



A.R. INTERNATIONAL CONSULTING · ARIC INSIGHT

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When the *vetting* catches up with the application.

U.S. visa applications, denial restructuring, and the firm's standing twelve-module due diligence — read together against the U.S. interagency-grade screening surface that now adjudicates them. A reading from the firm's desk for applicants and Trusted Traveller candidates.

FOREWORD · THE FIRM'S POSITION

The U.S. visa surface is now adjudicated against an interagency-grade screening posture — biographical, financial, behavioural, document-integrity, sanctions, social-media, and travel-history dimensions resolved in parallel against a multi-source intelligence picture before the consular decision is rendered. The firm's practice is to read every applicant and every Trusted Traveller candidate against the same pre-screening discipline the firm runs across its counterparty and executive due-diligence files. This issue records that practice as the firm now publishes it — the twelve-module checklist applied to the visa file on intake, the same twelve modules read in the opposite direction in restructuring after a denial, and the standing due-diligence methodology under which both motions are governed.

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SECTION I · THE PICTURE HAS CHANGED

U.S. interagency-grade screening — *and what it actually adjudicates.*

An honest read on the screening surface a U.S. visa or Trusted Traveller application now sits against, the dimensions adjudicated in parallel, and the reason most denials are not, in the firm's reading, decided at the consular window.

I.1 · *The application is no longer the file. The picture is.*

An applicant submits a form. The adjudication runs against a picture. The picture is assembled from biographical records, prior travel and adjudication history, financial signals, corporate and sectoral exposure, sanctions and watch-list screens, public-statement and social-media footprint, document-integrity signals across every prior submission, and counterparty risk inherited from the principals around the applicant. The screening surface that resolves this picture is U.S. **interagency-grade** — multiple agencies reading multiple data streams in parallel against the same name — and the consular decision is rendered after that picture has cleared, not before.

The implication for the applicant is simple and uncomfortable: **the file the applicant believes is being read is not the file the adjudicator is actually reading.** The applicant's file is what the applicant put on the form. The adjudicator's file is what the screening returned, with the form set against it as a consistency check. Every gap between the two is a finding before it is a question.

I.2 · *Two failure modes the firm sees most often.*

Under-disclosure. The applicant omits a fact — a prior denial, a prior overstay, a sensitive-sector affiliation, a sanctioned-country travel leg, a name variation on a prior document — on the assumption it will not surface. It surfaces. The omission converts the disclosure problem into a credibility problem, and credibility problems are adjudicated more harshly than the underlying fact would have been on its own.

Over-disclosure without structure. The applicant submits volume — pages of supporting material, multiple invitation letters, several versions of the same document — in the belief that volume reads as cooperation. It does not. Inconsistency between two versions of the same document is a document-integrity finding even where neither document is wrong. The remedy is not more paper. The remedy is a **single, internally consistent file** that anticipates the picture the screening will return.

I.3 · *What the firm reads against, on intake.*

The firm's intake on a visa or Trusted Traveller file runs the applicant against a **standing twelve-module pre-screening checklist** — the same module set, in the same sequence, for every file. The discipline is fixed; the depth on each module is calibrated to the file. The objective is to surface every finding the interagency-grade screen will surface, before the screen does, and to structure the file so that each finding either does not arrive at the adjudicator or arrives with the explanation already in the record.

I.4 · *Why this is sharper now.*

Three movements over the last several adjudication cycles all pull in the same direction. **First**, the screening posture has tightened across administrations rather than softening between them; the underlying interagency-grade screening surface has not been loosened by any of them, only incrementally extended. Reading the surface against the rhetoric of a given administration mis-reads it. **Second**, administrative-processing holds have become the load-bearing decision, not the consular interview — a file the screening cannot resolve cleanly does not generate an immediate refusal at the window; it generates a hold, read against the picture over weeks or months, and by the time the consular decision is rendered the picture has already done the work. **Third**, revocations after issuance, and Trusted Traveller revocations after enrolment, are no longer rare events. The picture is read continuously: an issuance is a snapshot of where it sat on the day of the decision, not a closure of the file. Where the picture moves materially after issuance — sectoral filing, counterparty transition, public-statement shift, sanctions-list adjacency — the surface re-reads, and the prior decision can be re-opened. The discipline is continuous, not transactional.

The firm's position is that the consular window is the last surface a well-prepared file is decided at, not the first. The picture is decided upstream — and the file that anticipates the picture is the file that reaches the window with the credibility the adjudicator is actually screening for.

SECTION II · THE TWELVE-MODULE PRE-SCREEN

The twelve modules the firm runs *on every file*.

