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

April 30, 2026

UNITED STATES OF AMERICA,	)	
Complainant,	)	
v.	)	8 U.S.C. § 1324a Proceeding
	)	OCAHO Case No. 2026A00037
GOLD MOUNTAIN, INC.,	)	
D/B/A CASA DE ORO #4,	)	
Respondent.	)	

NOTICE OF CASE ASSIGNMENT FOR COMPLAINT
ALLEGING UNLAWFUL EMPLOYMENT[1]

1. A complaint was filed on March 31, 2026, against Gold Mountain, Inc. d/b/a Casa De Oro #4 (Respondent) by the United States of America (Complainant). Attached to this Notice is a copy of the complaint, the Notice of Intent to Fine (NIF) issued by the Department of Homeland Security (DHS), and the Respondent's request for a hearing pursuant to 8 U.S.C. § 1324a(e)(3). This case is assigned to the Honorable Andrea Carroll-Tipton, Administrative Law Judge (ALJ).

2. Proceedings in this matter will be conducted according to the OCAHO rules appearing at 28 C.F.R. pt. 68 and the applicable case law.[2] It is imperative that you obtain a copy of the rules immediately and comply with their requirements in this case. A Portable Document Format (PDF)

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[1] The Office of the Chief Administrative Hearing Officer (OCAHO) does not typically publish a Notice of Case Assignment (NOCA). *See United States v. Liberty Constructors, LLC*, 18 OCAHO no. 1495, 1 n.1 (2023). "However, OCAHO will publish a NOCA when it contains an update to the standard information provided in order to enhance transparency and better inform stakeholders with an interest in OCAHO proceedings." *Id.* In the instant case, OCAHO is publishing this NOCA to address an issue related to the presence of citations to erroneous or non-existent OCAHO cases in the Respondent's request for hearing, a copy of which was attached to the complaint in this matter. *See infra* ¶ 10.

[2] Published OCAHO decisions may be accessed on the Executive Office for Immigration Review's (EOIR) website at https://www.justice.gov/eoir/office-of-the-chief-administrative-hearing-officer-decisions, or in the Westlaw database "FIM-OCAHO," or in the LexisNexis database "OCAHO." Hard copy volumes of OCAHO decisions up to and including volume 8 may be located at federal depository libraries nationwide, which may be located at http://catalog.gpo.gov/fdlpdir/FDLPdir.jsp. All volumes after 8 are only available online.

copy is available on the OCAHO webpage at https://www.justice.gov/eoir/office-of-the-chief-administrative-hearing-officer-regulations. If you are unable to access the webpage or print a copy, you may call our office at 703-305-0864 and request that a copy be mailed to you at no charge. Parties may also access an electronic version of OCAHO's procedural regulations reflecting recent changes at https://www.ecfr.gov/current/title-28/chapter-I/part-68. Parties are advised that OCAHO's procedural regulations were recently modified to reflect new requirements related to electronic filing. *See* Office of the Chief Administrative Hearing Officer Electronic Filing, 91 Fed. Reg. 9,989 (Mar. 2, 2026) (to be codified at 28 C.F.R. pt. 68).

Attorneys and unrepresented parties are advised to read the relevant rules in their entirety prior to filing documents. Attorneys are advised that the OCAHO rules sometimes differ from the Federal Rules of Civil Procedure.

Additionally, attorneys and unrepresented parties are encouraged to review and consult OCAHO's Practice Manual. OCAHO's Practice Manual is available at the following link, and provides an outline of the procedures and rules applicable to OCAHO cases: https://www.justice.gov/eoir/policy-manual-eoir/part-IV/ocaho.

All representatives and parties are also required to maintain a current address with OCAHO and to timely file a notice of a change of address with the presiding ALJ (or with the Chief Administrative Hearing Officer (CAHO) if the case either has not yet been assigned to an ALJ or is under administrative review by the CAHO) and must also serve such notice on the opposing party. *See United States v. Cordin Co.*, 10 OCAHO no. 1162, 4 (2012) ("It is the Respondent's responsibility (indeed, the responsibility of all parties before OCAHO) to file a notice of change of address or other contact information directly with the ALJ, as well as serving that notice on the opposing party."). If a party is using OCAHO's electronic filing application, OCAHO will use the email address provided by the parties when they register for the electronic filing application for electronic service. Users must immediately update their electronic filing application account if their email address changes. If a party is using OCAHO's electronic filing application, OCAHO will consider service completed when the appropriate electronic notification is delivered to the last email address on file provided by the user. *See* Office of the Chief Administrative Hearing Officer Electronic Filing, 91 Fed. Reg. at 9,996.

