EXHIBIT 6

FILED UNDER SEAL
Controlled Application Review and Resolution Program (CARRP)

CARRP Overview Lecture

National Security and Public Safety Division

Updated December 2017
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- Date of last revision: December 2017
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Module 3: CARRP Overview

- Build a common vocabulary for discussing CARRP cases.
- Understand USCIS policies impacting CARRP cases.
- Learn the four phases of the CARRP process.
- Characterize the discrete elements of an NS concern.
- Understand FDNS DS documentation requirements for CARRP cases.
- Distinguish CARRP from other USCIS policies.
- Discuss what CARRP is not.
- Be able to have a deconfliction conversation.
Application Exercise 3.1
“Vocabulary Bingo”
Identify Terms of Reference

CARRP Terms (Volume I):

- Controlled Application Review and Resolution Program (CARRP).
- National Security (NS) Concern.
- Known or Suspected Terrorist (KST).
- Non-Known or Suspected Terrorist (Non-KST).
- Non-KST NS Confirmed.
- Non-KST NS Not Confirmed.
CARRP Terms, Vol. I

CARRP: Controlled Application Review and Resolution Program

- The USCIS policy for identifying and processing cases with potential national security (NS) concerns.
CARRP Terms, Vol. I

National Security (NS) Concern

- Exists when an individual or organization has been determined to have an articulable link to prior, current or planned involvement in, or association with, an activity, individual or organization described in 212(a)(3)(A), (B), or (F), 237(a)(4)(A) or (B) of the Immigration and Nationality Act (INA).

- This determination requires that the case be handled in accordance with CARRP policy.
CARRP Terms, Vol. I

Individual / Organization + Connection to + NS ground from INA =

National Security Concern

Handled under CARRP
# National Security Grounds

<table>
<thead>
<tr>
<th>Area of National Security Concern Include:</th>
<th>Section of the INA</th>
</tr>
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<tbody>
<tr>
<td>Espionage</td>
<td>§212(a)(3)(A), and §237(a)(4)(A)</td>
</tr>
<tr>
<td>Sabotage</td>
<td>§212(a)(3)(B), and §237(a)(4)(B)</td>
</tr>
<tr>
<td>Exporting sensitive goods, technology, or information, or any other kind of</td>
<td></td>
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<tr>
<td>criminal behavior that endangers the National Security of the U.S.</td>
<td></td>
</tr>
<tr>
<td>Overthrowing the U.S. government by force or violence</td>
<td></td>
</tr>
<tr>
<td>Hijacking or sabotaging transportation</td>
<td></td>
</tr>
<tr>
<td>Hostage-taking</td>
<td></td>
</tr>
<tr>
<td>Attack or assassination of any government official (U.S. or any other government)</td>
<td></td>
</tr>
<tr>
<td>Using biological, chemical, or nuclear weapons</td>
<td></td>
</tr>
<tr>
<td>Using other weapons to harm people or cause damage (other than for personal</td>
<td></td>
</tr>
<tr>
<td>monetary gain)</td>
<td></td>
</tr>
<tr>
<td>Persons or groups the Secretaries of State and/or Homeland Security have found</td>
<td>§212(a)(3)(B), (a)(3)(F), and §237(a)(4)(B)</td>
</tr>
<tr>
<td>to be engaged in terrorist activity or associated with a terrorist organization.</td>
<td></td>
</tr>
</tbody>
</table>
Application Exercise 3.2
“Open Source Fact Patterns”
Known or Suspected Terrorist (KST):

- KST is a category of individuals who have been nominated and accepted for placement in the Terrorist Screening Database (TSDB) – this is the terrorist watchlist.

- AND have a specially coded lookout posted in the TECS and/or the Consular Lookout Automated Support System (CLASS), as used by the Department of State.
CARRP Terms, Vol. I

Non-Known or Suspected Terrorist (Non-KST) NS Concern

- Is a category of the remaining cases with NS concerns, regardless of source, including but not limited to associates of KST(s), unindicted co-conspirators, terrorist organization members, persons involved with providing material support to terrorists or terrorist organizations, and agents of foreign governments.

