a.2(b)(1)(v)(C).

#### IV. LIABILITY

##### A. The Government's Motion

###### Count I

ICE says that the names Terrence Anderson, Roberto Barrera, Guillermo Gomez, and Ricardo Mendoza appear on Hartmann's employee list, but the company never produced I-9s for them. The government points out that Hartmann admitted that it couldn't locate I-9s for these individuals and couldn't prepare new I-9s for them as requested because the individuals had been terminated.

###### Count II

ICE alleges that Hartmann failed to timely present I-9s for Grace E. Abad, Carlos E. Alba, Refugio Alba, Kenneth Bradford, Juan Ramon Cruz Miranda, Manuel T. Maldonado, Jose Javier Ponce Castillo, and Greg Sullivan. The government says that their names appear on Hartmann's employee list, but their I-9s were not promptly presented upon the government's request for them. ICE points out that Hartmann admits that at the time of the inspection, the company could not locate the original I-9s for these eight individuals.

###### Count III

ICE says Hartmann failed to ensure that Salvador Cruz, Richard Olson, and Jorge Milton Rivera Luna each checked a box in section 1 of their I-9 forms to indicate their immigration status. ICE also says the company failed to ensure that Salvador Cruz and Veronica Huerta signed section 1 of their respective I-9s. The government also says that Gerardo Mata and Melchor Parra checked boxes attesting respectively to status as a lawful permanent resident and an alien authorized to work until a date certain, but Hartmann failed to ensure that they entered their alien numbers on the form.

###### Count IV

ICE says that visual inspection of 788<sup>3</sup> of the forms for individuals named in Count IV, 400<sup>4</sup> of which consist of three-in-one forms, reflects that Hartmann failed to sign section 2 of all the forms. *See* Appendix, Count IV. ICE says the company takes issue with the allegation that it actually hired the unionized workers who had three-in-one forms instead of I-9s, but Hartmann did hire the workers according to 8 C.F.R. § 274a.1(c), which defines hire as “the actual commencement of employment of an employee for wages or other remuneration.” ICE points out, moreover, that these workers appear on Hartmann’s employee list with their respective hire dates, and Hartmann’s 2010 payroll records reflect that all but ten of them earned wages between February 17, 2010 and December 31, 2010.

One individual not on the 2010 payroll, Michael Barnard, was hired in January 2011, which explains why his name does not appear on the 2010 payroll records. ICE agreed to withdraw the allegations respecting the other nine in the interest of streamlining the litigation and avoiding inquiry into their possible termination dates. ICE accordingly withdrew its allegations involving Per Bjornstad, Edward Church, Dwight McBride, Brian Thomas Meek, Greg Shine, Alva Thompson, David Vernali, Arthur Bassard, and Gary Dwayne Moorman, and reduced the proposed penalty by \$8835.75. ICE also acknowledged that it listed the name of Omar Mota Perez twice in Count IV, and should have listed him only once.

ICE says further that the I-9s of Margarita Arroyo, Jose J. Martinez, Mario Martinez, Zalvador Munoz, and Jose Guadalupe Ortiz are missing List A or B documents in section 2, and that Derek James Maddox’s I-9 is missing List A or C documents. Felipe de Jesus Leon Magana’s I-9 is missing a document number under List A, and Juan C. Ramirez’s I-9 is missing the expiration date for his driver’s license.

ICE says that copying employees’ documents rather than fully completing their I-9s does not constitute substantial compliance with the employment verification requirements, and that Steve Tanaka’s and Matthew James Guelfi’s belief that the company did not need to sign the section 2 attestation cannot not absolve the company from liability for the violations in Count IV.

#### Count V

ICE says that Hartmann failed to complete section 3 of the I-9s for Zonia Mirna Carillo, Carlos Orlando Suazo Zepeda, and Maria Silvia Urbina after their respective employment authorization documents expired.

The government’s motion was accompanied by the following exhibits: G-1) Gary Wong’s affidavit with accompanying exhibits: A) Notice of Inspection (4 pp.); B) email from Steve Tanaka; C) Hartmann’s employee list (16 pp.); D) emails between Steve Tanaka and Gary Fong (2 pp.); E) email between Steve Tanaka and Gary Fong (2 pp.); F) email between Steve Tanaka

<sup>3</sup> The Notice of Intent to Fine attached to and incorporated into ICE’s amended complaint alleges that Hartmann failed to sign section 2 of 789 forms.

<sup>4</sup> But there were only 399 of these individuals that were actually named in the complaint.

and Gary Fong (3 pp.); G) Notice of Suspect Documents (7 pp.); H) Notice of Technical or Procedural Failures and list of 400 employees with three-in-one form (10 pp.); I) I-9s that Hartmann sent in response to NTPF (436 pp.); J) email from Gary Fong to Steve Tanaka; K) email between Steve Tanaka and Gary Fong (3 pp.); L) ICE's worksite enforcement guide (47 pp.); M) ICE's Memorandum to Case File (33 pp.); N) I-9s for Count II (8 pp.); O) I-9s for Count III (6 pp.); P) I-9s for Count IV (803 pp.); Q) additional I-9s for Count IV (9 pp.); R) I-9s for Count V (3 pp.); and S) Notice of Intent to Fine (2 pp.); G-2) Respondent's Responses to Complainant's First Set of Requests for Admission (168 pp.); G-3) deposition of Matthew James Guelfi (27 pp.); G-4) deposition of Steve Tanaka (33 pp.); G-5) deposition of Rayna Ruth Peters (41 pp.); G-6) deposition of Gary Fong (12 pp.); G-7) Interim Guidelines: Section 274A(b)(6) of the Immigration & Nationality Act Memorandum (11 pp.); and G-8) Respondent's Responses to Complainant's First Set of Interrogatories and Request to Produce (12 pp.).

## B. Hartmann's Response

### Count I

Hartmann admits to the violations alleged in Count I. Although it denies that it failed to prepare I-9s for the four individuals, it does admit that it could not locate the forms and that it failed to present them to ICE.

### Count II

Hartmann's answer denied the allegations in Count II. The company says it provided the eight I-9s to ICE on April 25, 2011, but it does not elaborate on this assertion or address it in response to ICE's motion for summary decision. The company does not contend that it presented these I-9s upon at least three business days' notice in response to the NOI, as directed by 8 C.F.R. § 274a.2(b)(2)(ii).

### Count III

Apart from the assertion in the answer that the allegations as to five employees named in Count III were barred by limitations, Hartmann did not address the allegations in this count.

### Count IV

Hartmann does not deny that it was the employer of 400 members of Local 16. In fact, it points out that its collective bargaining agreement with Local 16 states, "Whereas the *Employer* has the need to *hire* skilled technicians, and whereas Local 16 can supply such skilled technicians to the Employer, the Employer agrees to the wages and conditions hereinafter specified in this CBA" (emphasis added). Hartmann also does not deny that the three-in-one forms for the 399 Local 16 union workers that are named in the complaint all lacked a signature in section 2. The company instead emphasizes that it believed that the three-in-one forms were sufficient to confirm that the

Local 16 workers had proper employment authorization and that nothing further needed to be done to confirm their eligibility for employment. Hartmann admits that its belief was mistaken, and does not argue that use of the three-in-one form should shield it from liability, but says instead that its belief should be considered in assessing the penalty.

As to the remaining allegations in Count IV, Hartmann does not deny that it also failed to sign section 2 of the I-9 forms the company filled out itself. Steve Tanaka stated in his deposition that he previously did not view signing section 2 as one of an employer's key responsibilities in complying with the employment verification requirements. Hartmann does not address the remaining allegations in this count.

#### Count V

Hartmann's answer denied the allegations in Count V as being vague, ambiguous, and unclear, and said it could not provide a proper response, but the company did not specifically address these allegations in its response to ICE's motion.

Hartmann's response was accompanied by the following attachments: R-1) affidavit of Matthew James Guelfi (20 pp.), and attached exhibits A-LL (135 pp.); R-2) deposition of Matthew James Guelfi (32 pp.); R-3) deposition of Steve Tanaka (27 pp.); and R-4) deposition of Rayna Ruth Peters (15 pp.); R-5) deposition of Gary Fong (71 pp.); and R-6) Complainant's Responses to Respondent's Request for Admission (19 pp.).

### C. Discussion and Analysis

#### Count I

Hartmann's employee list reflects that Terrence Anderson was hired on August 1, 2008 and terminated on March 26, 2010; Roberto Barrera was hired on August 11, 2009 and terminated on October 15, 2010; Guillermo Gomez was hired on March 18, 2008 and no termination date appears; and Ricardo Mendoza was hired on October 8, 2009 and terminated on January 21, 2011. An employer is obligated to retain an I-9 form for a former employee for a period of three years after the individual's hire date or one year after the termination date, whichever is later. 8 U.S.C. § 1324a(b)(3)(B); 8 C.F.R. § 274a.2(b)(2)(i)(A). All the employees named in Count I are within the retention period and Hartmann admits it did not present I-9 forms for them. ICE accordingly met its burden of demonstrating that there is no genuine issue of material fact and that it is entitled to summary decision as to Count I.

#### Count II

Hartmann did not timely present I-9 forms for the employees named in Count II upon request by the government and does not contend that it did. ICE set the inspection date for March 4, 2011, but Hartmann says it presented the forms on April 25, 2011. Examination of the I-9 forms for these individuals reveals that most were not prepared until after the NOI was issued. ICE is



entitled to summary decision as to Count II.

### Count III

Visual inspection of the I-9 forms reflects that the violations alleged in Count III are facially apparent. Employers must ensure that employees check a box in section 1 attesting to status as a U.S. citizen, lawful permanent resident, or alien authorized to work in the United States. 8 U.S.C. § 1324a(b)(2); *United States v. Ketchikan Drywall Servs., Inc.*, 10 OCAHO no. 1139, 6, 15 (2011). The I-9s of Salvador Cruz, Richard Olson, and Jorge Milton Luna Rivera reflect that each failed to check a box in section 1 attesting to status as either a U.S. citizen, lawful permanent resident, or alien authorized to work. It is also facially apparent that Veronica Huerta and Salvador Cruz did not sign section 1 of their respective I-9s. Hartmann will, however, be held liable for only one violation on Salvador Cruz's I-9: failure to ensure that he checked a status box in section 1.

Failure to ensure that an employee enters an alien number after selecting status as a lawful permanent resident or alien authorized to work is also a substantive violation. *See Horno MSJ*, 11 OCAHO no. 1247 at 8 (citing *Ketchikan*, 10 OCAHO no. 1139 at 6); *see generally* Paul W. Virtue, *Interim Guidelines: Section 274A(b)(6) of the Immigration & Nationality Act Added by Section 411 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996* (Mar. 6, 1997), available at 74 Interpreter Releases 706 (Apr. 28, 1997) (hereinafter Virtue Memo). Gerardo Mata's I-9 reflects that he failed to enter an alien number after checking the box in section 1 indicating status as lawful permanent resident. His alien number does not appear in section 2 of the form, and no copy of his permanent resident card was attached to his I-9. Similarly, Melchor Parra's I-9 reflects that this individual failed to enter an alien number after checking the box in section 1 indicating status as an alien authorized to work until a date certain.

ICE is therefore entitled to summary decision as to Count III.

### Count IV

Hartmann hired at least 390<sup>5</sup> members of Local 16 who had three-in-one forms, and the section of that form that resembles section 2 of Form I-9 reflects no employer signature. Visual inspection confirms that Hartmann did not sign section 2 of these 390 three-in-one forms. *See* Appendix A, Count IV. Visual inspection of the forms for the other individuals named in Count IV reflects that Hartmann also failed to sign section 2 of the I-9s for 389<sup>6</sup> of them. *Id.* An

<sup>5</sup> Excluding Per Bjornstad, Edward Church, Dwight McBride, Brian Thomas Meek, Greg Shine, Alva Thompson, David Vernali, Arthur Bassard, and Gary Dwayne Moorman, all of whom also had three-in-one forms, but as to whom the allegations were withdrawn.

<sup>6</sup> ICE withdrew one violation related to Omar Mota Perez because his name was listed twice in Count IV. He did not have a three-in-one form.

employer is required to sign section 2 to attest under penalty of perjury that it reviewed the appropriate documents to verify the individual's identity and employment authorization. 8 C.F.R. § 274a.2(a)(3), (b)(1)(ii). Failure to comply with this requirement is a substantive violation.

Although ICE characterizes the three-in-one forms as “modified I-9s,” these forms are not an adequate substitute for filling out an actual I-9 as regulations require. 8 C.F.R. § 274a.2(a)(2). ICE did not charge these violations as failure to prepare I-9s, however, and chose instead the slightly less serious violation of failure to sign section 2. Because the government withdrew nine Count IV allegations and acknowledged that the name Oscar Perez Mota was inadvertently listed twice, ICE is entitled to summary decision that Hartmann failed to sign 779 I-9s.

Employers are required to review either a List A document, or both a List B and a List C document for each employee. 8 C.F.R. § 274a.2(b)(1)(v). ICE’s allegation that the I-9s for Jose J. Martinez, Mario Martinez, Zalvador Munoz, and Jose Guadalupe Ortiz contain only a List C document and are missing either a List A or B document is factually inaccurate, but visual inspection of these employees’ I-9 forms, along with the form for James Derek, reflects that these forms show only a List B document and are missing either a List A or C document in section 2. Visual inspection also reflects that a “military ID” appears under List C on Margarita Arroyo’s I-9, but a military ID does not establish work authorization for civilian employment.<sup>7</sup> Arroyo’s I-9 reflects neither a List A nor a List B document. *See* Appendix, Count IV. Hartmann will be held liable for only one violation on her I-9.

Felipe de Jesus Leon Magana’s I-9 reflects that Hartmann entered a lawful permanent resident card under List A but did not include a document identification number. This is a substantive violation. *See* Virtue Memo (no document identification number in section 2 is a substantive violation where no legible copy of the document is presented with the I-9). Juan C. Ramirez’s I-9 reflects that a driver’s license is entered, but no expiration date is entered. This is also a substantive violation. *Ketchikan*, 10 OCAHO no. 1139 at 6.

ICE is entitled to summary decision with respect to liability for 787 of the 797 violations originally charged in Count IV.

#### Count V

If an individual’s employment authorization expires, the employer is required to reverify the individual’s work authorization by completing section 3 of Form I-9, and must do so no later than the date of expiration. 8 C.F.R. § 274a.2(b)(1)(vii); *cf. United States v. Split Rail Fence Co.*, 11 OCAHO 1216a, 7-8 (2015). The employer must require the employee to present evidence of new or continuing authorization prior to the expiration of the employment authorization document. *Id.* Presentation of a permanent resident card, a Social Security card, or any other acceptable List A or List C document could satisfy this requirement. *See United States*

<sup>7</sup> A military ID is acceptable to show both identity and employment authorization only if the employer is the Armed Forces. 8 C.F.R. § 274a.2(a)(v)(A)(7).

*v. Split Rail Fence Co.*, 11 OCAHO no. 1216a, 8 (2015).

Visual inspection of the I-9s for Zonia Mirna Carrillo, Carlos Orlando Suazo Zepeda, and Maria Silvia Urbina reflects that each checked a box in section 1 indicating that he or she was an alien authorized to work until a date certain, and that the employees' respective Employment Authorization Documents (EADs) are entered under List A in section 2. Zonia Mirna Carrillo's EAD expired on September 9, 2006; Suazo Zepeda's EAD expired on July 5, 2000; and Maria Silvia Urbina's EAD expired on September 9, 2002. Section 3 of each of these I-9s is blank, indicating that Hartmann never re-verified these employees' documentation after their EADs expired. ICE is entitled to summary decision as to Count V.

