EXHIBIT 14

FILED UNDER SEAL
### Identifying a National Security (NS) Concern

As a result of the security checks or at any stage during the adjudicative process, the officer may identify one or more indicators that may raise a NS concern. In such cases, the officer must first confirm whether the indicator(s) relates to the applicant, petitioner, beneficiary, or derivative (“the individual”). When a Non-KST NS indicator has been identified, the officer must analyze the indicator and determine whether an articulable link exists between the individual and an activity, individual, or organization described in sections 212(a)(3)(A), (B), or (F), or 237 (A) or (B) of the Immigration and Naturalization Act (“the Act”). A KST NS concern must be confirmed via a TECS/IBIS check. If confirmed, the officer must contact the Terrorist Screening Center in order to determine whether the KST NS concern relates to the individual. (CARRP Policy Memorandum, p. 4).

### Assessing Eligibility in Cases with a NS Concern

If it is determined that a NS concern exists, the officer must conduct a thorough review of the record associated with the application or petition to determine if the individual is eligible for the benefit sought. The officer must also conduct internal vetting to obtain any relevant information to support adjudication and, in some cases, to further examine the nature of the NS concern. (CARRP Policy Memorandum, p. 4).

### External Vetting

#### Non-KST Cases:
If an application or petition appears to be otherwise approvable, and internal vetting is complete; there is an identified record owner in possession of NS information; and the NS concern remains, then the officer must initiate the external vetting process (Non-KST cases only) before the case may proceed to final adjudication. (CARRP Policy Memorandum, p. 5).

#### KST Cases:
Field officers are not authorized to conduct external vetting with record owners in possession of NS information. If the application/petition is otherwise approvable for KST cases, HQFDNS must conduct external vetting of KST concerns. (CARRP Policy Memorandum, p. 5).

### CARRP Adjudication

Upon completion of required vetting, if the NS concern remains, the officer must evaluate the result of the vetting and determine any relevance to adjudication, obtain any additional relevant information, and determine eligibility for the benefit sought. Adjudication of a case with a NS concern focuses on thoroughly identifying and documenting the facts behind an eligibility determination, and, when appropriate, removal, rescission, termination, or revocation under the Act. (CARRP Policy Memorandum, p. 6).
The Background Check and Adjudicative Assessment (BCAA) is used to document NS concerns and track actions taken on applications or petitions where such concerns exist. [Specific guidance on the use of this worksheet is available in each component's operational guidance.] The BCAA is also used as a record to assist data entry into the Fraud Detection and National Security Data System (FDNS-DS). Component guidance will outline when a case must be entered into FDNS-DS.

USCIS will complete the BCAA and coordinate with FDNS for entry into FDNS-DS for the following cases:

- all KST cases, regardless of the decision on the underlying application/petition;
- cases where a NS concern has been confirmed and the application/petition is recommended for approval (except for cases receiving a 212(d)(3)(B)(i) terrorist activity exemption and for which no other national security concerns exist); and
- to the extent required by operational guidance, cases where a national security concern has been confirmed and the application/petition is denied.

Source: BCAA Guidance and Instructions
High Level CARRP KST Workflow

- IDENTIFYING NS CONCERN
- INTERNAL VETTING/ELIGIBILITY ASSESSMENT
- EXTERNAL VETTING
- CARRP ADJUDICATION

Based on: CARRP Memo on 4/11/08 and DOMOPS Op Guidance 4/25/08
Mid Level CARRP KST Workflow

FIELD

TECS/IBIS Check Results in KST Hit

Confirm Match with TSC

Identified NIS Concern

Supervisor Review

Yes

Internal Vetting/ Eligibility Assessment Considering all denial grounds

No, NNS

Routine Adjudication

No

Does KST Concern Remain?

Yes

NSAU

Adjudicative Assistance Eligibility Review Assistance Declassification Use of Classified

No

BCAU

Vetting Assistance KST-External Vetting

NSAU

Grounds for Denial Identified?

Yes

Collaborative Decision Between Field & HQFDNS

No

Field HQ

If Necessary

Request Assistance with Declassification or Use of Classified from HQFDNS

If It Still Cannot Be Denied

Agency Management Review

Non-KST NIS Concern Remains

No, NNS

Non-KST CARRP Process

Routine Adjudication

Deconflict Deny/Abey

Non-KST CARRP Process

Routine Adjudication

Deconflict Deny/Abey

Based on: CARRP Memo on 4/11/08 and DOMOPS Op Guidance 4/25/08

Note: At any time, customer service can occur between the Field and HQFDNS.

