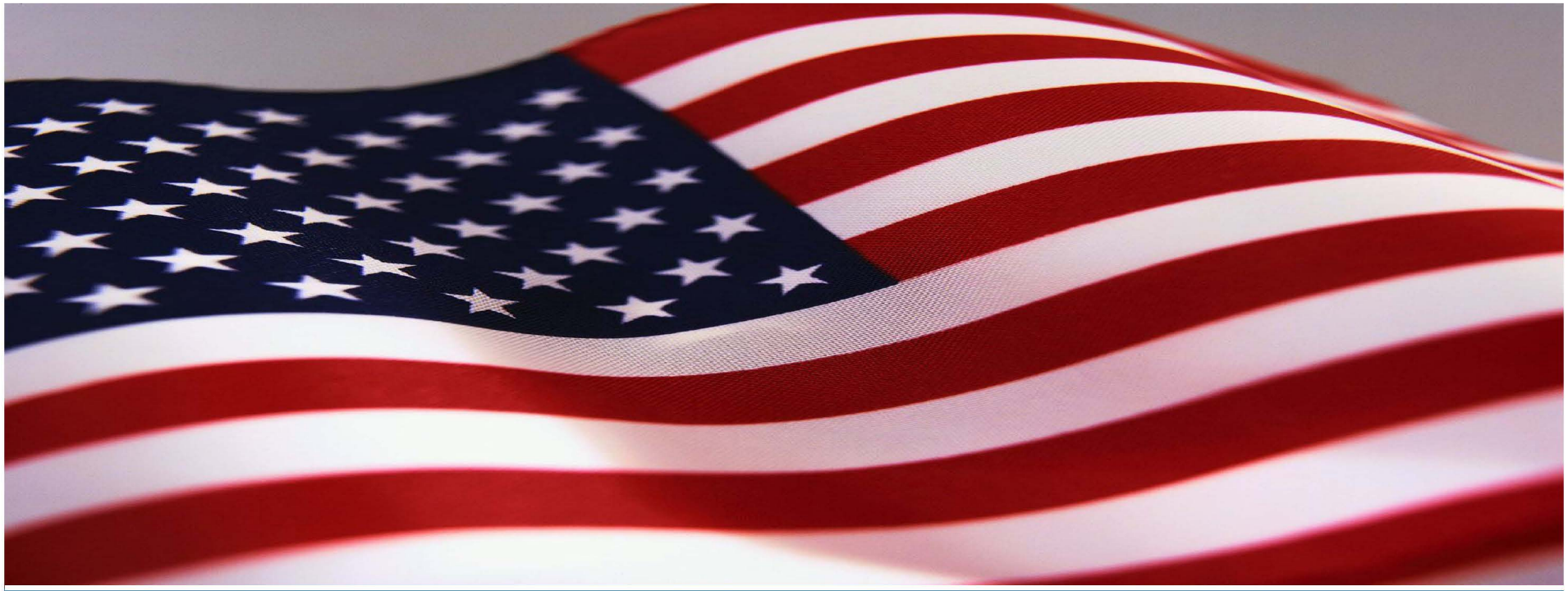
EXHIBIT 14

~~FILED UNDER SEAL~~



USCIS Domestic Operations Directorate (DOMOPS) CARRP Workflows

U.S. Citizenship and Immigration Services

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U.S. Citizenship and Immigration Services

Controlled Application Review and Resolution Program (CARRP) Summary

FIELD	
IDENTIFYING A NATIONAL SECURITY (NS) CONCERN	**Identifying a 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).

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

FIELD	
INTERNAL VETTING/ ELIGIBILITY ASSESSMENT	**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).

FIELD-NON-KST OR HQFDNS-KST	
EXTERNAL VETTING	**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. 6).

FIELD	
CARRP ADJUDICATION	**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).

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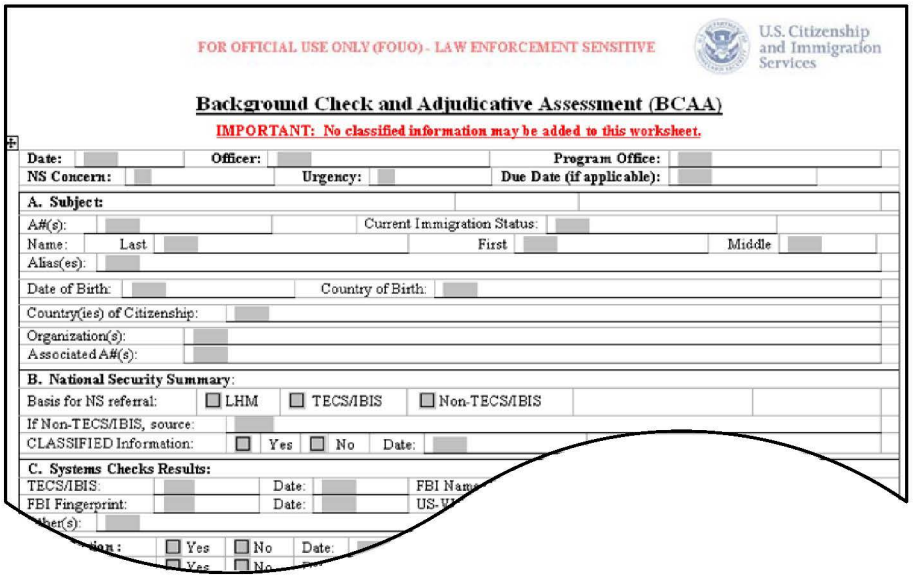
U.S. Citizenship and Immigration Services — Background Check and Adjudicative Assessment (BCAA)



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U.S. Citizenship and Immigration Services

Background Check and Adjudicative Assessment (BCAA)

IMPORTANT: No classified information may be added to this worksheet.

