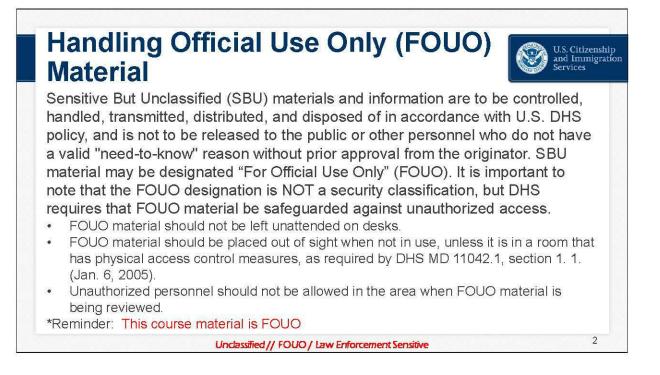
# EXHIBIT 44 FILED UNDER SEAL



[Instructor: If you have not previously been introduced, please tell students who are you and why are you qualified to teach this course.]



We have seen this slide throughout the modules thus far. But again, the CARRP process and all materials related to CARRP are For Official Use Only (FOUO) and should be handled accordingly.

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| <ul> <li>Module 1: Handling and Protecting Sensitive Information</li> <li>Module 2: CARRP Overview</li> <li>Module 3: Identifying and Documenting NS Concerns</li> <li>Module 4: Determining Eligibility and Vetting National<br/>Security Concerns</li> <li>Module 5: Adjudicating National Security Concerns</li> <li>Module 6: Review and Test <ul> <li>Course Review</li> <li>Capstone Practical</li> <li>Test Review</li> </ul> </li> </ul> | Course O | Verview U.S. Citizenshi<br>and Immigration   |
|--|----------|--|
|  |          | <ul> <li>Module 2: CARRP Overview</li> <li>Module 3: Identifying and Documenting NS Concerns</li> <li>Module 4: Determining Eligibility and Vetting National<br/>Security Concerns</li> <li>Module 5: Adjudicating National Security Concerns</li> <li>Module 6: Review and Test <ul> <li>Course Review</li> <li>Capstone Practical</li> </ul> </li> </ul> |

#### Say:

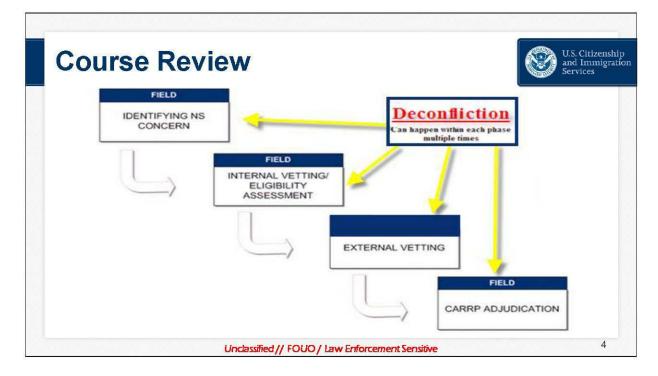
This section is our time to review what we have learned. All of the slides you are about to see in the course review have already been covered in class. The purpose of this module is to review critical points and get you ready for the CARRP test. If you have any lingering questions – now is the time to ask!

There is no Student Guide available for this module, so just focus on following along.

[Go to the next slide.]

Image Attribution: Image used with permission of Microsoft.

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#### Say:

Let's take a look at the four phases once more.

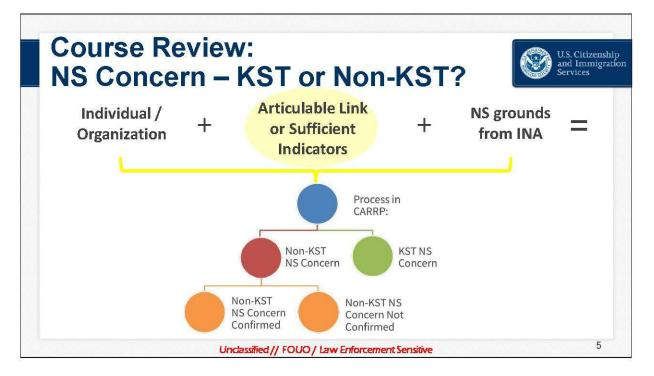
Phase 1: We identify our NS concern

Phase 2: We draft an eligibility assessment and conduct internal vetting

Phase 3: External Vetting occurs

Phase 4: We adjudicate the case

And as always, deconfliction can happen at any stage and multiple time throughout the process.



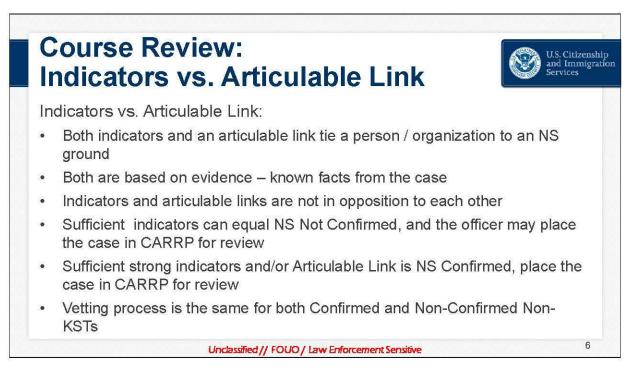
In this slide we see our "formula" for an NS concern. Remember, if one item is of the elements is missing, then we don't have an NS concern.

[Instructor: Have students enter responses in the chat or call on someone at random.]

Can anyone tell me what the difference is between an Articulable Link or an Indicator?

As you can see, if an applicant is processed in CARRP, you identify if they are a KST or a Non-KST. If Non-KST, you identify whether the NS concern is confirmed or not confirmed. Can you tell me the difference between confirmed or not confirmed?

