

EXHIBIT 65
FILED UNDER SEAL

Trainer the Trainer TPs and Critical Takeaways

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Major Themes:

- NS concerns are nothing more than a series of facts that tell us a person is connected to an NS activity from the INA
- The facts that make up a concern can come from anywhere – not just security checks!
- Identifying an NS concern does not require that the person be inadmissible, removable, or ineligible for the benefit
- When there are facts indicating an NS concern, we need to think of CARRP as a yellow traffic signal or caution sign and exercise due diligence
- Weigh all of the facts in the case together as one body of evidence – individually, one indicator may not mean very much, but collectively a series of facts can result in a concern
- When you don't understand a fact or aren't familiar with something in the case – find out!

Additional Talking Points:

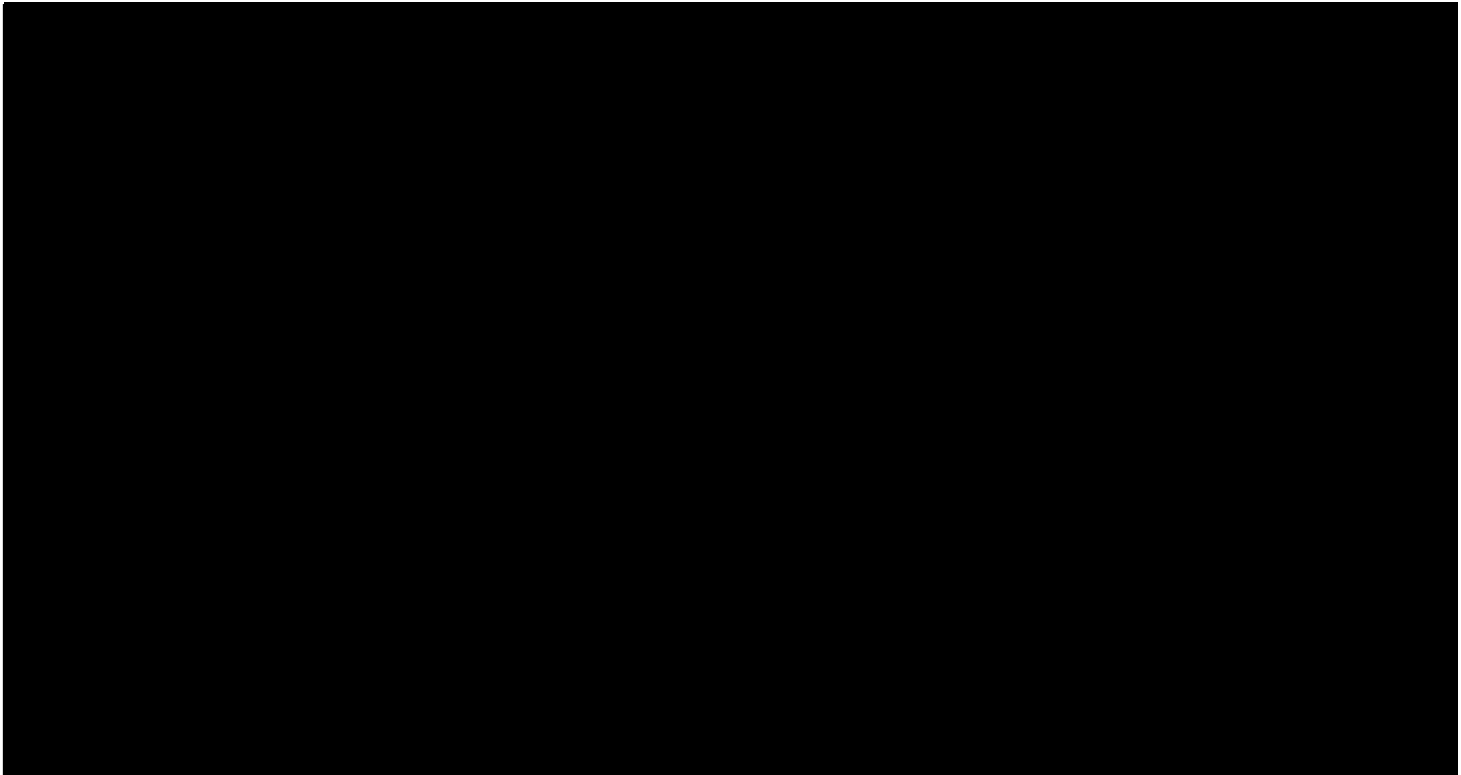
- Much of the indicators training is modeled on FDNS CARRP training for Identifying NS concerns
 - The overlap should help ISO's and FDNS IO's have a similar understanding of what constitutes an NS concern
 - However, the NS Indicator training is not a substitute for CARRP training and does not allow an ISO to be designated to work a CARRP case after a concern is identified
- The course structure for the NS Indicator training is builds on the steps an ISO needs to take from the when a case is reviewed / interviewed until the moment of referral to FDNS:
- The critical building blocks of the course are:
 - Understanding CARRP as the process for handling NS concerns
 - Understanding what an NS concern is
 - Understanding that NS concerns are simply a series of facts that can appear through a variety of sources
 - Understanding how to recognize and evaluate the facts that are present in a case
 - Understanding what to do if an NS concern might be present and what the next steps FDNS will take are
- This training focuses on Identifying NS concerns, which is Stage I of CARRP
 - However, the not all of Stage I is covered – for a FOD ISO audience, the rest of Stage I (categorizing the type of concern, documenting in DS, etc.) isn't as important
 - Instead, the focus is on recognizing the facts that lead to an initial identification that a case may require CARRP
 - Which means – throughout most of the training, we're talking about potential concerns – they won't actually be an NS concern until referred to FDNS and fully reviewed and opened in FDNS-DS