Date:	Officer:	Program Office:
NS Concern:	Urgency:	Due Date (if applicable):

A. Subject:

A#(s):		Current Immigration Status:	
Name: Last		First	Middle
Alias(es):			
Date of Birth:		Country of Birth:	
Country(ies) of Citizenship:			
Organization(s):			
Associated A#(s):			

B. National Security Summary:

Basis for NS referral:	☐ LHM	☐ TECS/IBIS	☐ Non-TECS/IBIS	
If Non-TECS/IBIS, source:				
CLASSIFIED Information:	☐ Yes	☐ No	Date:	

C. Systems Checks Results:

TECS/IBIS:	Date:	FBI Name	
FBI Fingerprint:	Date:	US-VI	
ber(s):			
ion:	☐ Yes ☐ No	Date:	
	☐ Yes ☐ No		

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

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

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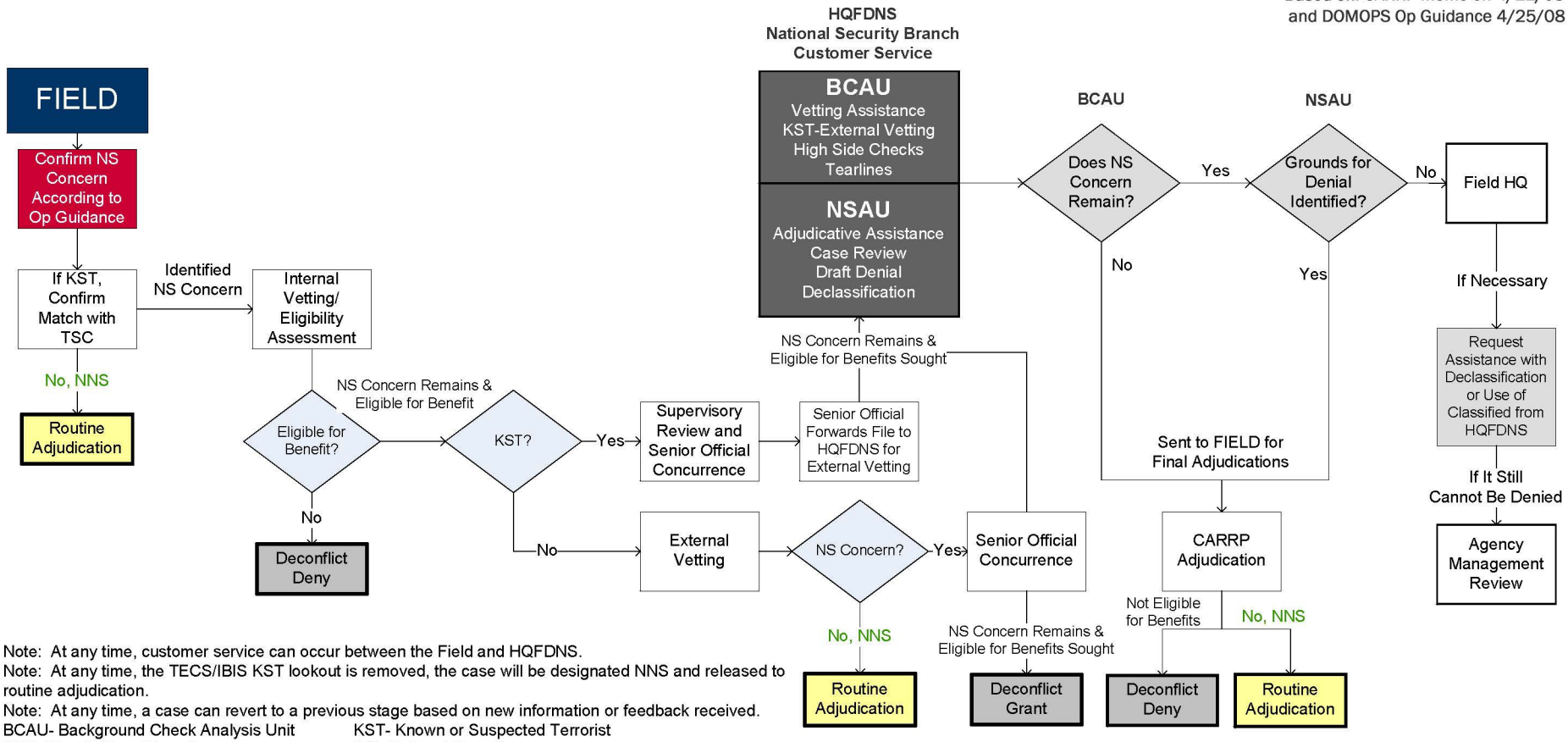
U.S. Citizenship and Immigration Services

CARRP Workflow Overview

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.
Note: At any time, a case can revert to a previous stage based on new information or feedback received.

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

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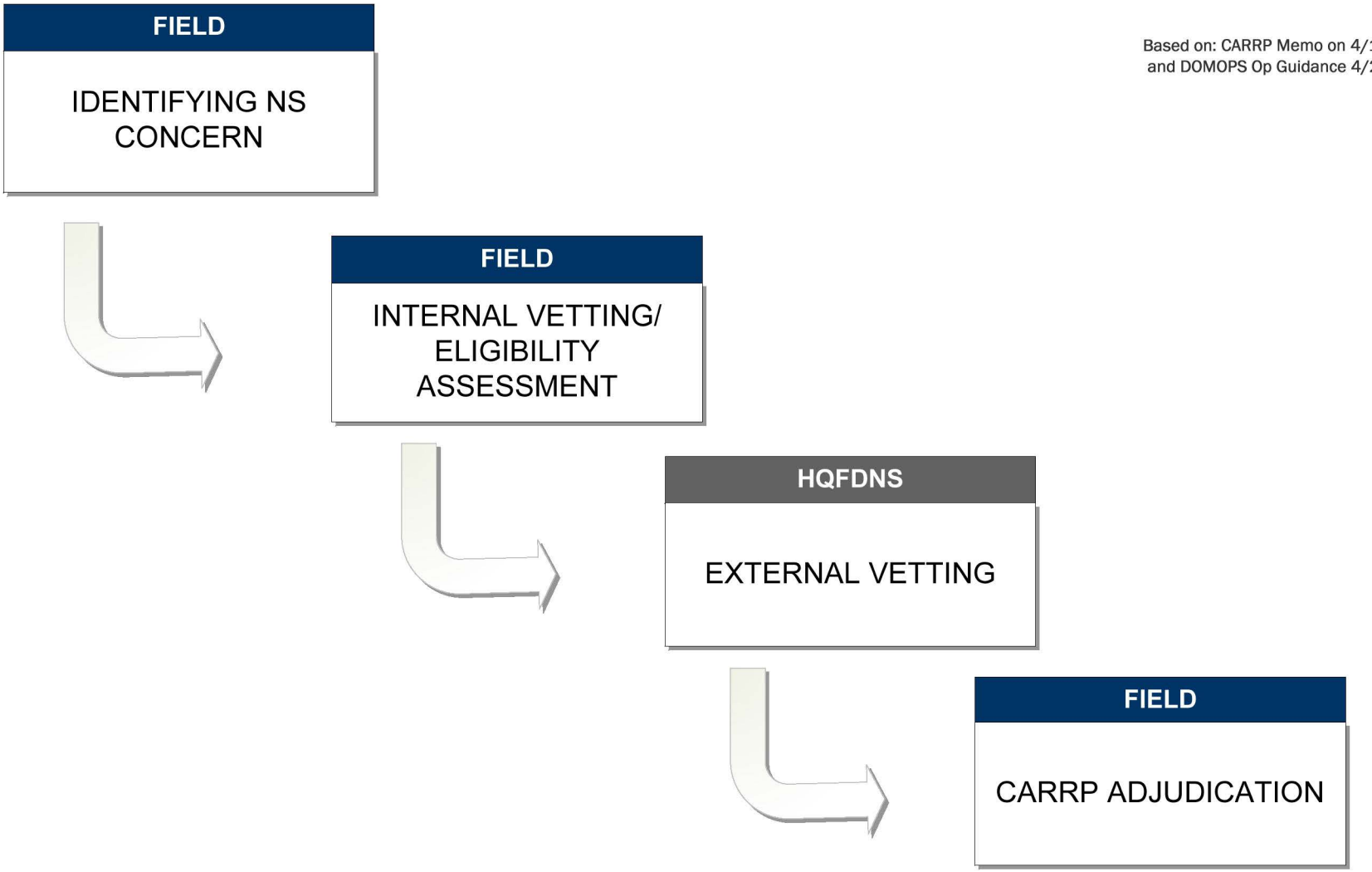
U.S. Citizenship and Immigration Services

