



**U.S. Citizenship
and Immigration
Services**

Date: **OCT 14 2011**

Keen Wei
AAA California Regional Center, LLC
20380 Town Center Lane # 170
Cupertino, CA 95014

Application: Request for Designation as a Regional Center
Applicant(s): Keen Wei

Re: AAA California Regional Center
RCW1031910073/ID1031910073/(Formerly W09002720)

****Corrected****

Pursuant to Section 610 of the Appropriations Act of 1993, on October 18, 2010, Keen Wei submitted a proposal seeking approval and designation by U.S. Citizenship and Immigration Services (USCIS) of the AAA California Regional Center.

USCIS hereby designates AAA California Regional Center as a Regional Center within the Immigrant Investor Pilot Program and approves the request as described below:

GEOGRAPHIC AREA:

The AAA California Regional Center shall have a geographic scope to include the counties of San Francisco, San Mateo, Contra Costa, Alameda, Santa Clara, San Benito, Fresno and Kings in the State of California.

FOCUS OF INVESTMENT ACTIVITY:

As depicted in the economic model, the general proposal, business plan and associated economic analysis, the Regional Center will engage in the following economic activities: the development, operation and management of new commercial enterprises in the Regional Center area.

The Regional Center shall focus on offering EB-5 compliant capital investment opportunities into new commercial enterprises or a mix of commercial enterprises in the following target industry economic categories:

COPY

1. Retail:
 - a. Supermarkets and Other Grocery (except Convenience) Stores – NAICS 445110
 - b. Pharmacies and Drug Stores – NAICS 446110
 - c. Women's Clothing Stores – NAICS 448120
 - d. Sporting Goods Stores – NAICS 451110
 - e. All Other General Merchandise Stores – NAICA 452990
2. Hospitality:
 - a. Hotels (except Casino Hotels) and Motels – NAICA 721110
3. Food Services:
 - a. Limited-Service Restaurants – NAICS 722211
4. Professional Offices:
 - a. Offices of Lawyers – NAICS 541110
 - b. Offices of Certified Public Accountants – NAICS 541211
 - c. Engineering Services – NAICS 541330
 - d. Custom Computer Programming Services – NAICA 541511
 - e. Other Management Consulting Services – NAICA 541618
 - f. Advertising Agencies – NAICS 541810
5. Medical Offices:
 - a. Offices of Physicians (except Mental Health Specialists) – NAICS 621111
6. Entertainment:
 - a. Fitness and Recreational Sports Centers – NAICS 713940
7. Assisted Living Facility:
 - a. Nursing Care Facilities – NAICS 623110
8. Alternative Energy Structure Construction:
 - a. Power and Communication Line and Related Structures Construction – NAICS 237130

If any investment opportunities arise that are beyond the scope of the approved industry categories, then an I-924 amendment application would be required to add that category.

Aliens seeking immigrant visas through the Immigrant Investor Pilot Program may file individual petitions with USCIS for capital investments in new commercial enterprises located within and affiliated with the approved Regional Center area.

The geographic focus of this area may contain some High Unemployment Targeted Employment Areas (TEAs) as designated by the State of California and rural TEAs, as defined in 8 CFR 204.6(e). Therefore, the minimum capital investment threshold for any individual immigrant investment into an approved commercial enterprise throughout the Regional Center shall be not less than \$500,000, if the investment target is located within a TEA or \$1,000,000 if it is located outside of a TEA. No debt arrangement will be acceptable unless it is secured by assets owned by the alien entrepreneur. A full capital investment must be made and placed at risk.

For any alien requesting the reduced threshold of \$500,000 based upon an investment in a Targeted Employment Area, the alien must establish at the time of filing of the I-526 petition that either the investment will be made in a TEA designated area or was in a TEA designated area at the time of the alien's initial investment into the enterprise.

EMPLOYMENT CREATION

Immigrant investors who file petitions for capital investments in new commercial enterprises located within and affiliated with the Regional Center area must fulfill all of the requirements set forth in INA 203(b)(5), 8 CFR 204.6, and 8 CFR 216.6, except that the petition need not show that the new commercial enterprises created ten new jobs directly as a result of the immigrant investor's investment. The determination whether the alien investor has met the job creation requirements will be established by a review of the required initial evidence at 8 CFR 204.6(j) and 8 CFR 216.6(a)(4) for the Form I-526 and Form I-829 petitions, respectively. The capital investment and job creation activities outlined in the individual petitions must fall within the bounds of the final economic analysis that is contained as part of the approved Regional Center proposal and its indirect job creation model and multipliers contained within the final approved Regional Center application package. The immigrant investor must show at the time of removal of conditions that they performed the activities described in Form I-526 petition, and the activities must be based on the approved regional center methodology for demonstrating job creation. The approved econometric model is RIMS II.

In addition, where job creation is claimed based on multipliers rooted in revenue generated by businesses occupying space and estimated project costs expenditures, the immigrant investor's individual I-526 petition affiliated with your Regional Center, should include as supporting evidence:

- A comprehensive detailed business plan with supporting financial, marketing and related data and analysis providing a reasonable basis for projecting creation of indirect and/or induced jobs to be achieved/realized within two years pursuant to 8 CFR 204.6(j)(4)(B) and reasonable methodologies pursuant to 8 CFR 204.6(m)(7)(ii).

An alien investor's I-829 petition to remove the conditions which was based on an I-526 petition approval that involved the creation of new indirect jobs based on multipliers tied to job creation inputs such as revenue generated by businesses occupying space and estimated project expenditures costs, needs to be supported by evidence showing the space is occupied by such businesses and that the funds were expended in the job-creating activity. Such evidence may include reasonable methodologies like multiplier tables, feasibility studies, and other economically or statistically valid forecasting devices which indicate the likelihood that the alien's investment has resulted in increased employment.

Additional Guidelines for individual Immigrant Investors Visa Petition (I-526)

Each individual petition, in order to demonstrate that it is associated with the Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain as supporting evidence relating to this Regional Center designation, the following:

1. A copy of this letter, the Regional Center approval and designation.
2. A copy of the USCIS approved Regional Center narrative proposal and business plan.
3. A copy of the job creation methodology required in 8 CFR 204.6(j)(4)(iii), as contained in the final Regional Center economic analysis which has been approved by USCIS, which reflects that investment by an individual immigrant investor will create not fewer than ten (10) full-time employment positions, either directly or indirectly, per immigrant investor.
4. A legally executed copy of the USCIS approved documents:

- | | |
|----------------------------------|----------------------------------|
| a. Operating Agreement | Draft dated June 6, 2010 |
| b. Offering Memorandum | Draft dated October 1, 2010 |
| c. Subscription Agreement | Draft dated October 1, 2010 |
| d. Escrow Agreement | Submission date October 18, 2010 |
| e. Limited Partnership Agreement | Draft dated October 1, 2010 |

Note: Each petition must also include any other evidence that is relevant to a proposed investment project, such as, licenses and permits, building contracts, construction costs, building projections and timelines, advisory opinions, feasibility studies, etc.

DESIGNEE'S RESPONSIBILITIES INHERENT IN CONDUCT OF THE REGIONAL CENTER:

The law, as reflected in the regulations at 8 CFR 204.6(m)(6), requires that an approved Regional Center in order to maintain the validity of its approval and designation must continue to meet the statutory requirements of the Immigrant Investor Pilot Program by serving the purpose of promoting economic growth, including increased export sales (where applicable), improved regional productivity, job creation, and increased domestic capital investment. Therefore, in order for USCIS to determine whether your Regional Center is in compliance with the above cited regulation, and in order to continue to operate as a USCIS approved and designated Regional Center, your administration, oversight, and management of your Regional Center shall be such as to monitor all investment activities under the sponsorship of your Regional Center and to maintain records, data and information in order to provide the information required on the Form I-924A supplement. Form I-924A, Supplement to Form I-924 is available in the "Forms" section on the USCIS website at www.uscis.gov.

Effective November 23, 2010, the failure to timely file a Form I-924A Supplement for each fiscal years in which the regional center has been designated for participation in the Immigrant Investor Pilot Program will result in the issuance of an intent to terminate the participation of the regional center in the Pilot Program, which may ultimately result in the termination of the approval and designation of the regional center.

Note: The requirement for the filing of Form I-924A Supplement commences in fiscal year 2011. Each regional center that remains designated for participation in the pilot program as of September 30, 2011 must submit the Form I-924A Supplement with the required supporting documentation on or before December 29, 2011.

If you have any questions concerning the Regional Center approval and designation under the Immigrant Investor Pilot Program, please contact the USCIS by Email at USCIS.ImmigrantInvestorProgram@dhs.gov.

Sincerely,



Rosemary Langley Melville
Director
California Service Center

cc: Linda Lau, Esq.



**U.S. Citizenship
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Date: **OCT 14 2011**

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Pursuant to Section 610 of the Appropriations Act of 1993, on October 18, 2010, Keen Wei submitted a proposal seeking approval and designation by U.S. Citizenship and Immigration Services (USCIS) of the AAA California Regional Center.

USCIS hereby designates Admiralty California Regional Center as a Regional Center within the Immigrant Investor Pilot Program and approves the request as described below:

GEOGRAPHIC AREA:

The AAA California Regional Center shall have a geographic scope to include the counties of San Francisco, San Mateo, Contra Costa, Alameda, Santa Clara, San Benito, Fresno and Kings in the State of California.

FOCUS OF INVESTMENT ACTIVITY:

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alien investor has met the job creation requirements will be established by a review of the required initial evidence at 8 CFR 204.6(j) and 8 CFR 216.6(a)(4) for the Form I-526 and Form I-829 petitions, respectively. The capital investment and job creation activities outlined in the individual petitions must fall within the bounds of the final economic analysis that is contained as part of the approved Regional Center proposal and its indirect job creation model and multipliers contained within the final approved Regional Center application package. The immigrant investor must show at the time of removal of conditions that they performed the activities described in Form I-526 petition, and the activities must be based on the approved regional center methodology for demonstrating job creation. The approved econometric model is RIMS II.

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Additional Guidelines for individual Immigrant Investors Visa Petition (I-526)

Each individual petition, in order to demonstrate that it is associated with the Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain as supporting evidence relating to this Regional Center designation, the following:

1. A copy of this letter, the Regional Center approval and designation.
2. A copy of the USCIS approved Regional Center narrative proposal and business plan.
3. A copy of the job creation methodology required in 8 CFR 204.6(j)(4)(iii), as contained in the final Regional Center economic analysis which has been approved by USCIS, which reflects that investment by an individual immigrant investor will create not fewer than ten (10) full-time employment positions, either directly or indirectly, per immigrant investor.
4. A legally executed copy of the USCIS approved documents:
 - a. Operating Agreement
 - b. Offering Memorandum
 - c. Subscription Agreement
 - d. Escrow Agreement

Draft dated June 6, 2010
Draft dated October 1, 2010
Draft dated October 1, 2010
Submission date October 18, 2010

e. Limited Partnership Agreement

Draft dated October 1, 2010

Note: Each petition must also include any other evidence that is relevant to a proposed investment project, such as, licenses and permits, building contracts, construction costs, building projections and timelines, advisory opinions, feasibility studies, etc.

DESIGNEE'S RESPONSIBILITIES INHERENT IN CONDUCT OF THE REGIONAL CENTER:

The law, as reflected in the regulations at 8 CFR 204.6(m)(6), requires that an approved Regional Center in order to maintain the validity of its approval and designation must continue to meet the statutory requirements of the Immigrant Investor Pilot Program by serving the purpose of promoting economic growth, including increased export sales (where applicable), improved regional productivity, job creation, and increased domestic capital investment. Therefore, in order for USCIS to determine whether your Regional Center is in compliance with the above cited regulation, and in order to continue to operate as a USCIS approved and designated Regional Center, your administration, oversight, and management of your Regional Center shall be such as to monitor all investment activities under the sponsorship of your Regional Center and to maintain records, data and information in order to provide the information required on the Form I-924A supplement. Form I-924A, Supplement to Form I-924 is available in the "Forms" section on the USCIS website at www.uscis.gov.

Effective November 23, 2010, the failure to timely file a Form I-924A Supplement for each fiscal years in which the regional center has been designated for participation in the Immigrant Investor Pilot Program will result in the issuance of an intent to terminate the participation of the regional center in the Pilot Program, which may ultimately result in the termination of the approval and designation of the regional center.