- CARRP is the process for handling NS concerns, but it can be more easily pictured as a yellow cautionary road sign or traffic signal – the presence of NS indicators suggests that there is something in the environment around which USCIS as an agency needs to slow down and exercise caution
- CARRP and TRIG are different – CARRP is a process, TRIG is an application of law
- The easiest way to break down an NS concern is in three elements –
 - a person;
 - facts suggesting the presence of an NS ground from the INA; and,
 - facts connecting the person to the activity described in the ground.
- We refer to “INA security grounds” or “INA NS grounds,” but that does not include every activity described in 212(a)(3) – it’s only certain sections have been determined to require handling via an NS process
- Because CARRP has nothing to do with the actual adjudicative decision in a case, it does not require a person to actually be inadmissible under one of the security grounds. Therefore, we can take an expansive reading of what INA security activities should be reviewed as a potential NS concern, because all we’re doing is using the security grounds to outline what should be handled through the process of CARRP
- When considering if an NS concern is present, ISO’s must consider all the facts in a case, regardless of where they come from
- Security checks are only one source of facts that could indicate a concern
- Just because security checks are clear, that does not automatically mean there’s no concern
- Facts suggesting an NS concern can also come from testimony or documents or application responses provided by the applicant themselves as part of the benefit request
- Because we are concerned with all the facts in a case, that means we can’t ignore things in a file or an interview that we’re unfamiliar with
- When considering whether an NS concern may be present in a case, it is critical that ISO’s are familiar with [REDACTED]
- The facts in a case must suggest both one of the specific INA security grounds and a connection between the person and the activity described in the ground
- The process of assembling all of the facts into a construction that meets the definition for an NS concern is similar to putting together a puzzle or building a car on an assembly line – individually, a single piece or fact may not stand out, but when organized in a certain way, enough facts together could connect a person to a concern
- A structured methodology for thinking about connections helps us decide how strongly connected to one of the security grounds a person must be for it to rise to the level of a potential concern
- Some of the things ([REDACTED]) that are not part of the security grounds used for CARRP can serve as the connection between a person and a separate activity that is one of the security grounds

Case Studies and Resources

- **LE**
- Slide 24 – Additional Resources: DOS Country Reports on Terrorism is a hyperlink to a public internet site run by DOS to provide an avenue for researching terrorist organizations
- Slide 33 – Case Study: [REDACTED]
- Slide 43 – Additional Resources: Studies in National Security is provided as a supplemental handout examining strong interview technique
- Slide 50 – Additional Resources: Studies in National Security is provided as a supplemental handout examining sources of financial information and how they may relate to an NS concern
- Slide 54 – Case Study: [REDACTED]
- Slide 50 – Additional Resources: Studies in National Security (2 documents) are provided as supplemental handouts examining how the interagency watchlisting process relates to USCIS screening and **LE** records in TECS

Exercise: Open Source Scenarios (Slide 25)



Instructions:

There are 10 scenarios to hand out in class. They can be reviewed one at a time as a class or can be distributed individually to single students. Once students have had a chance to review, discuss each fact pattern and identify whether an NS ground is present. The themes of this exercise are to emphasize that the facts unpinning an NS concern can come from anywhere (even open source) and to reinforce the grounds from the INA that constitute an NS concern.