- Individuals and organizations who fall into the Non-KST category may also pose a serious threat to national security.
Non-KST NS Concern - Confirmed

- There is a nexus to a national security ground, and a clear link exists between the individual or organization and the national security ground
- Articulable Link = NS Confirmed
CARRP Terms, Vol. I

Non-KST NS Concern – Not Confirmed

- There is a nexus to a national security ground, but there is **not** a clear link between the individual or organization and the national security ground
- Indicators of connection = NS Not Confirmed
Identify Terms of Reference

CARRP Terms (Volume II):

- Screening
- Systems Checks
- Security Checks
- Vetting
- Deconfliction
- Designated Officer
CARRP Terms, Vol. II

Screening

• Systematic examination or assessment, done especially to detect a potential threat or risk.

• May include background checks based on biographic or biometric information.

• May also include physical searches or examinations.
CARRP Terms, Vol. II

Systems Checks

- A query of any system of record to determine if the system holds information related to the subject.

- Can include:
  - CLAIMS 3
  - CIS
  - FDNS-DS
  - TECS
CARRP Terms, Vol. II

Security Checks

• A type of systems check using a system that may contain security related information.

• Security checks may include:
  • FBI Fingerprint Check or Name Check
  • TECS / NCIC
  • Automated Biometrics Identification System (IDENT)
CARRP Terms, Vol. II

Vetting

- A review of all the information uncovered about an individual.

- Sources of information can include:
  - Systems checks
  - Interviews
  - Open source information
  - Conversations with record owners

- You can vet an individual or a discrete piece of information
**CARRP Terms, Vol. II**

**Deconfliction**

- The coordination between USCIS and other governmental agencies who own NS information (record owners).

- The goal is to ensure that planned adjudicative activities do not compromise or impede an ongoing investigation or other record owner interest.
CARRP Terms, Vol. II

Designated Officer

- An officer identified by local management to be trained, competent and knowledgeable in CARRP procedures.

- “Designated officers” may be:
  - Fraud Detection and National Security - Immigration Officer (FDNS-IO);
  - CARRP trained Immigration Services Officer (CARRP-ISO);
  - Supervisory Immigration Services Officer (SISO);
  - FDNS-Supervisory Immigration Officer (FDNS-SIO);
  - Field Office Director (FOD); or,
  - CARRP trained Refugee and Asylum Officers.
Identify Terms of Reference

CARRP Terms (Volume III):

- Indicator
- Confirm [with Terrorist Screening Center]
- Resolved
- U.S. Person (USP)
- NS CME
- POAF
CARRP Terms, Vol. III

Indicator

Synonymous with “fact” or “evidence”

- e.g. “We have indicators of a potential NS concern” can also be stated “we have evidence of a potential NS concern.”

- e.g. indicator in the sentence “Travel pattern is one potential indicator that could be used to identify a concern” could be replaced by fact to read “Travel pattern is one potential fact that could be used to identify a concern.”
Confirm [with TSC]

Synonymous with “verify”

- e.g. “When encountering a [LE] record, you must contact the TSC to confirm the record” is the same as “When encountering a [LE] record, you must contact the TSC to verify that the individual is a match to the database.”
**Resolved**

Synonymous with “overcome”

- e.g. “We **resolved** the NS concern” is clearer when you think of it as “We **overcame** the NS concern.”

- e.g. “This non-KST was closed as **resolved**” can be restated as “The facts underlying the initial non-KST determination were **overcome** by new evidence acquired during vetting. The individual is no longer a non-KST.”
CARRP Terms, Vol. III

U.S. Person (USP) § 120.15 U.S. **person**.

- **U.S. person** means a **person** who is a U.S. citizen, lawful permanent resident or who is a protected individual as defined by U.S.C. 1324b(a)(3). It also means a U.S. corporation or business entity.

- LPR and USC terminology is utilized differently in parts of the U.S. government.

- So... if you are contacted and asked if someone is a USP and (the requestor has a need to know), provide the immigration status only, and leave the USP determination to the requesting entity.
A look At the Evolution of CARRP POLICY
CARRP Policy

- “Policy for Vetting and Adjudicating Cases with National Security Concerns,” Signed April 11, 2008
  - Established KST vs. Non-KST categories
  - Decentralized non-KST processing to the field
  - Defined CARRP terms (“deconfliction,” “external vetting,” etc.)
  - Described the 4 stages of CARRP

- “Clarification and Delineation of Vetting and Adjudication Responsibilities for Controlled Application Review and Resolution Program (CARRP) Cases in Domestic Field Offices,” Signed June 5, 2009
  - Identified the roles of “designated officers” in CARRP
  - Outlined the actions and FDNS-DS documentation responsibilities within each role
CARRP Policy