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Say:

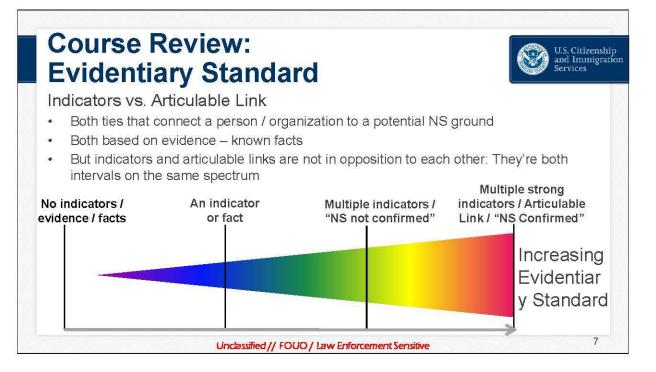
Let's review indicators vs. articulable links.

Both tie a person / organization to an NS ground

Both are based on evidence - known facts from the case

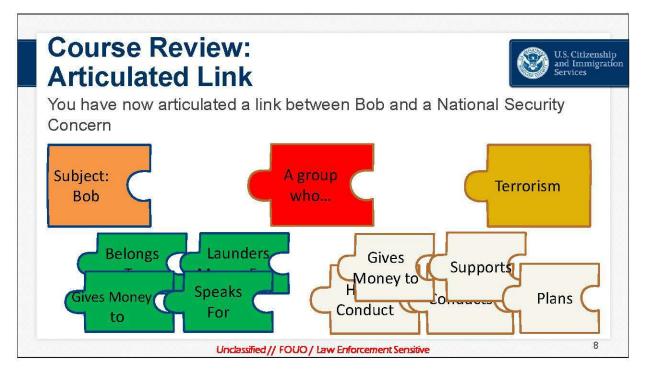
They are not in opposition to each other

Sufficient indicators can equal NS Not Confirmed, and the officer may place the case in CARRP for review Sufficient strong indicators and/or Articulable Link can Confirm the NS concern, place the case in CARRP for review Vetting process is the same for both Confirmed and Non-Confirmed Non-KSTs



Remember this slide that shows us the increasing evidentiary standard?

As we gain knowledge of additional facts or indicators, we move towards the articulable link/NS confirmed end of the spectrum.



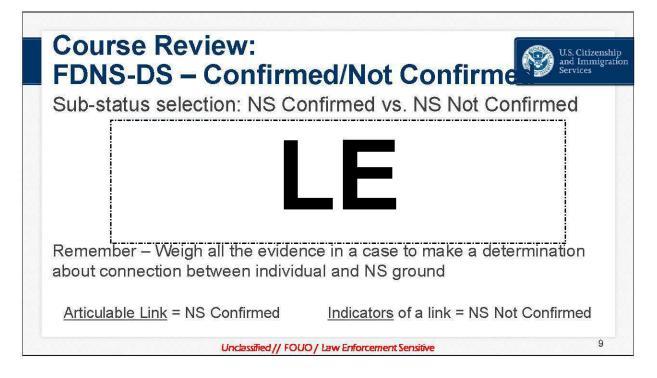
[Instructor: Slide is animated to demonstrate the links between an action and an articulable link.]

Say:

When determining whether there is an articulable link, you must be able to make a connection between the actions and the related grounds.

In this example, there is a subject, Bob and there is an NS ground of terrorism.

The rest of the puzzle pieces can be used to assemble a link between Bob and terrorism

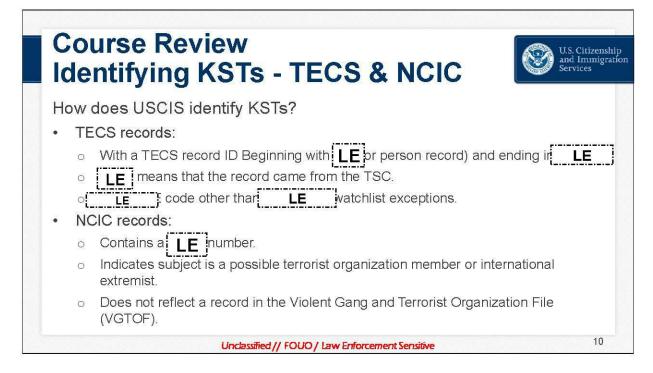




[Go to the next slide.]

This slide contains mock data used for training purposes only.

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Say:

And again, how does USCIS identify KSTs?

TECS records:

With a TECS record ID Beginning with LE for person record) and ending in LE

 LE
 heans that the record came from the TSC.

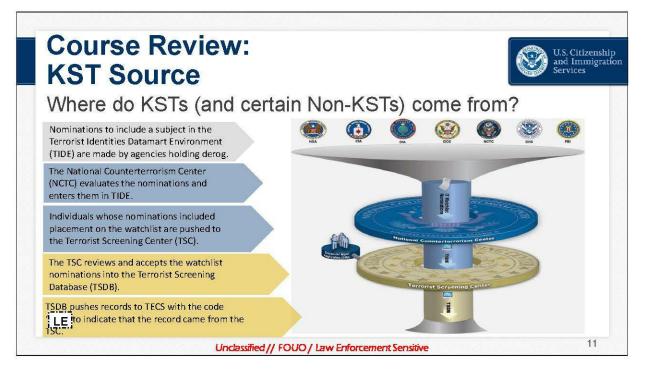
 LE
 code other than
 LE
 watchlist exceptions. If it's a
 LE
 you have a Non-KST.