High Level CARRP KST Workflow

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



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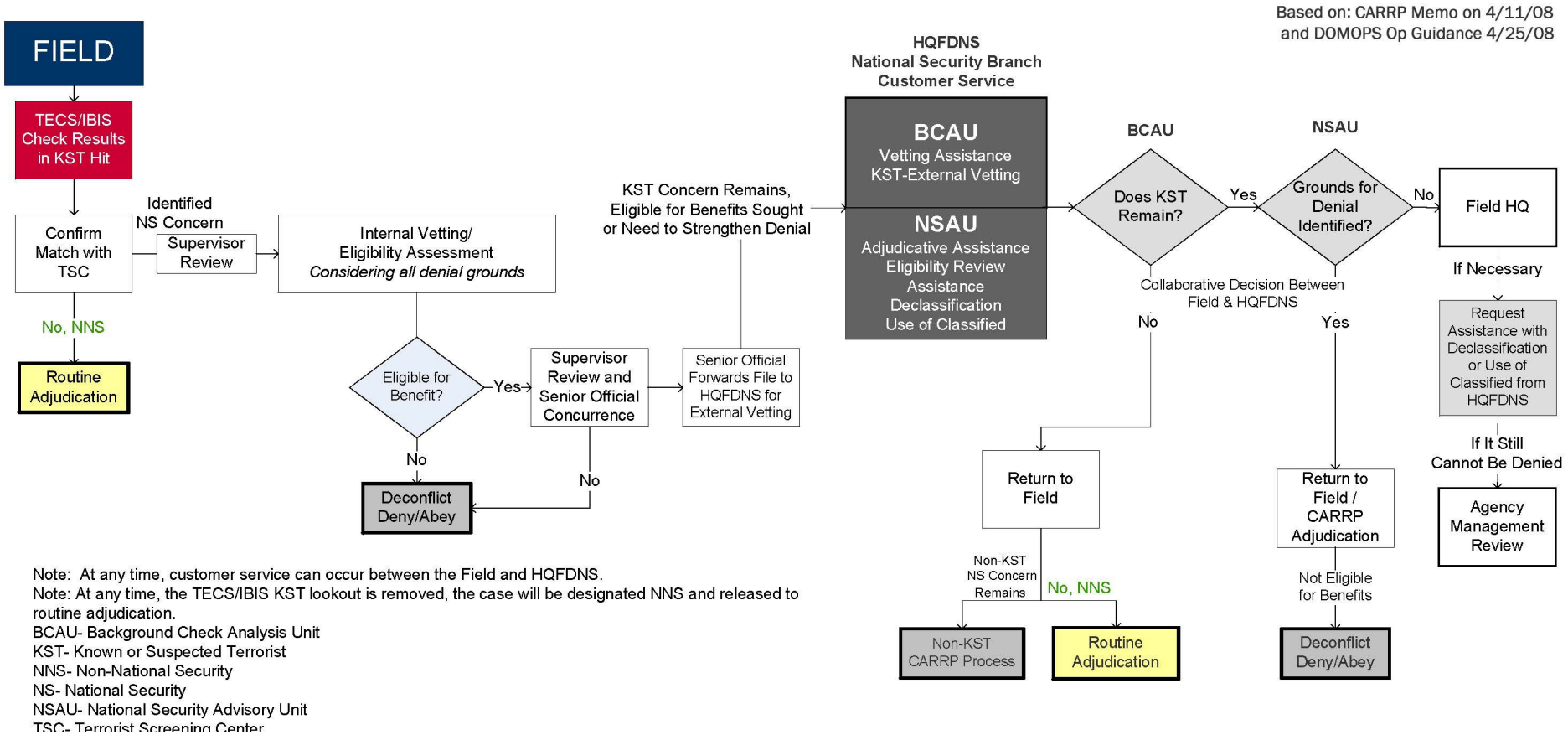
Mid Level CARRP KST Workflow



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
NNS- Non-National Security
NS- National Security
NSAU- National Security Advisory Unit
TSC- Terrorist Screening Center

