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A second passport, read as *insurance* against the day the first one stops working.

Citizenship by investment, mobility resilience, and the firm's reading of the programmes that actually move a family across a border on the day the airspace closes. A reading from the firm's desk for principals planning ahead of, not behind, an event.

FOREWORD · THE FIRM'S POSITION

Citizenship by investment is, in the firm's reading, not a status purchase. It is the **pre-positioning of a working second passport** against a future in which the principal's primary citizenship may — through conflict, sanctions exposure, sudden visa-policy reversal, or simple administrative closure — cease to deliver the mobility it currently delivers. The firm now publishes here, as an authorised **designated service provider**, the position it takes with private principals on the question: which programmes are actually load-bearing on the day they are needed, which are theatre, and what the intake discipline looks like when the work is done properly.

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SECTION I · WHY MOBILITY MATTERS

The day the passport *stops working*.

Conflict, sanctions, and policy reversal do not announce themselves on a useful timeline. The principal who waits until the event begins to plan is, in the firm's reading, already late.

I.1 · What “mobility” actually means in a crisis.

Mobility, in calm conditions, is a question of convenience — how many countries the passport admits without prior application, how long the visa-on-arrival is good for, how quickly the family clears immigration at the destination. In a crisis it becomes a different question entirely: **can the principal, the spouse, the children, and the household's key staff actually board an aircraft and clear an arrival hall on a passport that is not the one suddenly under restriction?** The answer is binary. Either there is a working second document at hand or there is not.

The crises that produce this question are not exotic. In the past quarter-century, holders of perfectly ordinary passports from Iran, Iraq, Lebanon, Syria, Russia, Belarus, Ukraine, Venezuela, Zimbabwe, Sudan, Afghanistan, Hong Kong, and Myanmar have each, at different points, found their primary travel document quietly demoted — visa programmes suspended, embassies shuttered, transit airports declining boarding, banks closing accounts associated with the issuing state. None of these were predicted on a useful timeline. Most were resolved, for those who had pre-positioned a second document, in days. For those who had not, in years.

I.2 · The four mechanisms that close a border to a passport.

Sanctions. A jurisdiction is added to a sanctions regime; carriers, insurers, and correspondent banks de-risk in advance of any formal restriction. The passport still exists. What it admits the holder to does not.

Visa-policy reversal. A receiving country withdraws visa-free or visa-on-arrival access for the issuing state, often overnight, often without an embassy stationed locally to service the new application requirement. The passport is unchanged; the route is closed.

Airspace and carrier closure. Conflict prompts overflight bans and route suspensions. The holder is not under sanction, but the only realistic exit is by road through a third country whose entry rules are set against the issuing state.

Document validity and renewal. Embassies close, consular services suspend, passport printing is centralised in a now-inaccessible capital. The document expires in-pocket and cannot be renewed where the holder is.

The firm's position. Each of these four mechanisms is solved, in advance, by the same instrument: a working second citizenship issued by a state that is not party to the dispute and whose passport is not the one under restriction. The instrument has to exist before the event. It cannot be obtained in time after the event begins.

I.3 · Why the work is done in calm, not in heat.

Every credible citizenship-by-investment programme is gated by a formal due-diligence process — conducted by independent vetting agencies, drawing on international watch-list, sanctions, and adverse-media screens. The process takes months, not weeks. **It cannot be accelerated by the principal's urgency.** A file submitted under crisis conditions is also a file submitted with a degraded source-of-funds picture, fewer reachable references, frozen bank lines, and, frequently, a counterparty risk profile that has begun to draw negative attention. The same applicant, walking the same file through the same programme twelve months earlier, is a clean approval. Twelve months later, the same file is a referral or a refusal.

This is the central counsel the firm gives. **The right time to file is the time at which one cannot yet articulate a specific reason to file.** The wrong time is the time at which the reason has become obvious to the adjudicator.

SECTION II · THE PROGRAMMES THAT ARE LOAD-BEARING

A short reading of the programmes the firm *actually* files into.

Not every programme that exists on paper is a programme the firm will commit a principal to. Below: the short list, by region, with a one-line note on what each is genuinely useful for.

CARIBBEAN · FIVE PROGRAMMES

St Kitts & Nevis · Dominica · Antigua · Grenada · Saint Lucia.

