



PROJECT FIREWALL

Critical Information for Recruiters Under Pressure

! Are You Being Pressured to Violate Immigration Laws?

If your hiring managers or executives are directing you to bypass qualified American candidates or manipulate the hiring process to favor foreign workers on temporary visas, you are at serious personal and professional risk. Project Firewall changes everything about immigration enforcement, and ignorance is not a defense.

Critical Facts You Must Know

Project Firewall targets individual employees, not just companies

Recruiters face criminal liability, fines, and career destruction

Investigations use ALL your digital communications as evidence

Whistleblower protections exist - you have legal options NOW

What is Project Firewall?

Project Firewall is the Department of Labor's most aggressive immigration enforcement initiative in history. Launched in 2025, it represents a fundamental shift in how the government investigates and prosecutes work visa violations across all temporary worker programs.

Key features that make this unprecedented:

- **Secretary-level involvement:** For the first time ever, the Secretary of Labor personally certifies investigations
- **Multi-agency task force:** DOL, DOJ, EEOC, and USCIS share data and coordinate prosecutions
- **Individual accountability focus:** Investigations specifically target employees who facilitate violations
- **Enhanced penalties:** Debarment from all work visa programs, massive fines, and criminal referrals
- **"Full force" mandate:** Explicitly stated goal to use maximum federal enforcement power

Why Recruiters Are at Risk

As a recruiter, you are often the person who executes hiring decisions. This makes you a primary target in investigations because you:

- Create and post job descriptions
- Screen and evaluate candidates
- Document hiring decisions
- Communicate with candidates about rejections
- Maintain hiring records and correspondence



Personal Consequences You Face

- **Criminal liability:** Visa fraud is a federal crime with potential jail time
- **Civil penalties:** Personal fines separate from company penalties
- **Career destruction:** Public naming in investigations ends recruiting careers
- **Professional licenses:** SHRM, HRCI certifications can be revoked
- **Blacklisting:** Other employers won't hire recruiters involved in visa fraud
- **Personal bankruptcy:** Legal defense costs often exceed \$100,000

Red Flags: When You're Being Asked to Break the Law

Recognize these illegal directives from management:

- **"Tailor the requirements"** - Creating job posts that only H-1B candidates can meet
- **"We need someone who can start immediately"** - Code for excluding Americans who need notice periods or targeting visa holders already in-country
- **"Find issues with local candidates"** - Manufacturing reasons to reject qualified Americans
- **"Post it but keep it quiet"** - Using obscure job boards to avoid American applicants
- **"Document their communication issues"** - Creating pretextual rejection reasons
- **"We already have someone in mind"** - Running sham searches for predetermined visa holders
- **"Adjust the salary range lower"** - Making positions unattractive to American workers

What Investigators Look For

Project Firewall investigators use sophisticated data analysis to identify patterns. They specifically examine:

Digital Evidence They Collect

- **Email communications:** All messages discussing candidates and hiring decisions
- **Applicant tracking systems:** Full audit trails of every candidate interaction
- **Calendar entries:** Meetings about "visa strategy" or "workforce planning"
- **Slack/Teams messages:** Informal communications often contain smoking guns
- **Document revisions:** They can see how job posts were modified over time
- **LinkedIn activity:** Whether you actually searched for American candidates

Statistical Red Flags That Trigger Investigations

- 100% foreign worker hire rate for positions requiring "communication skills"
- American candidates rejected at higher rates than foreign nationals
- Positions reposted multiple times with changing requirements
- Salary offerings below market rate for the geographic area
- Pattern of positions filled by visa holders from single staffing companies

✓ How to Protect Yourself NOW

- **Document everything:** BCC your personal email on questionable directives
- **Create contemporaneous notes:** Write detailed notes after each pressure conversation
- **Request written confirmation:** "Can you please email me these hiring criteria?"
- **Know whistleblower laws:** You have protection under multiple federal statutes
- **Consult an attorney:** Many offer free consultations for whistleblower cases
- **Consider recording:** Check your state's laws on recording conversations
- **Build external evidence:** Forward concerning documents to personal email (legally)

Your Legal Rights and Protections

Federal Whistleblower Protection: You cannot be fired, demoted, or harassed for:

- Refusing to participate in illegal hiring practices
- Reporting violations to federal agencies
- Cooperating with investigations
- Consulting with an attorney about potential violations

Potential Rewards: Whistleblowers may be eligible for:

- Percentage of recovered penalties (can be substantial)
- Protection from retaliation lawsuits
- Qui tam actions under the False Claims Act
- Immigration-related whistleblower rewards

Report Violations or Get Help

DOL Wage and Hour Division: 1-866-4-US-WAGE (487-9243)

DOJ Civil Rights Division: 1-800-255-7688 | civilrights.justice.gov

EEOC Discrimination Hotline: 1-800-669-4000

USCIS Fraud Detection: uscis.gov/report-fraud | 1-800-375-5283

All agencies accept anonymous reports and have secure online portals

What to Do Right Now

1. **Audit your recent hires:** Review if any suspicious patterns exist
2. **Secure evidence:** Safely store emails and documents showing pressure
3. **Know your exposure:** Consider how many questionable hires you've processed
4. **Get legal advice:** Employment attorneys often provide free whistleblower consultations
5. **Make a decision:** Continue risking your career or protect yourself by acting now

***Disclaimer:** This document is independently researched and represents a reformulation of publicly available information from government sources including the Department of Labor, Department of Justice, EEOC, and USCIS. This is not an official government publication.*

Remember: When investigations begin, it's too late to protect yourself. The government will have all your emails, messages, and documents. Acting now—while you still have options—is your only protection.