#### V. PENALTY

Civil money penalties are assessed for paperwork violations according to the parameters set forth at 8 C.F.R. § 274a.10(b)(2): the minimum penalty for each individual with respect to whom a violation occurred after September 29, 1999, is \$110, and the maximum is \$1100. The penalties in this case range from a low of \$88,880 to a high of \$888,880. Because the government has the burden of proof with respect to the penalty, *United States v. March Construction, Inc.*, 10 OCAHO no. 1158, 4 (2012), ICE must prove the existence of any aggravating factor by a preponderance of the evidence, *United States v. Carter*, 7 OCAHO no. 931, 121, 159 (1997).

In assessing an appropriate penalty, the following factors must be considered: 1) the size of the employer's business, 2) the employer's good faith, 3) the seriousness of the violations, 4) whether the individual was an unauthorized alien, and 5) the employer's history of previous violations. 8 U.S.C. § 1324a(e)(5). The statute neither requires that equal weight be given to each factor, nor rules out consideration of additional factors. *See United States v. Hernandez*, 8 OCAHO no. 1043, 660, 664 (2000). While the government bears the burden of proof with respect to the statutory factors, a party seeking consideration of a nonstatutory factor, such as ability to pay the penalty, bears the burden of showing that the factor should be considered as a matter of equity and that the facts support a favorable exercise of discretion. *See United States v. Century Hotels Corp.*, 11 OCAHO no. 1218, 4 (2014) (citing *United States v. M & D Masonry, Inc.*, 10 OCAHO no. 1211, 11 (2014)).

#### A. The Government's Position

ICE set a baseline fine of \$935 for each violation in accordance with internal guidance that sets this base when the employer has an error rate of more than fifty percent. The government says that ninety percent of the 912 I-9s for which Hartmann was responsible either were not presented at all, or contained substantive paperwork violations, and that certification was lacking on more than 700 forms.

ICE's Memorandum to Case File Determination of Civil Money Penalty characterized the company as medium-sized, but nevertheless treated the size of Hartmann's business as a neutral factor. It also treated good faith and the company's lack of history of previous violations as neutral factors. The government enhanced the penalty by five percent based on the seriousness of

the violations and by an additional five percent for each of the 205 allegedly unauthorized workers in Hartmann's workforce. ICE also points out that of the 259 employees listed in the Notice of Suspect Documents, only six were able to provide valid work documents.

ICE says the seriousness of the violations is amplified by the testimony of Rayna Peters that she entered additional information in section 2 after the NOI, and that her supervisee, Brendo Velasquez, backdated the hire dates on the forms. Even though Peters' name appears on most of the forms, she was not necessarily the person who entered the information. Peters said in her deposition that she did not recall reviewing documents before signing 300-400 forms during the audit. ICE says further that Hartmann cannot establish good faith based on this record, and that the penalties proposed are not excessive. The government points out that although Hartmann enrolled in E-Verify, it waited until after being served with a NIF to do so. The government says that Hartmann hired workers without examining their documents, which shows a disregard for ensuring that its employees have proper authorization documents.

ICE anticipates that Hartmann will claim it detrimentally relied on its belief that it would not be fined. The government points out that Steve Tanaka testified that he doesn't remember ICE auditor Gary Fong ever telling him that there would be no fine, and that Matthew Guelfi similarly testified that Fong never said that Hartmann would not be subject to a fine. The government says in addition that Fong himself testified that he never told Hartmann there would be no fine. The government also points out that respondents are not entitled to a warning prior to the issuance of a NIF.

ICE argues that Hartmann needs a significant penalty to be motivated to change its behavior. ICE says that after the government notified it that the three-in-one forms were unacceptable, Hartmann modified the three-in-one forms, but never ensured that such a form would fully comply with the law. Even though Guelfi said the union's original three-in-one form was no longer being used by Local 16 or itself, he later testified that he had no idea if the union had in fact stopped using the three-in-one form. ICE says, furthermore, that it found a three-in-one form for Christopher Shatterly that was dated in 2013, well after ICE notified the company that such a form was unacceptable.

#### B. Hartmann's Response

Hartmann points out that the NIF was issued over two years after the inspection began and more than a year after the inspection was concluded. Hartmann says it was prejudiced by the undue delay in issuing the NIF, and that the company detrimentally relied on ICE's "intimation" that the company would not be fined. Hartmann says it believed that it would not be fined if it took the remedial steps called for pursuant to the NSD and NTPF, and that in reliance on this belief it entered into a class action settlement pursuant to which it paid more than \$2 million to settle wage and hour claims. Hartmann points to an email from Steve Tanaka to ICE auditor Fong stating, "Hopefully we now have the documents in good order, but just let us know if anything more is needed." Hartmann acknowledges, however, that Fong never told the company it would not be fined.

Hartmann says further that ICE's baseline penalty is excessive as well as disproportionate to the violations, and that the government's consideration of the statutory factors is too narrowly constrained. The company points out that the proposed penalty is 89% to 94% of the maximum permissible, and OCAHO cases say penalties at this level are reserved for the most egregious violations. The company says the aggravating factors in cases where ICE's proposed penalties were left undisturbed involved intentional misconduct, falsifying I-9s, or having a workforce that was mostly unauthorized, factors that don't apply to Hartmann.

Hartmann points out that the penalties are designed to deter future violations, not to punish employers, and that its remedial efforts are entitled to great weight. The company argues that the penalties should be substantially reduced because the company acted in good faith by 1) copying and retaining employees' work authorization documents, 2) providing I-9s to ICE and cooperating with the inspection, 3) terminating the unauthorized workers, 4) ceasing use of the three-in-one form, 5) correcting the technical and procedural violations, and 6) hiring an HR manager and enrolling in E-Verify following the inspection. Hartmann also points out that even when the hiring was handled through warehouse and operations departments, the company completed I-9 forms and made photocopies of work authorization documents, which it then turned in to Hartmann's payroll office to be put into individual employee files. As to the on-call workers supplied by Local 16, the company says it just followed the procedures established by the union. Hartmann admits that the violations are serious, but says they are not all equally so, nor are they so egregious as to warrant so substantial a fine.

### C. Discussion and Analysis

Although legacy INS did audit the company in or around 1994, it is undisputed that Hartmann has no history of previous violations. The parties are also in accord in their views that the penalty should not be aggravated based on the size of Hartmann's business. While there were times when Hartmann had hundreds of workers, there were other times when it had substantially fewer. The size of the workforce is thus difficult to assess because the workforce varied depending upon the number of events produced. The parties disagree, however, as to whether Hartmann made sufficient good faith efforts to warrant reduction of the penalties, how serious the violations were, whether the penalty is excessive, and whether Hartmann can make out an estoppel defense.

The short answer to Hartmann's claim of equitable estoppel is that the government is virtually impervious to such a claim. *See United States v. Tom & Yu, Inc.*, 3 OCAHO no. 412, 163, 169 (1992). It is well established that the government may not be estopped on the same terms as other litigants, and there must be at minimum some affirmative government misconduct, not just a delay or omission, upon which to premise an estoppel. *See United States v. Greif*, 10 OCAHO no. 1183, 5 (2013). The lead case in the Ninth Circuit, in which this case arises, sets out a two-prong threshold inquiry. *See Watkins v. U.S. Army*, 875 F.2d 699, 706-09 (9th Cir. 1989) (en banc). First, there must be affirmative misconduct going beyond mere negligence, delay, inaction, or failure to follow internal agency guidelines. Second, there must be a showing that

the misconduct will cause a serious injustice and that estoppel will not unduly burden the public interest. Neither of these threshold elements has even been articulated, let alone shown.

If an express oral misstatement cannot estop the United States, *United States v. Corporate Loss Prevention Associates*, 6 OCAHO no. 908, 967, 983-84 (1997) (modified by CAHO), an estoppel is a fortiori not created merely by silence or delay. As pointed out in *United States v. Sunshine Building Maintenance, Inc.*, 7 OCAHO no. 997, 1122, 1168-69 (1998), moreover, the Supreme Court has left open the question of whether even affirmative misconduct would be sufficient to estop the government, citing *Office of Personnel Management v. Richmond*, 496 U.S. 414, 419-23 (1990). There appears in addition to be no causal relationship between ICE's delay in issuing the NIF and the resolution of the wage and hour case; Hartmann would still have had to resolve that claim in some fashion regardless of when the NIF issued. The fact that Hartmann not only violated the verification requirements, but also evidently violated wage and hour laws, is not in any event an equity warranting the reduction of a penalty.

The company points to its good faith conduct during and after the inspection, but OCAHO case law assessing good faith looks primarily to the steps an employer took before issuance of the NOI, not what it did afterward. See *United States v. Durable, Inc.*, 11 OCAHO no. 1229, 14 (2014) (affirmed by CAHO) (assessing good faith by examining "what the steps, if any, the employer took prior to the NOI to ascertain what the law requires and to conform its conduct to it"). There is minimal evidence here that Hartmann made reasonable efforts before the NOI. Although the government did not claim that Hartmann acted in bad faith, it argued that the company could not establish good faith because its verification procedures were too defective, as evidenced in the testimony of Rayna Peters. Even if Peters did actually examine non-union workers' original identity and employment authorization documents, she did not fill out section 2 herself, and the date on section 2 may not be the date that the documents were actually reviewed. As to the Local 16 employees who had three-in-one forms, Peters checked only their names, birthdates, Social Security numbers, withholdings, and checkoff authorizations, but did not review their identity and work authorization documents. These employment verification procedures are sufficiently defective to foreclose a claim of either good faith or substantial compliance.

Hartmann says its violations aren't the most serious, such as failing to prepare an I-9 at all, see *United States v. Reyes*, 4 OCAHO no. 592, 1, 10 (1994). But the company did fail to present I-9s for four individuals, and failure to sign the section 2 attestation, the vast majority of Hartmann's violations, is also among the most serious of possible violations. See *United States v. Emp'r Solutions Staffing Grp. II, LLC*, 11 OCAHO no. 1242, 11 (2015) (describing section 2 as "the very heart" of the verification process). The following violations are serious as well: failure to ensure that an employee signs section 1; failure to ensure that an employee checks a box in section 1 attesting to status as a U.S. citizen, lawful permanent resident, or alien authorized to work; and failure to verify the proper identity and employment authorization documents in section 2. *Ketchikan*, 10 OCAHO no. 1139 at 6. Failure to include an expiration date on a driver's license, as well failure to ensure that an employee enters an A number in section 1 after selecting status as a lawful permanent resident or alien authorized to work, are also serious

violations. *Id.*

Hartmann's conduct is nevertheless not comparable to that of the employers in *United States v. Symmetric Solutions, Inc.*, 10 OCAHO no. 1209, 8-9, 11 (2014), where the company paid workers in cash under the table, or that in *Employer Solutions*, 11 OCAHO no. 1242 at 8, where company representatives falsified attestations. Neither does Hartmann have a history of previous violations and a workforce more than ninety percent of which was unauthorized, like the employer in *Durable*, 11 OCAHO no. 1229 at 17. Penalties as high as those proposed here are ordinarily reserved for the most egregious violations, *United States v. Fowler Equip. Co.*, 10 OCAHO no. 1169, 6 (2013), and Hartmann's violations are not of that order.

## VI. CONCLUSION

ICE is entitled to summary decision as to liability for 808 violations. OCAHO case law has emphasized that penalties should have a deterrent effect on an employer's behavior and not merely be a cost of doing business. *Emp'r Solutions*, 11 OCAHO no. 1242 at 11 (“[A] penalty cannot be set so low that the employer can comfortably pay it simply as a cost of doing business; the prophylactic purpose of a penalty is best served when a penalty is sufficiently significant to motivate a change of behavior.”). The record reflects that, although Hartmann's violations were not among the most egregious, the company does appear to need additional motivation to conform its employment verification processes to what the law requires. Based on the record as a whole and the statutory factors in particular, the penalty will be adjusted to be somewhat closer to the midrange. The 799 violations in Counts I, II, and IV are assessed at a rate of \$700 each for a total of \$559,300, while the nine less serious violations in Counts III and V are assessed at \$550 each for a total of \$4950. Added to this is an additional \$200 for each of the 205 unauthorized aliens, or \$41,000. The penalties accordingly total \$605,250.

## VII. FINDINGS OF FACT AND CONCLUSIONS OF LAW

### A. Findings of Fact

1. Hartmann Studios, Inc., incorporated in 1985, is an event design and production company, with its main office in Richmond, California, and a smaller office in Atlanta, Georgia.
2. Matthew James Guelfi is Hartmann Studio, Inc.'s vice president, and Steve Tanaka is the controller.
3. When legacy Immigration and Naturalization Service conducted an audit of Hartmann's I-9s in 1994, the company was not fined, but it terminated some employees who could not provide updated documentation.
4. The Department of Homeland Security, Immigration and Customs Enforcement served

Hartmann Studios, Inc. with a Notice of Inspection (NOI) on February 17, 2011, and agreed the next day to postpone the inspection until March 4, 2011.

5. The Department of Homeland Security, Immigration and Customs Enforcement served Hartmann Studios, Inc. with a Notice of Suspect Documents and a Notice of Technical or Procedural Failures on October 12, 2011.

6. The Department of Homeland Security, Immigration and Customs Enforcement served Hartmann Studios, Inc. with a Notice of Intent to Fine on May 14, 2013.

7. On June 12, 2013, Hartmann Studios, Inc. filed a request for hearing before the Office of the Chief Administrative Hearing Officer.

8. The Department of Homeland Security, Immigration and Customs Enforcement filed a complaint with this office on November 20, 2013.

9. Hartmann Studios, Inc., hired Terrence Anderson, Roberto Barrera, Guillermo Gomez, and Ricardo Mendoza, and failed to present I-9s for them upon request by the government.

10. Hartmann Studios, Inc. hired Grace E. Abad, Carlos E. Alba, Refugio Alba, Kenneth Bradford, Juan Ramon Cruz Miranda, Manuel T. Maldonado, Jose Javier Ponce Castillo, and Greg Sullivan, and failed to timely present I-9s for them.

11. Hartmann Studios, Inc. hired Salvador Cruz, Richard E. Olson, Jorge Milton Rivera Luna, and failed to ensure that they checked a box in section 1 attesting to status as a U.S. citizen, lawful permanent resident, or alien authorized to work.

12. Hartmann Studios, Inc. hired Veronica Huerta and failed to ensure that she signed section 1 of Form I-9.

13. Hartmann Studios, Inc. hired Gerardo Mata and failed to ensure that he entered his alien number in section 1 after checking the box in section 1 indicating status as lawful permanent resident; the alien number does not appear in section 2, and no copy of the permanent resident card was attached to the I-9.

14. Hartmann Studios, Inc. hired Melchor Parra and failed to ensure that he entered an alien number in section 1 after checking the box in section 1 indicating status as an alien authorized to work until a date certain; the alien number does not appear in section 2, and no copy of the employment authorization document was attached to the I-9.

15. Hartmann Studios, Inc. hired 779 individuals listed in Count IV, as reflected in the Appendix hereby incorporated by reference, and failed to sign section 2 of their I-9 forms.