The most established CBI register in the world. Visa-free or visa-on-arrival access to the United Kingdom, Schengen, Singapore, and Hong Kong on most of the five. Processing typically four to nine months when the file is clean. Grenada uniquely admits the holder to the U.S. E-2 treaty-investor visa.

SOUTH PACIFIC

Republic of Vanuatu.

The fastest credible programme on the market — final approval has historically run in two to four months on a clean file. Two routes: the Contribution-Based Programme and the Investment-Linked CIIP via the Vanuatu Impact Fund. The firm files both as an authorised designated service provider.

MEDITERRANEAN

Republic of Malta.

A European Union passport at the end of the process — the only programme on the market that delivers full EU citizenship rights with right of establishment across all member states. Substantially longer time-to-passport (12 to 36 months), substantially higher financial threshold, substantially deeper due diligence.

EURASIA

Republic of Türkiye.

A real-estate-linked route at a moderate threshold, with a working passport that admits the holder to Japan, Singapore, South Korea, and most of South America visa-free, and qualifies for the U.S. E-2. Useful for principals whose business gravity is in the region.

NORTH AFRICA

Arab Republic of Egypt.

A flat contribution route at a relatively low threshold, structured through the central bank. Less mobility power than the Caribbean five but credible and quietly active. Useful as a second-tier resilience document for regional principals.

RESIDENCY-FIRST ROUTES

UAE · Portugal · Greece · Cyprus.

Not citizenship on day one, but a working residency that runs in parallel to a citizenship file and provides interim mobility, banking access, and a credible address while the longer file matures. The firm uses these as bridge instruments rather than end-states.

II.1 · What the firm will not file into.

The firm declines to file into programmes that are either (a) sanctioned or under formal international review, (b) operating without an independent due-diligence layer, (c) marketed primarily through brokers offering fee discounts in exchange for relaxed file standards, or (d) issued by states whose own passport is currently subject to material visa-policy reversal in the receiving jurisdictions the principal needs. A second passport that fails the same way the first one failed is not a second passport. It is a duplicate of the problem.

SECTION III · HOW THE FIRM READS A FILE

The intake discipline behind a *working second passport*.

A citizenship file is, in the firm's reading, a due-diligence file before it is anything else. The discipline below is what the firm runs on intake, before a single programme is recommended to a principal.

III.1 · *What the firm reads, in sequence.*

- **Source-of-funds and source-of-wealth picture** — reconstructed end-to-end against bank statements, audited accounts, transactional records, and corporate filings, before the programme's vetting agency sees the file.
- **Sanctions and watch-list screening** — the principal, the spouse, every adult dependant, and every counterparty of material exposure read against the standing eight-list register of sanctions and watch-list bodies.
- **Adverse-media and litigation history** — in every operating jurisdiction and in every name variation on file, including transliterations.
- **Document integrity** — consistency of names, dates, addresses, and signatures across every prior immigration, banking, corporate, and tax filing the principal has ever made.
- **Mobility-need framing** — a deliberate, written-out account of why this passport, this programme, this jurisdiction, in this sequence, with this family configuration. The vetting agency will ask. The answer should be on the file before the question is.
- **Counterparty and principal-around-the-principal screen** — business partners, board affiliations, and capital providers read at the same depth as the principal, because the programme will read them at the same depth.

Why the discipline matters. A clean file moves through the programme's vetting in months. A file the firm has not pressure-tested before submission is, far more often than not, the file that comes back with a request-for-information that opens a new line of inquiry. The objective on intake is to surface every finding the programme's vetting agency will surface, before it does, and to put the explanation on the record at the same time as the question.

III.2 · *The principal's decision, framed plainly.*

The decision is not whether to obtain a second citizenship. The decision is **whether to obtain it now, while the file is clean and the programmes are open, or later, under conditions that have already begun to close.** The firm's counsel, consistently, is the former. The instrument is cheaper, the file is stronger, the timeline is shorter, and the second passport is in hand the day the principal needs it — not, six months in, the answer to a question the principal can no longer afford to be asking.

The firm engages on this work as an authorised **designated service provider** for the programmes it files into, on a private-counsel basis, and conducts the full intake before any programme is recommended. The intake is the commitment. The programme is the consequence of the intake.

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 constitute an offer of representation in any jurisdiction. Citizenship-by-investment programmes are subject to amendment and suspension by the issuing states without notice. Successful citizenship is contingent on the outcome of the relevant government's due-diligence process and is not guaranteed. Principals considering any programme should engage formal counsel in their own jurisdiction.