Parties wishing to appear anonymously (or pseudonymously) or to use their initials in the case caption rather than their name should be aware of applicable law on that issue when making any such request to the presiding OCAHO adjudicator. *See generally United States v. Wallcon, LLC*, 21 OCAHO no. 1630, 3-5 (2025) (discussing OCAHO's consideration of such requests).

Parties wishing to raise arguments in OCAHO proceedings sounding in constitutional law should be aware of both the expectations and limitations of OCAHO's consideration of such arguments. *See generally United States v. ABS Staffing Sols., LLC*, 21 OCAHO no. 1632, 7-17 (2025). Parties should also be aware that such arguments may be waived or forfeited if not timely raised. *See id*. at 16-17.

3. OCAHO does not have authority to appoint counsel. 28 C.F.R. § 68.34. Unrepresented parties are encouraged to seek and obtain representation and, if appropriate, to avail themselves of available pro bono resources. Private parties may be represented by an attorney who is a member in good standing of the bar of the highest court of any state, the District of Columbia, or any territory or commonwealth of the United States. 28 C.F.R. § 68.33(c)(1). Attorneys must file a Notice of Appearance as required by 28 C.F.R. § 68.33(f). In limited circumstances subject to the requirements of 28 C.F.R. § 68.33(c)(2), private parties may be represented by law students. Private parties may also be represented by certain non-attorney representatives in appropriate

circumstances, in accordance with the requirements in 28 C.F.R. § 68.33(c)(3). Non-attorney representatives who wish to appear before the ALJ on behalf of a party must seek approval from the ALJ pursuant to 28 C.F.R. § 68.33(c)(3). Private parties may also represent themselves and should file a Notice of Appearance in accordance with 28 C.F.R. § 68.33(f) if they do so.

4. The Respondent has the right to file an answer to the complaint. The answer (and two copies) must be filed within thirty (30) days after receipt of the attached complaint by either Respondent or its attorney (or representative) of record. 28 C.F.R. §§ 68.3(b), 68.9. The answer is considered filed on the date when OCAHO receives the filing. 28 C.F.R. § 68.8(b). If the Respondent fails to file an answer within the time provided, the Respondent may be deemed to have waived its right to appear and contest the allegations of the complaint, and the ALJ may enter a judgment by default along with any and all appropriate relief. 28 C.F.R. § 68.9(b).

5. All documents filed by either party must be filed as follows:

(i) The Department of Homeland Security, the Department of Justice, and all attorneys and authorized representatives must electronically file all documents with OCAHO through OCAHO's electronic filing application. *See* Office of the Chief Administrative Hearing Officer Electronic Filing, 91 Fed. Reg. at 9,996. OCAHO's electronic filing application can be accessed at the following location: https://ocaho.eoir.justice.gov/.

(ii) Unrepresented (or "pro se") complainants and respondents may either: (a) file documents electronically through OCAHO's electronic filing application; or (b) file documents by sending an original and two copies of the document to the ALJ at the address provided on the attached Service List. If an unrepresented complainant or respondent chooses to use OCAHO's electronic filing application for a case, the individual must electronically file all documents through OCAHO's electronic filing application for the duration of the case, unless the presiding ALJ or CAHO directs otherwise. *See id.*

6. All documents filed with OCAHO must be served on all other parties of record in the case and must include a certificate of service indicating the manner and date of service of the documents on all other parties. Service must be accomplished in one of the following ways, depending upon whether all parties in the case are using OCAHO's electronic filing application:

(i) If all parties of record in this case are using OCAHO's electronic filing application, the OCAHO electronic filing application will effectuate service by providing a notification of all electronically filed documents on all parties to the case by email. The filing party must include a certificate of service stating that all parties are using OCAHO's electronic filing application and, therefore, no separate service was completed. *See id.*

(ii) If one or more parties of record in this case are not using OCAHO's electronic filing application (or when the electronic filing application is unavailable), parties must serve a copy of all documents filed with OCAHO on all parties of record either:

- by personal delivery;
- by mailing a copy to the last known address of the party or representative; or
- by email, if the party being served has consented to receive electronic service of documents.