16. Hartmann Studios, Inc. hired Jose M. Martinez, Mario Martinez, Zalvador Munoz, Jose Guadalupe Ortiz, and James Derek, and entered only a List B document in section 2 of their I-9



forms.

17. Hartmann Studios, Inc. hired Margarita Arroyo and entered only a List C document in section 2 her Form I-9.

18. Hartmann Studios, Inc. hired Felipe de Jesus Leon Magana and entered a lawful permanent resident card under List A of his I-9, but failed to enter a document identification number.

19. Hartmann Studios, Inc. hired Juan C. Ramirez and entered a driver's license in section 2 of his I-9, but did not enter an expiration date.

20. Hartmann Studios, Inc. hired Zonia Mirna Carrillo, Carlos Orlando Suazo Zepeda, and Maria Silvia Urbina, and failed to re-verify their employment eligibility by completing section 3 of their I-9 forms after their respective Employment Authorization Documents expired.

21. Since September 2008, Hartmann and International Alliance of Theatrical Stage Employees Union Local 16 (Local 16) have been parties to a Collective Bargaining Agreement (CBA) pursuant to which Local 16 supplies skilled stage technicians for hire by Hartmann.

22. International Alliance of Theatrical Stage Employees Union Local 16 (Local 16) workers are available to work for any employer with whom Local 16 has a Collective Bargaining Agreement when the individual completes a "three-in-one" form, which is a one-page document that combines a portion of a W-4 form, parts of sections 1 and 2 of Form I-9, and a "check-off authorization" that permits 3.5% of the employee's wages to be deducted and paid to Local 16 for the individual's union dues.

23. For employees who were not members of Local 16, Rayna Peters, staff accountant for Hartmann, received I-9 forms that were already filled out from Hartmann's operations assistant or warehouse assistant manager.

24. Upon receipt of an I-9 for an employee who was not a member of Local 16, Rayna Peters confirmed that the document numbers on the employee's I-9 matched the numbers on the documents the employee submitted.

25. Rayna Peters, staff accountant for Hartmann, did not review International Alliance of Theatrical Stage Employees Union Local 16 (Local 16) workers' employment verification documents upon receipt of a "three-in-one" form.

26. When reviewing a "three-in-one" form, Rayna Peters, staff accountant for Hartmann, checked for the employees' full name, birthdate, Social Security number, withholdings, and union checkoff authorization, but did not compare the employees' identity and employment authorization documents to the numbers listed on the three-in-one forms.

## B. Conclusions of Law

1. Hartmann Studios, Inc. is an entity within the meaning of 8 U.S.C. § 1324a(a)(1) (2012).
2. All conditions precedent to the institution of this proceeding have been satisfied.
3. Hartmann Studios, Inc. is liable for 808 violations of 8 U.S.C. § 1324a(a)(1)(B) (2012).
4. The INA imposes an affirmative duty upon employers to prepare and retain I-9 forms for employees hired after November 6, 1986 and to make those forms available for inspection on at least three business days' notice. 8 C.F.R. § 274a.2(b)(2)(ii).
5. Employers are obligated to ensure that each employee checks a box in section 1 attesting to status as a U.S. citizen, lawful permanent resident, or alien authorized to work in the United States. 8 U.S.C. § 1324a(b)(2); *see Ketchikan Drywall Servs., Inc.*, 10 OCAHO no. 1139, 6, 15 (2011).
6. Failure to ensure that an employee enters an alien number after selecting status as a lawful permanent resident or alien authorized to work is a substantive violation. *See United States v. Horno MSJ, Ltd.*, 11 OCAHO no. 1247, 8 (2015) (citing *United States v. Ketchikan Drywall Servs., Inc.*, 10 OCAHO no. 1139, 6 (2011)); *see generally* Paul W. Virtue, *Interim Guidelines: Section 274A(b)(6) of the Immigration & Nationality Act Added by Section 411 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996* (Mar. 6, 1997), available at 74 Interpreter Releases 706 (Apr. 28, 1997).
7. An employer is required to sign section 2 to attest under penalty of perjury that it reviewed the appropriate documents to verify the individual's identity and employment authorization. 8 C.F.R. § 274a.2(a)(3), (b)(1)(ii).
8. Employers are required to review either a List A document, or both a List B and a List C document for each new employee. 8 C.F.R. § 274a.2(b)(1)(v).
9. An employer's failure to enter a document identification number associated with a List A, B, or C document in section 2 is a substantive violation. *See* Paul W. Virtue, *Interim Guidelines: Section 274A(b)(6) of the Immigration & Nationality Act Added by Section 411 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996* (Mar. 6, 1997), available at 74 Interpreter Releases 706 (Apr. 28, 1997).
10. If an individual's employment authorization expires, the employer is required to reverify the individual's employment eligibility by completing section 3 of Form I-9, and must do so no later than the date the employment authorization expires. 8 C.F.R. 274a.2(b)(1)(vii); *cf. United States v. Split Rail Fence Co.*, 11 OCAHO no. 1216a, 7-8 (2015).
11. In assessing the appropriate penalty, the following factors must be considered: 1) the size of the employer's business, 2) the employer's good faith, 3) the seriousness of the violation(s), 4)

whether or not the individuals involved were unauthorized aliens, and 5) any history of previous violations of the employer. 8 U.S.C. § 1324a(e)(5) (2012).

12. The statute neither requires that equal weight be given to each factor, nor does it rule out consideration of additional factors. *See United States v. Hernandez*, 8 OCAHO no. 1043, 660, 664 (2000).

13. While the government bears the burden of proof with respect to the statutory factors, a party seeking consideration of a nonstatutory factor, such as ability to pay the penalty, bears the burden of showing that the factor should be considered as a matter of equity and that the facts support a favorable exercise of discretion. *See United States v. Century Hotels Corp.*, 11 OCAHO no. 1218, 4 (2014) (citing *United States v. M & D Masonry, Inc.*, 10 OCAHO no. 1211, 11 (2014)).

14. The government is virtually impervious to a claim of equitable estoppel. *See United States v. Tom & Yu, Inc.*, 3 OCAHO no. 412, 163, 169 (1992).

15. In assessing good faith, case law looks primarily to an employer's actions before the issuance of the NOI, not after. *See United States v. Durable, Inc.*, 11 OCAHO no. 1229, 14 (2014) (assessing good faith by examining "what the steps, if any, the employer took prior to the NOI to ascertain what the law requires and to conform its conduct to it") (affirmed by CAHO).

16. Failing to prepare an I-9 at all is one of the most serious violations. *See United States v. Reyes*, 4 OCAHO no. 592, 1, 10 (1994).

17. An employer's failure to sign section 2 of Form I-9 is a very serious violation. *See United States v. Emp'r Solutions Staffing Grp. II, LLC*, 11 OCAHO no. 1242, 11 (2015) (describing section 2 as "the very heart" of the verification process).

18. The following violations are all very serious: failure to ensure that an employee signs section 1; failure to ensure that an employee checks a box in section 1 attesting to status as a U.S. citizen, lawful permanent resident, or alien authorized to work; and failure to verify the proper identity and employment authorization documents in section 2. *See United States v. Ketchikan Drywall Servs., Inc.*, 10 OCAHO no. 1139, 6 (2011).

19. Failure to include an expiration date on a driver's license, as well failure to ensure that an employee enters an alien number in section 1 after selecting status as a lawful permanent resident or alien authorized to work, are serious violations. *See United States v. Ketchikan Drywall Servs., Inc.*, 10 OCAHO no. 1139, 6 (2011).

20. Penalties close to the maximum permissible should be reserved for the most egregious violations. *See United States v. Fowler Equip. Co.*, 10 OCAHO no. 1169, 6 (2013).

21. Civil money penalties should have a deterrent effect on an employer's behavior and not merely be a cost of doing business. *See United States v. Emp'r Solutions Staffing Grp. II, LLC*,

11 OCAHO no. 1242, 11 (2015) (“[A] penalty cannot be set so low that the employer can comfortably pay it simply as a cost of doing business; the prophylactic purpose of a penalty is best served when a penalty is sufficiently significant to motivate a change of behavior.”).

To the extent that any statement of fact is deemed to be a conclusion of law or any conclusion of law is deemed to be a statement of fact, the same is so denominated as if set forth as such.

**ORDER**

Hartmann Studios, Inc. is liable for 808 violations of 8 U.S.C. § 1324a(a)(1)(B) and is ordered to pay civil money penalties totaling \$605,250. All other pending motions are denied.

**SO ORDERED.**

Dated and entered this 8th day of July, 2015.

---

Ellen K. Thomas  
Administrative Law Judge

**Appeal Information**

This order shall become the final agency order unless modified, vacated, or remanded by the Chief Administrative Hearing Officer (CAHO) or the Attorney General.

Provisions governing administrative reviews by the CAHO are set forth at 8 U.S.C. § 1324a(e)(7) and 28 C.F.R. pt. 68. Note in particular that a request for administrative review must be filed with the CAHO within ten (10) days of the date of this order, pursuant to 28 C.F.R. § 68.54(a)(1).

Provisions governing the Attorney General’s review of this order, or any CAHO order modifying or vacating this order, are set forth at 8 U.S.C. § 1324a(e)(7) and 28 C.F.R. pt. 68. Within thirty (30) days of the entry of a final order by the CAHO, or within sixty (60) days of the entry of an Administrative Law Judge’s final order if the CAHO does not modify or vacate such order, the Attorney General may direct the CAHO to refer any final order to the Attorney General for review, pursuant to 28 C.F.R. § 68.55.

A petition to review the final agency order may be filed in the United States Court of Appeals for the appropriate circuit within forty-five (45) days after the date of the final agency order pursuant to 8 U.S.C. § 1324a(e)(8) and 28 C.F.R. § 68.56.

**APPENDIX****COUNT I**

<b>No.</b>	<b>Employee Name</b>	<b>Violation(s) Alleged</b>	<b>Status</b>	<b>Finding</b>
1	Anderson, Terrence	Failure to prepare and/or present I-9	Unknown	Violation as alleged
2	Barrera, Roberto	Failure to prepare and/or present I-9	Unknown	Violation as alleged
3	Gomez, Guillermo	Failure to prepare and/or present I-9	Unknown	Violation as alleged
4	Mendoza, Ricardo	Failure to prepare and/or present I-9	Unknown	Violation as alleged

**COUNT II**

<b>No.</b>	<b>Employee Name</b>	<b>Violation(s) Alleged</b>	<b>Status</b>	<b>Finding</b>
1	Abad, Grace E.	Failure to timely prepare and/or present I-9	Authorized	Failure to timely present I-9
2	Alba, Carlos E.	Failure to timely prepare and/or present I-9	Authorized	Failure to timely present I-9
3	Alba, Refugio	Failure to timely prepare and/or present I-9	Authorized	Failure to timely present I-9
4	Bradford, Kenneth	Failure to timely prepare and/or present I-9	Authorized	Failure to timely present I-9
5	Cruz Miranda, Juan Ramon	Failure to timely prepare and/or present I-9	Authorized	Failure to timely present I-9
6	Maldonado, Manuel T.	Failure to timely prepare and/or present I-9	Authorized	Failure to timely present I-9
7	Ponce Castillo, Jose Javier	Failure to timely prepare and/or present I-9	Authorized	Failure to timely present I-9
8	Sullivan, Greg	Failure to timely prepare and/or present I-9	Authorized	Failure to timely present I-9

## COUNT III

No.	Employee Name	Violation(s) Alleged	Status	Finding
1	Cruz, Salvador	Employee failed to check status box in section 1; Employee failed to sign section 1	Unauthorized	Employee failed to check status box in section 1
2	Huerta, Veronica	Employee failed to sign section 1	Unauthorized	Violation as alleged
3	Mata, Gerardo	Employee failed to provide A # after checking box indicating status as LPR	Unauthorized	Violation as alleged
4	Olson, Richard E.	Employee failed to check status box in section 1	Authorized	Violation as alleged
5	Parra, Melchor	Employee failed to provide A # after checking indicating status as alien authorized to work	Authorized	Violation as alleged
6	Rivera Luna, Jorge Milton	Employee failed to check status box in section 1	Unauthorized	Violation as alleged

## COUNT IV

No.	Employee Name	Violation(s) Alleged	Modified I-9?	Status	Finding
1	Abbot, Brian Craig	Employer did not sign section 2	Y	Authorized	Violation as alleged
2	Acosta, Geysell M.	Employer did not sign section 2	N	Authorized	Violation as alleged
3	Adams, Thomas B.	Employer did not sign section 2	Y	Authorized	Violation as alleged
4	Agrillo, Joseph Paul	Employer did not sign section 2	Y	Authorized	Violation as alleged
5	Aguilar, Alfredo Ceja	Employer did not sign section 2	N	Unauthorized	Violation as alleged
6	Aguilar, Dora	Employer did not sign section 2	N	Unauthorized	Violation as alleged
7	Aguilar, Jose De Jesus Ceja	Employer did not sign section 2	N	Unauthorized	Violation as alleged

8	Aguilar, Ruben Ferreira	Employer did not sign section 2	N	Authorized	Violation as alleged
9	Aguilera, Mauricio C.	Employer did not sign section 2; Missing List A or B document	N	Authorized	Employer did not sign section 2
10	Aker, Jeffrey	Employer did not sign section 2	Y	Authorized	Violation as alleged
11	Alegre, Anselma	Employer did not sign section 2	N	Unauthorized	Violation as alleged
12	Alejandre, Ana Maria	Employer did not sign section 2	N	Authorized	Violation as alleged
13	Alejandre, Raul	Employer did not sign section 2	N	Authorized	Violation as alleged
14	Alejo, Victor Hugo	Employer did not sign section 2	N	Unauthorized	Violation as alleged
15	Aleman Renteria, Alfredo	Employer did not sign section 2	N	Unauthorized	Violation as alleged
16	Ali, Zaid	Employer did not sign section 2	Y	Authorized	Violation as alleged
17	Allen, Joseph J.	Employer did not sign section 2	Y	Authorized	Violation as alleged
18	Alley, Robert Brooks	Employer did not sign section 2	Y	Authorized	Violation as alleged
19	Alvarez Dawling, Susana	Employer did not sign section 2	N	Unauthorized	Violation as alleged
20	Amescua, Luis	Employer did not sign section 2	N	Authorized	Violation as alleged
21	Amin, Nirali Mukund	Employer did not sign section 2	N	Authorized	Violation as alleged
22	Anaya, Claudia	Employer did not sign section 2	N	Authorized	Violation as alleged

23	Anderson, William	Employer did not sign section 2	N	Authorized	Violation as alleged
24	Anecston, Shawn David	Employer did not sign section 2	Y	Authorized	Violation as alleged
25	Araujo, Juan Carlos	Employer did not sign section 2	N	Unauthorized	Violation as alleged
26	Arellano, Jesus	Employer did not sign section 2	N	Unauthorized	Violation as alleged
27	Arellano, Paul	Employer did not sign section 2	N	Unauthorized	Violation as alleged
28	Arevalo, Carlos E.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
29	Arias H, Nuvia	Employer did not sign section 2	N	Unauthorized	Violation as alleged
30	Arroyo, Margarita	Missing List A or B document	N	Authorized	Violation as alleged
31	Arteaga, Nestor	Employer did not sign section 2	N	Authorized	Violation as alleged
32	Ashe, Michael Charles	Employer did not sign section 2	Y	Authorized	Violation as alleged
33	Audie, Judith	Employer did not sign section 2	N	Authorized	Violation as alleged
34	Avalos, Salvador	Employer did not sign section 2	N	Unauthorized	Violation as alleged
35	Avery, Robert	Employer did not sign section 2	Y	Authorized	Violation as alleged
36	Avila, Luis E. Morales	Employer did not sign section 2	N	Unauthorized	Violation as alleged
37	Aviles, Engelmer A.	Employer did not sign section 2	N	Unauthorized	Violation as alleged