 NCIC records:

Contains a LE number

Indicates subject is a possible terrorist organization member or international extremist

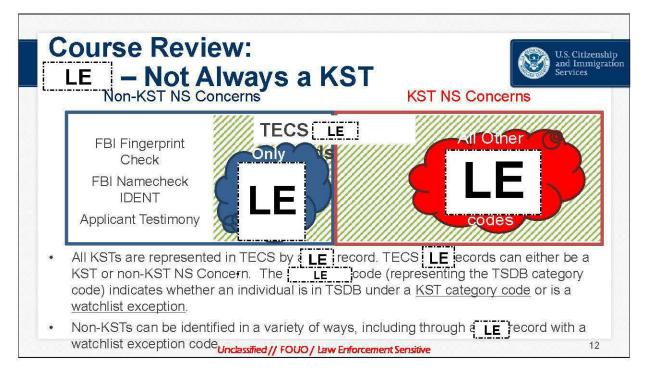
Does not reflect a record in the Violent Gang and Terrorist Organization File (VGTOF).



Let's take a look at this slide once again. As you can see, several agencies may nominate a person to the watchlist and only that agency may remove a person from the watchlist. What do you do when you receive a **LE** TECS Hit? Confirm a match with the TSC.

[Go to the next slide.]

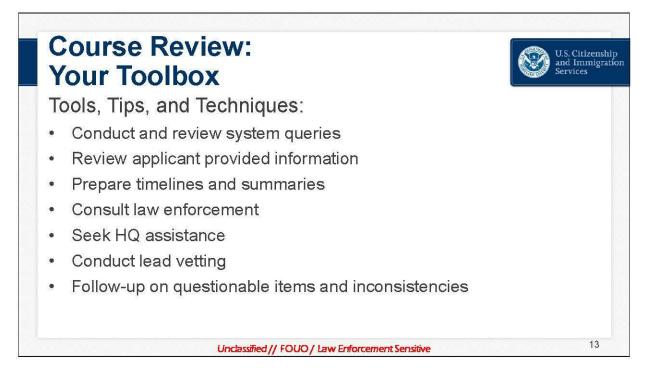
Image Attribution: The image and graphics this slide were created by and are the property of the United States government (TSC).



Just to recap with LE if the Concern. All other LE we have a Non-KST NS Concern. All other LE odes are KST NS Concerns.

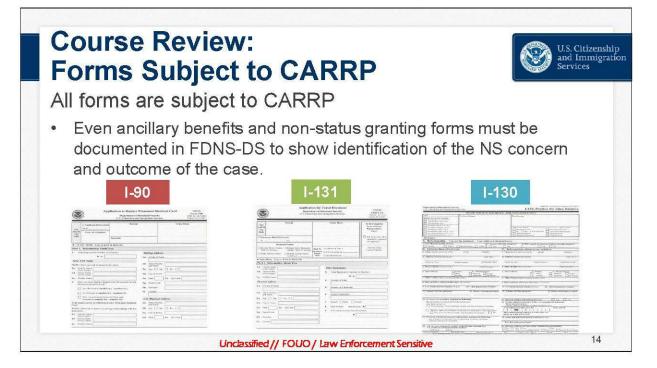
The LE code represents a Terrorist Screening Database category code.

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#### Say:

We talked extensively about your "toolbox" when working CARRP cases. Remember that the list on the slide is not exhaustive. As you take on more CARRP cases, you'll gain more experience and discover additional techniques and tips on your own. But, the slide highlights many of the important steps such as review of the case, preparing timelines and summaries, consulting LEAs, seeking HQ assistance, lead vetting, and following up on any remaining issues.



This is just a reminder that ALL Forms are subject to CARRP, at the very least Phase 1 of the process. We've already discussed in the previous modules why that is. Even ancillary benefit applications may contain information that can either support an existing NS Concern or serve as an indicator of a NS Concern. And if we want to use that information, the form has to be in CARRP.

| Vetting & Deco  | onfliction   | Services   |
|---|--|--|
| Internal Vetting  | External Vetting   | Deconfliction  |
| <ul> <li>Try to collect<br/>information</li> </ul>            | Try to collect     information   | Try to collect     information   |
| <ul> <li>Focus on immigration<br/>elements in case</li> </ul> | <ul> <li>Focus on the nature<br/>of the national<br/>security issue</li> </ul> | <ul> <li>Focus on knowledge /<br/>activities that may<br/>assist LEIC</li> </ul> |
| <ul> <li>Leverage USCIS &amp;<br/>DHS systems</li> </ul>      | Leverage LEIC     databases & record     owners                                | Build relationships     with law enforcement                                     |

This slide visually demonstrates the purpose and focus of each vetting stage. We are always trying to collect information.

But during internal vetting we are focusing on the immigration element of the case and leveraging USCIS and DHS systems. During external vetting we are focusing on the nature of the NS concern and leverage LEIC databases and record owners. And when we are deconflicting the focus is on the knowledge/activities that may assist LEIC and we are building relationships with law enforcement.

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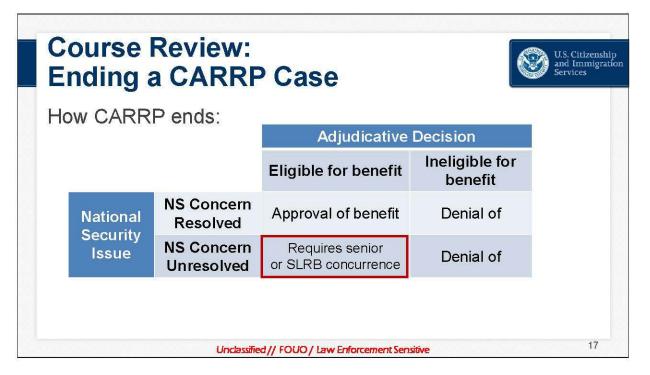


#### Say:

Don't limit yourself to the tools and techniques we've discussed here. If you have a tool or technique that you can use in your own toolbox to make a decision on a case, utilize it so long as it adheres to policy and regulations. You might use some of your tools and techniques multiple times, in various orders, and during different phases.

Sometimes you have to think outside the box to make a decision. This is commonly the case with CARRP.

Keep in mind the limitations that may be placed on cases of litigation. During litigation, USCIS may no longer have jurisdiction over the case. As such, when cases are in litigation, adjudicators should communicate with OCC throughout the CARRP process.



We have seen this chart many times throughout the modules. It's an excellent graphic to remember when you are thinking about how a CARRP case would end. If our individual is ineligible for the benefit then it will be denied regardless of whether the NS concern is resolved or not.

If the applicant is eligible and the concern is resolved, the case is approved. If they are eligible, but the concern remains unresolved, then we seek senior official or SLRB concurrence to approve the benefit.

Just a reminder that if a KST is unresolved and eligible for the benefit, it requires USCIS Deputy Director (D2) concurrence. As discussed before, there could be high profile Non-KST cases that could also require D2 concurrence.

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| Course Review:<br>Vocabulary<br>Confusing Vocab |         | U.S. Citizenship<br>and Immigration<br>Services |
|---|---------|---|
| RFA to HQ FDNS                                  | ≠       | in FDNS-  |
| NS Concern Confirmed                            | ≠       | DS  |
| (Non-KST)                                       |         | Confirming a LE                                 |
| Resolving an NS concern                         | ¥       | record  |
| Deconfliction                                   | ≠       | with the TSC                                    |
| Unclassified // FOUO / Law Er                   | forceme | TRANSFERSOR Resolution 18                       |

Say:

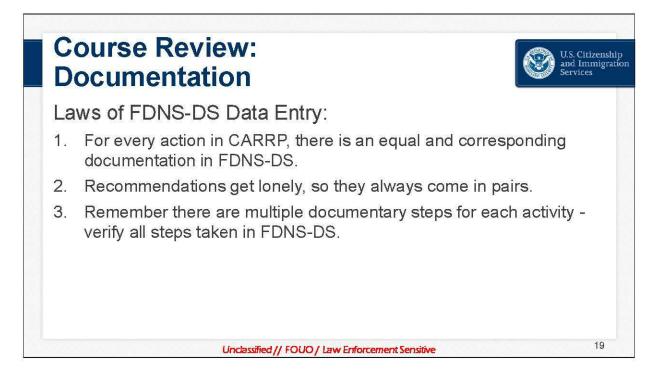
At the very beginning of this course we discussed some vocabulary terms. So it's only fitting that now we're at the end of the course we return to some of the vocabulary terms we've learned.

An RFA to HQ FDNS has nothing to do with the

Confirming a Non-KST NS concern does not mean that you are confirming a LE with the TSC

Deconfliction is not vetting. Deconfliction is outward facing- making sure that our activities will not impede an LEA. Resolving an NS concern does not mean drafting a TECS resolution memo.

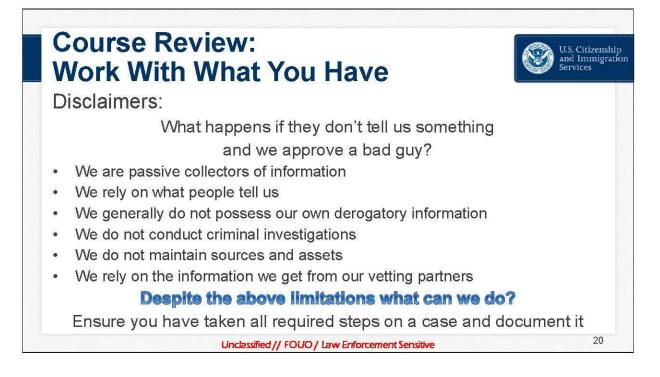
# Case 2:17-cv-00094-LK Document 665-21 Filed 06/13/24 Page 20 of 57



#### Say:

Document, document, document. We cannot stress enough the importance of documenting your work in FDNS-DS. In addition, recommendations are always done in pairs, by the requestor and by the approver. If this is not done properly, you will not be able to proceed to the next process phase.

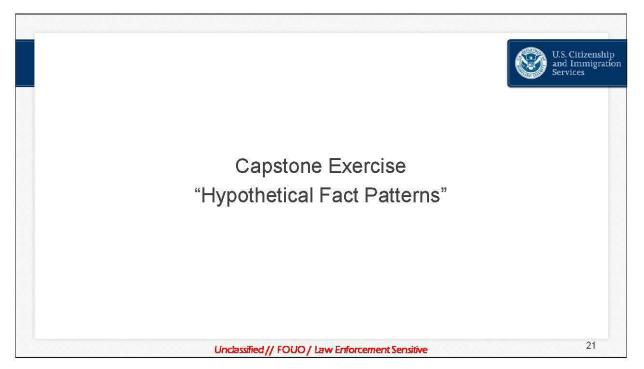
Ensure that your activities and systems checks are done properly! Although cumbersome, this is necessary not only to verify your efforts and hard work, but also to protect you and the agency. If it's not in FDNS-DS, then it didn't happen.



In a previous class the question came up in external vetting – "What happens if they don't tell us stuff?" We cannot predict the future. Our decisions and adjudications rely on the information that we have. That is why in the previous slide, we stressed the importance of documenting our work. If we've done all that we can in vetting and documented it properly, we can justify the adjudicative decision.

We have no control of future incidents or information that relates to the applicant. This is why it is important to adjudicate as soon as FDNS completes vetting.

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Say:

We are now going to review 10 hypothetical fact patterns (including the two you've already seen) which address topics covered in this training. They are not a definitive guide, but a tool to practice applying the articulable link framework on some fact patterns that you might see in your everyday work.

These are all either NS Confirmed, NS Not Confirmed, Non-NS. There are no KSTs, because we're going to teach you how to identify KSTs right after this. There are no wrong answers here.

The point is to think consistently and logically about articulating a link between an individual or organization to a NS related inadmissibility as outlined in the INA.

Disclaimer: Some are based on real cases, with fictionalized information, and some are completely made up.

# **Common Addresses**



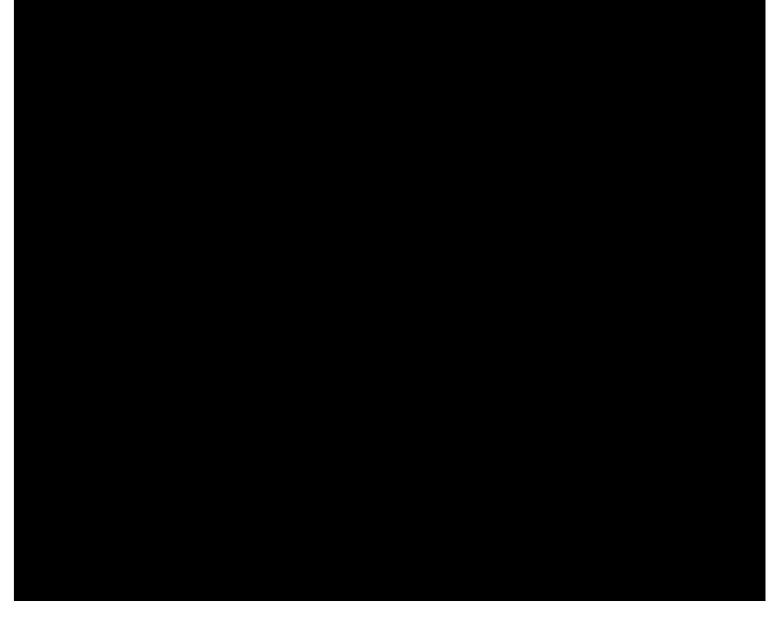
| Hypothetical #2 | U.S. Citizenship<br>and Immigration<br>Services |
|-----------------|---|
| Employment      |   |

| Money Laundering |  |
|------------------|--|
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|                  |  |
|                  |  |
|                  |  |

# Hypothetical #4



Home Country Activities



| not | heti | cal | #5  |
|-----|------|-----|-----|
| NUL |      | Gai | TTU |



Watchlisting

# Hypothetical #6



Organizational Links

|    | 4.8        |              |     |     |
|----|------------|--------------|-----|-----|
| HV | poth       | <b>h</b> oti | cal | #7  |
|    | <b>NOU</b> | ICU          | Jai | TTI |



Employment Links

| Hypothetical | #8 |  |  |
|--------------|----|--|--|



Money Laundering

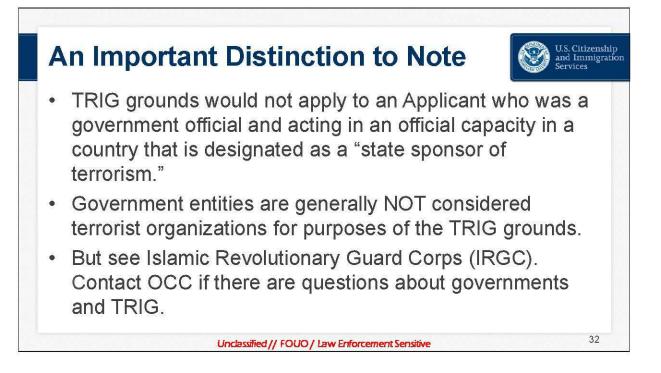
| <br>            |                 |   |
|-----------------|-----------------|---|
| Hypothetical #9 |                 | U.S. Citizenship<br>and Immigration<br>Services |
|                 | OGA Information |   |
|                 |                 |   |
|                 |                 |   |
|                 |                 |   |
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# Hypothetical #10



Home Country Activities

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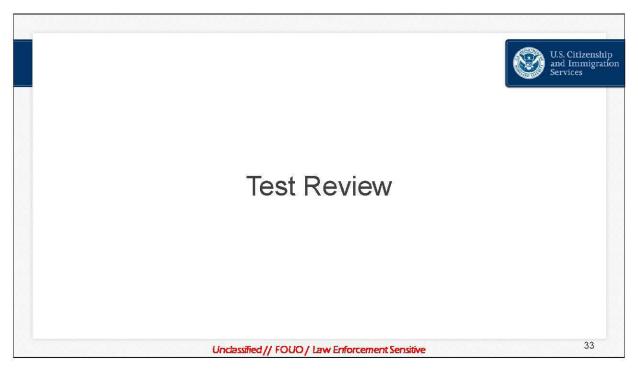
In general, a recognized government, would not be considered a terrorist organization. Individual government actors would not be considered inadmissible for TRIG for actions carried out in an official capacity, but they may have engaged in persecution or human rights abuses while acting under the authority of their government.

For any questions relating to governments and TRIG, including what the recognized government is in a given country at a given time and place, please contact counsel.

[Go to the next slide.]

NOTE: 4/15/2019 Islamic Revolutionary Guard Corps (IRGC) See https://www.state.gov/foreign-terrorist-organizations/

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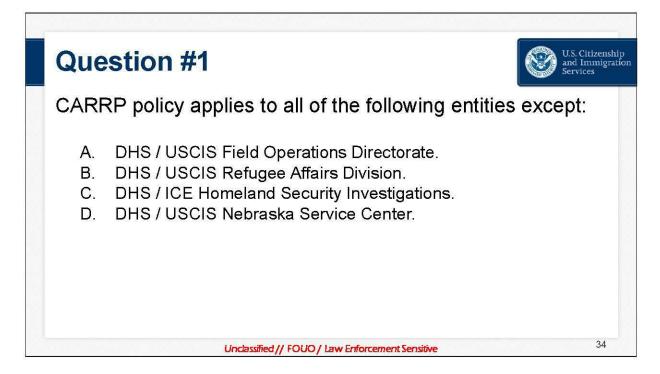
Say:

OK, now we're going to wrap up with a test review game. We're going to present 15 questions that are very similar to what you will be asked on the test.

All the questions have the same multiple-choice format with 4 potential answers, which is what you'll see on the test.

Type your letter answer into the chat box for each question and we will see what the majority opinion is!

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Say:

Our first question is, CARRP policy applies to all of the following entities except:

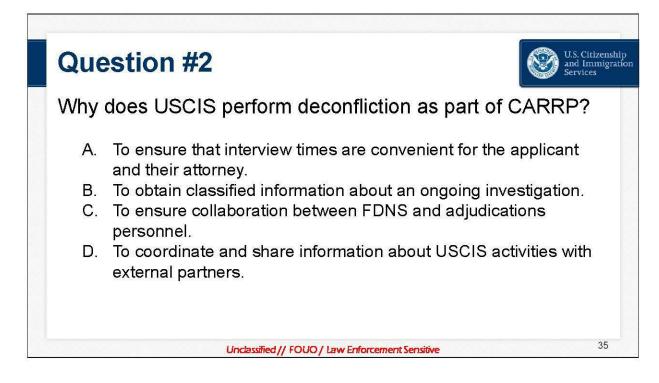
DHS / USCIS Field Operations Directorate. DHS / USCIS Refugee Affairs Division.

DHS / ICE Homeland Security Investigations.

DHS / USCIS Nebraska Service Center.

[Instructor: Process answers in chat.]

The correct answer is C, DHS / ICE Homeland Security Investigations.



Why does USCIS perform deconfliction as part of CARRP?

To ensure that interview times are convenient for the applicant and their attorney.

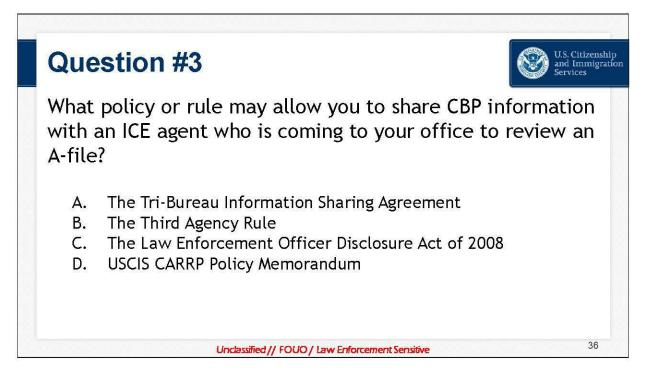
To obtain classified information about an ongoing investigation.

To ensure collaboration between FDNS and adjudications personnel.

To coordinate and share information about USCIS activities with external partners.

[Instructor: Process answers in chat.]

The correct answer is D, To coordinate and share information about USCIS activities with external partners.

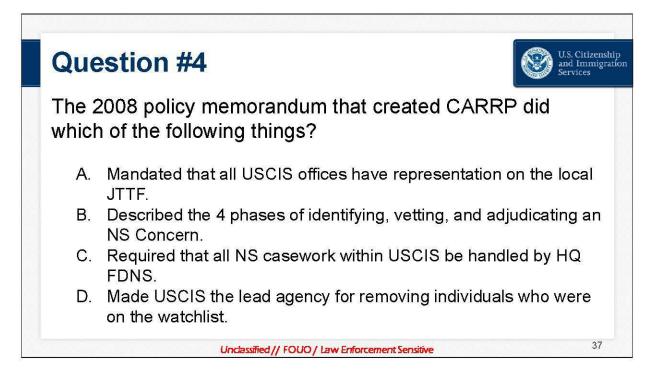


What policy or rule may allow you to share CBP information with an ICE agent who is coming to your office to review an A-file?

The Tri-Bureau Information Sharing Agreement The Third Agency Rule The Law Enforcement Officer Disclosure Act of 2008 USCIS CARRP Policy Memorandum

[Instructor: Process answers in chat.]

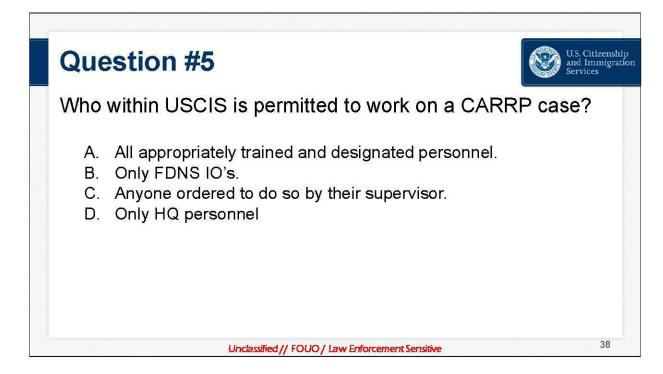
The correct answer is B, The Third Agency Rule.



The 2008 policy memorandum that created CARRP did which of the following things?

Mandated that all USCIS offices have representation on the local JTTF. Described the 4 phases of identifying, vetting, and adjudicating an NS Concern. Required that all NS casework within USCIS be handled by HQ FDNS. Made USCIS the lead agency for removing individuals who were on the watchlist. [Instructor: Process answers in chat.]

The correct answer is B, Described the 4 phases of identifying, vetting, and adjudicating an NS Concern.



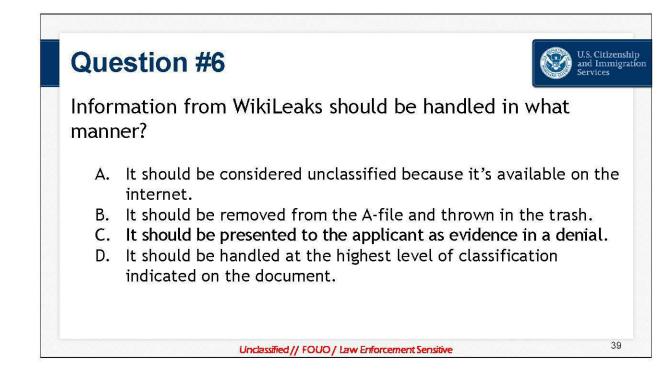
Who within USCIS is permitted to work on a CARRP case?

All appropriately trained and designated personnel. Only FDNS IO's. Anyone ordered to do so by their supervisor. Only HQ personnel

[Instructor: Process answers in chat.]

The correct answer is A, All appropriately trained and designated personnel.

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Say:

Information from WikiLeaks should be handled in what manner?

It should be considered unclassified because it's available on the internet.

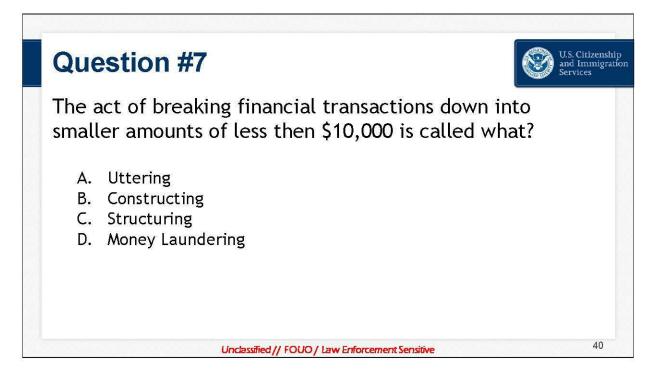
It should be removed from the A-file and thrown in the trash.

It should be presented to the applicant as evidence in a denial.

It should be handled at the highest level of classification indicated on the document.

[Instructor: Process answers in chat.]

The correct answer is D, It should be handled at the highest level of classification indicated on the document.

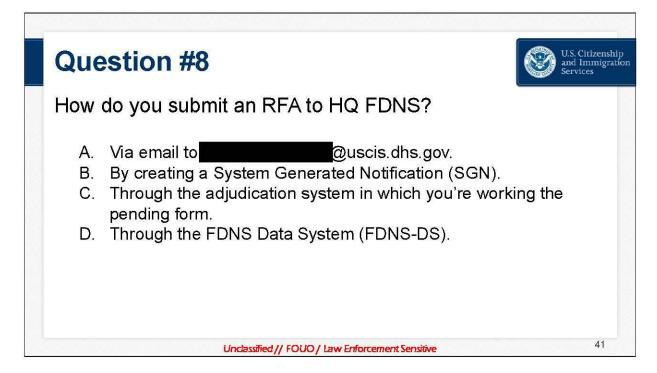


The act of breaking financial transactions down into smaller amounts of less then \$10,000 is called what?

Uttering Constructing Structuring Money Laundering

[Instructor: Process answers in chat.]

The correct answer is C, Structuring.



How do you submit an RFA to HQ FDNS?

Via email to @uscis.dhs.gov.

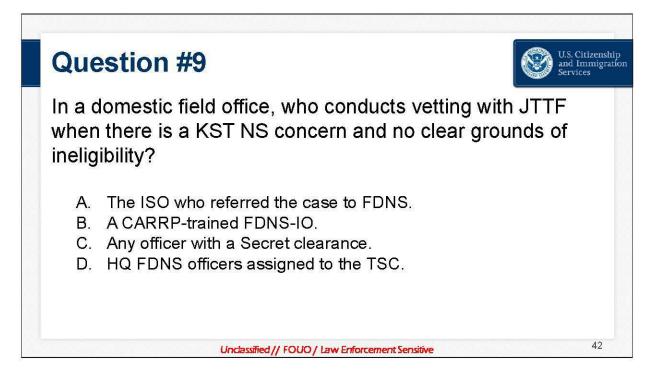
By creating a System Generated Notification (SGN).

Through the adjudication system in which you're working the pending form.

Through the FDNS Data System (FDNS-DS).

[Instructor: Process answers in chat.]

The correct answer is D, Through the FDNS Data System (FDNS-DS).

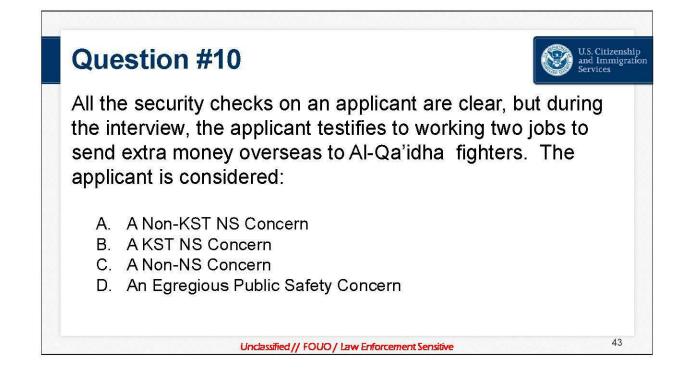


In a domestic field office, who conducts vetting with JTTF when there is a KST NS concern and no clear grounds of ineligibility?

The ISO who referred the case to FDNS. A CARRP-trained FDNS-IO. Any officer with a Secret clearance. HQ FDNS officers assigned to the TSC.

[Instructor: Process answers in chat.]

The correct answer is B, A CARRP-trained FDNS-IO.



All the security checks on an applicant are clear, but during the interview, the applicant testifies to working two jobs to send extra money overseas to Al-Qa' idha fighters. The applicant is considered:

A Non-KST NS Concern A KST NS Concern A Non-NS Concern An Egregious Public Safety Concern

[Instructor: Process answers in chat.]

The correct answer is A, A Non-KST NS Concern.

| Que                  | estion #11 Services  |
|----------------------|--|
|                      | is understanding and identifying LE  |
| A.<br>B.<br>C.<br>D. | The codes tell you which agency to vet with.<br>The codes tell you if the application should be denied.<br>The codes tell you if an individual needs to be handled as a KST.<br>The codes tell you what additional background checks have been<br>performed. |
|                      | Unclassified // FOUO / Law Enforcement Sensitive 44  |

Why is understanding and identifying LE codes important to CARRP?

The codes tell you which agency to vet with.

The codes tell you if the application should be denied.

The codes tell you if an individual needs to be handled as a KST.

The codes tell you what additional background checks have been performed.

[Instructor: Process answers in chat.]

The correct answer is C, The codes tell you if an individual needs to be handled as a KST.

| Qu                   | estion #12  |
|----------------------|---|
| -                    | is understanding and identifying <b>LE</b>                        |
| А.<br>В.<br>С.<br>D. | The codes tell you if an individual needs to be handled as a KST. |
|                      | Unclassified // FOUO / Law Enforcement Sensitive 45               |

Why is understanding and identifying LE codes important to CARRP?

The codes tell you which agency to vet with.

The codes tell you if the application should be denied.

The codes tell you if an individual needs to be handled as a KST.

The codes tell you what additional background checks have been performed.

[Instructor: Process answers in chat.]

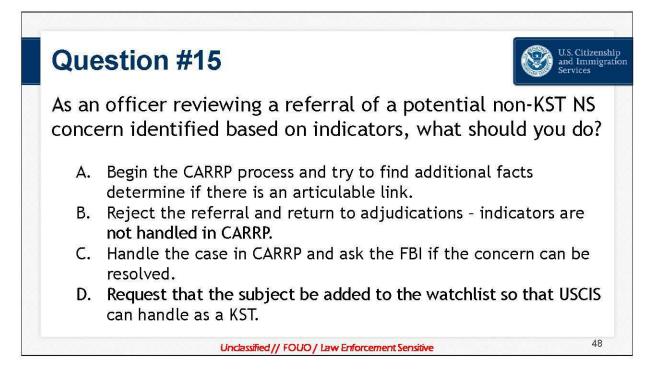
The correct answer is C, The codes tell you if an individual needs to be handled as a KST.

# **Question #13**



# **Question #14**





As an officer reviewing a referral of a potential non-KST NS concern identified based on indicators, what should you do?

Begin the CARRP process and try to find additional facts determine if there is an articulable link.

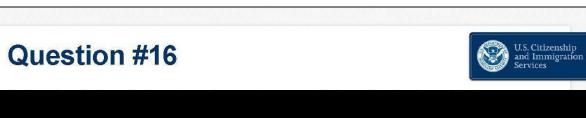
Reject the referral and return to adjudications - indicators are not handled in CARRP.

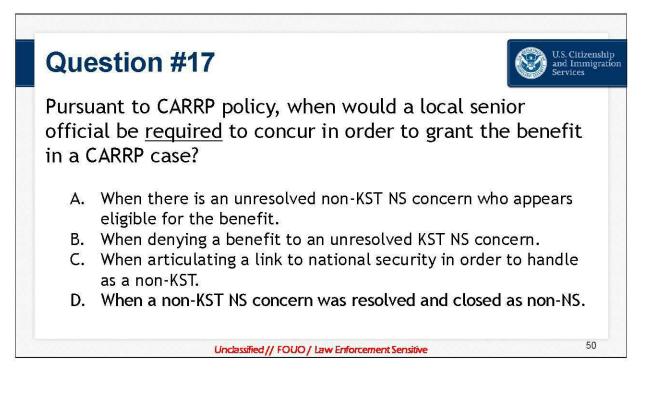
Handle the case in CARRP and ask the FBI if the concern can be resolved.

Request that the subject be added to the watchlist so that USCIS can handle as a KST.

[Instructor: Process answers in chat.]

The correct answer is A, Begin the CARRP process and try to find additional facts in order to determine if there is an articulable link.



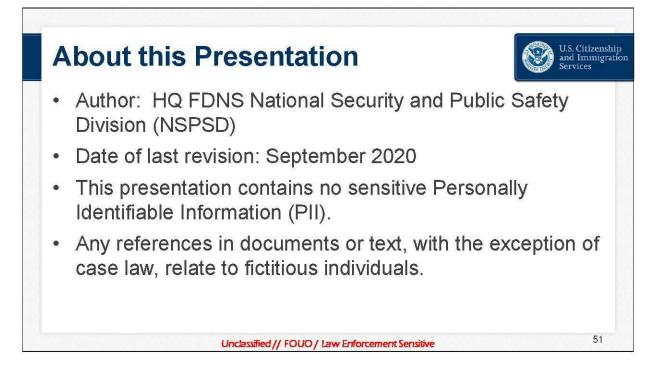


Pursuant to CARRP policy, when would a local senior official be required to concur in order to grant the benefit in a CARRP case?

When there is an unresolved non-KST NS concern who appears eligible for the benefit. When denying a benefit to an unresolved KST NS concern. When articulating a link to national security in order to handle as a non-KST. When a non-KST NS concern was resolved and closed as non-NS.

[Instructor: Process answers in chat.]

The correct answer is A, When there is an unresolved non-KST NS concern who appears eligible for the benefit.



As with all of the other CARRP modules, this presentation was last updated in September 2020. It does not contain PII and any references in documents or text, with the exception of case law, relate to fictitious individuals.

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## Disclaimer



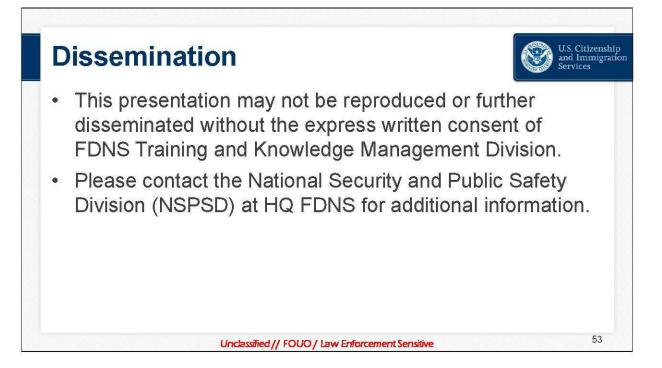
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