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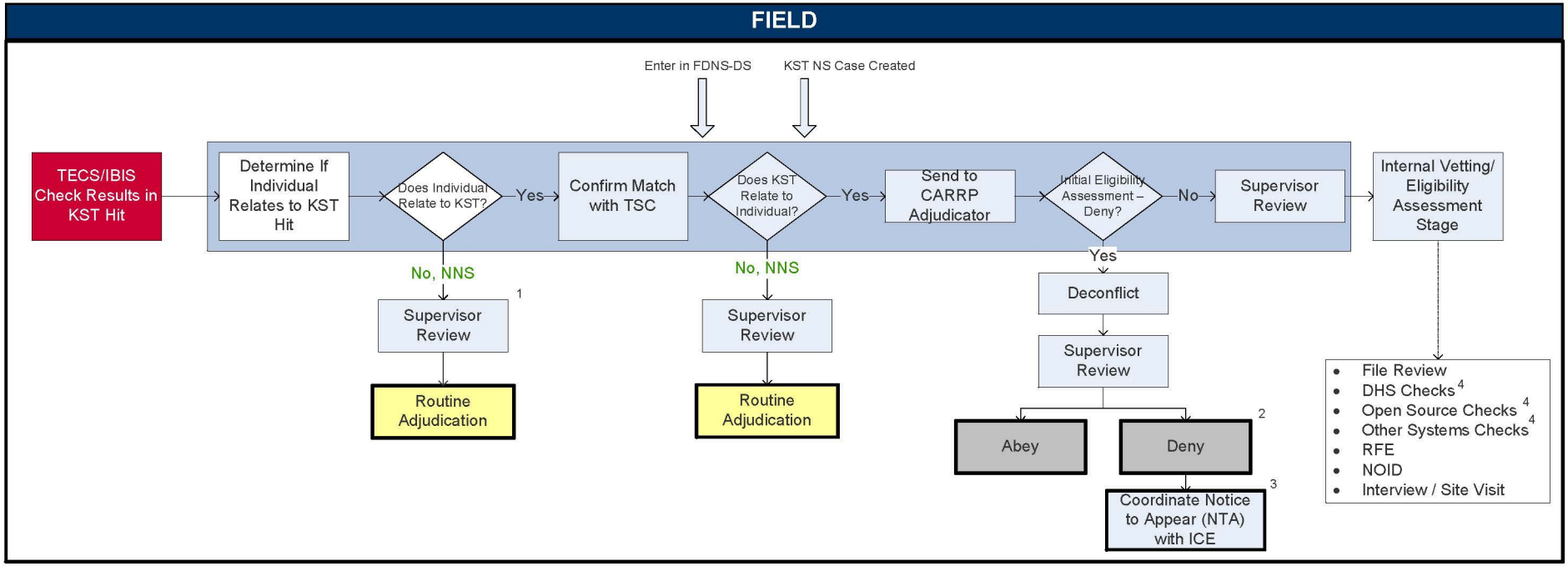
U.S. Citizenship and Immigration Services

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. 5)
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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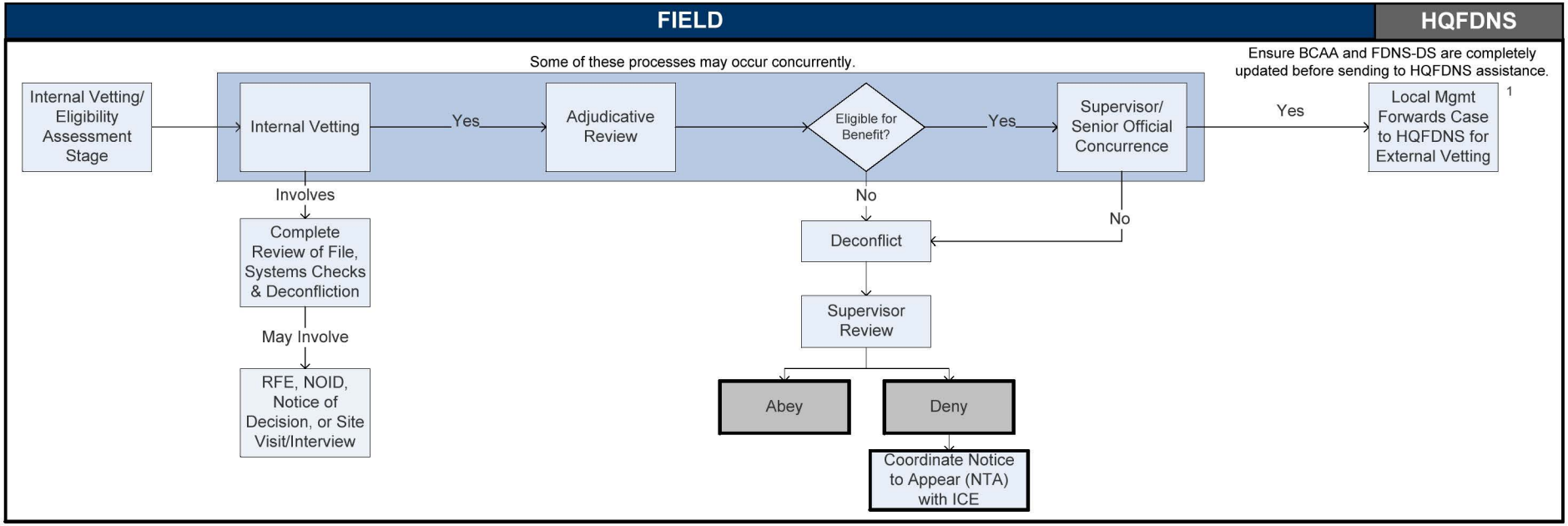
U.S. Citizenship and Immigration Services

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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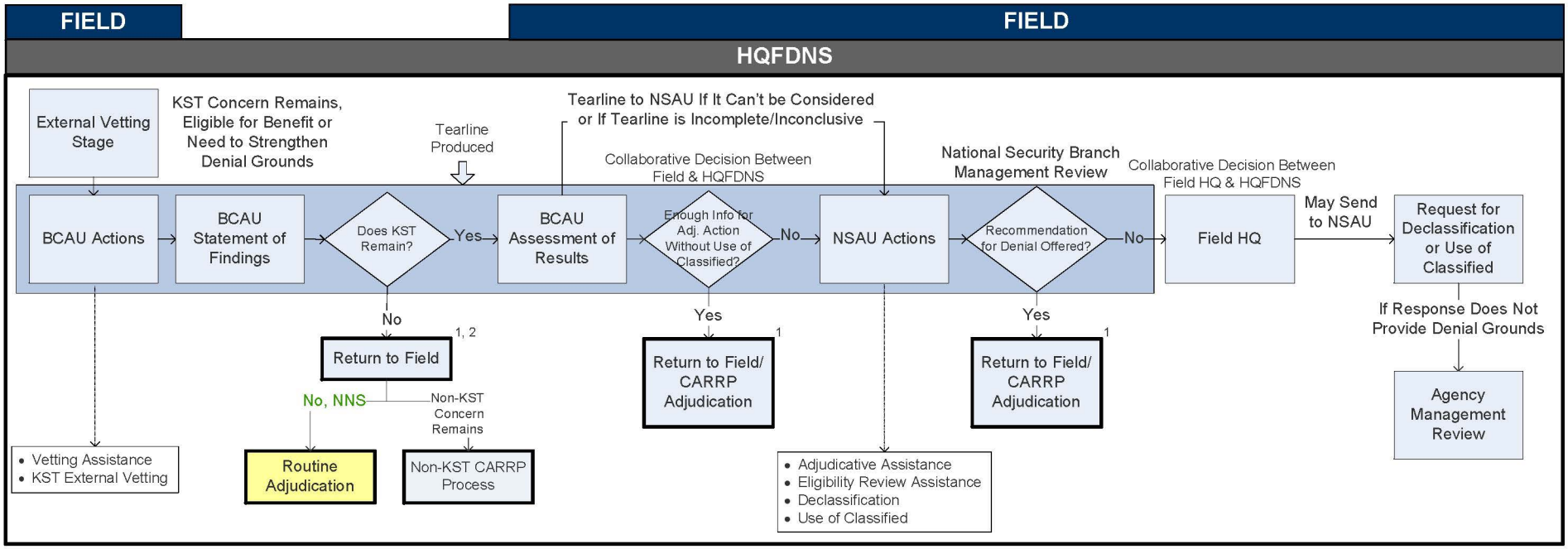
Low Level CARRP KST Workflow: External Vetting

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



1. HQFDNS will notify the Field of the results and what denial grounds have been identified via FDNS-DS, email, or STE/STU-III.
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.

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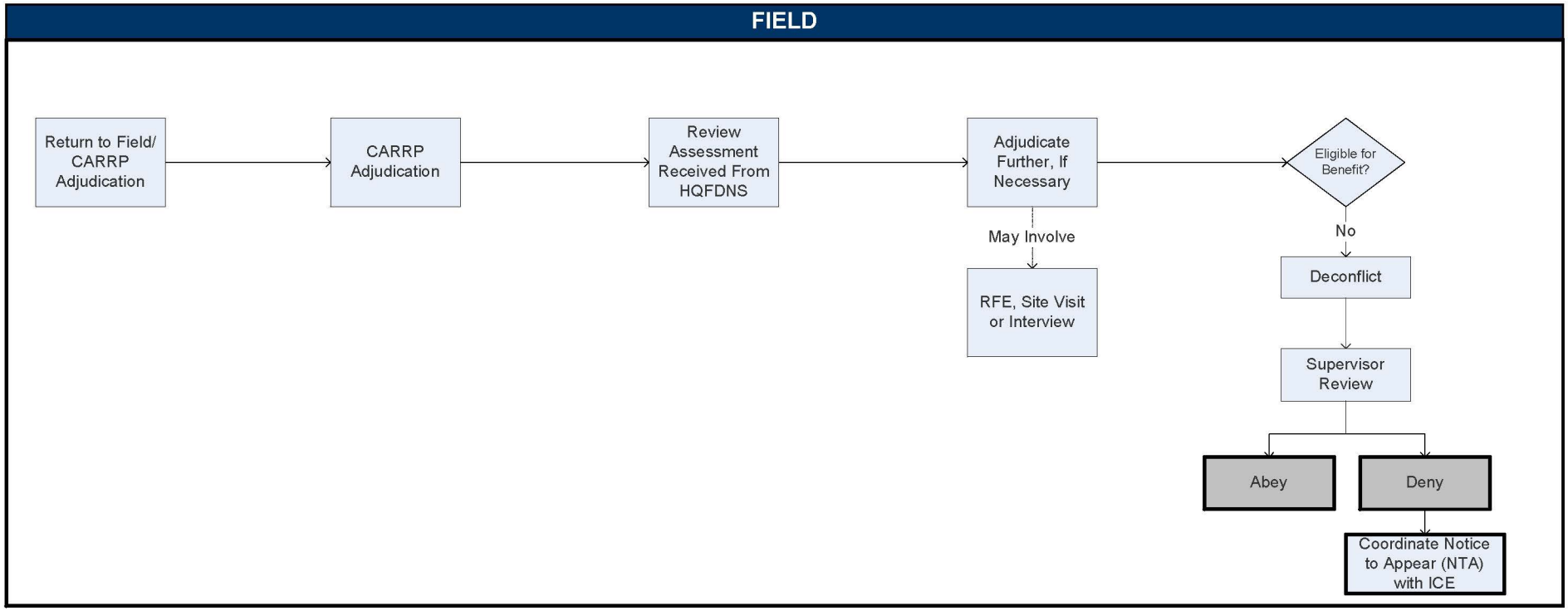
U.S. Citizenship and Immigration Services

Low Level CARRP KST Workflow: CARRP Adjudication

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



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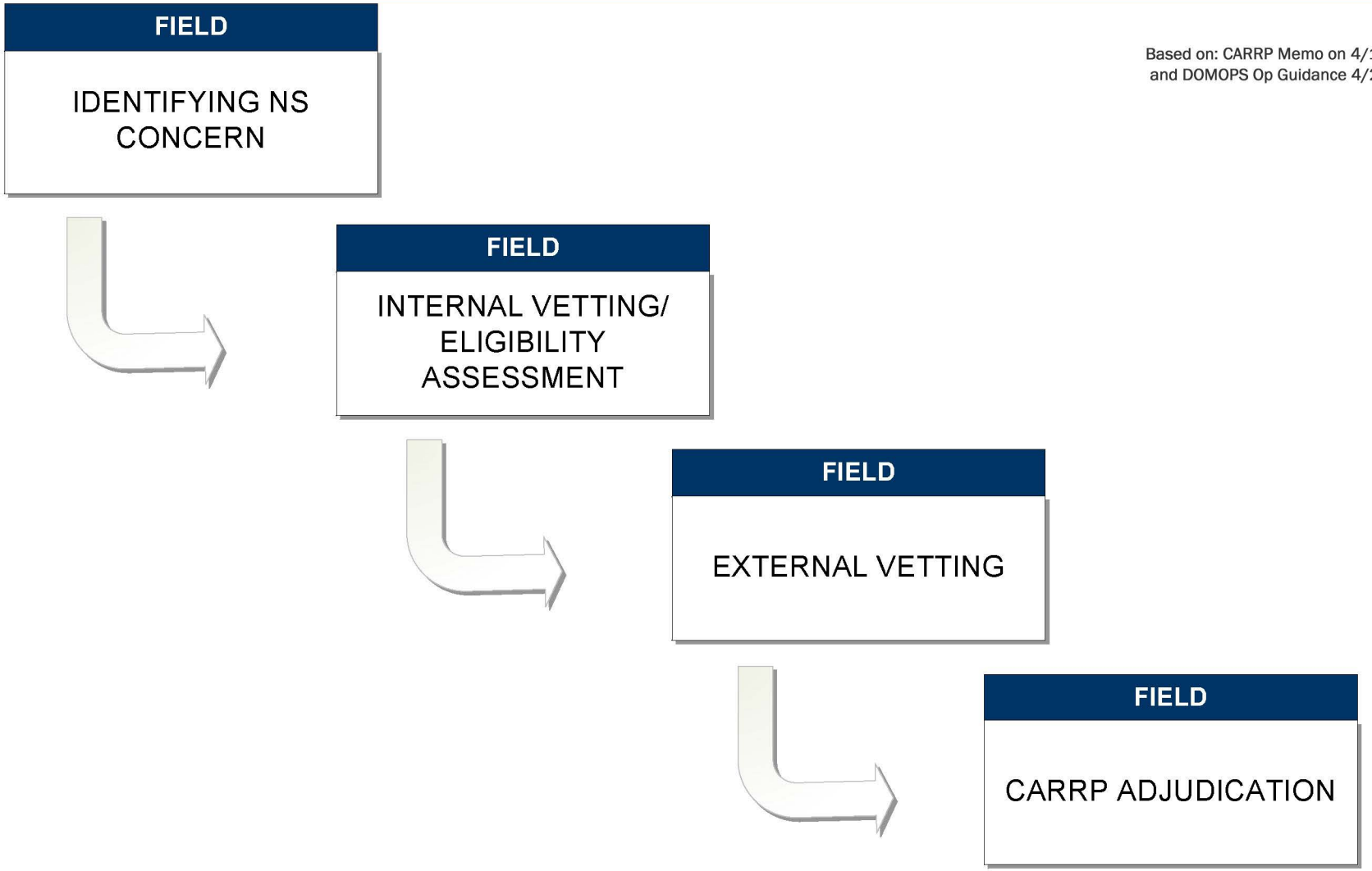
High Level CARRP Non-KST Workflow