38	Avina, Jessica	Employer did not sign section 2	N	Authorized	Violation as alleged
39	Axelrod, Samantha	Employer did not sign section 2	N	Authorized	Violation as alleged
40	Bahena, Modesto	Employer did not sign section 2	N	Unauthorized	Violation as alleged
41	Balbuena, Edgar	Employer did not sign section 2	N	Unauthorized	Violation as alleged
42	Banuelos, Anthony Myles	Employer did not sign section 2; Missing List A or B document	N	Authorized	Employer did not sign section 2
43	Barajas, Elvia	Employer did not sign section 2	N	Unauthorized	Violation as alleged
44	Barajas, Erendira	Employer did not sign section 2	N	Unauthorized	Violation as alleged
45	Barajas, Gilberto S.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
46	Barajas, Leyde E.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
47	Barajas, Lucia	Employer did not sign section 2	N	Unauthorized	Violation as alleged
48	Barajas, Luis A.	Employer did not sign section 2	N	Authorized	Violation as alleged
49	Barajas, Martin E.	Employer did not sign section 2; Missing List A or B document	N	Authorized	Employer did not sign section 2
50	Barajas Velasquez, Rafael	Employer did not sign section 2	N	Authorized	Violation as alleged
51	Barba Garcia, Cesar	Employer did not sign section 2	N	Unauthorized	Violation as alleged
52	Barnard, Michael	Employer did not sign section 2	Y	Authorized	Violation as alleged

53	Barr, Jennifer	Employer did not sign section 2	Y	Authorized	Violation as alleged
54	Barron, Paulino	Employer did not sign section 2	Y	Authorized	Violation as alleged; Employee's signature appears in section 2, not employer's
55	Bassard, Arthur	Employer did not sign section 2	Y	Authorized	No violation (allegation withdrawn)
56	Bassett, Mark	Employer did not sign section 2	Y	Authorized	Violation as alleged
57	Basulto, Ruben	Employer did not sign section 2	N	Unauthorized	Violation as alleged
58	Beard, James Philip	Employer did not sign section 2	Y	Authorized	Violation as alleged
59	Becerra, Erik R.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
60	Becker, Dennis	Employer did not sign section 2	Y	Authorized	Violation as alleged
61	Bell, Gordon	Employer did not sign section 2	Y	Authorized	Violation as alleged
62	Bell, Kevin Ross	Employer did not sign section 2	Y	Authorized	Violation as alleged
63	Bell, Lee Alan	Employer did not sign section 2	Y	Authorized	Violation as alleged
64	Bellamy, Richard	Employer did not sign section 2	Y	Authorized	Violation as alleged
65	Ben Yisrael, Joanna	Employer did not sign section 2	Y	Authorized	Violation as alleged
66	Benson, Cheyenne	Employer did not sign section 2	Y	Authorized	Violation as alleged

67	Berg, Jon	Employer did not sign section 2	Y	Authorized	Violation as alleged
68	Bermejo Verdin, Jaime	Employer did not sign section 2	N	Authorized	Violation as alleged
69	Bermudez, Melchor	Employer did not sign section 2	N	Authorized	Violation as alleged
70	Bermudez Murillo, Luis Angel	Employer did not sign section 2	N	Authorized	Violation as alleged
71	Bermudez Murillo, Santos	Employer did not sign section 2	N	Authorized	Violation as alleged
72	Bigbee, Maurice	Employer did not sign section 2	N	Authorized	Violation as alleged
73	Bjornstad, Per	Employer did not sign section 2	Y	Authorized	No violation (allegation withdrawn)
74	Blain, Gabriel N.	Employer did not sign section 2	Y	Authorized	Violation as alleged
75	Blakely, Richard	Employer did not sign section 2	Y	Authorized	Violation as alleged
76	Bolanos Villalobos, Agustin	Employer did not sign section 2	N	Authorized	Violation as alleged
77	Bor, Jesse	Employer did not sign section 2	Y	Authorized	Violation as alleged
78	Boschin, William	Employer did not sign section 2	Y	Authorized	Violation as alleged
79	Bott, Zoe	Employer did not sign section 2	Y	Authorized	Violation as alleged
80	Bradford, Roberto	Employer did not sign section 2	Y	Authorized	Violation as alleged
81	Brawley, John A.	Employer did not sign section 2	Y	Authorized	Violation as alleged

82	Brigance, Timothy	Employer did not sign section 2	Y	Authorized	Violation as alleged
83	Briggs, Bonnie	Employer did not sign section 2	Y	Authorized	Violation as alleged
84	Britton, Ian	Employer did not sign section 2; Missing List A or C document	Y	Authorized	Employer did not sign section 2
85	Brodhead, Will	Employer did not sign section 2	Y	Authorized	Violation as alleged
86	Brown, Andrew G.	Employer did not sign section 2	Y	Authorized	Violation as alleged
87	Brown, Christopher Robert	Employer did not sign section 2	Y	Authorized	Violation as alleged
88	Brown, Dustin	Employer did not sign section 2	Y	Authorized	Violation as alleged
89	Brown, Paul R.	Employer did not sign section 2	Y	Authorized	Violation as alleged
90	Buffington, Alan	Employer did not sign section 2	N	Authorized	Violation as alleged
91	Burke, Paul	Employer did not sign section 2	Y	Authorized	Violation as alleged
92	Burns Gaoiran, Kelly	Employer did not sign section 2	N	Authorized	Violation as alleged
93	Bustos, Maria Cristina	Employer did not sign section 2	N	Authorized	Violation as alleged
94	Cabello Rivera, Raul	Employer did not sign section 2	N	Unauthorized	Violation as alleged
95	Cabrera, Neftaly	Employer did not sign section 2	N	Unauthorized	Violation as alleged
96	Calderon, Carlos	Employer did not sign section 2	N	Unauthorized	Violation as alleged

97	Calderon, Elizabeth	Employer did not sign section 2	N	Unauthorized	Violation as alleged
98	Campbell, Samuel	Employer did not sign section 2	Y	Authorized	Violation as alleged
99	Cardona, Amy	Employer did not sign section 2	N	Authorized	Violation as alleged
100	Carmona Garcia, Jorge	Employer did not sign section 2	N	Unauthorized	Violation as alleged
101	Cartagena, Julio	Employer did not sign section 2	N	Authorized	Violation as alleged
102	Casey, Sean Michael	Employer did not sign section 2	Y	Authorized	Violation as alleged
103	Cassidy, Sean Michael	Employer did not sign section 2	Y	Authorized	Violation as alleged
104	Castellanos, Jaime	Employer did not sign section 2	Y	Authorized	Violation as alleged
105	Castellanos, Omar	Employer did not sign section 2	N	Unauthorized	Violation as alleged
106	Castillo, Norman Xavier	Employer did not sign section 2	N	Unauthorized	Violation as alleged
107	Castro, Elisa	Employer did not sign section 2	N	Unauthorized	Violation as alleged
108	Caudill, Ryan Scott	Employer did not sign section 2	Y	Authorized	Violation as alleged
109	Caughell, Emily	Employer did not sign section 2	N	Authorized	Violation as alleged
110	Cavaletti, Deron	Employer did not sign section 2	Y	Authorized	Violation as alleged
111	Cazares Rodriguez, Patricia	Employer did not sign section 2	N	Unauthorized	Violation as alleged

112	Cazares Vargas, Maria Elizabeth	Employer did not sign section 2	N	Unauthorized	Violation as alleged
113	Cecaci, Anthony Steven	Employer did not sign section 2	Y	Authorized	Violation as alleged
114	Cedeno, Salvador	Employer did not sign section 2	N	Unauthorized	Violation as alleged
115	Ceja, Omar	Employer did not sign section 2	N	Authorized	Violation as alleged
116	Cervantes, Abelina	Employer did not sign section 2	N	Authorized	Violation as alleged
117	Cervantes, Lorenzo	Employer did not sign section 2	N	Unauthorized	Violation as alleged
118	Chacon Villanueva, Julio Cesar	Employer did not sign section 2	N	Unauthorized	Violation as alleged
119	Chadwick, Nicholas Robert	Employer did not sign section 2	Y	Authorized	Violation as alleged
120	Chan, Stanley	Employer did not sign section 2	Y	Authorized	Violation as alleged
121	Chandler, Scott Alan	Employer did not sign section 2	Y	Authorized	Violation as alleged
122	Chapot, John F.	Employer did not sign section 2	Y	Authorized	Violation as alleged
123	Chavez, Victoriano	Employer did not sign section 2	N	Authorized	Violation as alleged
124	Chevalier, Philippe Richard	Employer did not sign section 2	Y	Authorized	Violation as alleged
125	Chevoor, Michael G.	Employer did not sign section 2	Y	Authorized	Violation as alleged
126	Chew, Sedley	Employer did not sign section 2	Y	Authorized	Violation as alleged

127	Chicas, Christian	Employer did not sign section 2	Y	Authorized	Violation as alleged
128	Childers, David O.	Employer did not sign section 2	Y	Authorized	Violation as alleged
129	Chriss, Ian	Employer did not sign section 2	Y	Authorized	Violation as alleged
130	Church, Edward	Employer did not sign section 2	Y	Authorized	No violation (allegation withdrawn)
131	Ciccarone, Richard	Employer did not sign section 2	Y	Authorized	Violation as alleged
132	Cisneros Hernandez, Cesar	Employer did not sign section 2	N	Unauthorized	Violation as alleged
133	Cisneros Zavala, Jose Edgardo	Employer did not sign section 2	N	Authorized	Violation as alleged
134	Clary, Gareth R.	Employer did not sign section 2	Y	Authorized	Violation as alleged
135	Cobalt, Stacey	Employer did not sign section 2	Y	Authorized	Violation as alleged
136	Coenen, Braden	Employer did not sign section 2	Y	Authorized	Violation as alleged
137	Coleman, Sean M.	Employer did not sign section 2	Y	Authorized	Violation as alleged
138	Collard, Daniel Timothy	Employer did not sign section 2	Y	Authorized	Violation as alleged
139	Condon, Andrew P.	Employer did not sign section 2	Y	Authorized	Violation as alleged
140	Conran, Chris Michael	Employer did not sign section 2	Y	Authorized	Violation as alleged; Employee's signature appears, not employer's

141	Contreras, Julio H.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
142	Cook, Jared Weston	Employer did not sign section 2	Y	Authorized	Violation as alleged
143	Cook, Ryan Wesley	Employer did not sign section 2	Y	Authorized	Violation as alleged
144	Cordova, Steven	Employer did not sign section 2	Y	Authorized	Violation as alleged
145	Cornejo, Mauricio A.	Employer did not sign section 2	Y	Authorized	Violation as alleged
146	Cortez, Wilfredo	Employer did not sign section 2	N	Authorized	Violation as alleged
147	Corti, Dino R.	Employer did not sign section 2	Y	Authorized	Violation as alleged
148	Courtney, Colleen	Employer did not sign section 2	N	Authorized	Violation as alleged
149	Coyle Johnson, Elisabeth Carey	Employer did not sign section 2	Y	Authorized	Violation as alleged
150	Crist, Kelly A.	Employer did not sign section 2	Y	Authorized	Violation as alleged
151	Critchfield, John	Employer did not sign section 2	Y	Authorized	Violation as alleged
152	Crouchet, Zepp	Employer did not sign section 2	N	Authorized	Violation as alleged
153	Cruz, Jose I.	Employer did not sign section 2	N	Authorized	Violation as alleged
154	Cruz, Virginia	Employer did not sign section 2	N	Unauthorized	Violation as alleged
155	Cruz Ortiz, Humberto	Employer did not sign section 2	N	Authorized	Violation as alleged



156	Cuellar, Jose A.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
157	Culloty, John	Employer did not sign section 2	Y	Authorized	Violation as alleged
158	Curcio, Jon Andrew	Employer did not sign section 2	Y	Authorized	Violation as alleged
159	Dagesse, Lawrence Gerard	Employer did not sign section 2	Y	Authorized	Violation as alleged; Employee's signature appears in section 2, not employer's
160	Dalton, John Michael	Employer did not sign section 2	N	Authorized	Violation as alleged
161	Dauley, Carol	Employer did not sign section 2	Y	Authorized	Violation as alleged
162	Davies, Evan F.	Employer did not sign section 2	Y	Authorized	Violation as alleged
163	De Leon Cabrera, Juan Jesus	Employer did not sign section 2	N	Unauthorized	Violation as alleged
164	De Waart, Boris	Employer did not sign section 2	Y	Authorized	Violation as alleged
165	Deckner, Colin M.	Employer did not sign section 2	Y	Authorized	Violation as alleged
166	Del Rio, Antonio	Employer did not sign section 2	N	Unauthorized	Violation as alleged
167	Del Rio, Jonathan	Employer did not sign section 2	N	Unauthorized	Violation as alleged
168	Destiny, Michael James	Employer did not sign section 2	Y	Authorized	Violation as alleged
169	DeWitt, Zoltan	Employer did not sign section 2	Y	Authorized	Violation as alleged

170	DeWolf, John W.	Employer did not sign section 2	Y	Authorized	Violation as alleged
171	Diaz Echevarria, Ambrosio	Employer did not sign section 2	N	Authorized	Violation as alleged
172	Diprima, Rudi	Employer did not sign section 2	Y	Authorized	Violation as alleged
173	Dixon, Kevin J.	Employer did not sign section 2	Y	Authorized	Violation as alleged
174	Dominguez, Jency	Employer did not sign section 2	N	Unauthorized	Violation as alleged
175	Donnelly, Kieran Francis	Employer did not sign section 2	Y	Authorized	Violation as alleged
176	Dooling, George Thomas	Employer did not sign section 2	Y	Authorized	Violation as alleged
177	Downs, Polly Lee	Employer did not sign section 2	Y	Authorized	Violation as alleged
178	Dupuie, Jody	Employer did not sign section 2	N	Authorized	Violation as alleged
179	Duran, Juan	Employer did not sign section 2	N	Authorized	Violation as alleged
180	Duran Rodriguez, Paola	Employer did not sign section 2	N	Unauthorized	Violation as alleged
181	Durst, John D.	Employer did not sign section 2	Y	Authorized	Violation as alleged
182	Early, Brian J.	Employer did not sign section 2	Y	Authorized	Violation as alleged
183	Edelhauser, James E.	Employer did not sign section 2	Y	Authorized	Violation as alleged
184	Eduardo Bonilla, Fredy	Employer did not sign section 2	N	Authorized	Violation as alleged