Note: At any time, the TECS/IBIS KST lookout is removed, the case will be designated NNS and released to routine adjudication.

BCAU- Background Check Analysis Unit
KST- Known or Suspected Terrorist
NIS- Non-National Security
NNS- Non-National Security
NS- National Security
NSAU- National Security Advisory Unit
TSC- Terrorist Screening Center

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Low Level CARRP KST Workflow: Identifying NS Concern

Based on: CARRP Memo on 4/11/08 and DOMOPS Op Guidance 4/25/08

Note: At any time, a NS Concern can be designated NNS and released to routine adjudication. Also at any time, a supervisor review can return a NS Concern or NS Case to an earlier stage in the CARRP process.

1. An IBIS Resolution Memo is produced at this point.
2. All references to denying a case also encompass the possibility of referring an asylum case to an Immigration Judge. (CARRP Memo, p. 9)
3. Coordinate NTA with ICE if individual is amenable to removal and present in the US.
4. Refer to DOMOPS Ops Guidance for a full review of all security checks which can be conducted.

Field - The Field refers to Field Offices, Service Centers, and the National Benefits Center.

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Low Level CARRP KST Workflow: Internal Vetting/Eligibility Assessment

Based on: CARRP Memo on 4/11/08 and DOMOPS Op Guidance 4/25/08

1. Forward file after confirming subject remains on the Terrorist Watch List, documenting all adjudicative actions in FDNS-DS, and attaching completed BCAA to FDNS-DS record. As digitization occurs, files may not be physically moved up to HQFDNS, but will be digitally transferred. Refer to DOMOPS Ops Guidance for information concerning when vetting assistance may be requested from HQFDNS.

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Low Level CARRP KST Workflow: External Vetting

Based on: CARRP Memo on 4/11/08 and DOMOPS Op Guidance 4/25/08

BCAU Actions

- Vetting Assistance
- BCAU Statement of Findings
- BCAU Actions

Tearline to NSAU if It Can't be Considered or If Tearline is Incomplete/Inconclusive

National Security Branch Management Review

Field HQ & HQFDNS

Collaborative Decision Between Field HQ & HQFDNS

Request for Declassification or Use of Classified

Agency Management Review

No NSAU Actions

- Adjudicative Assistance
- Eligibility Review Assistance
- Declassification
- Use of Classified

Yes

Return to Field/ CARRP Adjudication

1. HQFDNS will notify the Field of the results and what denial grounds have been identified via FDNS-OS, email, or STE/STU-Ill.
2. Only returned to the Field if the LE hit has been removed.

Note: Per DOMOPS Ops Guidance, the designated CARRP officer must notify HQFDNS whenever new factors arise that may affect the application/petition if case is at HQFDNS.
Low Level CARRP KST Workflow: CARRP Adjudication

Based on: CARRP Memo on 4/11/08 and DOMOPS Op Guidance 4/25/08

FIELD

Return to Field/CARRP Adjudication

CARRP Adjudication

Review Assessment Received From HQFDNS

Adjudicate Further, If Necessary

May Involve

RFE, Site Visit or Interview

Eligible for Benefit?

No

Deconflict

Supervisor Review

Abey

Deny

Coordinate Notice to Appear (NTA) with ICE

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High Level CARRP Non-KST Workflow

1. IDENTIFYING NS CONCERN
2. INTERNAL VETTING/ELIGIBILITY ASSESSMENT
3. EXTERNAL VETTING
4. CARRP ADJUDICATION

Based on: CARRP Memo on 4/11/08 and DOMOPS Op Guidance 4/25/08

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Mid Level CARRP Non-KST Workflow

**FIELD**

- Identified NS Concern
  - Confirm NS Concern According to Op Guidance
    - No, NNS
    - Routine Adjudication
      - Eligible for Benefit?
        - Yes
        - External Vetting
          - Does Non-KST Remain?
            - Yes
              - External Vetting
                - NS Concern Remains & Eligible for Benefits Sought
                  - Senior Official Requests External Vetting Assistance
            - No
              - Supervisory Review
                - Routine Adjudication
                  - Eligible for Benefit?
                    - Yes
                      - Supervisory Review
                        - Senior Official Concur
                          - NS Concern Remains & Eligible for Benefits
                            - Deconflict Deny/Abey
                          - Not Eligible for Benefits
                            - Deconflict Deny/Abey
                    - No
                      - Deconflict Deny/Abey