The filing party must include a certificate of service that specifies the date and manner of service on the other party or parties. When a party is represented by an attorney, service must be made upon the attorney. *See id.*

7. Procedures for conducting discovery are governed by OCAHO rules and applicable case law. *See generally* 28 C.F.R. §§ 68.18–68.23. The parties should not initiate discovery until the presiding ALJ has set a discovery schedule or otherwise authorized the start of discovery. *See Ferrero v. Databricks*, 18 OCAHO no. 1505, 4-8 (2023). Should either party believe it is necessary to begin discovery prior to that time, it may seek leave from the presiding ALJ to do so through the filing of a motion. *See id*.

8. OCAHO operates a Settlement Officer Program, which is a voluntary program through which the parties can use a settlement officer to mediate settlement negotiations as a means of alternative dispute resolution. The settlement officer may convene and oversee settlement conferences and negotiations, may confer with the parties jointly and/or individually, and will seek voluntary resolution of issues. The parties may request that the presiding ALJ refer the case to a settlement officer at any time while proceedings are pending, up to thirty days before the date scheduled for a hearing in the matter. More information about the Settlement Officer Program can be found in the OCAHO Practice Manual: https://www.justice.gov/eoir/policy-manual-eoir/part-IV/ocaho/chapter-4-7.

9. Should the ALJ determine that a hearing is required, the Respondent would have the right to appear in person and give testimony at the place and time fixed for the hearing. 28 C.F.R. § 68.39. The hearing shall be held at the nearest practicable place to the place where the Respondent resides or the place where the alleged violation occurred. *See* 8 U.S.C. § 1324a(e)(3)(B); 28 C.F.R. § 68.5(b). Due regard shall also be given to the convenience and necessity of the parties or their representatives in selecting a time and place for the hearing. *See* 5 U.S.C. § 554(b).

10. All parties in OCAHO proceedings are expected to act with integrity and in an ethical manner and shall conform their conduct to the Standards of Conduct. 28 C.F.R. § 68.35. Consistent with this expectation, parties and attorneys appearing before OCAHO who elect to use technological tools such as generative artificial intelligence (AI) in preparing their filings should be mindful of the ethical and professional responsibility implications of using such tools. *See generally Wallcon*, 21 OCAHO no. 1630, at 9-14 (discussing ethical and professional considerations regarding the use of generative AI in OCAHO proceedings). The presiding ALJ may also provide further direction regarding the use of generative AI in individual cases. *See id*. at 14 n.10.

To that end, as a matter of course while preparing this Notice of Case Assignment, the undersigned reviewed both the complaint itself and the documents attached thereto, including the Notice of Intent to Fine and the Respondent's request for hearing. That review revealed numerous troubling errors in the citations to OCAHO case law that were included in the Respondent's request for hearing. In its request for hearing, Respondent cited nineteen times to purported OCAHO cases, asserting that those cases substantiated various arguments made by the Respondent. However, of those nineteen citations, none of the cited cases both (1) exists exactly as cited[3] <u>and</u> (2) substantiates the proposition for which it is cited. In other words, not a single one of the citations in the request for hearing is entirely accurate.

In a small number of instances, the cases cited by the Respondent appear to exist and at least arguably substantiate the proposition for which they are cited, but the citations contain some

[3] Meaning that the case name, volume and publication number, and year of decision were all correctly reported by the Respondent.

sort of error (such as an incorrect volume number, publication number, and/or year of decision).[4] In a vacuum, it would be possible to believe that these relatively minor mistakes were mere typos. However, more troublingly, in several other instances, the cases exist exactly as cited by the Respondent, but do not appear to substantiate the propositions for which they were cited.[5] In other instances, the cases cited match the name of a published OCAHO decision, but the citations do not include the correct volume, publication number, and/or year of those decisions, and neither the decision at the cited publication number nor the decision in the case of that same name appears to substantiate the proposition for which the case is cited.[6] And, perhaps most troublingly, a handful of the citations to OCAHO case law in the Respondent's request for hearing appear to have been fabricated out of whole cloth. In other words, for this final group of citations, not only do the publication numbers provided not match the case names provided, but also no cases by that name

[4] For example, the Respondent cites to "United States v. Pegasus Restaurant, 10 OCAHO no. 1143 (2010)" as an example of a case in which "OCAHO considered inability to pay" in assessing a civil penalty. There is indeed an OCAHO published decision titled *United States v. Pegasus Restaurant, Inc.*, that can be found at 10 OCAHO no. 1143. Moreover, the ALJ in that case did consider the respondent's ability to pay the penalty in that case, as asserted by the Respondent. However, that decision was issued in the year 2012, not in 2010 as represented by the Respondent in its citation in the request for hearing.