185	Eisler, Larry	Employer did not sign section 2	Y	Authorized	Violation as alleged
186	Elliott, Shane Paul	Employer did not sign section 2	Y	Authorized	Violation as alleged
187	Ellis, Alicia S.	Employer did not sign section 2	N	Authorized	Violation as alleged
188	Engle, Jesse M.	Employer did not sign section 2; Missing List A or C document	Y	Authorized	Employer did not sign section 2
189	English, Teresa	Employer did not sign section 2; Missing List A or B document	N	Authorized	Employer did not sign section 2
190	Erbach, Robert H.	Employer did not sign section 2	Y	Authorized	Violation as alleged
191	Escalante, Alberto Flores	Employer did not sign section 2	N	Authorized	Violation as alleged
192	Escareno M, Jose Luis	Employer did not sign section 2	N	Unauthorized	Violation as alleged
193	Escobar, Santana	Employer did not sign section 2	N	Unauthorized	Violation as alleged
194	Escobar Navarro, Serbelio	Employer did not sign section 2	N	Unauthorized	Violation as alleged
195	Espinoza, Perla	Employer did not sign section 2	N	Unauthorized	Violation as alleged
196	Estes, Robert Scot	Employer did not sign section 2	Y	Authorized	Violation as alleged
197	Estrada, Margarita	Employer did not sign section 2	N	Unauthorized	Violation as alleged
198	Evans, Danicholas C.	Employer did not sign section 2	N	Authorized	Violation as alleged
199	Fabian, Luis	Employer did not sign section 2	N	Unauthorized	Violation as alleged

200	Fahrner, John	Employer did not sign section 2	Y	Authorized	Violation as alleged
201	Farias, Juan A.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
202	Farr, Richard Allan	Employer did not sign section 2	N	Authorized	Violation as alleged
203	Fernandez, Gabriel	Employer did not sign section 2	N	Unauthorized	Violation as alleged
204	Fierros, Rosa Maria	Employer did not sign section 2	N	Authorized	Violation as alleged
205	Figueroa, Patrick	Employer did not sign section 2	Y	Authorized	Violation as alleged
206	Finholt, Mike	Employer did not sign section 2	Y	Authorized	Violation as alleged
207	Fletes, Bob S.	Employer did not sign section 2	Y	Authorized	Violation as alleged
208	Flood, Sean P.	Employer did not sign section 2	Y	Authorized	Violation as alleged
209	Flores, Ana A.	Employer did not sign section 2	N	Authorized	Violation as alleged
210	Flores, Virginia	Employer did not sign section 2	N	Authorized	Violation as alleged
211	Flowers, Reshaad	Employer did not sign section 2	N	Authorized	Violation as alleged
212	Foley, Emmet	Employer did not sign section 2	Y	Authorized	Violation as alleged; Employee's signature appears in section 2, not employer's
213	Fotiu, Huey	Employer did not sign section 2	Y	Authorized	Violation as alleged

214	Franco, Saul	Employer did not sign section 2	N	Unauthorized	Violation as alleged
215	Franco Melendez, Maria O.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
216	Freeze, Josh	Employer did not sign section 2	Y	Authorized	Violation as alleged
217	Fukushima, John	Employer did not sign section 2	Y	Authorized	Violation as alleged
218	Fung, Robert	Employer did not sign section 2	N	Authorized	Violation as alleged
219	Fuquay, William	Employer did not sign section 2	Y	Authorized	Violation as alleged
220	Gallegos, Juan Carlos	Employer did not sign section 2	Y	Authorized	Violation as alleged
221	Garcia, Aquileo	Employer did not sign section 2	N	Authorized	Violation as alleged
222	Garcia, Claudio	Employer did not sign section 2	N	Unauthorized	Violation as alleged
223	Garcia, Elver	Employer did not sign section 2	N	Unauthorized	Violation as alleged
224	Garcia, Flor	Employer did not sign section 2	N	Unauthorized	Violation as alleged
225	Garcia, Isidro	Employer did not sign section 2	N	Unauthorized	Violation as alleged
226	Garcia, Jesus Munoz	Employer did not sign section 2	N	Authorized	Violation as alleged
227	Garcia, Joan M.	Employer did not sign section 2	N	Authorized	Violation as alleged
228	Garcia, Jose Antonio	Employer did not sign section 2	N	Unauthorized	Violation as alleged

229	Garcia, Victor	Employer did not sign section 2	N	Unauthorized	Violation as alleged
230	Garcia Contreras, Geronimo	Employer did not sign section 2	N	Authorized	Violation as alleged
231	Garcia N, Rafael	Employer did not sign section 2	N	Unauthorized	Violation as alleged
232	Garibay, Rodrigo	Employer did not sign section 2	N	Unauthorized	Violation as alleged
233	Garnica, Alberto	Employer did not sign section 2	N	Unauthorized	Violation as alleged
234	Garsva, Timothy	Employer did not sign section 2	Y	Authorized	Violation as alleged
235	Gerry, Nicholas Thomas	Employer did not sign section 2	Y	Authorized	Violation as alleged
236	Gill, Ernest A.	Employer did not sign section 2	N	Authorized	Violation as alleged
237	Goings, Kiernan	Employer did not sign section 2; Employer did not print name	N	Authorized	Employer did not sign section 2
238	Gomez, Adriana	Employer did not sign section 2	N	Unauthorized	Violation as alleged
239	Gomez, Baldemar	Employer did not sign section 2	N	Unauthorized	Violation as alleged
240	Gomez, Edwin	Employer did not sign section 2	N	Unauthorized	Violation as alleged
241	Gomez, Rosa N.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
242	Gomez, Sergio	Employer did not sign section 2	N	Authorized	Violation as alleged
243	Gonzales, Jose Montes	Employer did not sign section 2	N	Unauthorized	Violation as alleged

244	Gonzalez, Adolfo	Employer did not sign section 2	N	Authorized	Violation as alleged
245	Gonzalez, Alejandra	Employer did not sign section 2	N	Unauthorized	Violation as alleged
246	Gonzalez, Arturo	Employer did not sign section 2	N	Authorized	Violation as alleged
247	Gonzalez, Bertha	Employer did not sign section 2	N	Unauthorized	Violation as alleged
248	Gonzalez, David	Employer did not sign section 2	N	Authorized	Violation as alleged
249	Gonzalez, Joaquin	Employer did not sign section 2	N	Authorized	Violation as alleged
250	Gonzalez, MA Esther	Employer did not sign section 2	N	Authorized	Violation as alleged
251	Gonzalez, Rogelio	Employer did not sign section 2	N	Authorized	Violation as alleged
252	Gonzalez De Cabrera, Gloria	Employer did not sign section 2	N	Authorized	Violation as alleged
253	Goodno, David	Employer did not sign section 2	Y	Authorized	Violation as alleged
254	Gould, Chris	Employer did not sign section 2	Y	Authorized	Violation as alleged
255	Graelish, Ryan	Employer did not sign section 2	N	Authorized	Violation as alleged
256	Graham, James	Employer did not sign section 2	Y	Authorized	Violation as alleged
257	Green, Edward	Employer did not sign section 2	Y	Authorized	Violation as alleged
258	Gregory, Jon Dale	Employer did not sign section 2	Y	Authorized	Violation as alleged

259	Guelfi, Michael J.	Employer did not sign section 2; Employer did not print name	N	Authorized	Employer did not sign section 2
260	Guerra, Artemio	Employer did not sign section 2	N	Unauthorized	Violation as alleged 2
261	Guerra, Rony	Employer did not sign section 2	N	Unauthorized	Violation as alleged
262	Guerrero, Abram	Employer did not sign section 2; Missing List A or C document	Y	Authorized	Employer did not sign section
263	Guerrero Prado, Alberto	Employer did not sign section 2	N	Unauthorized	Violation as alleged
264	Gutierrez, Blanca C.	Employer did not sign section 2	N	Authorized	Violation as alleged
265	Gutierrez, Cesar	Employer did not sign section 2	N	Unauthorized	Violation as alleged
266	Gutierrez, Jesse M.	Employer did not sign section 2	N	Authorized	Violation as alleged
267	Gutierrez, Jose	Employer did not sign section 2	N	Authorized	Violation as alleged
268	Gutierrez, Luz Elena	Employer did not sign section 2	N	Unauthorized	Violation as alleged
269	Gutierrez Lopez, Alvaro	Employer did not sign section 2	N	Unauthorized	Violation as alleged
270	Guzman, Jose M.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
271	Guzman, Julio Cesar	Employer did not sign section 2	N	Authorized	Violation as alleged
272	Guzman, Victor S.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
273	Guzman Machado, Luis Alberto	Employer did not sign section 2	N	Unauthorized	Violation as alleged



274	Hall, Shaunna Elizabeth	Employer did not sign section 2	Y	Authorized	Violation as alleged
275	Halley, Elton P.	Employer did not sign section 2	Y	Authorized	Violation as alleged
276	Hanrahan, Benito	Employer did not sign section 2	Y	Authorized	Violation as alleged
277	Hanrahan, Dennis Patrick	Employer did not sign section 2	Y	Authorized	Violation as alleged
278	Hansen, Daniel Wayne	Employer did not sign section 2	N	Authorized	Violation as alleged
279	Hansen, Patrick G.	Employer did not sign section 2	N	Authorized	Violation as alleged
280	Harlan, Barbara	Employer did not sign section 2	Y	Authorized	Violation as alleged
281	Harper, Lisa	Employer did not sign section 2	Y	Authorized	Violation as alleged
282	Harrington, Guy	Employer did not sign section 2	Y	Authorized	Violation as alleged
283	Harris, Neil F.	Employer did not sign section 2	Y	Authorized	Violation as alleged
284	Hartley, Jacques M.	Employer did not sign section 2	Y	Authorized	Violation as alleged
285	Hartman, Aaron F.	Employer did not sign section 2	Y	Authorized	Violation as alleged
286	Hartz, Melanie	Employer did not sign section 2; Employer did not print name	N	Authorized	Employer did not sign section 2
287	Harutoonian, Lydia	Employer did not sign section 2	Y	Authorized	Violation as alleged
288	Hatch, David	Employer did not sign section 2	Y	Authorized	Violation as alleged

289	Haugen, Michael	Employer did not sign section 2	Y	Authorized	Violation as alleged
290	Havandjian, Christine Sevan	Employer did not sign section 2	Y	Authorized	Violation as alleged; Employee's signature appears in section 2, not employer's
291	Heartsill, Ronald G.	Employer did not sign section 2	N	Authorized	Violation as alleged
292	Helbig, Frank	Employer did not sign section 2	Y	Authorized	Violation as alleged; Employee's signature appears in section 2, not employer's
293	Hemmatianpour, Valentino	Employer did not sign section 2	N	Authorized	Violation as alleged
294	Henn, Galen	Employer did not sign section 2	Y	Authorized	Violation as alleged
295	Hennes, Paul Anthony	Employer did not sign section 2	Y	Authorized	Violation as alleged
296	Heredia, Jose	Employer did not sign section 2	N	Authorized	Violation as alleged
297	Hernandez, Ana Estela	Employer did not sign section 2; Employer did not print name	N	Authorized	Employer did not sign section 2
298	Hernandez, Catalina	Employer did not sign section 2	N	Unauthorized	Violation as alleged
299	Hernandez, Delia	Employer did not sign section 2	N	Unauthorized	Violation as alleged
300	Hernandez, Eduardo Rodriguez	Employer did not sign section 2	N	Unauthorized	Violation as alleged

301	Hernandez, Eladio	Employer did not sign section 2	N	Unauthorized	Violation as alleged
302	Hernandez, Exman	Employer did not sign section 2	N	Unauthorized	Violation as alleged
303	Hernandez, Francisco A.	Employer did not sign section 2	N	Authorized	Violation as alleged
304	Hernandez, Jairo	Employer did not sign section 2	N	Unauthorized	Violation as alleged
305	Hernandez, Janea D.	Employer did not sign section 2	N	Authorized	Violation as alleged
306	Hernandez, Jesus Rueda	Employer did not sign section 2	N	Unauthorized	Violation as alleged
307	Hernandez, Joe D.	Employer did not sign section 2	N	Authorized	Violation as alleged
308	Hernandez, Jose Enrique	Employer did not sign section 2	N	Unauthorized	Violation as alleged
309	Hernandez, Luis	Employer did not sign section 2	N	Unauthorized	Violation as alleged
310	Hernandez, Luis A.	Employer did not sign section 2	N	Authorized	Violation as alleged
311	Hernandez, Melvin	Employer did not sign section 2	N	Unauthorized	Violation as alleged
312	Hernandez, Ramiro	Employer did not sign section 2	N	Unauthorized	Violation as alleged
313	Hernandez, Sergio	Employer did not sign section 2	N	Unauthorized	Violation as alleged
314	Hernandez, Veronica	Employer did not sign section 2	N	Unauthorized	Violation as alleged
315	Hernandez Aguirre, Eduardo	Employer did not sign section 2	N	Unauthorized	Violation as alleged

316	Hernandez Jeronimo, Antonio Jesus	Employer did not sign section 2	N	Unauthorized	Violation as alleged
317	Hernandez Jimenez, Guillermo	Employer did not sign section 2	N	Unauthorized	Violation as alleged
318	Hernandez Luz, Jose Luis	Employer did not sign section 2	N	Unauthorized	Violation as alleged
319	Herrera, Harold D.	Employer did not sign section 2	N	Authorized	Violation as alleged
320	Herrera, Rosalio	Employer did not sign section 2	N	Unauthorized	Violation as alleged
321	Hess, Robert	Employer did not sign section 2	Y	Authorized	Violation as alleged; Employee's signature appears in section 2, not employer's
322	Hetrick, Mark J.	Employer did not sign section 2	Y	Authorized	Violation as alleged
323	Heywood, James Stephen	Employer did not sign section 2	Y	Authorized	Violation as alleged
324	Hill, Jaeger Bryce	Employer did not sign section 2	Y	Authorized	Violation as alleged
325	Hill, Leighton Cyrus	Employer did not sign section 2	Y	Authorized	Violation as alleged
326	Hill, Tonyette K.	Employer did not sign section 2	N	Authorized	Violation as alleged
327	Holguin, Nathan	Employer did not sign section 2	Y	Authorized	Violation as alleged
328	Holt, Jimmy R.	Employer did not sign section 2	N	Authorized	Violation as alleged
329	Hoobyar, Jason	Employer did not sign section 2; Missing List A or C	Y	Authorized	Employer did not sign section 2

		document			
330	Hoobyar, Peter Scott	Employer did not sign section 2	Y	Authorized	Violation as alleged
331	Horn, Lisa Rani	Employer did not sign section 2	Y	Authorized	Violation as alleged
332	Hornbeck, Lawrence	Employer did not sign section 2	Y	Authorized	Violation as alleged
333	Horowitz, Jay William	Employer did not sign section 2	Y	Authorized	Violation as alleged
334	Houghton, Scott Anthony	Employer did not sign section 2	Y	Authorized	Violation as alleged
335	Hudson, Peter Daniel	Employer did not sign section 2	Y	Authorized	Violation as alleged
336	Huebner, David Michael	Employer did not sign section 2	Y	Authorized	Violation as alleged
337	Huerta, Antonio Cisneros	Employer did not sign section 2	N	Unauthorized	Violation as alleged
338	Huerta, Lorena M.	Employer did not sign section 2; Missing List A or B document	N	Authorized	Employer did not sign section 2
339	Huerta, Silvia	Employer did not sign section 2	N	Unauthorized	Violation as alleged
340	Huft, Douglas W.	Employer did not sign section 2	Y	Authorized	Violation as alleged
341	Hunt, Richard Allen	Employer did not sign section 2	Y	Authorized	Violation as alleged
342	Hutchinson, Joel A.	Employer did not sign section 2	Y	Authorized	Violation as alleged
343	Hutchinson, Neil	Employer did not sign section 2	Y	Authorized	Violation as alleged