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



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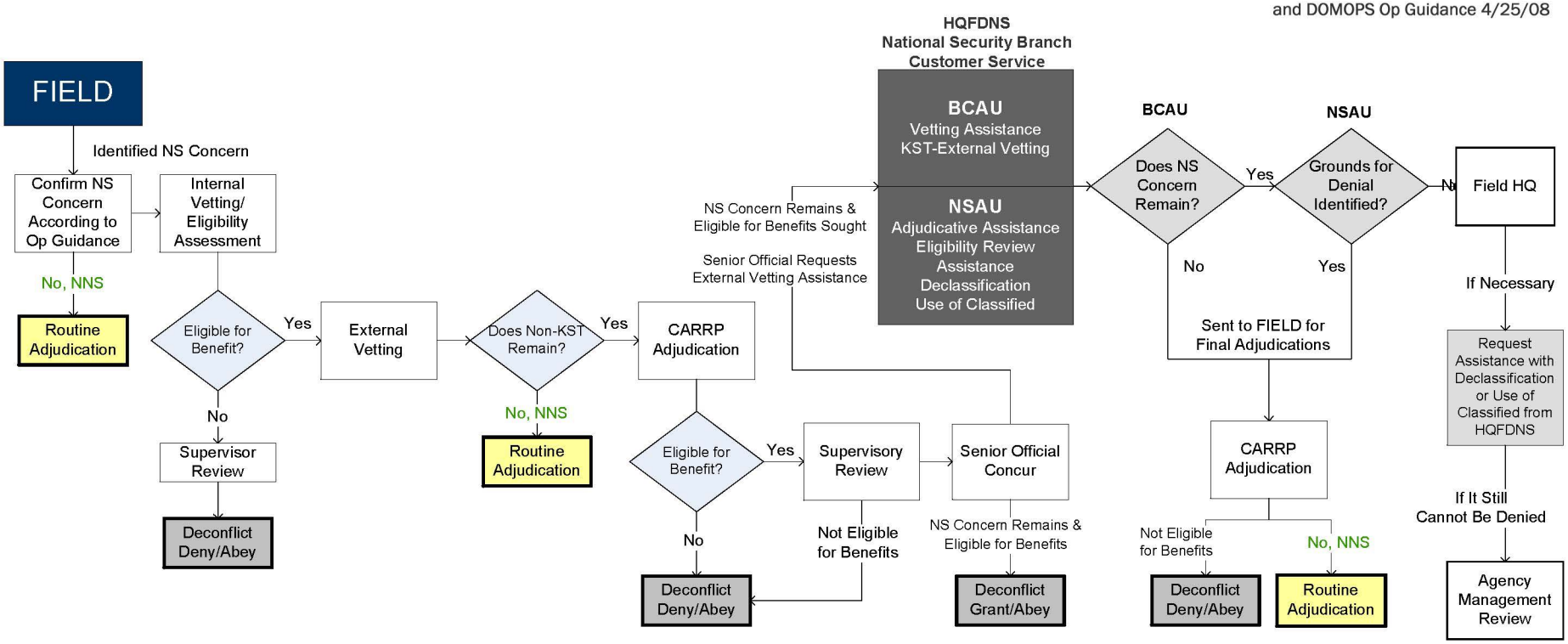
Mid Level CARRP Non-KST Workflow

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.
BCAU- Background Check Analysis Unit
KST- Known or Suspected Terrorist
NNS- Non-National Security
NS- National Security
NSAU- National Security Advisory Unit

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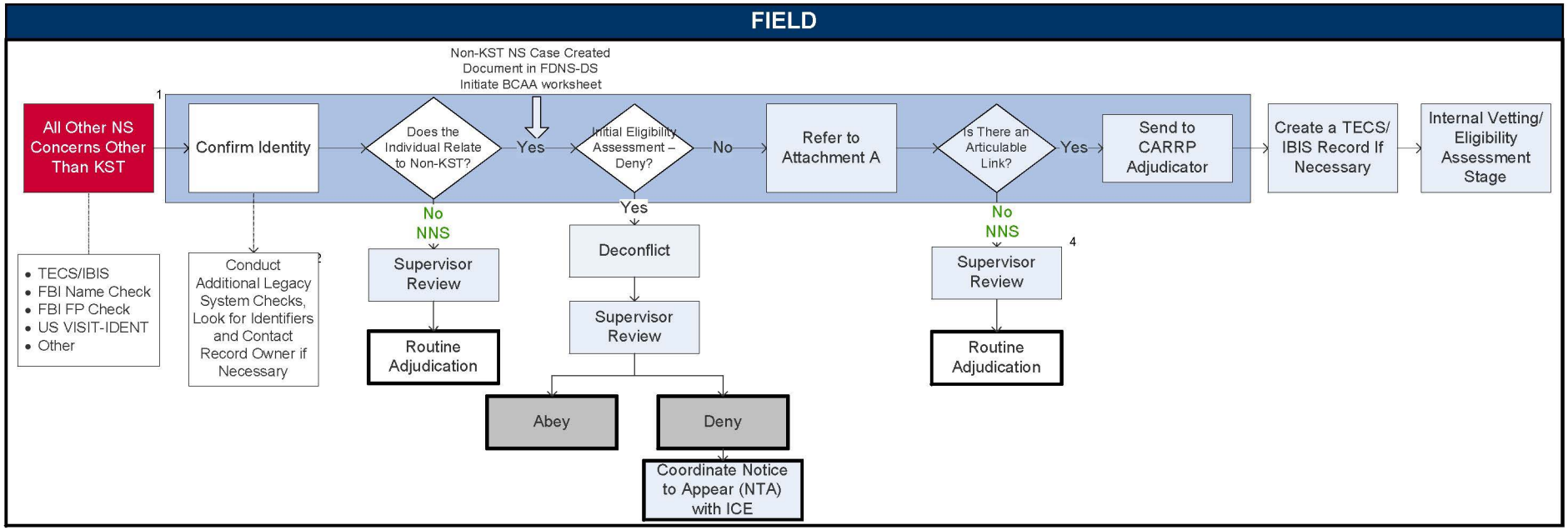
U.S. Citizenship and Immigration Services

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. (DOMOPS 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.