[5] For example, the Respondent cites to "United States v. WSC Plumbing, Inc., 9 OCAHO no. 1061 (2000)" for the following proposition, which it quotes as follows (thereby asserting that the cited decision repeats this language verbatim): "Minor or technical violations cannot support penalties unless ICE first provides the required opportunity to cure." There is indeed an OCAHO published decision titled *United States v. WSC Plumbing, Inc.*, that can be found at 9 OCAHO no. 1061 and was issued in the year 2000. The bare citation is, therefore, technically correct. However, the quoted language that Respondent attributed to that decision in its request for hearing does not appear anywhere in the cited decision, nor can the undersigned find any language in that decision that is closely related to the quoted language. Indeed, *WSC Plumbing* does not appear to plausibly stand for any proposition similar to that asserted by the Respondent.

[6] For example, the Respondent cites to "United States v. Liberty Packaging, Inc., 14 OCAHO no. 1351 (2019)" as an example of a case where the ALJ substantially reduced the penalty where the record reflected good faith compliance efforts by the respondent. For starters, there is an OCAHO published decision titled *United States v. Liberty Packaging, Inc.* However, that decision appears at 11 OCAHO no. 1245 (not 14 OCAHO no. 1351), and was issued in 2015 (not 2019). The case that appears at 14 OCAHO no. 1351 is titled *Brooks v. Anthem, Inc.*, and was issued in 2020 (not 2019). Neither *United States v. Liberty Packaging, Inc.*, 11 OCAHO no. 1245 (2015), nor *Brooks v. Anthem, Inc.*, 14 OCAHO no. 1351 (2020), substantiates the proposition for which the Respondent attempted to cite it. *Brooks v. Anthem, Inc.*, 14 OCAHO no. 1351, is a case arising under 8 U.S.C. § 1324b (unlike this case, which arises under 8 U.S.C. § 1324a), and did not discuss penalties at all. In *United States v. Liberty Packaging, Inc.*, the ALJ expressly found that the respondent in that case "did not act in good faith," 11 OCAHO no. 1245, at 10, and therefore the case cannot suffice as an example where the record reflected good faith compliance efforts by the respondent (as asserted by the Respondent in its request for hearing).

could be located in the entire library of OCAHO published decisions across the office's nearly forty-year history.[7]

These problematic citations to OCAHO cases in the Respondent's request for hearing bear many of the hallmarks of "hallucinated" legal authorities that are often produced by generative AI. *See, e.g.*, *Wallcon*, 21 OCAHO no. 1630, at 11-12 (discussing the issue of "hallucinated" legal materials produced by generative AI). Anticipating this issue eventually making its way into OCAHO proceedings, the CAHO first issued guidance to parties before OCAHO on the potential issues related to the use of generative AI in OCAHO proceedings in *United States v. Wallcon, LLC*, 21 OCAHO no. 1630 (2025). In *Wallcon*, the CAHO cautioned that "generative AI tools have been shown to 'hallucinate' certain legal materials or conclusions, including citations to non-existent cases or other authorities." *Id.* at 11. The CAHO also pointed out that submission of such "hallucinated" or otherwise false authorities "inflicts severe damage upon multiple levels of any judicial or adjudicatory system[.]" *Id.*; *see also Mata v. Avianca, Inc.*, 678 F. Supp. 3d 443, 448-49 (S.D.N.Y. 2023) (explaining the different types of harms flowing from submission of fake authorities).

Accordingly, the CAHO advised that all parties and attorneys appearing before OCAHO "should take care to confirm the accuracy of any citations or other research or drafting conducted using such tools," and noted that "[p]arties and attorneys are responsible for all filings they submit to OCAHO," and could be sanctioned for failing to adhere to the standards of conduct in OCAHO

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[7] In perhaps the most egregious example, the Respondent's request for hearing cites "United States v. Todd's Rods, 13 OCAHO no. 1353 (2020)" in support of the proposition that good faith compliance by the employer warranted a steep reduction in the civil penalty. For starters, there is no 13 OCAHO no. 1353 – Volume 13 of OCAHO's published decisions ends with *United States v. Visiontron Corp.*, 13 OCAHO no. 1348 (2020). There is a 14 OCAHO no. 1353, but it is a case titled *Patel v. USCIS Boston* that does not discuss good faith or civil penalties at all. *See Patel v. USCIS Boston*, 14 OCAHO no. 1353 (2020). Moreover, after a thorough search of OCAHO's published decisions on the Department of Justice website and commercial legal research databases, it appears that OCAHO has never published a decision titled "United States v. Todd's Rods" in its history.