• “Revision of Responsibilities for CARRP Cases Involving Known or Suspected Terrorists,” Signed July 26, 2011
  - Revised the 2008 memo to allow the field to perform external vetting of KST cases without a requirement to consult HQ FDNS

• “Updated Instructions for Handling LE Records,” Signed May 23, 2012

**CARRP Policy**

**Trends in CARRP Policy: 2008 - Present**

- **Discussion:** Which forms are subject to CARRP?
  - EB5 forms were specifically included in 2012, but other forms types are still unclear. **ALL FORMS ARE SUBJECT TO CARRP (at least stage 1).**
  - CARRP should apply equally to all types of work in all directorates

- **Myth:** Are KSTs inherently “riskier” then non-KST NS Concerns?
  - Current policy requires D2 concurrence to approve a KST, but only local senior official concurrence to approve a non-KST
  - Greater experience in watchlisting policy suggests that some non-KSTs are every bit as important to identify and work
  - There is no such thing as “CARRP Lite”
CARRP Policy

Trends in CARRP Policy: 2008 - Present

• Decentralization
  – Shift towards greater resources being devoted to officers working cases in the field
  – First non-KST work decentralized away from HQ in 2008, then KST work followed in 2011

• Flexibility & Clarity vs. Uniformity
  – Future policy will need to consolidate previous memorandum
  – Going forward, CARRP must promote component guidance to address specific operational issues in each directorate
  – Future policy must also increase clarity while allowing CARRP to remain flexible and responsive
CARRP Process: The 4 Stages

External Vetting Activities:
- Liaison with partner agencies
- Following up with partner agencies

CARRP Adjudication Activities:
- Make a decision on the benefit
- Obtain necessary concurrence from local leadership, HQ component leadership, or the Senior Leadership Review Board
- Determine what other information is needed

Deconfliction: Can happen within each phase multiple times

Conducted by field or HQFDNS depending on type of NS concern
Actions, Roles & FDNS-DS

For every CARRP stage, consider:

- **WHAT** is being done?
  - i.e., vetting, adjudication, eligibility

- **WHO** is doing it?
  - i.e., CARRP ISO, FDNS IO, Asylum Officer, Field Office Director

- **HOW** is it being documented?
  - i.e., Activities Tab, Special Actions Tab, Deconflictions Tab
Application Exercise 3.7
“CARRP Process Timeline”
Core Concepts Outline:

- Benefits of CARRP
- TRIG and CARRP
- How CARRP ends
- Deconfliction
- FDNS-DS
- What CARRP is not
Core Concept: Benefits of CARRP

Two Major Benefits to CARRP:

#1 – It provides additional resources to work a national security case

#2 – It results in highly detailed, consistent documentation

Studies in National Security:
Core Concept: CARRP and TRIG

TRIG is an inadmissibility

CARRP
INA § 212(a)(3)(a), (b) & (f)

TRIG and CARRP

TRIG
INA § 212(a)(3)(b)

CARRP is a national security process

CARRP and TRIG overlap in certain INA grounds, but differ in what constitutes a “connection”
### Core Concept: CARRP and TRIG

Vetting can ride together when a TRIG exemption is being considered:

<table>
<thead>
<tr>
<th>TRIG – no exemption available</th>
<th>TRIG – exemption available, will not be granted</th>
<th>TRIG – exemption available will be granted</th>
<th>No TRIG issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>Handle under CARRP</td>
<td>Handle under CARRP</td>
<td>Is there any other nexus to national security?</td>
<td>Is there any other nexus to national security?</td>
</tr>
</tbody>
</table>

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Core Concept: How CARRP Ends

CARRP with a defined end = A two part process of inquiry

1. Is the NS concern **Resolved** or **Unresolved**?
2. Is the case eligible to be approved/granted or denied/referred?

<table>
<thead>
<tr>
<th>National Security Issue</th>
<th>Adjudicative Decision</th>
</tr>
</thead>
<tbody>
<tr>
<td>NS Concern Resolved</td>
<td>Eligible for benefit</td>
</tr>
<tr>
<td></td>
<td>Approval of benefit</td>
</tr>
<tr>
<td>NS Concern Unresolved</td>
<td>Ineligible for benefit</td>
</tr>
<tr>
<td></td>
<td>Denial of benefit</td>
</tr>
<tr>
<td></td>
<td>Requires senior official or SLRB concurrence</td>
</tr>
<tr>
<td></td>
<td>Denial of benefit</td>
</tr>
</tbody>
</table>
Core Concept: What CARRP Is Not