Note: At any time, a KST lookout may be entered on an individual. If this occurs, the NS Case should follow the KST CARRP process. 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.
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)

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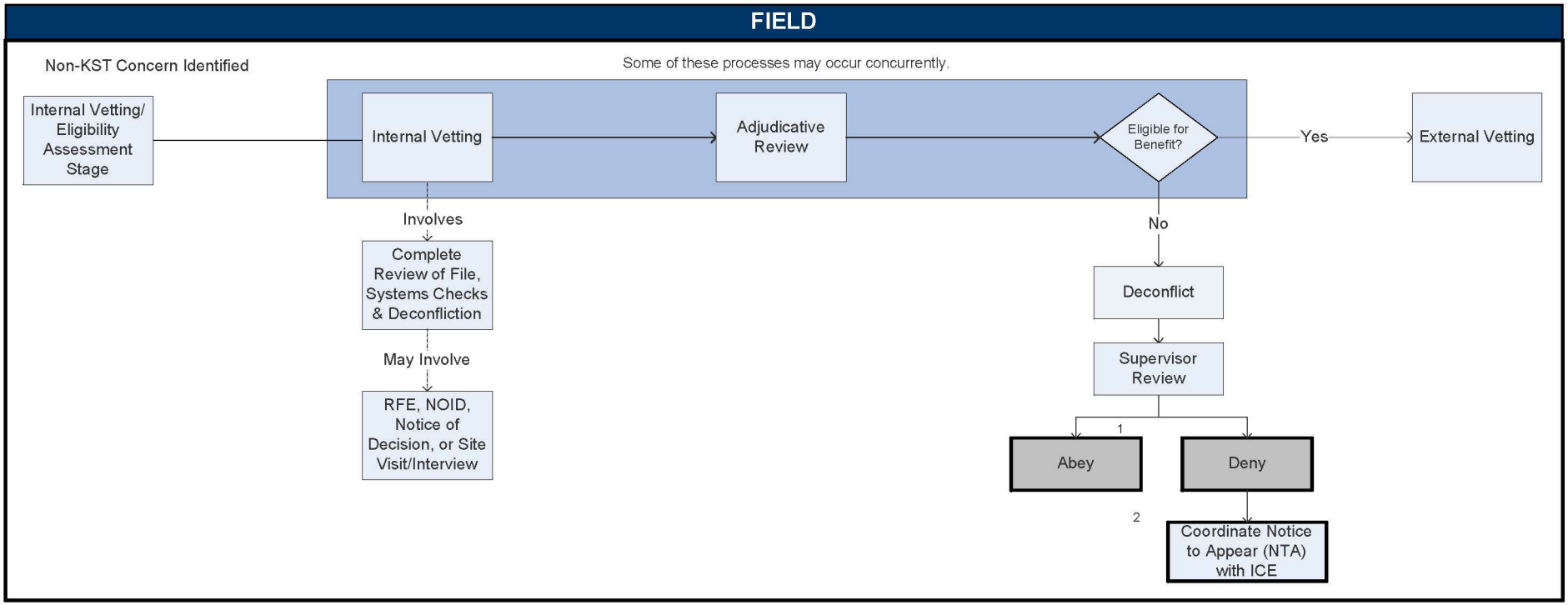
U.S. Citizenship and Immigration Services

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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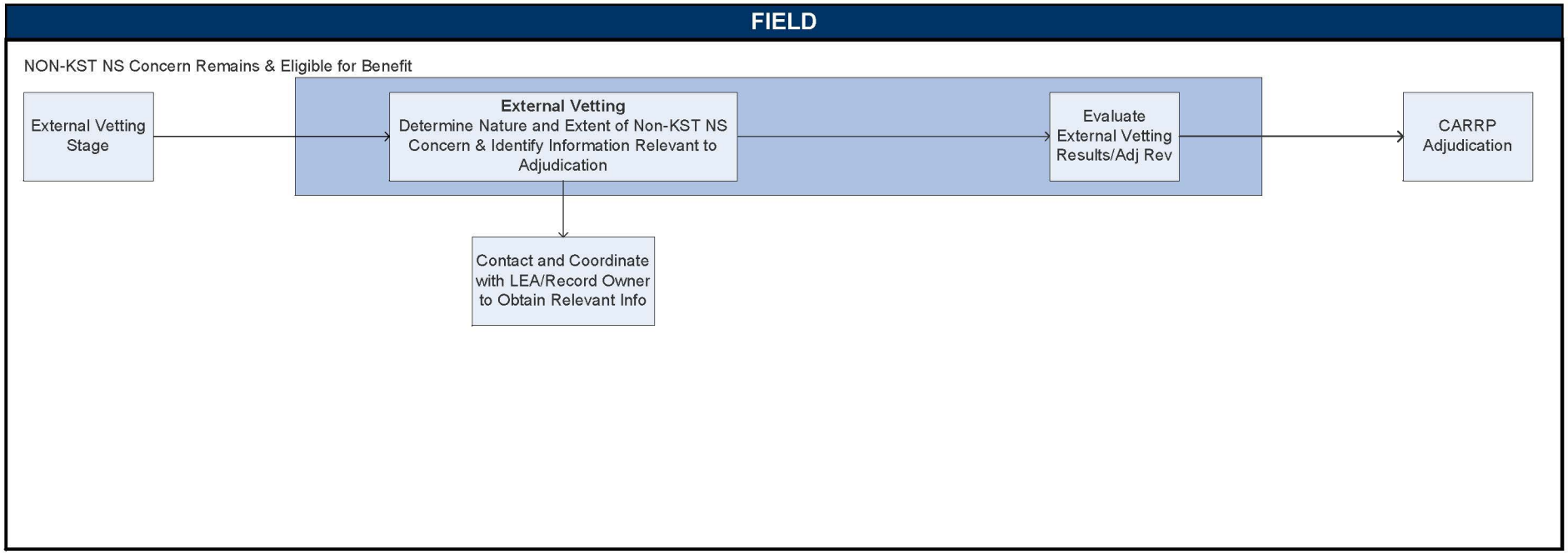
U.S. Citizenship and Immigration Services