The standing checklist set out below is the firm's intake instrument, compressed here for public reading. The twelve modules sit in three tiers: Standard Modules I–VII run on every file; Module VIII is the standing eight-list sanctions and watch-list screen; Optional Modules IX–XII are added on the instructing client's request. The applicant-facing pressure-test exhibit follows on the next two pages.

STANDARD · I

Identity & citizenship

Full legal name, every nationality held, name variations across every prior document, dual-passport disclosure.

STANDARD · II

Immigration & visa history

Every prior application, issuance, denial, administrative-processing history, prior residency status, purpose of travel.

STANDARD · III

Financial standing

Liquidity for stated travel, source-of-funds clarity, demonstrated ties to country of residence through assets and tax record.

STANDARD · IV

Business & corporate profile

Entities held across all jurisdictions, sensitive-sector exposure, state-owned-enterprise nexus, politically-exposed-person status.

STANDARD · V

Legal & compliance

Criminal record across all jurisdictions, pending matters, civil litigation, regulatory enforcement history, prior counsel.

STANDARD · VI

Travel history & sensitivity

Five-year country list with dates and purposes, sensitive-jurisdiction travel, forward calendar that sustains the file.

STANDARD · VII

Public statement & digital footprint

All social-media handles incl. pseudonymous, public statements that a comprehensive open-source review would surface.

MODULE VIII

Sanctions & watch-list (eight-list)

OFAC SDN, EU Consolidated, UN Security Council, UK HMT/OFSI, Canadian, Australian DFAT, Swiss SECO, World Bank Ineligible.

OPTIONAL · IX

Counterparty & channel risk

Deeper jurisdictional spreads, third parties around the matter, sole-channel discipline. Engaged on instruction.

OPTIONAL · X

Source-of-wealth tracing

Tracing of source-of-wealth and source-of-funds to documentary primary sources. Engaged on instruction.

OPTIONAL · XI

Document-integrity & OSINT deep-dive

Forensic reconciliation across versions, chain-of-custody, comprehensive open-source intelligence pull. Engaged on instruction.

OPTIONAL · XII

National-security & sectoral verification

Sensitive-sector and dual-use exposure, advisory and programme affiliations carrying national-security weight. Engaged on instruction.

The discipline is in completing the standing modules in sequence, on every file, with the depth on each module calibrated at intake. The pre-screen is not a test the applicant passes or fails; it is the instrument that surfaces the findings the interagency-grade screen will surface, in time for the file to anticipate them.

SECTION II.B · PUBLIC-READING PRESSURE-TEST · PART 1 OF 2

An applicant-facing pressure-test — *Standard Modules I–IV.*

A plain-reading question set, derived from the firm's standing intake instrument. The applicant who can answer every question below, on the record, with documentary support behind each answer, is the applicant whose file is ready to be read against the picture. The questions are the discipline.

Standard I · *Identity & citizenship.*

- Can you state your full legal name exactly as it appears on the passport to be used for the application, with every transliteration variant reconciled across every prior document?
- Can you list every nationality you currently hold, including any second passport, with issuing country, number, and expiry?
- Have you ever held or renounced U.S. citizenship or any other citizenship? Can you state the date and circumstances on the record?
- Have you used any aliases, former names, or name variations on any official document — and can you reconcile them?
- Does your spouse hold a nationality that would attract sanctions adjacency? Can you account for it cleanly?

Standard II · *Immigration & visa history.*

- Can you list every prior U.S. visa application — including any filed by intermediaries on your behalf — with class, date, post, and outcome?
- Can you account for every prior denial, with the cited statutory ground, on the record before the next file is contemplated?
- Have you ever been placed under administrative processing on a prior file? Can you state the outcome?
- Have you ever overstayed a U.S. admission, been removed, or been excluded from any country?
- Has any passport you held been reported lost or stolen with a valid visa affixed? Can you state the circumstances?

Standard III · *Financial standing.*

- Can you produce six months of personal and corporate bank statements demonstrating liquidity sufficient for the stated travel?
- Can you produce three years of tax returns filed in your country of residence, and financials for any entity you control or are a principal of?
- Is there any ambiguity in your source of wealth or source of funds that would attract an anti-money-laundering question?
- Can you demonstrate ties to your country of residence — real property, business, family — that read as nonimmigrant intent?

Standard IV · *Business & corporate profile.*

- Can you list every entity you hold across every jurisdiction — name, jurisdiction, registration number, role?
- Are you, or have you ever been, a politically-exposed person, or connected to one through business, investment, advisory, or family relationships?
- Are you an officer, beneficial owner, or signatory of any state-owned enterprise of any country?
- Do any of your activities sit in sensitive sectors — defence, intelligence, energy, nuclear, telecommunications, space, dual-use technology?
- Do you direct or signatory any entity registered in a jurisdiction on the FATF grey or black list?

SECTION II.B · PUBLIC-READING PRESSURE-TEST · PART 2 OF 2

Standard V–VII — and the *eight-list screen*.

The remaining standard modules, then the standing eight-list sanctions and watch-list screen the firm runs on every file. The Optional Modules IX–XII are not included as a public checklist; they are scoped, priced, and added file-by-file on the instructing client's request.

Standard V · *Legal & compliance*.

- Can you account for every conviction in any jurisdiction — including arrest-resulting traffic offences and DUI?
- Are you presently the subject of any pending criminal investigation or charge in any jurisdiction?
- Are you party to any pending civil litigation in any jurisdiction?
- Have you been the subject of regulatory enforcement by any financial regulator, securities authority, or law-enforcement agency?
- Would a comprehensive open-source review surface adverse media, regulatory action, or sanctions adjacency you would prefer to address before the screen does?

Standard VI · *Travel history & sensitivity*.

- Can you produce a full five-year country list, with approximate dates and purposes of travel?
- Have you travelled to any comprehensively sanctioned country, or sanctioned region, in the past five years?
- Have you travelled to any sensitive-jurisdiction or near-sanctioned country in the past five years — and can you state the purpose?
- Do you carry a forward-looking calendar of confirmed engagements that supports the file independently of any single event?

Standard VII · *Public statement & digital footprint*.

- Can you list every social-media account and handle you maintain — including pseudonymous and anonymous ones?
- Would any of your public statements read as hostile to U.S. institutions, interests, or public figures, on a comprehensive review?
- Have you posted, shared, or endorsed material that could be characterised as extremist or supportive of designated organisations?
- Have you posted material related to controlled substances, weapons, or activity inconsistent with U.S. law?

Module VIII · *Sanctions & watch-list (eight-list screen)*.

- Have you ever appeared on, or been near-matched against, the OFAC Specially Designated Nationals list?
- Have you ever appeared on the EU Consolidated, UN Security Council, UK HMT/OFSI, Canadian Consolidated Autonomous, Australian DFAT, Swiss SECO, or World Bank Listing of Ineligible Firms?
- Are you a co-beneficial-owner, business partner, or spouse of a national of a comprehensively sanctioned country?
- Have you had assets frozen, seized, or blocked under sanctions regulations — or transacted with any restricted-party-listed person or entity in the past five years?

If you cannot answer every question above, on the record, with documentary support behind each answer, the file is not ready. The pressure-test is the discipline. The discipline is the file.

SECTION III · DENIAL RESTRUCTURING

After a denial — *do not reapply blind. Reconstruct the file.*

Most denials, in the firm's reading, are not the end of the matter. They are a request, in the form of a refusal, for the file to be rebuilt against the picture that surfaced. The discipline is reconstruction, in sequence, before any second application is filed.

III.1 · *Read the refusal as a finding, not a verdict.*

A refusal cites a section of the immigration statute. That section is the doorway, not the room. The room is the picture the screening surface returned. The first discipline of restructuring is to read the refusal back into the picture, identify which of the twelve modules the finding sits inside, and treat that module as the load-bearing module the rebuilt file must carry. A second application that does not address the underlying module is, in the firm's reading, the most predictable cause of a second refusal.

III.2 · *Run the twelve modules in the opposite direction.*

On intake, the twelve modules anticipate the picture. On restructuring, the same twelve modules read backwards from the refusal to identify every module the prior file under-served, every document-integrity signal the prior submission may have created, and every counterparty exposure the prior channel may have introduced. The audit is the file. The discipline is to complete it before any new submission is contemplated.

III.3 · *The sole-channel rule.*

The firm's standing rule on restructuring is **sole-channel control**: from the moment the firm is engaged on a restructured file, no other party communicates with the post on the applicant's behalf, no further documents are submitted independently, and no intermediary makes representations of any kind. The sole-channel rule is not a courtesy to the firm; it is the discipline that prevents a second document-integrity finding from being created during the rebuild. The rule applies to family members, to prior counsel, to event organisers, and to any third party who introduced themselves around the matter while the prior file was open.

The firm's reading on restructuring is unambiguous. A denial is a request for a rebuilt file, against the same twelve modules, under sole-channel control, with the underlying finding addressed in the record before the second application is filed. Anything less is a re-submission of the file the screen already declined.

SECTION IV · THE STANDING METHODOLOGY

The firm's due diligence — *productised, calibrated per file.*

The same standing methodology the firm runs on counterparty, executive, and corporate-entity files is the methodology under which a visa or Trusted Traveller pre-screen is governed. A fixed module set, a fixed sequence, a fixed evidentiary discipline; depth and jurisdictional spread calibrated to the file at the time of instruction.

IV.1 · Subject & executive — *the first four modules.*

The standing model is presented in three tiers. **Standard Modules I–VII** read the subject, the entity, and the reputation into the picture: identity and citizenship; immigration and visa history; financial standing; business and corporate profile, including beneficial-ownership chain and sectoral exposure; legal and compliance, including regulatory and enforcement history; travel history and sensitivity; and public statement and digital-footprint exposure. The seven standard modules run as a fixed set on every file.

IV.2 · Module VIII — *the eight-list sanctions screen.*

Above and adjacent to the standard set, **Module VIII** runs the standing sanctions and watch-list screen on every file. The eight-list screen is itemised at IV.3 below.

IV.3 · Sanctions & watch-list screen — *eight lists.*

The standing screen runs against **eight recognised sanctions and watch lists** on every file: OFAC Specially Designated Nationals, the EU Consolidated Financial Sanctions list, the UN Security Council sanctions list, the UK HMT/OFSI consolidated list, the Canadian Consolidated Autonomous Sanctions list, the Australian DFAT consolidated list, the Swiss SECO sanctions list, and the World Bank Listing of Ineligible Firms. Matches are categorised, near-matches are reconciled, and the screen is recorded in the file as part of the work product. Politically-exposed-person, adverse-media, and FATF jurisdictional exposure are run as supplementary surfaces alongside the eight-list screen.

IV.4 · Optional Modules IX–XII — *added on instruction.*

The four optional modules — **(IX)** counterparty and channel risk with deeper jurisdictional spreads; **(X)** source-of-wealth tracing; **(XI)** document-integrity forensic and OSINT deep-dive; **(XII)** national-security and sectoral verification — are added **only on the instructing client's request**. The standard cut is the file unless the client instructs otherwise; optional layers are scoped, priced, and added file-by-file rather than bundled by default. The discipline is optional.

The firm's position is that visa and Trusted Traveller pre-screening sits inside the same methodology the firm runs on every counterparty file — the same modules, the same sequence, the same evidentiary discipline — calibrated to the surface that adjudicates it. The discipline travels.

SECTION V · TRUSTED TRAVELLER & CLOSE

Trusted Traveller candidates — *same picture, higher bar.*

The Trusted Traveller surface adjudicates the same picture against a higher behavioural and consistency bar over time. The discipline of intake, the discipline of restructuring after revocation, and the standing methodology under which both motions are governed.

V.1 · *The Trusted Traveller bar.*

Trusted Traveller programmes adjudicate the applicant against the same interagency-grade picture, against a behavioural-consistency bar held over a longer time horizon. The pre-screening checklist runs the same twelve modules. The differentiator is the **consistency burden**: the candidate's travel pattern, public-statement footprint, sectoral exposure, and counterparty register must read consistently across the years the membership covers, not only at the moment of application. A pattern that drifts is a pattern that is reviewed.

V.2 · *After revocation — the same restructuring discipline.*

A Trusted Traveller revocation is, in the firm's reading, a request to read the picture back through the same twelve modules and identify which module returned the finding. Restructuring is the same motion as on a visa denial: address the finding inside the module, rebuild the file under sole-channel discipline, and present the rebuilt picture against the same screening surface. The instrument is the same; the calendar is different.

V.3 · *Close.*

The firm publishes this position so that applicants and Trusted Traveller candidates — and the counsel and family advisers around them — can read the screening surface for what it is, pressure-test their own file against the twelve modules in time to address the findings before they surface, and approach restructuring after a refusal as the rebuild it actually is rather than as a re-submission of the file already declined. The discipline is the same on intake and on rebuild. The discipline is the firm's standing methodology, calibrated per file.

The firm's practice on this surface is unchanged: the file the applicant submits should be the file the picture returns. The twelve-module pre-screen is the instrument the firm runs to ensure that they match.

NOTE · NOT LEGAL ADVICE. This issue is published as the firm's working position for general reading. It is not a legal opinion, does not create a client relationship, and does not address the specific facts of any particular application. Specific U.S. visa, Trusted Traveller, or denial-restructuring matters require conflicts-checked engagement with U.S. immigration counsel and, where appropriate, the firm's standing pre-screening intake.