“covert agency program”

“potentially endless delays”

“a civil rights violation”

“Immigration authorities are instructed to follow the FBI direction as to whether deny, approve or hold in abeyance”

“Recruitment tool for the FBI”

“AUTOMATIC DESIGNATION EVEN FOR ROUTINE TRAVEL SUCH AS A FAMILY VISIT”
Core Concept: Deconfliction

Identifying NS Concern

Internal Vetting/Eligibility Assessment

Conducted by Field or HQFDNS depending on type of NS Concern

External Vetting

CARRP Adjudication

Deconfliction
Can happen within each phase multiple times
Core Concept: Deconfliction

**What** is deconfliction?
- An outward-facing process for sharing what USCIS knows
- A *conversation* between USCIS and an owner of NS information.
- *Coordination* between two agencies of the USG.
- An opportunity to *educate* about USCIS.

**When** do you deconflict?
- During any stage of CARRP.
- In response to a variety of case activities:
  - Prior to issuing an RFE or NOID.
  - Prior to conducting a site visit or interview.
  - Prior to a decision on the case (approval OR denial).
  - If USCIS receives additional information from other sources.
Core Concept: Deconfliction

- **Who** are you deconflicting with?
  - External law enforcement partners
  - Record owners
  - Case agents

- **Why** deconflict?
  - Ensure that record owner is aware that the individual has a benefit pending with USCIS.
  - Ensure that planned adjudicative activities do not compromise or impede an ongoing investigation or other record owner interest.
Core Concept: Deconfliction

• **Where** can you perform deconfliction?
  – Unclassified phone / email
  – Classified phone / email
  – In person, including JTTF

• **How** do law enforcement agencies benefit from deconfliction?
  – Deconfliction does not only help USCIS.
  – Benefits to other agencies may include:
    • Information from A-files
    • Ability to submit interview questions (must be pertinent to the benefit application)
    • Requests for evidence
    • Abeyance
Core Concept: Deconfliction

- Deconfliction is **not** USCIS asking permission to do something
- Deconfliction is **not** USCIS seeking concurrence with our decisions
- Deconfliction is **not** an opportunity for LEAs to critique USCIS adjudications
- Deconfliction is **not** asking what an LEA thinks about our activities
The Deconfliction Conversation

Step 1: Introduce yourself and your agency.

Step 2: Provide the record owner with the case number, TECS ID number, or any other identifying information you have regarding their case.

Step 3: Find out whether case is still open.

Step 4: Indicate what applications or petitions the subject has pending with USCIS.

Step 5: Indicate what possible action you are going to take with the case.

Step 6: Ask whether action will impede their investigation.
Deconfliction Sample 1

SA Johnson,
Deconfliction Sample 2

Dear SA Smith,

Thank you,

LE
Deconfliction Sample 3

Record owner,

Thank you,

LE
FDNS-DS

Documenting A CARRP Case
Documenting NS Concerns

For every action in CARRP, there is an equal and corresponding documentation in FDNS-DS.
Documenting NS Concerns
Documenting NS Concerns

NS Concerns CME

- CME = Case Management Entity
- A CME is the creation of a record in DS
- “NS Concerns” is one of the six categories of CME’s in FDNS DS
- An NS CME is the starting point for documenting all NS concerns in FDNS-DS
- The NS CME is a person centric outline of your CARRP case
Documenting NS Concerns

FDNS-DS Screen Tabs

•

•

•
Documenting NS Concerns

The NS Concerns Tab
Documenting NS Concerns

NS Concern CME Naming Convention:

NS – Janice SMITH
NS – Jim OCONNOR
NS – Ahmed AL RAIMY
NS – Jorge RAMOS RIVERA
Documenting NS Concerns

Building a CME:

LE
Handout:
Cheat-Sheet for Creating
a new NS CME
Core Concept: FDNS-DS

Entering Deconfliction:

LE
Application Exercise 3.8
“Deconfliction Sub-Tab”
Module 3 Wrap-up

Module Goals

✓ Building a common vocabulary for discussing CARRP cases.

✓ Understanding USCIS policy for handling CARRP cases.

✓ Identification of the personnel involved in the CARRP process.

✓ Learning about the four phases of the CARRP process.

✓ Characterizing the discreet elements of an NS concern.

✓ Having a deconfliction conversation.
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