Note: The requirement for the filing of Form I-924A Supplement commences in fiscal year 2011. Each regional center that remains designated for participation in the pilot program as of September 30, 2011 must submit the Form I-924A Supplement with the required supporting documentation on or before December 29, 2011.

If you have any questions concerning the Regional Center approval and designation under the Immigrant Investor Pilot Program, please contact the USCIS by Email at USCIS.ImmigrantInvestorProgram@dhs.gov.

Sincerely,



Rosemary Langley Melville
Director
California Service Center

cc: Linda Lau, Esq.

A #	Application/Petition I924, Application for Regional Center under Immigrant Investor Pilot Program	
Receipt # RCW1031910073	Application/Petitioner Aaa California Regional Center	
Notice Date June 8, 2011	Page 1 of 11	Beneficiary

GLOBAL LAW GROUP
C/O LINDA LAU, ESQ.
350 SOUTH FIGUEROA ST, SUITE 780
LOS ANGELES, CA 90071

Request for Evidence
APPROVED FOR FILING

AUG 23 2011

Notice also sent to:
FDC CSC C30070

RETURN THIS NOTICE ON TOP OF THE REQUESTED INFORMATION LISTED ON THE ATTACHED SHEET.

Note: You are given until **August 31, 2011** in which to submit the requested information to the address at the bottom of this notice.

Pursuant to 8 C.F.R. 103.2(b)(11) failure to submit **ALL** evidence requested **at one time** may result in the denial of your application.

For more information, visit our website at **www.uscis.gov**

Or call us at **1-800-375-5283**

Telephone service for the hearing impaired: **1-800-767-1833**

PS400270

P/K

CSC1298 WS22123 DIV III JT

You will be notified separately about any other applications or petitions you filed. Save this notice. Please enclose a copy of it if you write to us about this case, or if you file another application based on this decision. Our address is:

USCIS - CALIFORNIA SERVICE CENTER
P.O. BOX 10590
LAGUNA NIGUEL, CA 92607-0590
800-375-5283



RCW1031910073

REC'D 03/03/11 0331

C30225

Additional Information for Applicants and Petitioners.

General.

The filing of an application or petition does not in itself allow a person to enter or remain in the United States and does not confer any other right or benefit.

Inquiries.

If you do not hear from us within the processing time given on this notice and you want to know the status of this case, use InfoPass at www.uscis.gov to contact your local USCIS office or call our National Customer Service Center at 1-800-375-5283.

You should follow the same procedures before contacting your local USCIS office if you have questions about this notice.

Please have this form with you whenever you contact a local office about this case.

Requests for Evidence.

If this notice asks for more evidence, you can submit it or you can ask for a decision based on what you have already filed. When you reply, please include a copy of the other side of this notice and also include any papers attached to this notice.

Reply Period.

If this notice indicates that you must reply by a certain date and you do not reply by that date, we will issue a decision based on the evidence on file. No extension of time will be granted. After we issue a decision, any new evidence must be submitted with a new application or petition, motion or appeal, as discussed under "Denials".

Approval for a Petition.

Approval of an immigrant or nonimmigrant petition means that the beneficiary, the person for whom it was filed, has been found eligible for the requested classification. However, approval of a petition does not give any status or right. Actual status is given when the beneficiary is given the proper visa and uses it to enter the United States. Please contact the appropriate U.S. consulate directly if you have any questions about visa issuance.

For nonimmigrant petitions, the beneficiary should contact the consulate after receiving our approval notice. For approved immigrant petitions, the beneficiary should wait to be contacted by consulate.

If the beneficiary is now in the United States and believes he or she may be eligible for the new status without going abroad for a visa, he or she should use InfoPass to contact a local USCIS office about applying here.

Denials.

A denial means that after every consideration, USCIS concluded that the evidence submitted did not establish eligibility for the requested benefit.

If you believe there is more evidence that will establish eligibility, you can file a new application or petition, or you can file a motion to reopen this case. If you believe the denial is inconsistent with precedent decisions or regulations, you can file a motion for reconsideration.

If the front of this notice states that this denial can be appealed and you believe the decision is in error, you can file an appeal.

You can obtain more information about these processes by either using InfoPass to contact your local USCIS office, or by calling the National Customer Service Center.

A request for initial designation as a Regional Center under the Immigrant Investor Pilot Program ("Pilot Program") or an amendment to an existing Regional Center designation, may also involve:

1. A request for review of an exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, prior to the filing of Form I-526 petitions by individual alien entrepreneurs with USCIS and/or;
2. In the case of a Regional Center amendment request, a review of a specific capital investment project where the regional center designation involved a review of an exemplar capital investment project.

The petitioner is requesting initial designation as a Regional Center under the Pilot Program. The petitioner is requested to provide the following information to include in the review of the RC proposal and the specific investment projects outlined within the RC proposal.

Background:

The proposed Regional Center entity, AAA California Regional Center LLC dba AAA California Regional Center [AAACARC], was established on May 24, 2010 in California, and is structured as a LLC. AAACARC is requesting jurisdiction over a geographic area within the State of California, including San Francisco, San Mateo, Contra Costa, Alameda, Santa Clara, San Benito, Fresno and Kings counties. AAARC plans to offer EB-5 capital investment opportunities in affiliated new commercial enterprises, organized as corporations, focusing on projects in the following industry categories:

1. Retail (NAICS Code: 44 & 45)
2. Hospitality/Hotel (NAICS Code: 721)
3. Food Services (NAICS Code: 722)
4. Professional Office (NAICS Code: 541)
5. Medical Office (NAICS Code: 621)
6. Entertainment (NAICS Code: 7139)
7. Assisted Living Facility (NAICS Code: 623); and
8. Manufacturing/Assembly (NAICS Code: 3344)

The capital investment projects will involve equity investments to job creating enterprises located within the proposed bounds of the Regional Center.

8 CFR 204.6 (m)(3), which is appended to this notice, describes the evidence that must be submitted in support of a Regional Center proposal. After review of your proposal, the following information, evidence and/or clarification is required. Note that in response to this notice, that it is helpful to provide a cover letter that acts as an executive summary, followed by a table of contents with sections that are tabbed at the bottom of the page .

NAICS Codes:

Provide the NAICS codes used by the North American Industry Classification System (NAICS) for each of the 8 target industry economic categories.

(b) (4)



Promotion of Economic Growth within the selected Geographic Area (8 CFR 204.6(m)(3)(i)):

A Regional Center's geographic area must be contiguous and clearly delineated. Please do not confuse the Regional Center's jurisdiction over a geographic area, with the geographic area that is a Targeted Employment Area ("TEA") which may be located within the bounds of your Regional Center's jurisdiction. These are two different and distinct geographic areas and concepts.

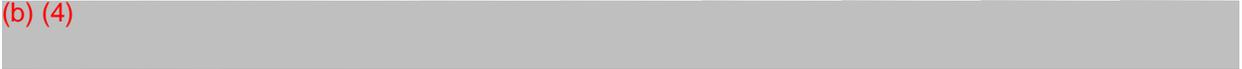
Note: For immigrant investors requesting the reduced threshold of \$500,000 based upon an investment in a TEA, the immigrant investor must when filing a Form I-526, establish at the time of filing that the investment will be made either in a TEA designated area or was in a TEA designated area at the time of the alien's initial investment into the enterprise. TEA determinations are not made within the context of the adjudication of Regional Center Proposals and thus cannot be relied on to establish TEA eligibility in prospective Form I-526 petitions.

Regional Center's Operational Plan (8 CFR 204.6(m)(3)(iii) and 8 CFR 204.6(m)(6)):

A proposal must include a detailed statement regarding the amount and source of the capital that has been committed to the Regional Center. USCIS has interpreted the words, "amount and source of capital that has been committed to the Regional Center" to mean the capital sufficient to sustain the Regional Center distinct from immigrant investors' required capital investment in a new commercial enterprise within the Regional Center.

- **Amount and Source of the Regional Center's Operating Capital (8 CFR 204.6(m)(3)(iii)):**

(b) (4)



The detailed statement that is required to meet the regulatory requirement relating to the amount and source of capital committed to the Regional Center should include:

- The exact amount of funds that have been dedicated to the Regional Center to accomplish the goals of the Immigrant Investor Pilot Program;
- The source of such funds;
- Whether the amount is sufficient to sustain the Regional Center.

(b) (4)



(b) (4)



- **Regional Center's Operational Plan-Promotional Efforts (8 CFR 204.6(m)(3)(iii):**

(b) (4)



Review of the commercial enterprise's organizational documents

A Regional Center may provide documentation for USCIS to review for EB-5 compliance within a Regional Center proposal, to include:

- Operating Agreements
- Partnership Agreements
- Subscription Agreements
- Escrow Agreements and Instructions (one for capital and one for any service fees).
- An Offering Memorandum, Private Placement Memorandum, or similar investment offering
- Memorandum of Understanding, Interagency Agreement, Contract, Letter of Intent, Advisory Agreement, or similar agreement to be entered into with any other party, agency or organization to engage in activities on behalf of or in the name of the Regional Center.
- Organizational Documents, such as articles of Incorporation, state registration documents, etc.

(b) (4) Also, each document submitted should have a version date so the specific version reviewed can be referenced in the Regional Center designation approval notice. Having this date memorialized in the approval notice will allow all parties to be aware of the specific version of the documents that USCIS reviewed.

General issues

Posting of Regional Center information on the USCIS Web site:

If the Regional Center Proposal is approved, then public contact information relating to the Regional Center will be posted on the USCIS web site. In order to provide accurate and updated information provide the following, as it relates to the Regional Center:

- Name of the Regional Center
- Public address
- Public Point of Contact
- Phone/Fax
- E-mail/Web Page

Any document containing a foreign language submitted to USCIS shall be accompanied by a full English translation that the translator has certified as complete and accurate, and by the translator's certification that he or she is competent to translate from the foreign language into English.

Copies:

RCW 10 319 10073

Page 7

Unless specifically required that an original document be filed with an application or petition, an ordinary legible photocopy may be submitted. Original documents submitted when not required will remain part of the record, even if the submission was not required.

Regulatory References

As reference, this regulatory reference page contains all of the regulations noted in this Request for Evidence.

The regulation at 8 CFR 103.2(a)(3) provides the following definitions:

(3) Representation. An applicant or petitioner may be represented by an attorney in the United States, as defined in 1.1(f) of this chapter, by an attorney outside the United States as defined in 292.1(a)(6) of this chapter, or by an accredited representative as defined in 292.1(a)(4) of this chapter. A beneficiary of a petition is not a recognized party in such a proceeding. An application or petition presented in person by someone who is not the applicant or petitioner, or his or her representative as defined in this paragraph, shall be treated as if received through the mail, and the person advised that the applicant or petitioner, and his or her representative, will be notified of the decision. Where a notice of representation is submitted that is not properly signed, the application or petition will be processed as if the notice had not been submitted.

The regulation at 8 CFR 204.6(e) provides the following definitions:

Qualifying employee

means a United States citizen, a lawfully admitted permanent resident, or other immigrant lawfully authorized to be employed in the United States including, but not limited to, a conditional resident, a temporary resident, an asylee, a refugee, or an alien remaining in the United States under suspension of deportation. This definition does not include the alien entrepreneur, the alien entrepreneur's spouse, sons, or daughters, or any nonimmigrant alien.

Regional center

means any economic unit, public or private, which is involved with the promotion of economic growth, including increased export sales, improved regional productivity, job creation, and increased domestic capital investment.

The regulation at 8 CFR 204.6(j)(4) provides:

Job creation --

(i) General. To show that a new commercial enterprise will create not fewer than ten (10) full-time positions for qualifying employees, the petition must be accompanied by:

(A) Documentation consisting of photocopies of relevant tax records, Forms I-9, or other similar documents for ten (10) qualifying employees, if such employees have already been hired following the establishment of the new commercial enterprise; or

(B) A copy of a comprehensive business plan showing that, due to the nature and projected size of the new commercial enterprise, the need for not fewer than ten (10) qualifying employees will result, including approximate dates, within the next two years, and when such employees will be hired.

