

EXHIBIT 62

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TRIG, CARRP, OR BOTH – SAME LAWS DIFFERENT RESULT

While CARRP and TRIG both rely on sections of law, there are inherent differences between the inadmissibility considerations of TRIG and the need for handling in CARRP.

TRIG – *Terrorist Related Inadmissibility Grounds, a section of the 212 that deals with admissibility or inadmissibility of individuals.*

Application – TRIG is a straight up application of the law.

Question to ask – Is the individual admissible or are they inadmissible according to 212(a)(3)?

Who – When adjudicating petitions, admissibility is generally not considered. However, when USCIS is admitting an individual TRIG and whether the person is inadmissible for TRIG is considered.

Question to ask – Am I granting an admission to the individual, if so is the individual admissible or inadmissible according to 212(a)(3)?

What – What are we looking for; in TRIG we're looking for a definitive act leading us to a definitive decision.

Questions to ask – Did the individual commit an activity listed in 212(a)(3)? What standard of evidence is required to show that the individual committed the act? And; Is the activity and the individual circumstances surrounding it waivable under current USCIS policy?

When – Whenever USCIS will be granting an admission to the individual.

CARRP – *The handling process which USCIS officers use to identify, vet, deconflict, and adjudicate cases with national security concerns.*

Application – CARRP is a subjective assessment that the individual is a threat.

Question to Ask – Is the individual connected to one of the activities mentioned in 212(a)(3)(A), (B), or (F), or 237(a)(4)(A) or (B)?

Who – All individuals that a designated CARRP officer has determined have a connection to an activity described in INA 212(a)(3)(A), (B), or (F), or 237(a)(4)(A) or (B), and that connection has not been overcome.

Question to Ask – Is the individual connected to one of the activities in 212(a)(3)(A), (B), or (F), or 237(a)(4)(A) or (B)? *(Note: While TRIG requires a definite yes or no, CARRP handling requires a subjective connection.)*

What – What are we looking for; in CARRP we're looking for a connection between and individual and the activity which requires time and resources to vet. The process which USCIS uses to vet National Security concerns is CARRP.

Questions to ask – Is the individual connected to the activity? How strong is the connection? And; Is there evidence that overcomes the connection?

When – Whenever USCIS encounters derogatory information on an individual.

Question and Example

Why is CARRP subjective and TRIG exact if they use the same section of law?

CARRP derives what is a National Security activity from the TRIG sections of law, but CARRP is not law and does not have the weight of law. CARRP is a handling process that allows trained and designated officers the time and resources to vet cases where a national security concern has been identified. In short, we're looking at the individual, the connection, and the activity, not whether or not the individual is inadmissible due to commission of the activity.

Can a person be need CARRP handling but not necessarily be TRIG?

Yes! Take spouses and children of Terrorists. TRIG applies to spouse or child if the inadmissible activity occurred within the last 5 years and the spouse or child should reasonably have known and has not renounced the activity. CARRP as a process is more expansive, there is no timeframe and no renouncing. Watchlisting for spouses and children is automatic based on the connection between the individual and the concern and so is CARRP processing.

What about Cartels or Transnational Criminal Organizations? We don't handle them in TRIG and criminal activity is not handled in CARRP, are they not National Security concerns?

In General cartels and criminal organizations or criminals for that manner are not subject to TRIG or CARRP. However, for every rule there is an exception. Designated CARRP officers must look at the individual and determine if the activity that the individual is connected to is national security in nature or criminal in nature. For example, did the person kidnap someone, or assassinate someone, what is the motive? If the motive is to compel action or governmental change it's CARRP. If the motive is criminal only, it's neither CARRP or TRIG.

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