Low Level CARRP Non-KST Workflow: External Vetting

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



LEA- Law Enforcement Agency

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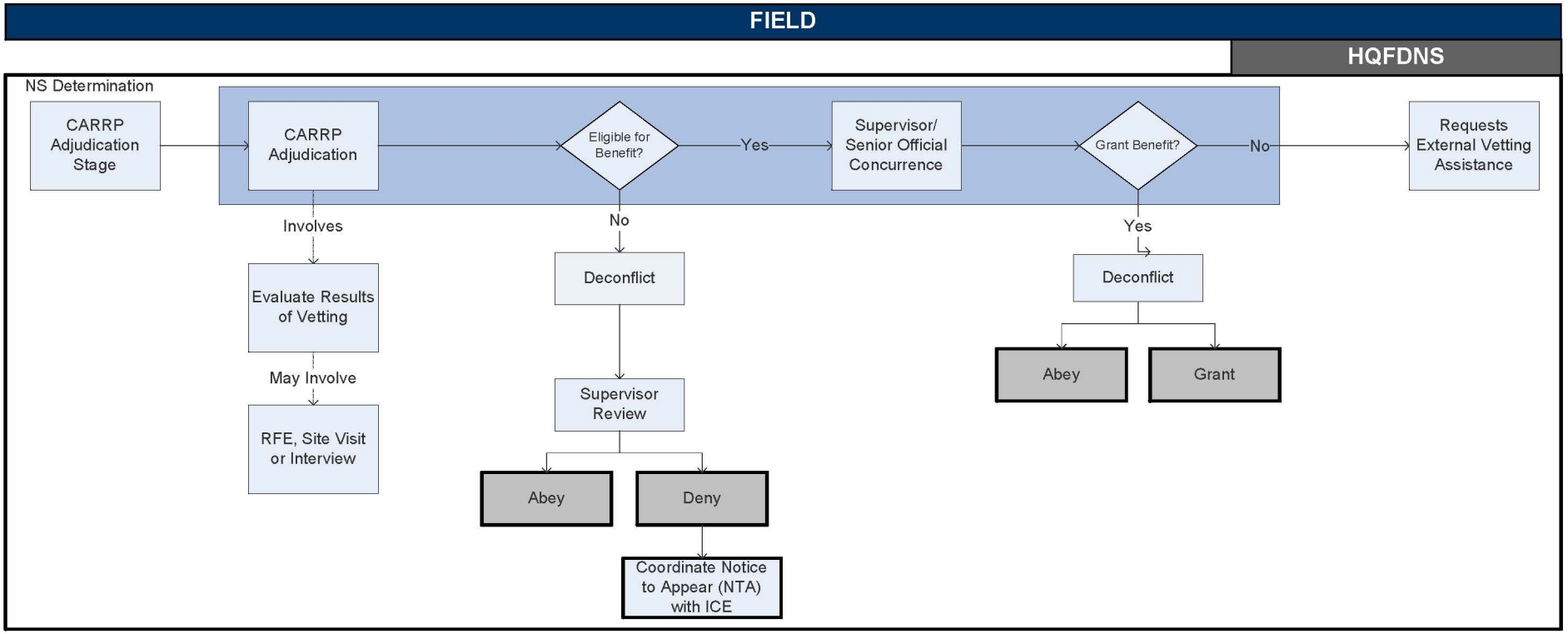
U.S. Citizenship and Immigration Services

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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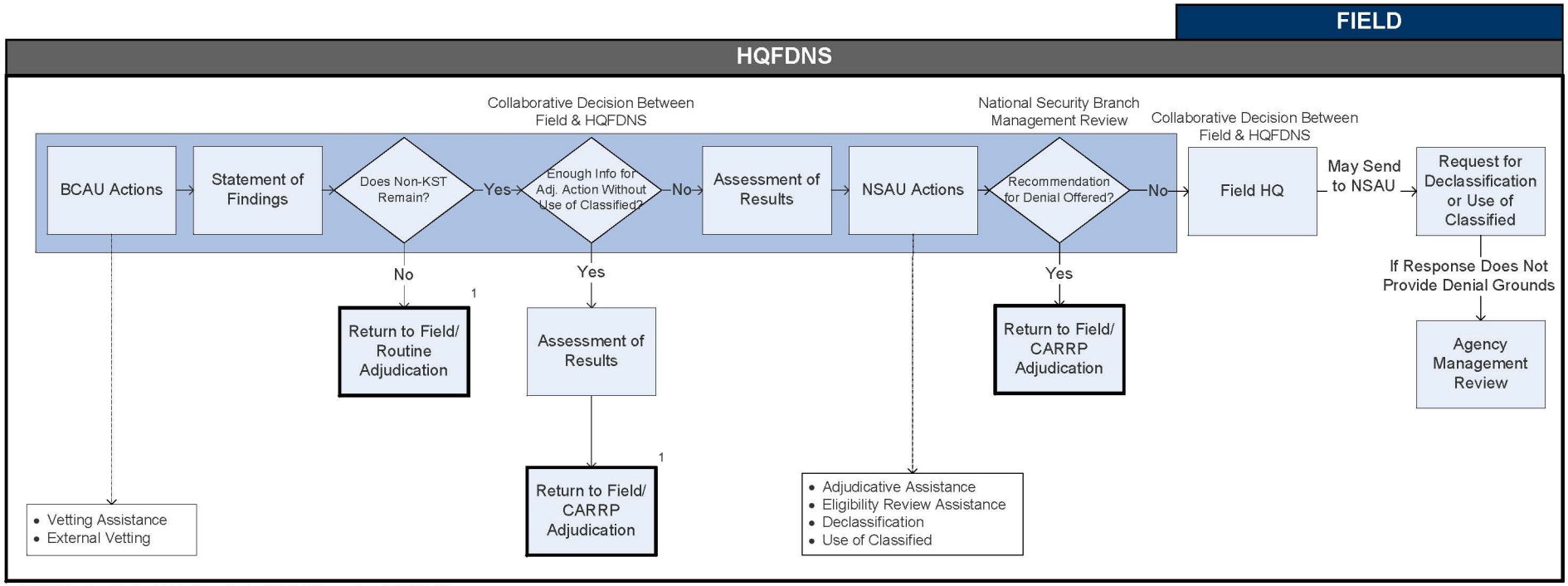
U.S. Citizenship and Immigration Services

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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