(ii) Troubled business. To show that a new commercial enterprise which has been established through a capital investment in a troubled business meets the statutory employment creation requirement, the petition must be accompanied by evidence that the number of existing employees is being or will be maintained at no less than the pre-investment level for a period of at least two years. Photocopies of tax records, Forms I-9, or other relevant documents for the qualifying employees and a comprehensive business plan shall be submitted in support of the petition.

(iii) Immigrant Investor Pilot Program. To show that the new commercial enterprise located within a regional center approved for participation in the Immigrant Investor Pilot Program meets the statutory employment creation requirement, the petition must be accompanied by evidence that the investment will create full-time positions for not fewer than 10 persons either directly or indirectly through revenues generated from increased exports resulting from the Pilot Program. Such evidence may be demonstrated by reasonable methodologies including those set forth in paragraph (m)(3) of this section.

The regulation at 8 CFR 204.6(m)(1) provides:

(1) Scope. The Immigrant Investor Pilot Program is established solely pursuant to the provisions of section 610 of the Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriation Act, and subject to all conditions and restrictions stipulated in that section. Except as provided herein, aliens seeking to obtain immigration benefits under this paragraph continue to be subject to all conditions and restrictions set forth in section 203(b)(5) of the Act and this section.

The regulation at 8 CFR 204.6(m) provides, in pertinent part:

(3) Requirements for regional centers. Each regional center wishing to participate in the Immigrant Investor Pilot Program shall submit a proposal to the Assistant Commissioner for Adjudications, which:

(i) Clearly describes how the regional center focuses on a geographical region of the United States, and how it will promote economic growth through increased export sales, improved regional productivity, job creation, and increased domestic capital investment;

(ii) Provides in verifiable detail how jobs will be created indirectly through increased exports;

(iii) Provides a detailed statement regarding the amount and source of capital which has been committed to the regional center, as well as a description of the promotional efforts taken and planned by the sponsors of the regional center;

(iv) Contains a detailed prediction regarding the manner in which the regional center will have a positive impact on the regional or national economy in general as reflected by such factors as increased household earnings, greater demand for business services, utilities, maintenance and repair, and construction both within and without the regional center; and

(v) Is supported by economically or statistically valid forecasting tools, including, but not limited to, feasibility studies, analyses of foreign and domestic markets for the goods or services to be exported, and/or multiplier tables.

Note that promoting economic growth through increased export sales is no longer a requirement.

The regulation at 8 CFR 204.6(m)(6) provides:

(6) Termination of participation of regional centers. To ensure that regional centers continue to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, or increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis, on a cumulative basis, and/or as otherwise requested by USCIS, using a form designated for this purpose. USCIS will issue a notice of intent to terminate the participation of a regional center in the pilot program if a regional center fails to submit the required information or upon a determination that the regional center no longer serves the purpose of promoting economic growth, including increased export sales, improved regional productivity, job creation, and increased domestic capital investment. The notice of intent to terminate shall be made upon notice to the regional center and shall set forth the reasons for termination. The regional center must be provided 30 days from receipt of the notice of intent to terminate to offer evidence in opposition to the ground or grounds alleged in the notice of intent to terminate. If USCIS determines that the regional center's participation in the Pilot Program should be terminated, USCIS shall notify the regional center of the decision and of the reasons for termination. As provided in 8 CFR 103.3, the regional center may appeal the decision to USCIS within 30 days after the service of notice.

The regulation at 8 CFR 216.6(a)(4) provides:

(4) Documentation. The petition for removal of conditions must be accompanied by the following evidence:

(i) Evidence that a commercial enterprise was established by the alien. Such evidence may include, but is not limited to, Federal income tax returns;

(ii) Evidence that the alien invested or was actively in the process of investing the requisite capital. Such evidence may include, but is not limited to, an audited financial statement or other probative evidence; and

(iii) Evidence that the alien sustained the actions described in paragraph (a)(4)(i) and (a)(4)(ii) of this section throughout the period of the alien's residence in the United States. The alien will be considered to have sustained the actions required for removal of conditions if he or she has, in good faith, substantially met the capital investment requirement of the statute and continuously maintained his or her capital investment over the two years of conditional residence. Such evidence may include, but is not limited to, bank statements, invoices, receipts, contracts, business licenses, Federal or State income tax returns, and Federal or State quarterly tax statements.

(iv) Evidence that the alien created or can be expected to create within a reasonable time ten full-time jobs for qualifying employees. In the case of a "troubled business" as defined in 8 CFR 204.6(j)(4)(ii), the alien entrepreneur must submit evidence that the commercial enterprise maintained the number of existing

RCW 10 319 10073

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employees at no less than the pre-investment level for the period following his or her admission as a conditional permanent resident. Such evidence may include payroll records, relevant tax documents, and Forms I-9.



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August 19, 2011

Via FedEx (Tracking No. 7973 3535 3842)

U.S. Citizenship and Immigration Services
California Service Center
Attn: EB-5 Processing Unit
P.O. Box 10590
24000 Avila Road, 2nd Floor
Laguna Niguel, CA 92677

**EB5 Regional Center
Application
RFE Response**

**Kindly update USCIS
record regarding
counsel's new address**

RE: Response to Request for Evidence

Type of Application:	Initial Designation as EB-5 Regional Center
Proposed Regional Center Name:	<u>AAA California Regional Center</u>
Name of Applicant:	AAA California Regional Center, LLC DbA AAA California Regional Center
USCIS Case Receipt Number:	RCW 10 319 10073

We represent the above named Applicant in its application for designation of AAA California Regional Center, and are submitting this response to the Request for Evidence ("RFE") issued by USCIS on June 8, 2011. The original RFE notice is enclosed on top of this response per your request. Kindly note that we are submitting a new G-28 updating our office address to: 909 El Centro Street, Suite 1, South Pasadena, CA 91030. We will appreciate your directing all future correspondence to our new address.

In summary, the RFE asks for the following items pertaining to the proposed AAA California Regional Center ("AAA CA RC"): (b) (4)

All requested items are contained in this RFE response. For ease of reference, the response enumerates each of USCIS' requests in the order that they appear in the RFE, followed by a response citing to the relevant supporting Exhibits.

USCIS Request #1A: (b) (4)

Response to Request #1A: As requested, please refer to the revised Economic Impact Report by



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Dr. Michael Evans (Exhibit 1A) and revised Overall Business Plan (Exhibit 1B), which reflect updated NAICS codes that are more specific, as follows:

6-digit NAICS Code	Industry Description
236220	Commercial and Institutional Building Construction
237130	Power and Communication Line and Related Structures Construction
445110	Supermarkets and Other Grocery (except Convenience) Stores
446110	Pharmacies and Drug Stores
448120	Women's Clothing Stores
451110	Sporting Goods Stores
452990	All Other General Merchandise Stores
541110	Offices of Lawyers
541211	Offices of Certified Public Accountants
541330	Engineering Services
541511	Custom Computer Programming Services
541618	Other Management Consulting Services
541810	Advertising Agencies
621111	Offices of Physicians (except Mental Health Specialists)
623110	Nursing Care Facilities
721110	Hotels (except Casino Hotels) and Motels
722211	Limited-Service Restaurants
713940	Fitness and Recreational Sports Centers

The revised NAICS codes and industry categories can be found in Table A (Summary Statistics for Employment and Revenues Projected for 8 Sample Projects), on page 5 of the revised Economic



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Impact Report, and Table B (Comparison of NAICS and RIMS II Sector Codes), on page 8 of the revised Economic Impact Report. The revised NAICS codes with descriptions are also found in the following updated sections of the revised Overall Business Plan: Section 1.3, Section 2.3, Section 2.4, Section 3.0, Section 3.1, Section 3.2, Section 3.3, Section 3.4, Section 3.5, Section 3.6, Section 3.7, and Section 3.8.

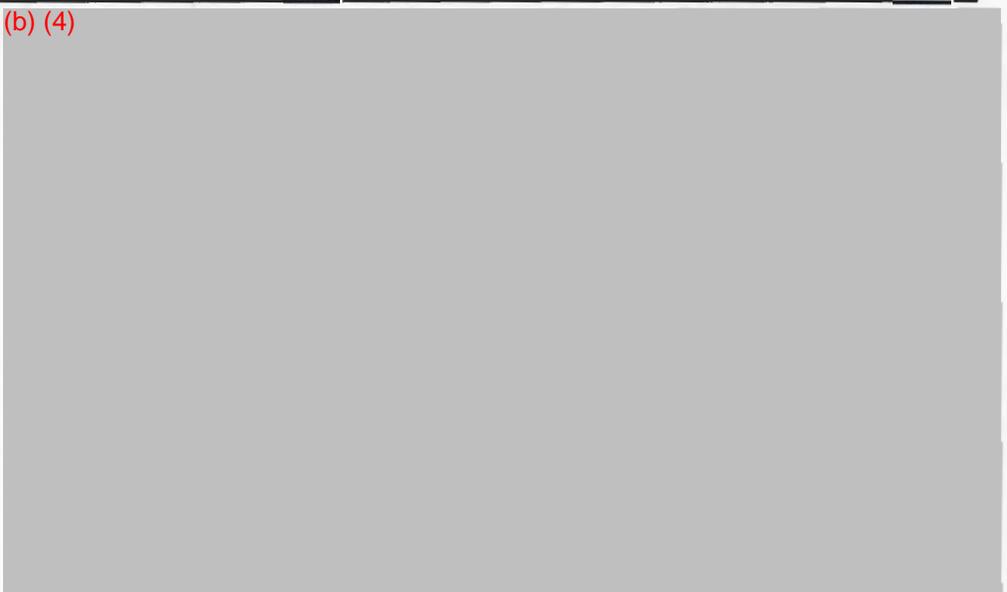
USCIS Request #1B: The Business Plan on Page 44 indicates a Solar Farm Project under Manufacturing Assembly and the NAICS code 3344. The correct code for Solar Power Structure Construction is 237130.

**Response to
Request #1B:**

(b) (4)



USCIS Request #2: (b) (4)





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(b) (4)



Response to
Request #2:

Exact amount of funds that have been dedicated to the regional center:
From (b) (4) has been committed to the regional center for its operational use, with a portion of that amount being spent for expense related to the setup of the regional center entity and its application for USCIS designation. The table on the following page shows the amount of money currently committed as well as the planned expenditures and expenses already incurred:



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Money deposited and committed into AAA California Regional Center LLC's account

(b) (4)

Budget including expenditure already incurred and projected expenditures

Source of funds dedicated to the regional center: Initially US (b) (4) was committed for the regional center by one of the LLC Member Ms. Yu Zhang, and a year later, another US (b) (4) was deposited and committed to the regional center by Ms. Keen Wei, another LLC Member and President of the regional center. The total of (b) (4) that has been committed to the regional center was sourced as follows. Please also find two check image copies attached at **Exhibit 2C** showing the capital commitment from Yu Zhang and Keen Wei.



<i>Date of deposit into regional center's company account as of August 6, 2011</i>	<i>Amount</i>	<i>Source</i>
June 21, 2010	(b) (4)	Ms. Yu Zhang, LLC Member of AAA California Regional Center LLC
August 5, 2011		Ms. Keen Wei, LLC Member of AAA California Regional Center LLC

As of August 6, 2011, the balance in AAA CA RC's operations account is about (b) (4). Please see Exhibit 2B for a copy of the account balance verification letter from First Commercial Bank.

Whether the amount is sufficient to sustain the Regional Center:

As shown in the Operational Plan submitted with the initial regional center proposal documents, the budget for regional center operations includes expenses for (b) (4).

This amount excludes the budget for the regional center designation. For details, please find the Operational Plan we resubmitted at Exhibit 1C, as well as Ms. Keen Wei's statement attached at Exhibit 2A.

The first (b) (4) committed by Ms. Yu Zhang on June 21, 2010 was spent for regional center entity setup and designation application. On August 5, 2011, Ms. Keen Wei committed another (b) (4) for marketing and promotional activities and general administrative expenses upon the regional center's designation.

The amount of over (b) (4) that is currently in AAA CA RC's bank account is sufficient to cover its initial operations, especially considering that all expenses related to its establishment and designation application have already been paid out.



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The regional center's current overhead expenses are and will continue to be funded with capital committed by LLC members of the regional center, (b) (4)

How the Regional Center will identify, assess and evaluate proposed investor projects and activities, and enterprises:

An Operational Plan describes how the regional center will identify, assess and evaluate proposed investor projects and activities, and enterprises including its administrative oversight, and due diligence performance in project section and investor screening is here submitted again at Exhibit 1C for your reference.

USCIS Request #3: (b) (4)

Response to Request #3:

Source of funds committed for promotional activities: As noted under Response #2, all operational funds for AAA CA RC come from the members of AAA California Regional Center LLC, including Ms. Yu Zhang and Ms. Keen Wei. AAA CA RC's promotional activities will continue (b) (4)

Description of past, present and future promotional activities: Per Ms. Keen Wei, the Member and President of the regional center, (b) (4)

Please see Ms. Wei's statement attached at Exhibit 2A. (b) (4)



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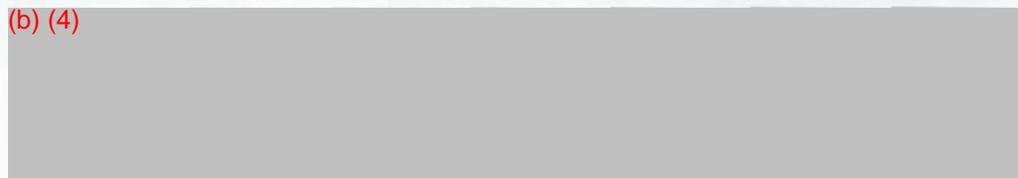
(b) (4)

Past promotional activities	
Present promotional activities	
Future promotional activities	

For more details on the future promotional activities, please refer to the statement from Ms. Keen Wei at Exhibit 2A. As shown Ms. Keen Wei's statement, the future promotional activities are broken down in the following page:

(b) (4)

USCIS Request #4: (b) (4)



Response to Request #4:

Please kindly note that sample offering documents to be used for new commercial enterprises affiliated with AAA CA RC were enclosed in the initial proposal documents but may not have been located easily. For ease of reference, however, additional copies are enclosed at



Exhibit 3A. Kindly note that the document titles and version dates are as follows:

- **Offering Memorandum (version date: October 1, 2010)**
- **Limited Partnership Agreement (version date: October 1, 2010)**
- **Subscription Agreement (version date: October 1, 2010)**
- **Escrow Instruction (version date: October 1, 2010)**

Also for your reference, a copy of AAA CA RC's Articles of Organization and LLC's Operating Agreement are included at Exhibit 3B.

USCIS Request #5: If the Regional Center is approved, then public contact information relating to the Regional Center will be posted on the USCIS web site. In order to provide accurate and updated information provide the following, as it relates to the Regional Center:

- Name of the Regional Center
- Public address
- Public Point of Contact
- Phone/Fax
- E-mail/Web Page

Response to Request #5: As requested, please find the requested information for the proposed AAA CA RC below:

Name of Regional Center: AAA California Regional Center	
Contact: Ms. Keen Wei, President and CEO. AAA California Regional Center LLC 20380 Town Center Lane #170 Cupertino, CA 95014 Phone: 408-621-2081 Fax: 408-973-8247 Email: info@aaacarc.com	Geographic Scope: 8 Contiguous California Counties of San Francisco County, San Mateo County, Contra Costa County, Alameda County, Santa Clara County, San Benito County, Fresno County and Kings County Industries: Retail (445110, 446110, 448120, 451110, 452990); Hospitality/Hotel (721110); Food Service (722111); Professional Office (541110, 541211, 541330, 541511, 541618, 541810); Medical Office (62111); Entertainment (713940); Assisted Living Facility (623110); and Alternative Energy Structure Construction (237130)



LIST OF EXHIBITS to RFE RESPONSE
of AAA CA California Regional Center (“AAA CA RC”)

Exhibit 1A Full revised Economic Impact Report for AAA CA RC by Dr. Michael Evans dated July 2011, with revised Section 1, Section 2, Section 26, and Section 27.

(b) (4)

Exhibit 1B Revised Overall Business Plan for AAA CA RC dated July 2011, with revised Section 1.3, Section 2.3, Section 2.4, Section 3.0, Section 3.1, Section 3.2, Section 3.3, Section 3.4, Section 3.5, Section 3.6, Section 3.7 and Section 3.8, all

(b) (4)

Exhibit 1C Operational Plan for AAA CA RC

Exhibit 2A Statement from Ms. Keen Wei, the President and CEO of AAA CA RC, detailing the amount and source of funds to sustain regional center operations, and its promotional activities.

Exhibit 2B Copy of most recent bank letter of AAA CA RC (for August 6, 2011) showing the amount of funds currently dedicated to AAA CA RC for operational use.

Exhibit 2C Copies of check images showing the capital commitment.

Exhibit 3A Copies of sample offering documents showing the investment structure to be used for new commercial enterprises that will be affiliated with AAA CA RC. The sample documents are:

- Offering Memorandum (version date October 1, 2010);
- Subscription Agreement (version date October 1, 2010);
- Limited Partnership Agreement (version date October 1, 2010); and
- Escrow Instruction (version date October 1, 2010).

Exhibit 3B Copies of AAA California Regional Center LLC’s organizational documents, including:

- Articles of Organization for AAA California Regional Center LLC, and
- LLC’s Operating Agreement

**Economic Impact of Eight Initially Proposed Projects as part
of the proposed AAA California Regional Center LLC**

**Prepared for:
AAA California Regional Center LLC**

**Prepared by:
Michael K. Evans
Evans, Carroll & Associates, Inc.
2785 NW 26th St.
Boca Raton, FL 33434
561-470-9035**

mevans@evanscarrollecon.com

August 2011

(Note: This Economic Impact Analysis supersedes for a prior economic impact analysis for AAA California Regional Center LLC dated October 2010 by including more specific NAICS codes, deleting all references to and analysis of the manufacturing industry, and adjusting the employment impact projections downward accordingly.)

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1. Executive Summary

AAA California Regional Center LLC seeks USCIS designation as an EB-5 regional center that will encompass the eight contiguous California counties of San Francisco, San Mateo, Alameda, Contra Costa, Santa Clara, San Benito, Fresno and Kings. This report provides an analysis of the economic impact of eight sample projects initially proposed within the proposed regional center's geographic boundary. The sample projects are summarized as follows:

1. **Mixed-use Building #1 in San Francisco (San Francisco County):** (b) (4)

2. **Mixed-use Building #2 in San Francisco (San Francisco County):** (b) (4)

3. **Mixed-use Building #3 in San Francisco (San Francisco County):** (b) (4)

4. **Food Court in San Francisco (San Francisco County):** (b) (4)

5. **Assisted Living Center in San Francisco (San Francisco County):** (b) (4)

6. **Mixed-Use Building in Fremont (Alameda County):** (b) (4)

7. **Professional Office Building in Gilroy (Santa Clara County):** (b) (4)

8. **Solar Farm Project in Coalinga (Fresno County):** (b) (4)

The economic impact analyses for the above sample projects were calculated using the RIMS II model and its final demand multipliers. The multipliers for the projects were based on

- for the projects in San Francisco County and Alameda County: data for San Francisco, San Mateo, Alameda, and Contra Costa counties;
- for the office building in Gilroy: data for Santa Clara and San Benito counties; and
- for the solar farm in Coalinga: data for Fresno and Kings counties.

(b) (4)



(b) (4)

Table B shows the relationship between the sectors given in Table A, the 6-digit NAICS codes and their description, and the RIMS II model sectors.

Table B. Comparison of NAICS and RIMS II Sector Codes

6-digit NAICS Code	Description	RIMS II Model Code
<u>236220</u>	Commercial and Institutional Building Construction	230000
<u>237130</u>	Power and Communication Line and Related Structures Construction	230000
<u>445110</u>	Supermarkets and Other Grocery (except Convenience) Stores	4A0000
<u>446110</u>	Pharmacies and Drug Stores	4A0000
<u>448120</u>	Women's Clothing Stores	4A0000
<u>451110</u>	Sporting Goods Stores	4A0000
<u>452990</u>	All Other General Merchandise Stores	4A0000
<u>541110</u>	Offices of Lawyers	5411
<u>541211</u>	Offices of Certified Public Accountants	5412
<u>541330</u>	Engineering Services	5413
<u>541511</u>	Custom Computer Programming Services	541511
<u>541618</u>	Other Management Consulting Services	541610
<u>541810</u>	Advertising Agencies	541800
<u>621111</u>	Offices of Physicians (except Mental Health Specialists)	621A00
<u>623110</u>	Nursing Care Facilities	623000
<u>721110</u>	Hotels (except Casino Hotels) and Motels	7211A0
<u>722211</u>	Limited-Service Restaurants	722000

713940 Fitness and Recreational Sports Centers

713940

(b) (4)



(b) (4)



6. Location of Projects in San Francisco and Alameda Counties

Figure 1 shows a map of all the counties in California. Figure 2 shows a map of San Francisco County, and Figure 3 shows a map of Alameda County, the two Bay Area Counties in which sample projects are currently planned.

Figure 3. Map of Alameda County



7. Commuting Patterns for Santa Clara and Fresno Counties

Table 2 shows the commuting patterns for the two counties in Central California where projects will be developed. The Santa Clara figures show 76.9% of the workforce residing in that county; (b) (4)



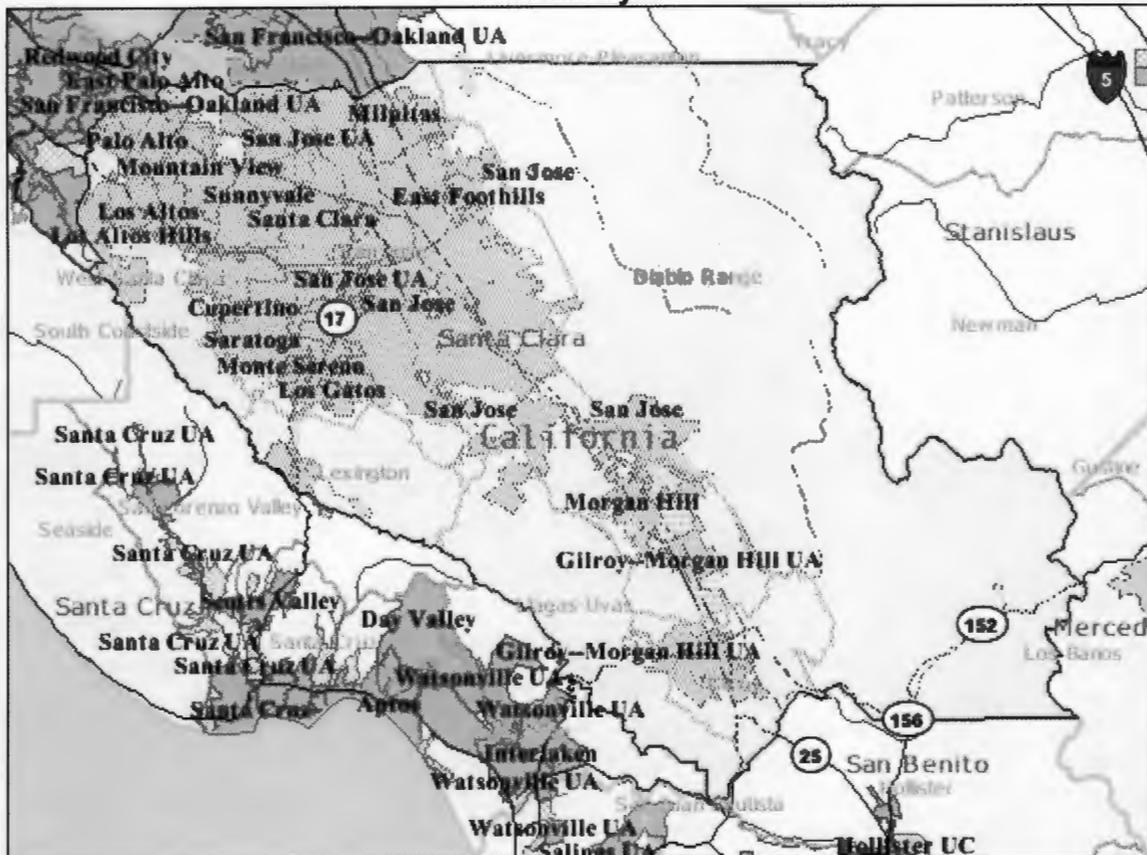
Table 2. Commuting Patterns for Santa Clara and Fresno Counties

	Santa Clara			Fresno	
All counties	946756	100.0%	All counties	298428	100.0%
Alameda	69669	7.4%	Fresno	273212	91.6%
Contra Costa	10145	1.1%	Kings	3959	1.3%
San Francisco	15868	1.7%			
San Mateo	55473	5.9%			
Santa Clara	727915	76.9%			
San Benito	8054	0.9%			

8. Location of Projects in Santa Clara and Fresno Counties

Figure 4 shows the maps of Santa Clara County, and Figure 5 shows the location of Fresno County. The Santa Clara County office building will be located in Gilroy, near the southern end of the county. The solar farm will be located in Coalinga, which is near the southern end of Fresno County.

Figure 4. Map of Santa Clara County



Part 3. Economic Impact Analysis for Proposed Projects in San Francisco and Alameda Counties (the Bay Area)

9. Introduction and Summary of Proposed Projects in Bay Area

The types of businesses proposed for San Francisco and Alameda Counties, i.e. the Bay Area section of the EB-5 regional center will include professional offices, medical offices, retail space, food services, hotels, spa, and assisted living. The six projects in the Bay Area can be briefly summarized as follows:

1. **Mixed-use Building #1 in San Francisco (San Francisco County):** (b) (4)
[Redacted]

2. **Mixed-use Building #2 in San Francisco (San Francisco County):** (b) (4)
[Redacted]

3. **Mixed-use Building #3 in San Francisco (San Francisco County):** (b) (4)
[Redacted]

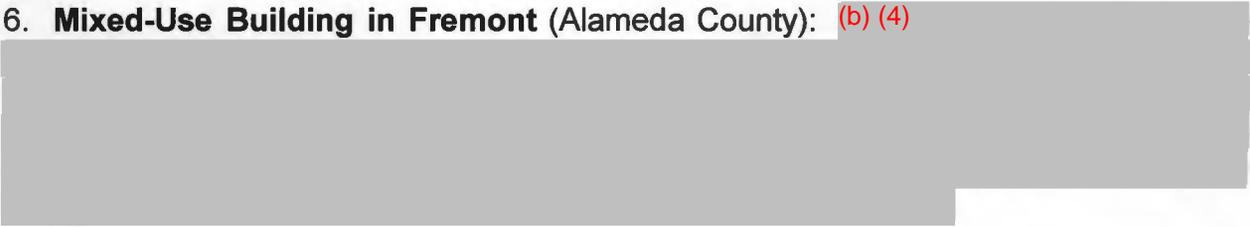
4. **Food Court in San Francisco (San Francisco County):** (b) (4)
[Redacted]

5. **Assisted Living Center in San Francisco (San Francisco County):** (b) (4)
[Redacted]

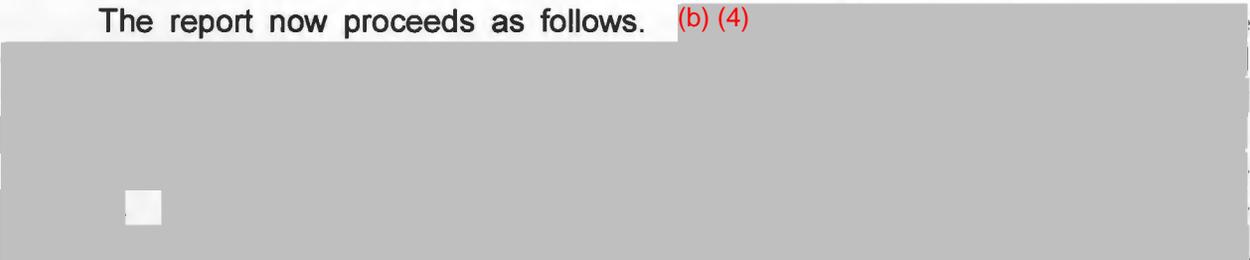
(b) (4)



6. Mixed-Use Building in Fremont (Alameda County): (b) (4)



The report now proceeds as follows. (b) (4)



Revenue discussions and generic economic impact tables are presented for the following seven categories.

1. Construction
2. Hotel space
3. Restaurants and food courts
4. Retail stores by individual category (Supermarkets and other grocery stores; Pharmacies and drug stores, Women's clothing stores, Sporting goods stores, and All other general merchandise stores)
5. Professional and medical office space by category (Office of lawyers, office of certified public accountants, Engineering services, Custom computer programming services, Other management consulting services, and Advertising agencies)
6. Spa/fitness center
7. Assisted living facilities

10. Economic Impact of Construction Projects

(b) (4)



Resume of Dr. Michael K. Evans

mevans@evanscarrollecon.com

CURRENT AND PREVIOUS POSITIONS

- Chairman, *Evans, Carroll & Associates, Inc.*, 1980-present (previously Evans Economics)

Economic consulting firm specializing in EB-5 immigration analysis, economic impact studies of development projects and new construction, models of state and local tax receipts, impact of current and proposed government legislation, and construction of econometric models for individual industries and companies.

- Chief Economist, *American Economics Group*, 2000-present.

Built a comprehensive state modeling system that provides economic analysis for a variety of consulting projects (see below).

- Clinical Professor of Economics, Department of Managerial Economics and Decision Sciences (MEDS), Kellogg Graduate School of Management, Northwestern University, 1996-99.

Taught courses in macroeconomics and business forecasting. Wrote textbooks for both courses.

- Winner of Blue Chip Economic Indicator Award for most accurate macroeconomic forecasts during the past four years, November 1999
- Founder and President, *Chase Econometric Associates*, 1970-1980
- Assistant and Associate Professor of Economics, Wharton School, University of Pennsylvania, 1964-69. Co-developer of the original Wharton Model.
- Visiting Professor, Radford University, (Radford, VA), 1987

Chairman of Institute for International Economic Competitiveness

- Visiting Lecturer, Hebrew University (Jerusalem), 1966-67

Built econometric model of the Israeli economy

Ph. D. in Economics, Brown University. Dissertation, "A Postwar Quarterly Model of the United States Economy, 1948-1962". A. B. in Mathematical Economics, Brown University

PREVIOUS ACTIVITIES AND EDUCATION

- Contributing Editor, *Industry Week*

Wrote a column in each issue on economic and financial trends as they impact the manufacturing sector.

- Editor, *The Evans Report*

Weekly newsletter discussing economic trends and financial markets. Pioneered the concept of the Monthly Tracking Model to incorporate recent economic releases into the overall economic forecast, including methods to predict these economic data.

- Consultant, *National Printing Equipment and Supply Association*

Prepares quarterly forecasts of shipments of printing equipment and graphic arts supplies by product line, based on an econometric model constructed for NPES. Also prepares analysis and forecasts of exports and imports by principal product line.

- Consultant, *APICS -- The Educational Society for Resource Management*,

In 1993, designed and developed the *APICS Business Outlook Index*, which uses survey data collected by the Evans Group to measure current production, production plans, shipments, employment, new orders, unfilled orders, inventory stocks, and the comparison of the actual to desired inventory/sales ratio to predict short-term changes in manufacturing sector activity. The results of this survey appeared every month in *APICS: The Performance Advantage*

- Consultant, *American Hardware Manufacturing Association*

Wrote a separate weekly edition of the Evans Report analyzing recent trends in the hardware and housing industries, including forecasts of the hardware industry based on an econometric model developed for AHMA.

- Board of Economists, *Los Angeles Times*

Wrote column every 6 weeks (5 other economists on the Board)

- Columnist, *United Press International*

Wrote twice-weekly column, "Dollars and Trends"

- Consultant, Senate Finance Committee,

Built the first large-scale supply-side model of the U. S. economy

- Consultant, Environmental Protection Agency and Council on Environmental Quality

Estimated inflationary impact of government regulations

- Consultant, National Aeronautics and Space Administration

Estimate impact of R&D spending on productivity growth

- Consultant, U. S. Treasury

Estimated impact of investment tax credit and accelerated depreciation on capital spending by industry

- Consultant, U. S. Department of Agriculture

Built large-scale econometric model of agricultural sector of U. S. economy

- Consultant, Organization of Economic Cooperation and Development

Built econometric model of the French economy

SAMPLE OF RECENT CONSULTING PROJECTS

For more information on these projects, see www.evansb5.com

A. Economic Impact of EB-5 Immigrant Investor Programs and New Markets Tax Credits

- Calculated the economic impact for a fractional-ownership marina in Port Charlotte, FL, plus office space, retail stores, restaurants, and a home brokerage office.
- Calculated the economic impact of construction and operation of four retirement homes in Vermont.

- Calculated the economic impact of an upscale retail shopping center in Vail, CO. and a medical office building in Edwards, CO (both in Eagle County).
- Calculated economic impact of a wind turbine manufacturing plant in Larimer County, CO
- Calculated economic impact of a hotel, retail stores, restaurants, office buildings, and bank facilities in Pasadena, CA
- Calculated economic impact of a luxury hotel and condominiums in Destin, FL

- Calculated economic impact of constructing and operating a mixed-use commercial project in Jupiter, FL
- Determined whether 17 possible restaurant locations in - and Broward Counties qualified as Targeted Employment Areas.
- Determined the economic impact of opening and operating a slot-machine casino in Hanover, MD, as part of a proposed EB-5 regional center for the Baltimore metropolitan area.
- Calculated the economic impact of renovating and expanding a restaurant on Martha's Vineyard, MA, as part of an EB-5 regional center in that state.
- Determined the economic impact of assembling and installing solar panels for residences in the state of LA.
- Determined a Targeted Employment Area for Dallas, TX as part of a proposed EB-5 regional center for the Dallas area. APPROVED
- Calculated the economic impact for various mixed used projects for a proposed regional center for the entire State of Texas, including shopping centers, office buildings, restaurants, assisted living centers, medical technology facilities, and other personal and business services.
- Calculated the economic impact for the construction and operation of several fast-food restaurants in 10 counties in central California.
- Calculated the economic impact for the renovation and expansion of a shopping mall in Greenville, SC.
- Calculated the economic impact of buying existing apartment buildings at deep discount prices, renovating and operating them, in 21 counties in FL.

- Calculated the economic impact of building and operating an institute for proton cancer therapy for a proposed EB-5 regional center in Brooklyn, NY.
- Calculated the economic impact of building and operating a mixed-use facility with medical offices, hotels, and apartments for a proposed EB-5 regional center in Queens, NY.
- Determined a Targeted Employment Area for Philadelphia, PA as part of a proposed EB-5 regional center for the Philadelphia area.
- Calculated the economic impact of a proposed office building and mixed-use facility for an EB-5 regional center in Dallas, Texas
- Calculated the economic impact for various mixed-use projects for a proposed EB-5 regional center in the greater New York City area, including an extended stay hotel, urgent care center, financial lending firm for alternative assets, retail stores, apartments, office space, warehouses, industrial "flex" space, entertainment centers, restaurants, conference and convention centers, nursing home and assisted living facilities, medical offices, medical technology facilities, and high-tech manufacturing.
- Calculated the economic impact of "green" hotels in 10 counties in Central California.
- Calculated the economic impact of generic projects in manufacturing, financial services, health services, hotels, and restaurants for a proposed regional center for the state of .
- Calculated the economic impact of 12 different types of economic activity for an expansion of the Palm Beach Regional Center to five contiguous counties. APPROVED
- Calculated the economic impact of a new auto parts plant in Alabama to supply parts to Kia automobiles.
- Calculated the economic impact of opening fast-food restaurants in - and Broward counties in FL.
- Calculated the economic impact of a mixed-use commercial center in Flushing, Queens County, NY.
- Calculated the economic impact of revitalizing and renovating part of the Brooklyn Navy Yard for "green" manufacturing facilities.
- Calculated the economic impact of 12 different types of economic activity for various counties in Charlotte and Sarasota counties, FL
- Calculated the economic impact of four new manufacturing and distribution companies in Palm Beach County, FL.

- Calculated the economic impact of developing a resort area and building residences in rural Tennessee.
- Calculated the economic impact of developing and operating a resort area in Southern Arizona.
- Calculated the economic impact of revitalizing the depressed East Side of Cleveland, Ohio, with new commercial and industrial buildings. APPROVED
- Determined the nationwide economic impact of a \$1 billion investment in Mississippi for a new hybrid motor vehicle plant.
- Determined the economic impact of expanding a shipyard in Southeastern Louisiana. APPROVED
- Calculated the economic impact of a new shopping center in Buena Vista, California, and two other generic shopping centers in Los Angeles and San Bernardino counties. APPROVED
- Calculated the economic impact of enhancing resort areas in eight rural counties in Colorado.
- Calculated the economic impact of the rehabilitation of Fitzsimons Village in Aurora, Colorado, by adding an office building with medical labs, hotel, shopping center, and residences.
- Determined the economic impact of a mixed-use commercial center for the Kansas City metropolitan area.
- Calculated the number of jobs created for a film production company in New York City.
- Calculated economic impact of small-scale rooftop solar panels in various counties in California.
- Calculated economic impact of 7 different types of proposed businesses for a proposed regional center in the Bay Area of California. APPROVED
- Determined the economic impact of a new biological research park, office building, and logistics center in Wooster, Ohio. APPROVED

- Calculated the economic effect of a mixed-use urban renewal project in Cleveland, Ohio. APPROVED
- Calculated economic impact of dairy farm and cheese processing plant in Northern California.
- Determined economic impact of a shipyard, food processing plant, and semiconductor plant for a proposed regional center in Louisiana and Mississippi. APPROVED
- Calculated the economic impact of a new gaming casino in Natchez, Mississippi.
- Developed an Input/Output Model for Guam, which was then used to calculate the economic impact of several generic projects. APPROVED
- Calculated the economic impact of a retail shopping center in suburban Los Angeles County. APPROVED
- Prepared an economic impact analysis for the "timber to homes" project for a proposed regional center in Colorado. APPROVED
- Calculated the economic impact for a proposed regional center in Baltimore, Maryland that would include the rebuilding of depressed areas in East Baltimore and along the riverfront.
- Prepared the economic analysis for a proposed EB-5 regional center for the entire state of that included impact calculations for 14 different types of industries. APPROVED
- Prepared the economic analysis for a proposed EB-5 regional center in the San Francisco Bay area that included calculations for 10 different types of industries. APPROVED
- Prepared economic impact calculations for proposed EB-5 regional centers in New York City and Northeastern New Jersey. APPROVED
- Calculated the economic impact of a rehabilitated office building in Albuquerque, New Mexico, including the increase in high quality jobs.
- Calculated the economic impact of a rehabilitated skilled nursing center in East Los Angeles, California, including the impact on nearby census tracts.

- Calculated the economic impact of development of warehouse and light industrial manufacturing space in Las Vegas, Nevada. APPROVED
- Calculated the economic impact of rehabilitation and expansion of a vacation and health spa in Sharon Springs, New York
- Calculated economic impact of revitalizing an old resort hotel and adding new facilities for Lake Geneva, WI.
- Calculated the employment and tax effects for a portfolio of projects undertaken under the New Market capital program.
- Calculated generic employment changes for proposed EB-5 project for an Inland Port in Palm Beach County, FL APPROVED
- Calculated the economic impact of construction of El Monte Village in El Monte, CA. APPROVED
- Built an input/output model of Guam to be used to calculate economic impact of EB-5 projects. Used this model to estimate impact of various proposed projects. APPROVED
- Calculated the economic impact of moving the Social Security Administration building in Birmingham, AL, and revitalizing the surrounding neighborhood.
- Calculated the economic impact of rehabbing and expanding the Everett Mall in Everett, WA.
- Determined the economic impact of building a new medical center in Charleston, SC
- Calculated economic impact of expanding Sugarbush resort in VT. Study included expansion of existing facilities and addition of new facilities. APPROVED
- Calculated economic impact for new market tax credit program in Portsmouth, N.H. Study included both overall economic impact, and the increase in employment and income and the decrease in the unemployment rate and incidence of poverty in individual census tracts.
- Calculated the economic benefits of EB-5 programs for foreign investors for a mixed-use construction project, including a hotel, retail stores, apartments, and a sports stadium in the Washington, D. C. metropolitan area APPROVED

- Calculated the economic benefits of EB-5 programs for foreign investors for a mixed-used retail shopping center in the New York City metropolitan area. APPROVED
- Calculated the economic benefits of EB-5 programs for foreign investors for proposed shopping centers in five separate counties in Southern California, including differential impacts of building the shopping centers in different counties. APPROVED

B. Projects for State and Local Governments

- Constructed an econometric model for the State of New York and determined the change in employment, labor income, and tax revenues for 43 different tax changes proposed by the Governor's office.
- Constructed a detailed econometric model for the State of Pennsylvania to determine the economic impact of the complete panoply of state taxes levied; the model contains over 1,000 equations. In cooperation with American Economics Group, the model was developed to simulate the effect of changes in any state tax rate on households and businesses by income deciles, household status, age of individuals, size of households, and many other demographic variables. The change in business taxes can also be simulated for detailed industry classifications.
- Determined whether the Washington, D.C. water and sewer authority should accept a high bid for a new waste disposal system. Decision to reject has saved the authority over \$200 million, as construction prices turned down sharply as predicted.
- Built an econometric model to determine the "tax gap" caused by Internet sales for the state of Minnesota.
- Determined appropriate levels of shelter grants individual counties in New York State, and for utility allowances in New York City. Reviewed and prepared testimony in ongoing court cases in these areas.
- Calculated the economic impact of the revitalization of downtown Milwaukee, Wisconsin.

C. Economic Impact of Casino Gaming

- Built an econometric model to predict the growth of the gaming industry over the next decade, and the economic impact of that industry on employment and tax revenues at the Federal and state levels.

- Estimated the economic impact of Indian casino gaming nationally and for the State of Wisconsin.
- Determined the economic impact of the Oneida Indian gaming casino on the Green Bay metropolitan area.
- Estimated the negative economic impact on the Milwaukee area if a new Indian gaming casino were to be built in Kenosha, Wisconsin.

D. Economic Impact of Smoking Bans and Higher Taxes

- Testified on economic impact of smoking bans in Canada; certified as an expert witness by the Court.
- Examined the impact of smoking bans on restaurant sales in several different locations in the U.S. to determine how much sales changed when these bans were imposed, and the differential effects depending on whether these bans were partial or total.
- Determined the cross-border effects on retail sales from differential rates in cigarette, gasoline, and alcohol excise taxes
- Determined the economic impact of higher cigarette taxes on minority group employment.
- Estimated the economic impact and loss of Federal and state tax revenues when higher cigarette prices lead to increased smuggling.

E. Consulting Projects for Travel and Tourism

- Built an econometric model to predict tourism trips and revenues for the major regions of the U.S. economy.
- Constructed econometric models to predict tourism in Las Vegas and Orlando.
- Using the IMPLAN model, predicted economic impact of tourism and travel expenditures for all counties in Pennsylvania.

F. Other Private Sector Consulting Projects

- Calculated the revenue gain at the Federal, state and local level generated by domestic manufacturing of Airbus parts and equipment.
- Calculated the economic impact of proposed EPA bans on fluoropolymer production.
- Estimated the size and economic importance of the fluoropolymer industry, and calculated economic impact of shutting down domestic production.
- Built an econometric model to examine how U.S. tax and regulatory policies help determine whether the gold mining industry would invest in the U.S. or other countries. Testified before Congress to help defeat legislation inimical to the mining industry.
- Built an econometric model to predict consumer bankruptcies, based on recent growth in consumer credit outstanding, the overall economic environment, and recent changes in credit regulations
- Estimated the economic impact of the ethanol subsidy on the U.S. economy and Farm Belt States, including the impact on the balance of payments, employment, and tax receipts. Testified before Congress to help pass legislation to extend subsidies to the ethanol industry.
- Built an econometric model to determine the impact of updating and improving the system of locks on the Upper Mississippi River on corn prices and exports, farm income, and the overall economy.

BOOKS PUBLISHED

Macroeconomics for Managers, Blackwell, 2003

-Practical Business Forecasting, Blackwell, 2002

Economic Impact of the Demand for Ethanol, Diane Publishing Company, 1998

How to Make Your Shrinking Salary Support You in Style for the Rest of Your Life, Random House, 1991

The Truth About Supply-Side Economics. Basic Books, 1983.

A Supply-Side Model of the U. S. Economy, mimeo (prepared for Senate Finance Committee), 1980.

An Econometric Model of the French Economy: A Short-Term Forecasting Model. O.E.C.D, March 1969.

Econometric Gaming (with L. R. Klein and M. J. Hartley). Random House, 1969.

Macroeconomic Activity: Theory, Forecasting and Control. Harper & Row, 1969.

The Wharton Econometric Forecasting Model (with L.R. Klein), Economics Research Unit, Wharton School: University of Pennsylvania Press, 1967. Enlarged edition, 1968.

Over 30 articles in major academic journals and publications (list on request)



AAA CALIFORNIA REGIONAL CENTER

UPDATED OVERALL BUSINESS PLAN

Pursuant to Matter of Ho and 8 CFR 204.6(m)(3)

August 2011

This Overall Business Plan supersedes for a prior overall business plan for AAA California Regional Center LLC dated October 2010 by including more specific NAICS codes, deleting all references to and analysis of the manufacturing industry.

AAA California Regional Center LLC
20380 Town Center Lane #170
Cupertino, CA 95014

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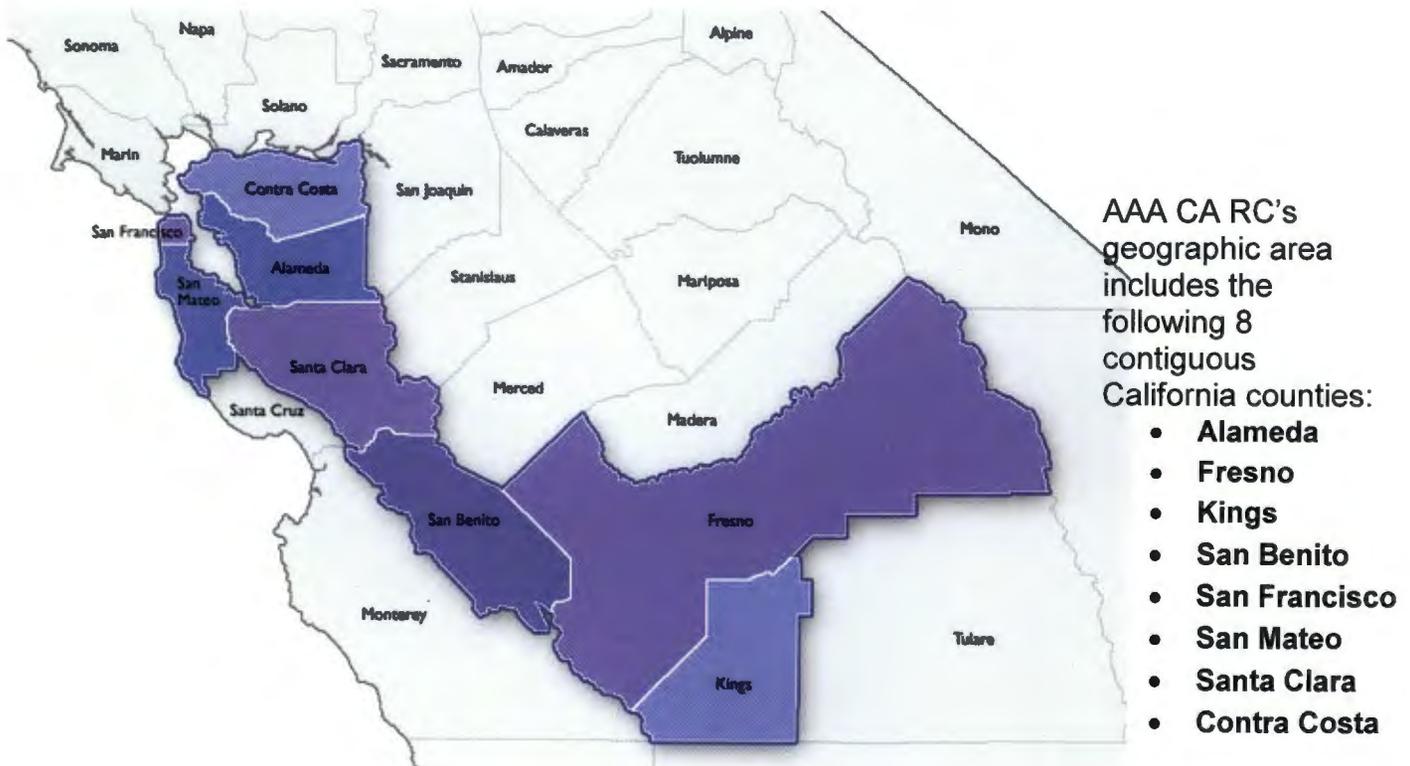
Section 1.0 Regional Center Business Overview

1.1 Summary

Pursuant to the Immigrant Investor Pilot Program, **AAA California Regional Center ("AAA CA RC")** is proposed as a regional center that will fund commercial real estate acquisition, construction/renovation, development and/or management of projects within a contiguous region comprised of 8 counties across the northern and central portions of California including: San Francisco County, San Mateo County, Contra Costa County, Alameda County, Santa Clara County, San Benito County, Fresno County, and Kings County. Job-generating commercial activities within AAA CA RC will focus on the following target industries: retail, hospitality/hotel, food service, professional office, medical office, entertainment, assisted living facility, and alternative energy structure construction. Projects may include new development and/or redevelopment of distressed and vacant properties. AAA CA RC is proposed by AAA California Regional Center LLC, the applicant.