344	Ibarra, Juan M.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
345	Iraheta, Karla	Employer did not sign section 2	N	Unauthorized	Violation as alleged
346	Jacobson, Phillip Andrew	Employer did not sign section 2	Y	Authorized	Violation as alleged
347	Janusch, Rod M.	Employer did not sign section 2	Y	Authorized	Violation as alleged
348	Javius, Sirmac B.	Employer did not sign section 2	N	Authorized	Violation as alleged
349	Jaworski, Jay Carl	Employer did not sign section 2	Y	Authorized	Violation as alleged
350	Jett, Bradford Alan	Employer did not sign section 2	Y	Authorized	Violation as alleged
351	Johannsen, Jon	Employer did not sign section 2	Y	Authorized	Violation as alleged
352	John, Edward William	Employer did not sign section 2; Missing List A, B, and/or C document	Y	Authorized	Employer did not sign section 2
353	Johnson, Adam James	Employer did not sign section 2	Y	Authorized	Violation as alleged
354	Johnson, Gregory R.	Employer did not sign section 2	Y	Authorized	Violation as alleged
355	Johnson, Michael Troy	Employer did not sign section 2	N	Authorized	Violation as alleged
356	Juarez, Elvia	Employer did not sign section 2	N	Unauthorized	Violation as alleged
357	Juarez de Barcenaz, Besi M.	Employer did not sign section 2	N	Authorized	Violation as alleged
358	Jury, Andrew Mark	Employer did not sign section 2	Y	Authorized	Violation as alleged

359	Karlsen, Kirsten	Employer did not sign section 2	N	Authorized	Violation as alleged
360	Kasprzak, Brian Paul	Employer did not sign section 2	Y	Authorized	Violation as alleged
361	Kassab, Karim L.	Employer did not sign section 2; Missing List A or C document	N	Authorized	Employer did not sign section 2
362	Kavanagh, Neale James	Employer did not sign section 2	Y	Authorized	Violation as alleged
363	Kelly, Jon Paul	Employer did not sign section 2	Y	Authorized	Violation as alleged
364	Kendrix, Christopher Keith	Employer did not sign section 2	Y	Authorized	Violation as alleged
365	Kerswell, Jake	Employer did not sign section 2	Y	Authorized	Violation as alleged
366	Khaleel, Jonathon S.	Employer did not sign section 2	N	Authorized	Violation as alleged
367	Khalsa, Japji S.	Employer did not sign section 2	Y	Authorized	Violation as alleged
368	Kiely, James William	Employer did not sign section 2	Y	Authorized	Violation as alleged
369	Kimball, Michael D.	Employer did not sign section 2	Y	Authorized	Violation as alleged
370	Kimbrough, Reginald Albert	Employer did not sign section 2	Y	Authorized	Violation as alleged
371	Kirkland, Ken E.	Employer did not sign section 2	Y	Authorized	Violation as alleged
372	Klincko, Kenneth William	Employer did not sign section 2	Y	Authorized	Violation as alleged
373	Knight, Patrick M.	Employer did not sign section 2	Y	Authorized	Violation as alleged

374	Koeper, Michael Ralph	Employer did not sign section 2	Y	Authorized	Violation as alleged
375	Kramer, Jeffrey E.	Employer did not sign section 2	Y	Authorized	Violation as alleged
376	Kramlich, Jeffrey A.	Employer did not sign section 2	N	Authorized	Violation as alleged
377	Krebsler, John	Employer did not sign section 2	Y	Authorized	Violation as alleged
378	Kumarezas, James John	Employer did not sign section 2	Y	Authorized	Violation as alleged
379	Kyle, Stephen Corbett	Employer did not sign section 2	Y	Authorized	Violation as alleged
380	LaBarre, Elizabeth Ann	Employer did not sign section 2	N	Authorized	Violation as alleged
381	Lacabe, Keith Andrew	Employer did not sign section 2	Y	Authorized	Violation as alleged
382	LaConte, Richard G.	Employer did not sign section 2	Y	Authorized	Violation as alleged
383	Lagios, Demetre	Employer did not sign section 2	Y	Authorized	Violation as alleged
384	Lakota, Anne	Employer did not sign section 2	Y	Authorized	Violation as alleged
385	Lambert Jr., Roger Lee	Employer did not sign section 2	Y	Authorized	Violation as alleged
386	Lamons, Peter James	Employer did not sign section 2	Y	Authorized	Violation as alleged
387	Landaverde, Carlos J.	Employer did not sign section 2	N	Authorized	Violation as alleged
388	Landaverde, Ronald A.	Employer did not sign section 2	N	Authorized	Violation as alleged



389	Landrum, Zachary Reed	Employer did not sign section 2	Y	Authorized	Violation as alleged
390	Larsen, Eric J.	Employer did not sign section 2	N	Authorized	Violation as alleged
391	Lau, Helen	Employer did not sign section 2	N	Authorized	Violation as alleged
392	Lawrence, Andrew David	Employer did not sign section 2	Y	Authorized	Violation as alleged
393	Lawrence, Toby Edward	Employer did not sign section 2	Y	Authorized	Violation as alleged
394	Lazaris, Paul W.	Employer did not sign section 2; Missing List A or C document	Y	Authorized	Employer did not sign section 2
395	Lazzarini, Dan	Employer did not sign section 2	Y	Authorized	Violation as alleged
396	Lee, Derrick	Employer did not sign section 2; Missing List A or B document	N	Authorized	Employer did not sign section 2
397	Lee, Jonathan Brian	Employer did not sign section 2	Y	Authorized	Violation as alleged
398	Leinweber, Melanie N.	Employer did not sign section 2	N	Authorized	Violation as alleged
399	Lemi, Kristina G.	Employer did not sign section 2	N	Authorized	Violation as alleged
400	Leon, Catalina	Employer did not sign section 2	N	Unauthorized	Violation as alleged
401	Leshne, Carla	Employer did not sign section 2	Y	Authorized	Violation as alleged
402	Lewis, Emmett Russell	Employer did not sign section 2	Y	Authorized	Violation as alleged
403	Liebenguth, John	Employer did not sign section 2	Y	Authorized	Violation as alleged

404	Lim, James C.	Employer did not sign section 2	Y	Authorized	Violation as alleged
405	Limon, Rosa Imelda	Employer did not sign section 2	N	Unauthorized	Violation as alleged
406	Loo, Derek	Employer did not sign section 2	Y	Authorized	Violation as alleged
407	Lopez, Guadalupe	Employer did not sign section 2; Missing List A or B document	N	Authorized	Employer did not sign section 2
408	Lopez, Luis A.	Employer did not sign section 2	N	Authorized	Violation as alleged
409	Lopez, Maria	Employer did not sign section 2	N	Unauthorized	Violation as alleged
410	Lopez, Victor A.	Employer did not sign section 2; Missing List A or B document	N	Authorized	Employer did not sign section 2
411	Lopez Mederos, Jose Fernando	Employer did not sign section 2	N	Authorized	Violation as alleged
412	Lovitt, Keith D.	Employer did not sign section 2	N	Authorized	Violation as alleged
413	Lubensky, Joshua Lashem	Employer did not sign section 2	Y	Authorized	Violation as alleged
414	Lucero, Eugene Paul	Employer did not sign section 2	Y	Authorized	Violation as alleged
415	Lucero, Steven R.	Employer did not sign section 2	N	Authorized	Violation as alleged
416	Lucero, Wilfredo	Employer did not sign section 2	N	Unauthorized	Violation as alleged
417	Luevano, Mark	Employer did not sign section 2	Y	Authorized	Violation as alleged
418	Luon, Mettiana	Employer did not sign section 2	Y	Authorized	Violation as alleged

419	Mac Donald, James Robert	Employer did not sign section 2	Y	Authorized	Violation as alleged
420	Macachor, Jeremy	Employer did not sign section 2	Y	Authorized	Violation as alleged
421	Macias R, Fidel	Employer did not sign section 2	N	Unauthorized	Violation as alleged
422	Maciel, Anabell	Employer did not sign section 2; Missing List A or B document	N	Authorized	Employer did not sign section 2
423	MacLeod, James	Employer did not sign section 2	Y	Authorized	Violation as alleged
424	Macpherson, Kevin Michael	Employer did not sign section 2	Y	Authorized	Violation as alleged
425	Maddox, Derek James	Missing List A or C document	N	Authorized	Violation as alleged
426	Magana, Felipe De Jesus Leon	Missing document number under List A	N	Unauthorized	Violation as alleged
427	Magdaleno B, Antonio	Employer did not sign section 2	N	Unauthorized	Violation as alleged
428	Maidenberg, Reed A.	Employer did not sign section 2	Y	Authorized	Violation as alleged
429	Maner, Samantha	Employer did not sign section 2; Missing List A or B document	N	Authorized	Employer did not sign section 2
430	Manigault, Erin	Employer did not sign section 2	Y	Authorized	Violation as alleged
431	Manjarrez Montano, Ruben	Employer did not sign section 2	N	Authorized	Violation as alleged
432	Manning, Anne M.	Employer did not sign section 2	N	Authorized	Violation as alleged
433	Manrique, Anel	Employer did not sign section 2	N	Unauthorized	Violation as alleged

434	Manrique, Mercedes	Employer did not sign section 2; Employer did not print name	N	Unauthorized	Employer did not sign section 2
435	Manship, Blake A.	Employer did not sign section 2	Y	Authorized	Violation as alleged
436	Manuel, Andre J.	Employer did not sign section 2; Missing List A or B document	N	Authorized	Employer did not sign section 2
437	Marin, Felipe De Jesus	Employer did not sign section 2	N	Authorized	Violation as alleged
438	Marin, Rex	Employer did not sign section 2	Y	Authorized	Violation as alleged
439	Mariscal, Elizabeth	Employer did not sign section 2	N	Unauthorized	Violation as alleged
440	Markovski, Daniel	Employer did not sign section 2	Y	Authorized	Violation as alleged
441	Marquez, Eric	Employer did not sign section 2	N	Authorized	Violation as alleged
442	Martin, William Christopher	Employer did not sign section 2	Y	Authorized	Violation as alleged
443	Martinez, Genaro	Employer did not sign section 2; Missing List A, B, and/or C document	N	Unauthorized	Employer did not sign section 2
444	Martinez, Jesus	Employer did not sign section 2	N	Unauthorized	Violation as alleged
445	Martinez, Jorge A.	Employer did not sign section 2	N	Authorized	Violation as alleged
446	Martinez, Jose J.	Missing List A or B document	N	Unauthorized	Missing List A or C document
447	Martinez, Luis F.	Employer did not sign section 2	N	Unauthorized	Violation as alleged

448	Martinez, Mario	Missing List A or B document	N	Authorized	Missing List A or C document
449	Martinez, Oscar	Employer did not sign section 2; Missing List A or B document	N	Authorized	Employer did not sign section 2
450	Martir, Marta A.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
451	Massol, Alexis	Employer did not sign section 2	Y	Authorized	Violation as alleged
452	Maynier, John P.	Employer did not sign section 2	Y	Authorized	Violation as alleged
453	McBride, Dwight	Employer did not sign section 2	Y	Authorized	No violation (allegation withdrawn)
454	McCann, Robert J.	Employer did not sign section 2	Y	Authorized	Violation as alleged
455	McClendon, Gary R.	Employer did not sign section 2	Y	Authorized	Violation as alleged
456	McCombe, Michael F.	Employer did not sign section 2	N	Authorized	Violation as alleged
457	McCracken, Sean Anthony	Employer did not sign section 2	Y	Authorized	Violation as alleged
458	McCraw, Joseph	Employer did not sign section 2	Y	Authorized	Violation as alleged
459	McDonough, Meghan	Employer did not sign section 2	Y	Authorized	Violation as alleged
460	McGrath, Diarmaid	Employer did not sign section 2	Y	Authorized	Violation as alleged
461	McGriff, Anna M.	Employer did not sign section 2	Y	Authorized	Violation as alleged
462	McGuinn, Timothy	Employer did not sign section 2	Y	Authorized	Violation as alleged

463	McKereghan, Kevin Douglas	Employer did not sign section 2	Y	Authorized	Violation as alleged
464	McLaughlin, David K.	Employer did not sign section 2	Y	Authorized	Violation as alleged
465	McMillan, Donald A.	Employer did not sign section 2	N	Authorized	Violation as alleged
466	McNicoll, Edward	Employer did not sign section 2	Y	Authorized	Violation as alleged
467	McNutt, Scott	Employer did not sign section 2	Y	Authorized	Violation as alleged
468	Medina, Blanca Estela	Employer did not sign section 2; Employer did not print name	N	Authorized	Employer did not sign section 2
469	Medina, Maria Elena	Employer did not sign section 2	N	Authorized	Violation as alleged
470	Meek, Brian Thomas	Employer did not sign section 2	Y	Authorized	No violation (allegation withdrawn)
471	Mejia Martinez, Petronila	Employer did not sign section 2	N	Authorized	Violation as alleged
472	Melano, Octavio	Employer did not sign section 2	N	Unauthorized	Violation as alleged
473	Melgar, Rolando Atilio	Employer did not sign section 2	N	Unauthorized	Violation as alleged
474	Mendoza, Maria E.	Employer did not sign section 2	N	Authorized	Violation as alleged
475	Merten, Randal W.	Employer did not sign section 2	Y	Authorized	Violation as alleged
476	Middlemiss, Edward J.	Employer did not sign section 2	Y	Authorized	Violation as alleged
477	Milanes, Mario Alberto	Employer did not sign section 2	N	Authorized	Violation as alleged

478	Miller, Christopher David	Employer did not sign section 2	Y	Authorized	Violation as alleged
479	Miller, Kimberly Anne	Employer did not sign section 2	Y	Authorized	Violation as alleged
480	Miller, Ryan	Employer did not sign section 2	Y	Authorized	Violation as alleged
481	Miller, Seth	Employer did not sign section 2	Y	Authorized	Violation as alleged
482	Milligan, Russell C.	Employer did not sign section 2	Y	Authorized	Violation as alleged
483	Minifie, Darren	Employer did not sign section 2	N	Authorized	Violation as alleged
484	Mitchell, James	Employer did not sign section 2	Y	Authorized	Violation as alleged
485	Mohagen, Craig E.	Employer did not sign section 2	Y	Authorized	Violation as alleged
486	Molina, Miguel M.	Employer did not sign section 2	Y	Authorized	Violation as alleged
487	Molnar, Dan L.	Employer did not sign section 2	Y	Authorized	Violation as alleged
488	Mondoux, Raymond E.	Employer did not sign section 2	Y	Authorized	Violation as alleged
489	Montaner, Julian	Employer did not sign section 2	Y	Authorized	Violation as alleged
490	Montano, Maria E.	Employer did not sign section 2	N	Authorized	Violation as alleged
491	Montano, Ramon S.	Employer did not sign section 2; Missing List A or B document	N	Authorized	Employer did not sign section 2
492	Montante, Justin Max	Employer did not sign section 2	Y	Authorized	Violation as alleged