proceedings.[8] *Wallcon*, 21 OCAHO no. 1630, at 12-13. The CAHO concluded his discussion by stating that, "although OCAHO neither imposes a blanket prohibition on the use of generative AI nor a mandatory disclosure requirement regarding its use, OCAHO nevertheless expects all parties to take their ethical responsibilities seriously and to comport themselves with integrity and adherence to relevant standards of professional conduct, including when they rely on the use of generative AI." *Id.* at 14.[9]

Since that general guidance, further guidance has followed from both OCAHO specifically and EOIR generally. First, in a series of published decisions in 2025, an OCAHO ALJ issued an escalating series and warnings and sanctions to a pro se party whose filings included citations to non-existent or inapposite legal authorities. In *Obembe v. Droisys, Inc.*, in an order issued in response to a motion from the complainant, the ALJ noted the complainant's citation to a regulation that did not exist and to two other authorities that were not relevant to the complainant's argument. 22 OCAHO no. 1675a, 2-3 (2025). The ALJ placed the complainant on notice that sanctions might apply should similar conduct persist. *Id.* at 3 n.3. Shortly after the ALJ issued this order, the complainant in that case filed another motion with the ALJ, citing five total legal authorities; as the ALJ observed, all five citations either did not exist or did not substantiate the propositions for which they were cited. *See Obembe v. Droisys, Inc.*, 22 OCAHO no. 1675b, 2 (2025). The ALJ discussed potential sanctions for the complainant's violation of the ALJ's

[8] Although much of the discussion in *Wallcon* focused specifically on the ethical obligations of attorneys with respect to use of generative AI, the standards of conduct in OCAHO proceedings apply to "[a]ll persons appearing in proceedings" before an OCAHO ALJ. 28 C.F.R. § 68.35(a). Accordingly, while additional standards of professional responsibility may apply to attorneys generally, all parties appearing before OCAHO (both attorneys and non-attorneys) may be subject to sanctions for, among other things, "refusal to comply with directions," "refusal to adhere to reasonable standards of orderly and ethical conduct," and "failure to act in good faith[.]" 28 C.F.R. § 68.35(b).

[9] The CAHO also noted that nothing in that notice prohibited an ALJ "from imposing his or her own requirements related to the use of generative AI in individual cases[.]" *Id.* at 14 n.10. Similarly, nothing in this notice should be construed as limiting the ALJ's authority to address potential use of generative AI in further filings before her in this case.

previous order not to submit inaccurate law or facts and determined that the harshest available sanction (a decision against the complainant) was appropriate based on "the egregious nature . . . of the misrepresentations" in the complainant's filing. *Id.* at 2-3. However, prior to dismissal of the complaint, the ALJ provided the complainant an opportunity to show good cause as to why her complaint should not be dismissed. *Id.* at 3.

In response to the order to show cause, the complainant in that matter admitted that the improper citations were the result of her reliance on AI tools, further explaining that she did not have access to commercial legal research tools to verify citations. *See Obembe v. Droisys, Inc.*, 22 OCAHO no. 1675c, 3 (2025). Notwithstanding these explanations, the ALJ found that "[r]eliance on generative AI without regard to its accuracy is not good cause for misrepresenting caselaw and/or regulation," nor did lack of access to commercial legal research tools constitute good cause for such errors. *Id.* at 4. As a result of the complainant's failure to show good cause for the "egregious" misrepresentations in her previous filings, the ALJ dismissed the complaint with prejudice, in part "[t]o deter such conduct in the future[.]" *Id.* at 5.

Shortly after these decisions were issued, EOIR's then-Acting Director issued PM 25-40, *Use of Generative Artificial Intelligence in EOIR Proceedings*, available at https://www.justice.gov/eoir/media/1410621/dl?inline. EOIR Policy Mem. 25-40 (Aug. 8, 2025). Consistent with OCAHO's guidance in *Wallcon*, PM 25-40 stressed the expectation that all practitioners appearing before EOIR's adjudicatory components (including OCAHO) act in a professional and ethical manner in accordance with applicable standards of professional conduct, and cautioned practitioners that "submitting hallucinated or erroneous AI-generated content in filings before EOIR [would] likely violate professional conduct obligations[.]" *Id.* at 2-3.