1.2 Geographic Area and Scope

The eight contiguous counties comprising AAA CA RC's geographic area are located in the Bay Area and Central Valley regions of California. With a total area of 11,897 square miles, this geographic region contains a diverse area ranging from agricultural farmlands to high-density city blocks. The estimated 2009 population is 6,970,744, with a density of 582 people per square mile. Situated in the Bay Area and the Central Valley, these regions remain highly desirable locations for living and doing business, with growth expected to continue through the foreseeable future.



1.3 Target Industry Economic Clusters

AAA CA RC will fund the acquisition, construction/renovation, development, and/or management of facilities in the following industries:

- Retail
Supermarkets and Other Grocery (except Convenience) Stores (445110)
Pharmacies and Drug Stores (446110)
Women's Clothing Stores (448120)
Sporting Goods Stores (451110)
All Other General Merchandise Stores (452990)
- Hospitality
Hotels (except Casino Hotels) and Motels (721110)
- Food Service
Limited-Service Restaurants (722211)
- Professional Office
Offices of Lawyers (541110)
Offices of Certified Public Accountants (541211)
Engineering Services (541330)
Custom Computer Programming Services (541511)
Other Management Consulting Services (541618)
Advertising Agencies (541810)
- Medical Office
Offices of Physicians (except Mental Health Specialists) (621111)
- Entertainment
Fitness and Recreational Sports Centers (713940)
- Assisted Living Facility
Nursing Care Facilities (623110)
- Alternative energy structure construction
Power and Communication Line and Related Structures Construction (237130)

(1) Retail (e.g. retail shopping center)

Retail stores are the backbone of a shopping center development. Retail stores attract customers to the shopping center and surrounding office development. Shopping center development benefits the community by creating jobs and producing sales tax revenue, which the government uses to provide services.

(2) Hospitality / Hotel (e.g. hotel)

For mixed-use developments, a hotel can be an appropriate complement to office, retail and restaurant users. They provide lodging for corporate and vacationing travelers, and offer convenient rental space for meetings and conventions. Carefully planned resorts and other hospitality developments can bring needed tourists and shoppers to local retail stores and restaurants while diversifying the creation of jobs.

(3) Food Service & Dining (e.g. restaurant, food court)

Not only does outside food consumption reflect current economic moods, but it also generates sales and income in a number of supporting industries. Fast food restaurants and sit-down dinners are a key component of the shopping center tenant mix, and complement retail and office users. Cafes and bars can add even more diversity to the retail and office experience.

(4) Professional Office (e.g. professional office building)

Office space development diversifies job opportunities, increases employment and provides traffic for nearby retail stores. Professional services tenants benefit the local population and provide a stable rent roll for office buildings.

(5) Medical Office (e.g. medical office building)

From general medical and dental offices to specialists needing unique layouts for equipment, medical office space needs to be specially designed for medical equipment and concern for patient care. These offices also provide needed services to the community and provide highly skilled and professional job opportunities in the area

(6) Entertainment (e.g.: Spa/Fitness Center)

With a growing number of baby boomers reaching retirement age, senior housing facilities will provide seniors with the freedom of housing on their own coupled with the convenience of having basic services handled for them. Such establishments increase traffic for retail, restaurant, and entertainment facilities.

(7) Assisted Living Facility (e.g.: assisted living center)

With a growing number of baby boomers reaching retirement age, senior housing facilities will provide seniors with the freedom of housing on their own coupled with the convenience of having basic services handled for them. Such establishments increase traffic for retail, restaurant, and entertainment facilities.

(8) Alternative Energy Structure Construction (e.g. solar panel assembly)

According to the U.S. Census Bureau, alternative energy structure construction is indexed as a subset of power and communication line and related structures construction (NAICS 237130). This includes solar power structures, which would include foundations, wiring and solar panel assembly. The work performed would include new construction, reconstruction, rehabilitation,

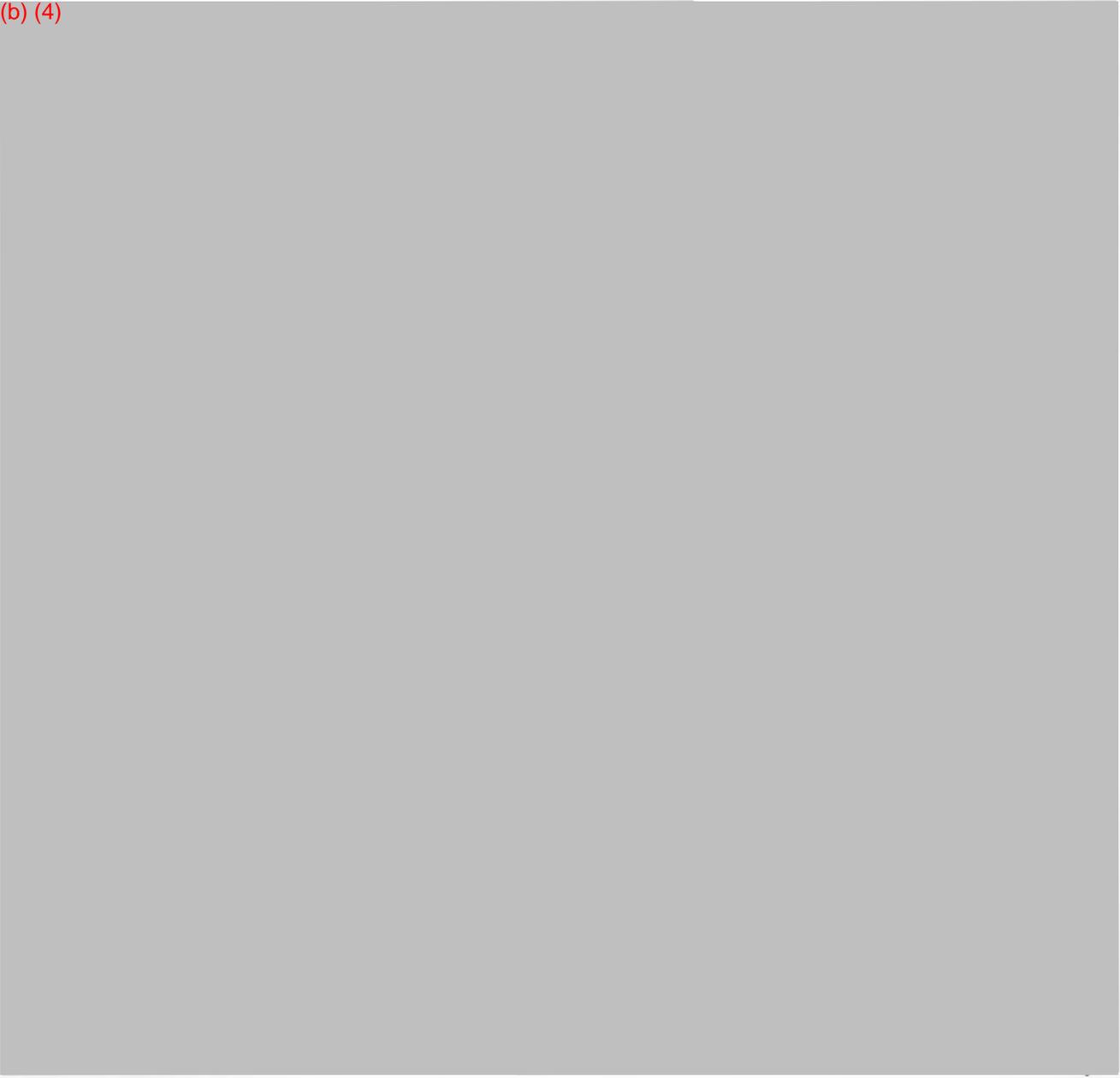
and repairs. These structures are usually connected to a power grid that is owned and operated by a local utility service. Selling back to the utility service company not only provides solar power to the direct owner of the solar power plant and their related infrastructure, but also allows any excess power to be transferred, sold and eventually used by numerous consumers who may be connected to that power grid.

1.4 Regional Center Investment Structure and Project Funding

(b) (4)



(b) (4)



1.5 Targeted Employment Area

Under the EB-5 immigrant investor program, an alien can become eligible for U.S. permanent resident status by investing either US\$1 million or US\$500,000 in a new commercial enterprise in the United States. To participate in the immigrant investor program by investing US\$500,000, the capital must be invested in a qualified Targeted Employment Area ("TEA").

Section 205(b)(5)(B) of the Immigration and Nationality Act defines a TEA as an area that, at the time of investment, is a "rural area" or an area that has experienced "high unemployment", i.e. an unemployment rate that is at least 150 percent of the national average unemployment rate.

For any other projects within the boundary of the regional center, the minimum capital investment threshold for any individual immigrant investment into an approved commercial enterprise throughout the regional center will be \$500,000 if the investment is made in a TEA, or \$1,000,000 if outside of a TEA. Evidence that the proposed commercial project is in a TEA within the regional center boundary will be provided with the individual 1-526 Petitions of EB-5 investors.

1.6 AAA California Regional Center LLC Management Team

Keen Wei, President and CEO

Keen Wei will be the President and CEO of AAA California Regional Center. Ms. Wei has a strong history of success in real estate with a special focus in the San Francisco and the Greater Bay Area of Northern California. Since 2006, she has founded 2 companies Comforhome Realty Investments Corp. and Bayhome Financial Corp. Her company's 2009 sales exceeded US\$100 million. Ms. Wei received her B.S. in Business from Japan University in Tokyo, Japan and her M.S. in Computer Science at Northwestern Polytechnic University in Fremont, California.

Zhen Zhen Li, General Manager

Zhen Zhen Li will be the General Manager of the regional center. Ms. Li has been a land and commercial property developer for over 10 years. Her recent projects include a joint venture with the Redevelopment Agency of the City of San Jose for a major renovation of a historic building in downtown San Jose, the construction of a school in the City of Fairfield, and major renovation projects in San Mateo.

Yu Zhang, Vice President of Marketing

Yu Zhang will be the Vice President of Marketing for the regional center. Ms. Zhang has been the Director of International Marketing at UNIS Enterprise of TsingHua University since 2006. She has more than twenty years of experience of working with overseas investment groups and individuals.

Ms. Zhang attended Centenary College and received her Executive MBA at Chinese People's University.

1.7 Economic Analysis Experts

Dr. Michael K. Evans, Evans, Carroll & Associates, Inc, Chairman

Dr. Michael K. Evans is the Chairman of Evans, Carroll & Associates (formerly Evans Economics), which has been providing economic forecasting and consulting to clients since 1981. The firm, based in Boca Raton, Florida, specializes in economic analysis for EB-5 programs, economic impact studies of development projects and new construction, models of state and local tax receipts, impact of current and proposed government legislation, and construction of econometric models for individual industries and companies. As Chief Economist for the American Economics Group from 2000 to the present, Dr. Evans has also built a comprehensive state modeling system that provides economic analysis for a variety of consulting projects. Previously Dr. Evans was founder and president of Chase Econometric Associates (1970-1980), and served as Clinical Professor of Economics at Kellogg Graduate School of Management, Northwestern University (1996-99) and Assistant and Associate Professor of Economics, Wharton School, University of Pennsylvania (1964-69). Dr. Evans holds a Ph. D. in Economics from Brown University.