493	Montes, Mauricio	Employer did not sign section 2	N	Unauthorized	Violation as alleged
494	Montiel, Emanuel C.	Employer did not sign section 2	N	Authorized	Violation as alleged
495	Moore, Gregory Thomas	Employer did not sign section 2	Y	Authorized	Violation as alleged
496	Moore, Timothy Merritt	Employer did not sign section 2	Y	Authorized	Violation as alleged
497	Moorman, Gary Dwayne	Employer did not sign section 2	Y	Authorized	No violation (allegation withdrawn)
498	Morales, Juan Gabriel	Employer did not sign section 2	N	Unauthorized	Violation as alleged
499	Morales, Yanira	Employer did not sign section 2	N	Unauthorized	Violation as alleged
500	Moreira, Amilcar	Employer did not sign section 2	N	Unauthorized	Violation as alleged
501	Moreira Munoz, Wilson Y.	Employer did not sign section 2	N	Authorized	Violation as alleged
502	Moreno, Daniel Patrick	Employer did not sign section 2	Y	Authorized	Violation as alleged
503	Moreno, Martin	Employer did not sign section 2	Y	Authorized	Violation as alleged
504	Morgan, Michael L.	Employer did not sign section 2	Y	Authorized	Violation as alleged
505	Morgan, Timothy J.	Employer did not sign section 2	Y	Authorized	Violation as alleged
506	Morgante, Joel Scott	Employer did not sign section 2	Y	Authorized	Violation as alleged
507	Mota Perez, Omar* <i>*This employee is also employee no. 571 and will only be counted once</i>	Employer did not sign section 2; Employer did not print name	N	Authorized	Employer did not sign section 2



508	Movillion, Reynaldo	Employer did not sign section 2	Y	Authorized	Violation as alleged
509	Muchlinski, Arthur Henryk	Employer did not sign section 2	Y	Authorized	Violation as alleged
510	Mueller, Craig Ernest	Employer did not sign section 2	Y	Authorized	Violation as alleged
511	Muldowney, Davina R.	Employer did not sign section 2	N	Authorized	Violation as alleged
512	Munos, Amparo	Employer did not sign section 2	N	Unauthorized	Violation as alleged
513	Munoz, Francisco	Employer did not sign section 2	N	Unauthorized	Violation as alleged
514	Munoz, Juan Jose	Employer did not sign section 2	N	Authorized	Violation as alleged
515	Munoz, Teresa	Employer did not sign section 2	N	Unauthorized	Violation as alleged
516	Munoz, Zalvador	Missing List A or B document	N	Unauthorized	Missing List A or C document
517	Murillo, Jose	Employer did not sign section 2	N	Unauthorized	Violation as alleged
518	Murillo, Maria A.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
519	Murillo Gomez, Nely	Employer did not sign section 2	N	Unauthorized	Violation as alleged
520	Murphy, Kenneth	Employer did not sign section 2	Y	Authorized	Violation as alleged
521	Murray, Melanie	Employer did not sign section 2	Y	Authorized	Violation as alleged
522	Murray, Rovell Lamon	Employer did not sign section 2	Y	Authorized	Violation as alleged; Employee's signature appears in

					section 2, not employer's
523	Myers, Sarah Camille	Employer did not sign section 2	N	Authorized	Violation as alleged
524	Nakahara, Mark S.	Employer did not sign section 2	Y	Authorized	Violation as alleged
525	Nava, Manuel Flores	Employer did not sign section 2	N	Unauthorized	Violation as alleged
526	Navarijo, Dimas	Employer did not sign section 2	N	Unauthorized	Violation as alleged
527	Navarijo, Elder N.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
528	Navarijo, Melvin E.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
529	Navarijo Doniz, Jose Manuel	Employer did not sign section 2	N	Unauthorized	Violation as alleged
530	Navarijo Juarez, Juan A.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
531	Navarro, Carlos	Employer did not sign section 2	N	Unauthorized	Violation as alleged
532	Navarro, Moises	Employer did not sign section 2	N	Authorized	Violation as alleged
533	Navarro Gonzalez, Alicia	Employer did not sign section 2	N	Unauthorized	Violation as alleged
534	Ness, Kjell A.	Employer did not sign section 2	Y	Authorized	Violation as alleged
535	Newell, Scott	Employer did not sign section 2	Y	Authorized	Violation as alleged
536	Nichols, James Timothy	Employer did not sign section 2	Y	Authorized	Violation as alleged

537	Nixon, Andrew Derek	Employer did not sign section 2	Y	Authorized	Violation as alleged
538	Nodal, Hector	Employer did not sign section 2	N	Authorized	Violation as alleged
539	Noel, Jason	Employer did not sign section 2	Y	Authorized	Violation as alleged
540	Noj, Karina Gonzalez	Employer did not sign section 2	N	Unauthorized	Violation as alleged
541	Nolasco, Felipe De Jesus	Employer did not sign section 2	N	Unauthorized	Violation as alleged
542	North, Jeff J.	Employer did not sign section 2	Y	Authorized	Violation as alleged
543	North, Robert	Employer did not sign section 2	Y	Authorized	Violation as alleged
544	Nunez, Hilda	Employer did not sign section 2	N	Unauthorized	Violation as alleged
545	Nunez Ramirez, Roberto	Employer did not sign section 2	N	Authorized	Violation as alleged
546	Nyberg, Peter James	Employer did not sign section 2	Y	Authorized	Violation as alleged
547	Obrien, Andrew Patrick	Employer did not sign section 2	Y	Authorized	Violation as alleged
548	Ohta, Casey W.	Employer did not sign section 2	Y	Authorized	Violation as alleged
549	Oliva Landaverde, Jose Napoleon	Employer did not sign section 2	N	Authorized	Violation as alleged
550	Olness, James Paul	Employer did not sign section 2	Y	Authorized	Violation as alleged
551	Orellana, Ana	Employer did not sign section 2	N	Unauthorized	Violation as alleged

552	Orona, Orlando J.	Employer did not sign section 2	Y	Authorized	Violation as alleged
553	Ortiz, Jose Guadalupe	Missing List A or B document	N	Authorized	Missing List A or C document
554	Ortiz Reyes, Ricardo	Employer did not sign section 2	N	Authorized	Violation as alleged
555	Osorio, Ana D.	Employer did not sign section 2	N	Authorized	Violation as alleged
556	Osorio, Carlos C.	Employer did not sign section 2	N	Authorized	Violation as alleged
557	Osorio Robles, Saul	Employer did not sign section 2	N	Unauthorized	Violation as alleged
558	Oster, John	Employer did not sign section 2	Y	Authorized	Violation as alleged
559	Ozier, Jason M.	Employer did not sign section 2	Y	Authorized	Violation as alleged
560	Padilla, Orlando E.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
561	Padilla, Osvaldo M.	Employer did not sign section 2; Missing List A or B document	N	Authorized	Employer did not sign section 2
562	Palmer, Jeffery Ian	Employer did not sign section 2	Y	Authorized	Violation as alleged
563	Parish, Alfred Phillip	Employer did not sign section 2	Y	Authorized	Violation as alleged
564	Parrish, Wesley Estes	Employer did not sign section 2	Y	Authorized	Violation as alleged
565	Paulino, Francisco	Employer did not sign section 2	N	Unauthorized	Violation as alleged
566	Pena, Marlon	Employer did not sign section 2	N	Unauthorized	Violation as alleged

567	Peralta, Paul James	Employer did not sign section 2	Y	Authorized	Violation as alleged
568	Perez, Abel	Employer did not sign section 2	N	Unauthorized	Violation as alleged
569	Perez, Filomena	Employer did not sign section 2	N	Unauthorized	Violation as alleged
570	Perez, Mayra Toscano	Employer did not sign section 2	N	Authorized	Violation as alleged
571	Perez, Omar Mota	Employer did not sign section 2	N	Authorized	No violation; duplicate listing of employee, who is also listed as employee no. 507
572	Perez, Ricardo	Employer did not sign section 2	N	Unauthorized	Violation as alleged
573	Perez, Ruben A.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
574	Perez Pacheco, Miguel A.	Employer did not sign section 2; Employer did not print name	N	Unauthorized	Employer did not sign section 2
575	Perretti, Charles A.	Employer did not sign section 2	Y	Authorized	Violation as alleged
576	Perrin, Jeffrey	Employer did not sign section 2	Y	Authorized	Violation as alleged
577	Peters, Richard	Employer did not sign section 2	Y	Authorized	Violation as alleged
578	Peterson, Kurt Richard	Employer did not sign section 2	Y	Authorized	Violation as alleged
579	Pilette, Paul Joseph	Employer did not sign section 2	Y	Authorized	Violation as alleged
580	Pineda Gutierrez, Carlos	Employer did not sign section 2	N	Unauthorized	Violation as alleged

581	Pino, Michael Deane	Employer did not sign section 2	Y	Authorized	Violation as alleged
582	Pitta, Ernest	Employer did not sign section 2	N	Authorized	Violation as alleged
583	Pochapin, Lee	Employer did not sign section 2	Y	Authorized	Violation as alleged
584	Podwil, Daniel Adam	Employer did not sign section 2	Y	Authorized	Violation as alleged
585	Pollek, Gary	Employer did not sign section 2	Y	Authorized	Violation as alleged
586	Polson, Fredric Wayne	Employer did not sign section 2	Y	Authorized	Violation as alleged
587	Pope, Bradley Fleming	Employer did not sign section 2	Y	Authorized	Violation as alleged
588	Pope, Valerie	Employer did not sign section 2	Y	Authorized	Violation as alleged
589	Portillo Salazar, Sergio	Employer did not sign section 2	N	Authorized	Violation as alleged
590	Powell, Robert E.	Employer did not sign section 2	Y	Authorized	Violation as alleged
591	Powell, Stephanie	Employer did not sign section 2	Y	Authorized	Violation as alleged
592	Powers, Robert B.	Employer did not sign section 2	Y	Authorized	Violation as alleged
593	Presotto, Paulo Rogerio	Employer did not sign section 2	Y	Authorized	Violation as alleged; Employee's signature appears in section 2 rather than employer's
594	Puch, Marcela	Employer did not sign section 2	N	Unauthorized	Violation as alleged

595	Quattrin, Cian Amergin	Employer did not sign section 2	Y	Authorized	Violation as alleged
596	Rabe, Paul	Employer did not sign section 2	N	Authorized	Violation as alleged
597	Ramirez, Carlos A.	Employer did not sign section 2	N	Authorized	Violation as alleged
598	Ramirez, Eric	Employer did not sign section 2	N	Authorized	Violation as alleged
599	Ramirez, Juan C.	Missing Driver's License Expiration Date	N	Authorized	Violation as alleged
600	Ramirez, Juan Francisco	Employer did not sign section 2	N	Authorized	Violation as alleged
601	Ramirez, Lazaro Alvaro	Employer did not sign section 2	N	Authorized	Violation as alleged
602	Ramirez, Norma	Employer did not sign section 2	N	Unauthorized	Violation as alleged
603	Ramirez, Silvia I.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
604	Ramos, Maribel	Employer did not sign section 2	N	Unauthorized	Violation as alleged
605	Ramos, Medel	Employer did not sign section 2	Y	Authorized	Violation as alleged
606	Ramrakha, Subharid Chand	Employer did not sign section 2	Y	Authorized	Violation as alleged
607	Rapisura, Erick	Employer did not sign section 2	Y	Authorized	Violation as alleged
608	Ray, Charles H.	Employer did not sign section 2	Y	Authorized	Violation as alleged
609	Raymond, Daniel	Employer did not sign section 2	Y	Authorized	Violation as alleged

610	Raymond, Derek Scott	Employer did not sign section 2	Y	Authorized	Violation as alleged
611	Raymond, Travis Lee	Employer did not sign section 2	Y	Authorized	Violation as alleged
612	Reade, George	Employer did not sign section 2	Y	Authorized	Violation as alleged; Employee's signature appears in section 2 rather than employer's
613	Recinos, Roberto	Employer did not sign section 2	N	Unauthorized	Violation as alleged
614	Record, Raven	Employer did not sign section 2	Y	Authorized	Violation as alleged
615	Regan, Christopher	Employer did not sign section 2	Y	Authorized	Violation as alleged
616	Regan, David	Employer did not sign section 2	Y	Authorized	Violation as alleged
617	Rege, Nichole	Employer did not sign section 2	N	Authorized	Violation as alleged
618	Reinis, Danielle Misha	Employer did not sign section 2	Y	Authorized	Violation as alleged
619	Rembert, Charles	Employer did not sign section 2	N	Authorized	Violation as alleged
620	Retana, Guillermo	Employer did not sign section 2	N	Unauthorized	Violation as alleged
621	Revolorio, Lester	Employer did not sign section 2	N	Authorized	Violation as alleged
622	Rexroat, Travis	Employer did not sign section 2	Y	Authorized	Violation as alleged
623	Richardson, Edward T.	Employer did not sign section 2	Y	Authorized	Violation as alleged



624	Rico Casillas, Jeffery	Employer did not sign section 2	N	Authorized	Violation as alleged
625	Rienecker, Thomas D.	Employer did not sign section 2	Y	Authorized	Violation as alleged
626	Riley, Marlowe	Employer did not sign section 2	Y	Authorized	Violation as alleged
627	Rinfret, Gary	Employer did not sign section 2	Y	Authorized	Violation as alleged
628	Rios, Maria	Employer did not sign section 2	N	Unauthorized	Violation as alleged
629	Rios Lopez, Juan	Employer did not sign section 2	N	Authorized	Violation as alleged
630	Ripka, James H.	Employer did not sign section 2	Y	Authorized	Violation as alleged
631	Rivera, Reyes	Employer did not sign section 2	N	Unauthorized	Violation as alleged
632	Rivera, Sergio	Employer did not sign section 2	N	Unauthorized	Violation as alleged
633	Rivera Negrete, Jose Luis	Employer did not sign section 2	N	Unauthorized	Violation as alleged
634	Roberts, Shea	Employer did not sign section 2	Y	Authorized	Violation as alleged; Employee's signature appears in section 2 rather than employer's
635	Robinson, Terrell	Employer did not sign section 2	N	Authorized	Violation as alleged
636	Roblero Acevedo, Jonathan	Employer did not sign section 2	N	Authorized	Violation as alleged
637	Rodriguez, Alberto	Employer did not sign section 2	N	Unauthorized	Violation as alleged

638	Rodriguez, Alma	Employer did not sign section 2	N	Unauthorized	Violation as alleged
639	Rodriguez, Cesar	Employer did not sign section 2	N	Unauthorized	Violation as alleged
640	Rodriguez, Daniela	Employer did not sign section 2	N	Unauthorized	Violation as alleged
641	Rodriguez, Gabriel	Employer did not sign section 2	N	Unauthorized	Violation as alleged
642	Rodriguez, Luiz	Employer did not sign section 2	N	Authorized	Violation as alleged
643	Rodriguez, Norma	Employer did not sign section 2	N	Unauthorized	Violation as alleged
644	Rodriguez, Oscar	Employer did not sign section 2	N	Unauthorized	Violation as alleged
645	Rodriguez, Yulissa	Employer did not sign section 2	N	Unauthorized	Violation as alleged
646	Rodriguez Martinez, Alejandro	Employer did not sign section 2	N	Unauthorized	Violation as alleged
647	Rogers, Kevin	Employer did not sign section 2	Y	Authorized	Violation as alleged
648	Rojas, Ana	Employer did not sign section 2	N	Unauthorized	Violation as alleged
649	Romero, Laura	Employer did not sign section 2	N	Unauthorized	Violation as alleged
650	Romero De Gonzalez, Ruth Estela	Employer did not sign section 2	N	Authorized	Violation as alleged
651	Romo, Jose De Jesus	Employer did not sign section 2	N	Unauthorized	Violation as alleged
652	Rosado, Jacqueline	Employer did not sign section 2	N	Authorized	Violation as alleged