As the above guidance makes clear, there may be serious consequences for pro se parties, attorneys, and other representatives appearing before OCAHO who submit filings containing citations to erroneous or non-existent legal authorities, including when those authorities are generated by AI. *See Wallcon*, 21 OCAHO no. 1630, at 13 (referencing potential sanctions); *Obembe*, 22 OCAHO no. 1675c, at 2-5 (dismissing a complaint with prejudice where the pro se complainant submitted false citations produced by generative AI). All parties, whether represented by an attorney or proceeding pro se, are responsible for the contents of their filings and have a responsibility to verify that the authorities they are citing both exist and substantiate the propositions for which they are cited. *See Wallcon*, 21 OCAHO no. 1630, at 12-13.

At this early stage of the litigation, with only the complaint and its attachments (as filed by the Complainant) in the record, I cannot (and do not) draw any factual conclusions as to how the erroneous citations discussed above made their way into the Respondent's request for hearing.[10] I also acknowledge that the Respondent's request for hearing was not submitted to OCAHO directly by the Respondent; rather, the Respondent submitted the request for hearing to DHS, and DHS attached a copy of that request for hearing to the complaint in this matter (as they must in accordance with 28 C.F.R. § 68.7(c)). Moreover, although the name of the individual who signed the Respondent's request for hearing (and thus presumably prepared it) is not entirely legible, that name does not appear to match the name of the individual identified by the Complainant as the Respondent's attorney in this proceeding.[11] It is therefore possible that this request for hearing was

[10] To be clear, the submission of erroneous or non-existent legal authorities is problematic regardless of whether those fictitious legal authorities are produced by generative AI or by any other cause (such as simple carelessness or lack of due diligence in checking citations). Parties may be subject to sanctions for submission of false authorities regardless of the source of those false authorities.

[11] The Complainant did not include the name of the Respondent's apparent counsel on either the complaint itself or on the Notice of Intent to Fine or request for hearing documents submitted with the complaint. Rather, the Complainant appears to have simply entered the name and contact information for the Respondent's apparent attorney on the appropriate screen in the OCAHO electronic filing application. While this is minimally sufficient to alert OCAHO to

prepared and submitted to DHS by a non-attorney on behalf of the Respondent, while the Respondent has since secured counsel to represent them in these proceedings. Accordingly, even assuming arguendo that I could impose any sanctions based on those errors at this time,[12] I would likely decline to do so. The presiding ALJ may, in her discretion, address these issues further in the proceedings before her as necessary and appropriate.

Nevertheless, both parties and their representatives are strongly cautioned to confirm the accuracy and relevance of all citations in documents submitted to OCAHO in this case, regardless of whether the party or representative uses generative AI when drafting these documents. Submission of erroneous or non-existent legal authorities in filings before the ALJ (or, if the case is under administrative review, the CAHO) may warrant sanctions up to and including exclusion of a party or representative, *see* 28 C.F.R. § 68.35(b), and dismissal of the complaint or the Respondent's request for hearing, *see Obembe*, 22 OCAHO no. 1675c, at 5.

Notice Given By:

Elizabeth Vayo
Deputy Chief Administrative
Hearing Officer
5107 Leesburg Pike, Suite 2500
Falls Church, VA 22041

Attachments

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the potential presence of a counsel representing the Respondent, the better practice would be for the Complainant to identify the Respondent's counsel somewhere on the complaint document itself. *Cf.* 28 C.F.R. § 68.7(b)(2) (providing that complaints must include "[t]he names and addresses of the respondents, agents, and/or their representatives who have been alleged to have committed the violation"). Moreover, if the individual identified by the Complainant as the Respondent's attorney does indeed intend to represent the Respondent in this matter, the Respondent's attorney must file a notice of appearance. *See* 28 C.F.R. § 68.33(f).

[12] *See* 28 C.F.R. § 68.11(a) (authorizing the CAHO "to act on non-adjudicatory matters relating to a proceeding prior to the appointment of an [ALJ]"); *Wangperawong v. Meta Platforms, Inc.*, 20 OCAHO no. 1613, 7-8 (2024) (discussing the type of non-adjudicatory matters that the CAHO might be able to address prior to the assignment of an ALJ).