Exercise: N-400 Review (Slide 56)

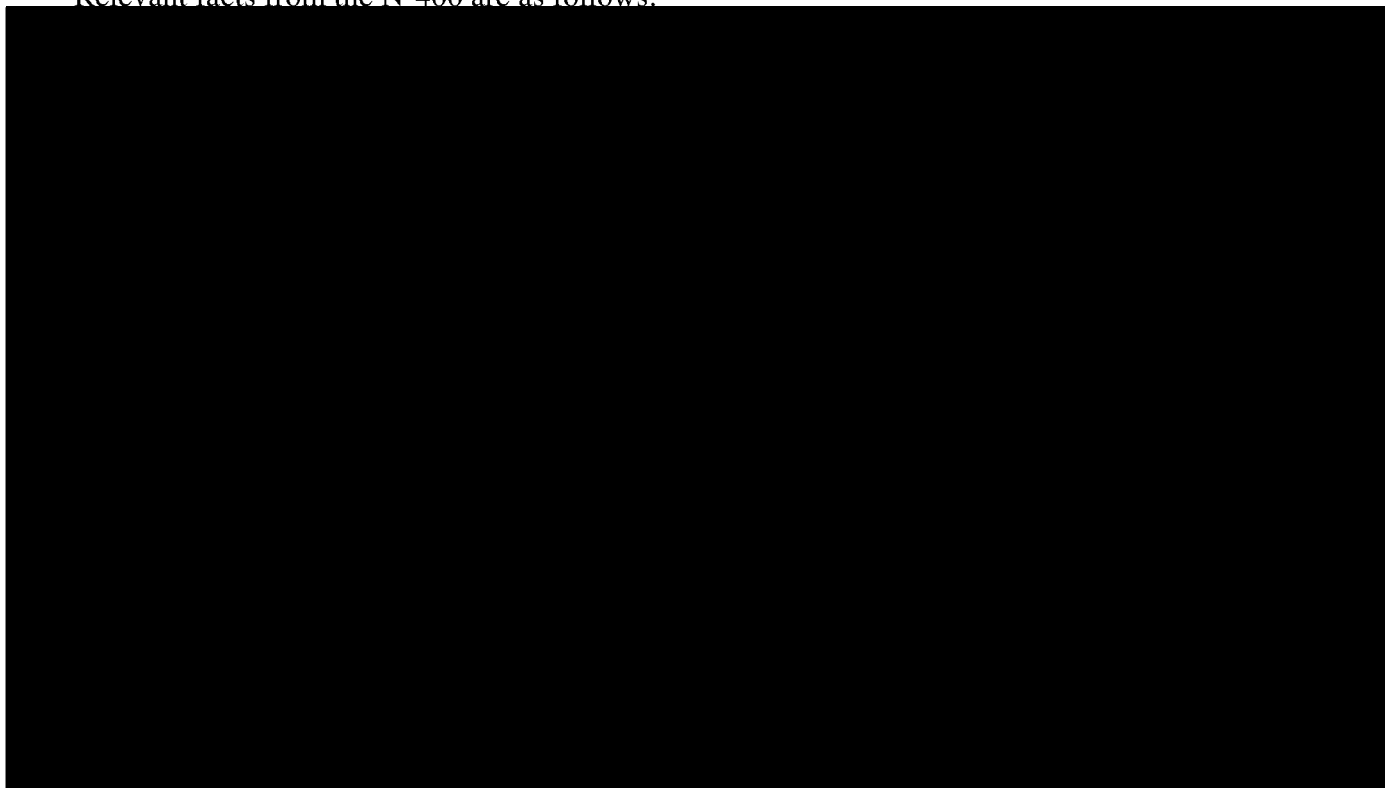
Instructions:

Review the facts one the N-400 one at a time without interpreting or giving context to particular facts. For example, do not point out patterns in travel – simply read the dates and countries visited. Students should consider all the facts in the case make a determination as to whether or not the case is a national security concern. After each student has made a decision, have students identify the facts in the N-400 that stood out to them as potentially related to national security. At this point, provide context and connections between the facts. Challenge students to identify lines of inquiry or facts that they would follow up on, and then have them describe how to find the information they think is missing through systems checks, an interview, open source, etc.

The exercise demonstrates that even a single form that ISO's handle routinely every day can present sufficient facts that an individual is an NS concern. It also emphasizes that one or two facts independently may not mean very much – the key to assemble all the pieces of the puzzle.

Reinforce that there are no issues with continuous residence or physical presence and no issues with marriage fraud or the duration of the statutory period. Instruct students to focus on the NS issues in the case rather than potential adjudicative considerations.

Relevant facts from the N-400 are as follows:



Key observations / questions for a guided discussion:

