

Exhibit 12
-- Filed Under Seal --



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Studies in National Security

Mar. 2015

ARTICULABLE LINK WRITING 101

Identifying a National Security concern requires the presence of three elements:

Immigration Service Requestor + **Articulable Link** + **NS GROUND**

An articulable link is a synopsis of facts which tie an individual or organization to a national security ground. The best articulable links state the subject, the NS ground, and the connection between them in a couple of sentences. What follows are examples of some articulable links:

Example 1
(From SCOPS)

[Redacted]

Example 2
(From FOD)

[Redacted]

Example 3
(From SCOPS)

[Redacted]

Example 4
(From RAIO)

[Redacted]