  - Supervisor Review
    - Routine Adjudication
      - Eligible for Benefit?
        - Yes
          - Supervisory Review
            - Senior Official Concur
              - NS Concern Remains & Eligible for Benefits
                - Deconflict Deny/Abey
              - Not Eligible for Benefits
                - Deconflict Deny/Abey
        - No
          - Deconflict Deny/Abey

  - Deconflict Deny/Abey

**BCAU** - Background Check Analysis Unit

**KST** - Known or Suspected Terrorist

**NNS** - Non-National Security

**NS** - National Security

**NSAU** - National Security Advisory Unit

**HQFDNS**

- National Security Branch
  - Customer Service

**NSAU**

- Adjudicative Assistance
  - Eligibility Review
    - Assistance
      - Declassification
        - Use of Classified
          - Supervisory Senior Official
            - Review Concur
              - Not Eligible NS Concern Remains & No Eligible for Benefits
                - Deconflict Deconflict
              - Not Eligible NS Concern Remains & Eligible for Benefits
                - Deconflict Grant/Abey
            - Not Eligible
              - Deconflict Grant/Abey

**CARRP**

- Adjudication
  - No, NNS
    - Routine Adjudication
      - Eligible for Benefit?
        - Yes
          - Supervisor Review
            - Senior Official Concur
              - Not Eligible NS Concern Remains & Eligible for Benefits
                - Deconflict Deconflict
              - Not Eligible NS Concern Remains & No Eligible for Benefits
                - Deconflict Deconflict
            - Not Eligible
              - Deconflict Grant/Abey
        - No
          - Supervisory Review
            - Senior Official Concur
              - Not Eligible NS Concern Remains & Eligible for Benefits
                - Deconflict Deconflict
              - Not Eligible NS Concern Remains & No Eligible for Benefits
                - Deconflict Deconflict
            - Not Eligible
              - Deconflict Grant/Abey

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Low Level CARRP Non-KST Workflow: Identifying NS Concern

Based on: CARRP Memo on 4/11/08 and DOMOPS Op Guidance 4/25/08

1. A Non-KST may arise as a result of a security check or at any stage of the adjudicative process. (DOM OPS Ops Guidance, p. 9)
2. Identifiers- Refer to p. 10 of DOMOPS Ops Guidance.
3. An IBIS Resolution Memo is produced at this point.
4. Update FDNS-DS will information.

Attachment A: “Guidance for Identifying National Security Concerns” from DOMOPS Ops Guidance
Field: The Field refers to Field Offices, Service Centers, and the National Benefits Center (p. 4)
Low Level CARRP Non-KST Workflow: Internal Vetting/Eligibility Assessment

Based on: CARRP Memo on 4/11/08 and DOMOPS Op Guidance 4/25/08

1. All references to denying a case also encompass the possibility of referring an asylum case to an Immigration Judge. (CARRP Memo, p. 5)
2. Coordinate NTA with ICE if individual is amenable to removal and present in the US.

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Low Level CARRP Non-KST Workflow: External Vetting

Based on: CARRP Memo on 4/11/08 and DOMOPS Op Guidance 4/25/08

Field

- **External Vetting Stage**
  - Determine Nature and Extent of Non-KST NS Concern & Identify Information Relevant to Adjudication

- **Evaluate External Vetting Results/Adj Rev**

- **CARRP Adjudication**

- **Contact and Coordinate with LEA/Record Owner to Obtain Relevant Info**

LEA - Law Enforcement Agency

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Low Level CARRP Non-KST Workflow:
CARRP Adjudication Part I

Based on: CARRP Memo on 4/11/08
and DOMOPS Op Guidance 4/25/08

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Low Level CARRP Non-KST Workflow: CARRP Adjudication Part II

Based on: CARRP Memo on 4/11/08 and DOMOPS Op Guidance 4/25/08

1. HQFDNS will notify the Field of results via FDNS-DS, email, or STE/STU-III.

BCAU- Background Check Analysis Unit
NSAU- National Security Advisory Unit
Field HQ- HQ Office of Field Operations (OFO) or HQ Service Operations (SCOPS) (p. 29 DOMOPS Ops Guidance)

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