653	Rose, Joseph A.	Employer did not sign section 2	Y	Authorized	Violation as alleged
654	Roulston, Katherine	Employer did not sign section 2	Y	Authorized	Violation as alleged
655	Rua Martinez, Felipe	Employer did not sign section 2	N	Unauthorized	Violation as alleged
656	Ruiz, Rafael A.	Employer did not sign section 2	N	Unauthorized	Violation as alleged
657	Rutia Hernandez, Petra	Employer did not sign section 2	N	Unauthorized	Violation as alleged
658	Ryan, Anne	Employer did not sign section 2; Missing List A or C document	N	Authorized	Employer did not sign section 2
659	Ryan, Kathleen Grace	Employer did not sign section 2	Y	Authorized	Violation as alleged
660	Ryan, Patrick E.	Employer did not sign section 2	Y	Authorized	Violation as alleged
661	Saarni, Nelson Oliver	Employer did not sign section 2	Y	Authorized	Violation as alleged
662	Saavedra, Jorge	Employer did not sign section 2	N	Unauthorized	Violation as alleged
663	Salazar, Diana Karen	Employer did not sign section 2	N	Authorized	Violation as alleged
664	Salceda, Laura	Employer did not sign section 2	N	Unauthorized	Violation as alleged
665	Salomon, Amber	Employer did not sign section 2; Missing List A or C document	N	Authorized	Employer did not sign section 2
666	Samayoa Donis, Jose M.	Employer did not sign section 2	N	Authorized	Violation as alleged
667	Samayoa Garcia, Jose A.	Employer did not sign section 2	N	Unauthorized	Violation as alleged

668	Samish, Ian Harvey	Employer did not sign section 2	Y	Authorized	Violation as alleged
669	Sammon, Jeff	Employer did not sign section 2	Y	Authorized	Violation as alleged
670	Samudio, Robert Anthony	Employer did not sign section 2	Y	Authorized	Violation as alleged
671	Sanchez, Berenice	Employer did not sign section 2	N	Unauthorized	Violation as alleged
672	Sanchez, Enrique	Employer did not sign section 2	N	Unauthorized	Violation as alleged
673	Sanchez, Maria	Employer did not sign section 2	N	Unauthorized	Violation as alleged
674	Sanchez Cruz, Maria	Employer did not sign section 2	N	Unauthorized	Violation as alleged
675	Sanders, Christopher James	Employer did not sign section 2	Y	Authorized	Violation as alleged
676	Sandoval, Savino	Employer did not sign section 2	N	Authorized	Violation as alleged
677	Santos, Powell	Employer did not sign section 2	Y	Authorized	Violation as alleged
678	Sapien, Victor Manuel	Employer did not sign section 2	N	Unauthorized	Violation as alleged
679	Sarabia, Maria F.	Employer did not sign section 2	N	Authorized	Violation as alleged
680	Saud, Chris	Employer did not sign section 2	Y	Authorized	Violation as alleged; Employee's signature appears in section 2 instead of employer's
681	Saunders, Catherine Ruth	Employer did not sign section 2	Y	Authorized	Violation as alleged

682	Scharfenberg, Gretchen	Employer did not sign section 2	Y	Authorized	Violation as alleged
683	Schempp, Stephanie Rose	Employer did not sign section 2	Y	Authorized	Violation as alleged
684	Schirmang, Vanessa Edith	Employer did not sign section 2	Y	Authorized	Violation as alleged
685	Schoening, John	Employer did not sign section 2	Y	Authorized	Violation as alleged
686	Schoening, Paul Ronald	Employer did not sign section 2	Y	Authorized	Violation as alleged
687	Schwalbach, David	Employer did not sign section 2	N	Authorized	Violation as alleged
688	Sciacqua, Edward	Employer did not sign section 2	N	Authorized	Violation as alleged
689	Seamas, Craig	Employer did not sign section 2	Y	Authorized	Violation as alleged
690	Segal, Lauren	Employer did not sign section 2	N	Authorized	Violation as alleged
691	Seifert, Jason	Employer did not sign section 2	Y	Authorized	Violation as alleged
692	Senick, Joshua	Employer did not sign section 2	Y	Authorized	Violation as alleged
693	Servin, Jesse	Employer did not sign section 2	Y	Authorized	Violation as alleged
694	Shafer, Susan	Employer did not sign section 2	Y	Authorized	Violation as alleged
695	Shankel, Erin	Employer did not sign section 2	Y	Authorized	Violation as alleged
696	Shankel, Mark	Employer did not sign section 2	Y	Authorized	Violation as alleged

697	Shea, Paul	Employer did not sign section 2	N	Authorized	Violation as alleged
698	Shellenberger, Christopher Thomas	Employer did not sign section 2	Y	Authorized	Violation as alleged
699	Sherer, Daniel H.	Employer did not sign section 2	Y	Authorized	Violation as alleged; Employee's signature appears in section 2 instead of employer's
700	Sherwood, Govinda	Employer did not sign section 2	Y	Authorized	Violation as alleged
701	Shine, Chris	Employer did not sign section 2	Y	Authorized	Violation as alleged
702	Shine, Greg	Employer did not sign section 2	Y	Authorized	No violation (allegation withdrawn)
703	Shores, Aaron	Employer did not sign section 2	Y	Authorized	Violation as alleged
704	Short, Allen E.	Employer did not sign section 2	N	Authorized	Violation as alleged
705	Sierra, Heraldo	Employer did not sign section 2	N	Unauthorized	Violation as alleged
706	Sims, Molly	Employer did not sign section 2	N	Authorized	Violation as alleged
707	Sims, Ndiko Jamal	Employer did not sign section 2	Y	Authorized	Violation as alleged
708	Sion, Adam	Employer did not sign section 2; Missing List A, B, and/or C document	Y	Authorized	Employer did not sign section 2
709	Small, Kendall	Employer did not sign section 2	N	Authorized	Violation as alleged

710	Smart, Robert William	Employer did not sign section 2	Y	Authorized	Violation as alleged
711	Smith, Kenneth	Employer did not sign section 2	Y	Authorized	Violation as alleged
712	Smith, Kevin Russell	Employer did not sign section 2	Y	Authorized	Violation as alleged; Employee's signature appears in section 2 instead of employer's
713	Smith, Ronald	Employer did not sign section 2	Y	Authorized	Violation as alleged
714	Soledad, Martin	Employer did not sign section 2	N	Unauthorized	Violation as alleged
715	Soogian, Daniel	Employer did not sign section 2	Y	Authorized	Violation as alleged
716	Sotiras, Pete	Employer did not sign section 2	Y	Authorized	Violation as alleged
717	Souza, John Christopher	Employer did not sign section 2	Y	Authorized	Violation as alleged
718	Spangler, Mark	Employer did not sign section 2	Y	Authorized	Violation as alleged
719	St. Arnaud, Patrice	Employer did not sign section 2	Y	Authorized	Violation as alleged
720	St. Hilaire, John	Employer did not sign section 2	Y	Authorized	Violation as alleged
721	Starobin, Michael	Employer did not sign section 2	Y	Authorized	Violation as alleged
722	Starr, Michael	Employer did not sign section 2	Y	Authorized	Violation as alleged
723	Steele, Timothy	Employer did not sign section 2	N	Authorized	Violation as alleged

724	Stover, Kevin	Employer did not sign section 2	Y	Authorized	Violation as alleged
725	Stoye, Abram	Employer did not sign section 2	Y	Authorized	Violation as alleged
726	Sullivan, Terry S.	Employer did not sign section 2	Y	Authorized	Violation as alleged
727	Summers, Kent	Employer did not sign section 2	N	Authorized	Violation as alleged
728	Sweeney, Bryan James	Employer did not sign section 2	Y	Authorized	Violation as alleged
729	Tanaka, Steven	Employer did not sign section 2	N	Authorized	Violation as alleged
730	Tapia, Ricardo	Employer did not sign section 2	N	Unauthorized	Violation as alleged
731	Taravella, Michael Robert	Employer did not sign section 2	Y	Authorized	Violation as alleged
732	Taylor, Douglas	Employer did not sign section 2	Y	Authorized	Violation as alleged
733	Teele, Michael	Employer did not sign section 2	N	Authorized	Violation as alleged
734	Tenorio Revuelta, Ismael	Employer did not sign section 2	N	Unauthorized	Violation as alleged
735	Teo, Benjamin V.	Employer did not sign section 2	Y	Authorized	Violation as alleged
736	Terrell, Brent C.	Employer did not sign section 2	N	Authorized	Violation as alleged
737	Thompson, Alva	Employer did not sign section 2	Y	Authorized	No violation (allegation withdrawn)
738	Thompson, Joshua	Employer did not sign section 2	Y	Authorized	Violation as alleged



739	Thompson, Kevin A.	Employer did not sign section 2	Y	Authorized	Violation as alleged
740	Thompson, Shadi Johnny	Employer did not sign section 2	N	Authorized	Violation as alleged
741	Thomson, Kevin Robert	Employer did not sign section 2	Y	Authorized	Violation as alleged
742	Thonus, Michael	Employer did not sign section 2	Y	Authorized	Violation as alleged
743	Tisnados, Alexander	Employer did not sign section 2	N	Unauthorized	Violation as alleged
744	Tolmie, David L.	Employer did not sign section 2	Y	Authorized	Violation as alleged
745	Tran, Benny	Employer did not sign section 2	Y	Authorized	Violation as alleged
746	Trefry, Leah	Employer did not sign section 2; Employer did not print name	N	Authorized	Employer did not sign section 2
747	Trejos, Deborah G.	Employer did not sign section 2	N	Authorized	Violation as alleged
748	Trimmer, Brian	Employer did not sign section 2	Y	Authorized	Violation as alleged
749	Tunks, Timothy	Employer did not sign section 2	Y	Authorized	Violation as alleged
750	Urban, Robert J.	Employer did not sign section 2	Y	Authorized	Violation as alleged
751	Uribe, Juan Carlos	Employer did not sign section 2	N	Authorized	Violation as alleged
752	Utrera, Miguel	Employer did not sign section 2	N	Unauthorized	Violation as alleged
753	Valdez, Erica	Employer did not sign section 2	N	Unauthorized	Violation as alleged

754	Van Bockern, Brendan	Employer did not sign section 2	Y	Authorized	Violation as alleged
755	Van Perre, Ivan J.	Employer did not sign section 2	Y	Authorized	Violation as alleged
756	Vande Moortel, Jean	Employer did not sign section 2	Y	Authorized	Violation as alleged
757	Vasquez, Anner	Employer did not sign section 2	N	Unauthorized	Violation as alleged
758	Vasquez, Claudia	Employer did not sign section 2	N	Unauthorized	Violation as alleged
759	Vasquez, Milton	Employer did not sign section 2	N	Unauthorized	Violation as alleged
760	Vazquez, Alberto	Employer did not sign section 2	N	Unauthorized	Violation as alleged
761	Vazquez Cruz, David	Employer did not sign section 2	N	Unauthorized	Violation as alleged
762	Vega Ortiz, Javier	Employer did not sign section 2	N	Unauthorized	Violation as alleged
763	Vega Vizcaino, Jose De Jesus	Employer did not sign section 2	N	Authorized	Violation as alleged
764	Venerable, Randall Jon	Employer did not sign section 2	Y	Authorized	Violation as alleged
765	Vernali, David	Employer did not sign section 2	Y	Authorized	No violation (allegation withdrawn)
766	Visco, Louis	Employer did not sign section 2	Y	Authorized	Violation as alleged
767	Vogel, Douglas G.	Employer did not sign section 2	Y	Authorized	Violation as alleged
768	Vollendorf, Dorothy	Employer did not sign section 2	Y	Authorized	Violation as alleged

769	Vournas, John	Employer did not sign section 2	Y	Authorized	Violation as alleged
770	Vukmanic, Thomas George	Employer did not sign section 2	Y	Authorized	Violation as alleged; union signed the form and is listed as the employer
771	Wade, Colin	Employer did not sign section 2	Y	Authorized	Violation as alleged
772	Waldron, David	Employer did not sign section 2	Y	Authorized	Violation as alleged
773	Walton, Marcellis	Employer did not sign section 2; Employer did not print name	N	Authorized	Employer did not sign section 2
774	Weiser, Isaac Yosef	Employer did not sign section 2	Y	Authorized	Violation as alleged
775	Wessling, Timothy Francis	Employer did not sign section 2	Y	Authorized	Violation as alleged
776	Whalen, David	Employer did not sign section 2	Y	Authorized	Violation as alleged
777	White, Randall	Employer did not sign section 2	Y	Authorized	Violation as alleged
778	Whitfield, Collin	Employer did not sign section 2	Y	Authorized	Violation as alleged
779	Whitmore, Jennifer	Employer did not sign section 2	Y	Authorized	Violation as alleged
780	Williams, Carl	Employer did not sign section 2; Missing List A or B document	N	Authorized	Employer did not sign section 2
781	Williams, Mary	Employer did not sign section 2	Y	Authorized	Violation as alleged
782	Willis, Chris A.	Employer did not sign section 2	Y	Authorized	Violation as alleged

783	Wilson, Alfred	Employer did not sign section 2	N	Authorized	Violation as alleged
784	Wilson, Greg	Employer did not sign section 2	Y	Authorized	Violation as alleged
785	Wilson, Joshua	Employer did not sign section 2	N	Authorized	Violation as alleged
786	Winslow, Trenton Robb	Employer did not sign section 2	Y	Authorized	Violation as alleged
787	Wolfersperger, Karl	Employer did not sign section 2	Y	Authorized	Violation as alleged
788	Wolohan, Joseph	Employer did not sign section 2	Y	Authorized	Violation as alleged
789	Woodward, Lisa	Employer did not sign section 2	Y	Authorized	Violation as alleged
790	Wright, Nicholas	Employer did not sign section 2	Y	Authorized	Violation as alleged
791	Wright, Sean	Employer did not sign section 2	Y	Authorized	Violation as alleged
792	Wyman, Scott	Employer did not sign section 2; Employer did not print name	N	Authorized	Employer did not sign section 2
793	Young, David Ellis	Employer did not sign section 2	Y	Authorized	Violation as alleged
794	Zamora, Alexander	Employer did not sign section 2	N	Authorized	Violation as alleged
795	Zeh, Alex	Employer did not sign section 2	Y	Authorized	Violation as alleged
796	Zermeno Cornejo, Adrian	Employer did not sign section 2	N	Authorized	Violation as alleged
797	Zermeno Cornejo, Juan Francisco	Employer did not sign section 2	N	Authorized	Violation as alleged

## COUNT V

<b>No.</b>	<b>Employee Name</b>	<b>Violation(s) Alleged</b>	<b>Status</b>	<b>Finding</b>
1	Carrillo, Zonia Mirna	Failure to complete section 3	Authorized	Violation as alleged
2	Suazo Zepeda, Carlos Orlando	Failure to complete section 3	Authorized	Violation as alleged
3	Urbina, Maria Silvia	Failure to complete section 3	Authorized	Violation as alleged