1.8 Immigration Counsel

Linda Lau, Esq., Global Law Group

Linda Lau is an attorney licensed in California with over twenty-two years of experience handling business immigration matters. Ms. Lau provides legal representation to domestic and international companies and represents firms in the connection with the transfer and employment of executives, managers and professionals on both a temporary and permanent basis. Ms. Lau also has extensive experience advising companies and individuals on the development of immigrant investor (EB-5) projects. She holds a B.A. degree from the University of California at Berkeley and an M.S.W. degree from University of Michigan, Ann Arbor. She received her J.D. degree from the UCLA School of Law. Ms. Lau is also admitted as a solicitor of England and Wales.

1.9 Architect

Salvatore Caruso, AIA, Founder, Salvatore Caruso Design Corporation

A former chairman of the A.I.A. Government Affairs Commission and member of the City of San Jose Planning Commission, Mr. Caruso has more than twenty years' worth of commercial and residential design and construction supervising experience. His major projects include a five-star hotel in Napa Valley, mass residential projects in the City of Mountain View, and shopping centers across the Bay Area. Mr. Caruso studied architecture in Italy at the Institute D'Architettura D'Italia. Mr. Caruso is currently licensed with the California Architects Board through September, 2011.

1.10 Banking Institution & Escrow

(b) (4)



1.11 Sample Investment Agreements

The following sample investment agreements are included in AAA CA RC's designation application:

1. Private Offering Memorandum
2. Subscription Agreement
3. Limited Partnership Agreement
4. Joint Escrow Instructions

The above listed sample agreements reflect the intended use of limited partnerships as the investment vehicles for AAA CA RC, as well as the intended use of escrow pending the receipt of each alien investor's I-526 petition by USCIS.

Section 2.0 Regional Center Market Analysis

(b) (4)



Section 3.0 Sample Projects Details

AAA CA RC has 8 proposed Sample Projects to be completed in the Counties of San Francisco, Alameda, Santa Clara and Fresno. The projects cover all of the proposed industries and include many mixed-use facilities. For purposes of this application of this application, the 8 sample projects will also be called “hypothetical” sample projects because the project locations have not been finalized.

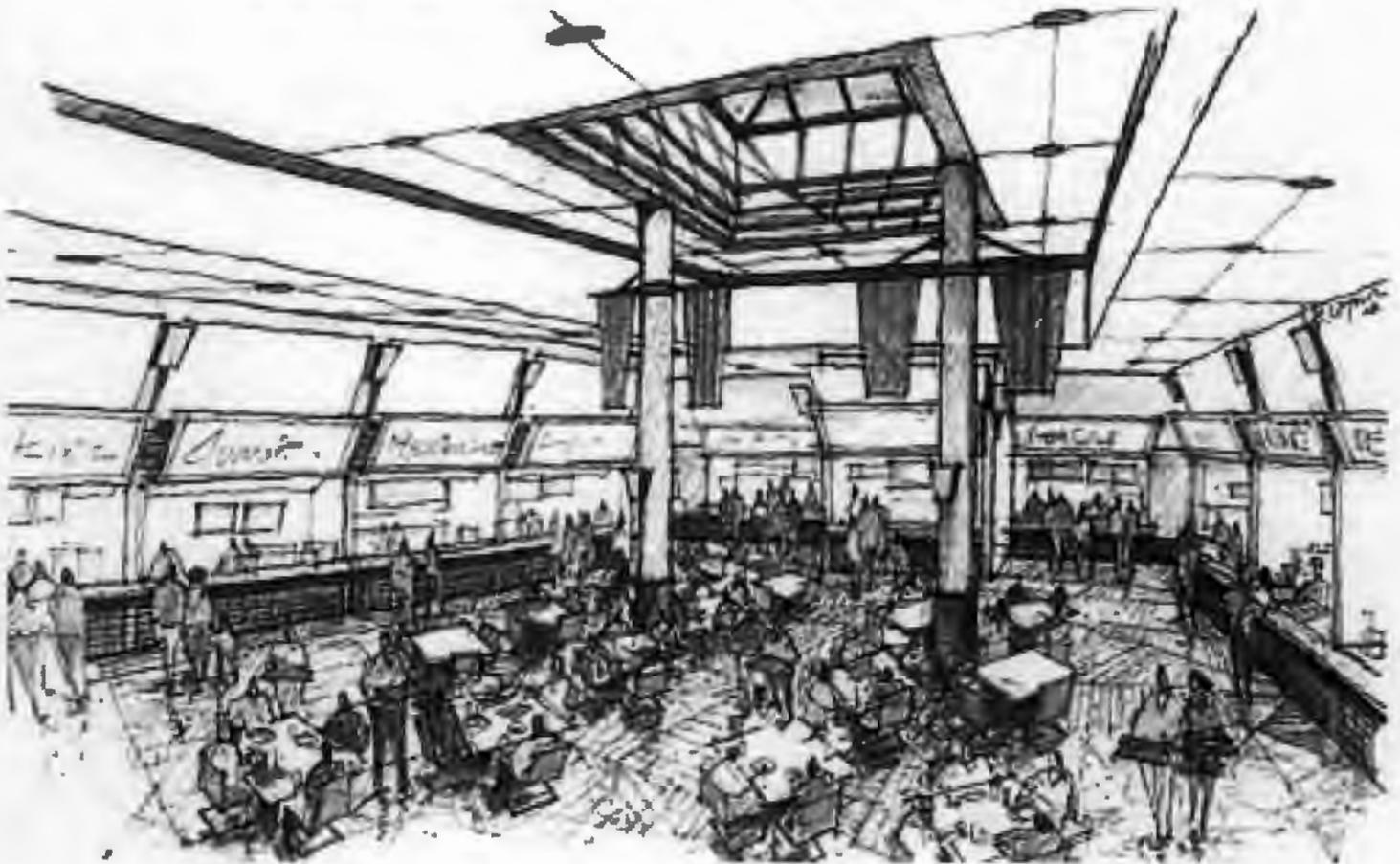
Below is a summary table of the 8 Sample Projects proposed for AAA CA RC:

Summary Table of Sample Projects for AAA California Regional Center				
	Proposed Project name	Planned Square footage	Industries with [NAICS Code]	Total job creation projected
1	Mixed Use #1 (San Francisco County)	(b) (4)	Professional office space, Hotel, and Retail services [NAICS Codes 541110; 541211; 541330; 541511; 541618; 541810; 721110; 445110; 446110; 448120]	(b) (4)
2	Mixed Use #2 (San Francisco County)		Retail and Professional office space [NAICS Codes 445110; 446110; 448120; 541110; 541211; 541330; 541511; 541618; 541810]	
3	Mixed Use #3 (San Francisco County)		Retail services and medical offices [NAICS Codes 445110; 446110; 448120; 451110; 452990; 621111]	
4	Food Court (San Francisco County)		Food Services "Fine Dining" Facilities [NAICS Code 722211]	
5	Assisted Living Facility (San Francisco County)		Assisted Living Facilities and restaurant [NAICS Codes: 623110; 722211]	
6	Mixed Use #4 (Alameda County)		Hotel, Restaurant and Spa services [NAICS Codes 721110; 722211; 713940]	
7	Professional Office (Santa Clara County)		Professional office space [NAICS Code 541110; 541211; 541330; 541511; 541618; 541810]	
8	Coalinga Solar Farm (Fresno County)		Alternative energy structure construction [NAICS Code 237130]	

updated



AAA CALIFORNIA REGIONAL CENTER



UPDATED OPERATIONAL PLAN AUGUST 2011

This Operational Plan supersedes a prior operational plan for AAA California Regional Center LLC dated October 2010 by including more specific NAICS codes, deleting all references to and analysis of the manufacturing industry.

AAA California Regional Center LLC
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1.0 REGIONAL CENTER OVERVIEW

1.1 BUSINESS SUMMARY

PROPOSED REGIONAL CENTER	AAA California Regional Center
REGIONAL CENTER APPLICANT	AAA California Regional Center LLC, a California Limited Liability Company organized on May 24, 2010 ("Applicant")
GEOGRAPHIC SCOPE	Contiguous counties of San Francisco, San Mateo, Contra Costa, Alameda, Santa Clara, San Benito, Fresno and Kings County within the state of California
TARGETED INDUSTRIES	<p>Activities within AAA California Regional Center will focus on the following industry clusters:</p> <ul style="list-style-type: none">• <u>Retail</u> Supermarkets and Other Grocery (except Convenience) Stores (445110) Pharmacies and Drug Stores (446110) Women's Clothing Stores (448120) Sporting Goods Stores (451110) All Other General Merchandise Stores (452990)• <u>Hospitality</u> Hotels (except Casino Hotels) and Motels (721110)• <u>Food Service</u> Limited-Service Restaurants (722211)• <u>Professional Office</u> Offices of Lawyers (541110) Offices of Certified Public Accountants (541211) Engineering Services (541330)

Custom Computer Programming Services (541511)
Other Management Consulting Services (541618)
Advertising Agencies (541810)

- Medical Office

Offices of Physicians (except Mental Health Specialists) (621111)

- Entertainment

Fitness and Recreational Sports Centers (713940)

- Assisted Living Facility

Nursing Care Facilities (623110)

- Alternative energy structure construction

Power and Communication Line and Related Structures
Construction (237130)

For further detail regarding the planned activities of AAA California Regional Center within the targeted industries, please refer to the overall business plan and economic impact analysis.

INVESTMENT STRUCTURE

(b) (4)



PROJECT FUNDING

1.2 OPERATIONS SUMMARY

**ADMINISTRATIVE
OVERSIGHT**

Applicant will be responsible for the administration of all regional center operations, including marketing, project selection and oversight, investor recruitment, and record-keeping.

DUE DILIGENCE

(b) (4)

MARKETING STRATEGY

**FUNDING FOR
OPERATIONS**

POINT OF CONTACT

Ms. Keen Wei
President and CEO
AAA California Regional Center LLC
20380 Town Center Lane #170
Cupertino, California 95014
Email: info@aaacarc.com
Tel: (408)832-8938

Upon designation of AAA California Regional Center by USCIS, Applicant will be responsible for overseeing and monitoring all regional center operations for EB-5 program compliance so that its designation is maintained. Applicant will keep records, data and information related to all investors as well as the investments, the projects involved, and the movement of funds to and from each limited partnership established within AAA California Regional Center. In addition, Applicant will compile specific reports as requested by USCIS on an annual basis.

2.0 ADMINSTRATIVE OVERSIGHT

(b) (4)



(b) (4)



3.0 DUE DILIGENCE

(b) (4)



(b) (4)



4.0 PROMOTIONAL EFFORTS

(b) (4)



5.0 FUNDING FOR REGIONAL CENTER OPERATIONS

(b) (4)



AAA CALIFORNIA REGIONAL CENTER LLC



20380 Town Center Lane, #170, Cupertino, CA 95014
Tel: (408)621-2081 . Fax: (408) 973-8247

August 17, 2011
U.S. Citizenship and Immigration Services
California Service Center
Attn: EB-5 Processing Unit
P.O. Box 10590
24000 Avila Road, 2nd Floor
Laguna Niguel, CA 92677

My name is Keen Wei. I am the LLC Member and President of AAA California Regional Center LLC. The purpose of this letter is to provide further explanation about the amount, source and use of funds committed to AAA California Regional Center ("AAA CA RC") for its operations use, and promotional activities.

I. Capital committed to the Regional Center

AAA California Regional Center LLC has three LLC members, Ms. Yu Zhang, Ms. Zhen Zhen Li, and myself. On June 21, 2011, Ms. Yu Zhang deposited US (b) (4) to the LLC's company account as the initial capital investment. On August 5, 2011, I deposited US (b) (4) to the LLC's company account as a second capital investment. As of August 2011, there is a total of (b) (4) capital deposited in AAA CA RC. Ms. Yu Zhang has been the Director of International Marketing at UNIS Enterprise since 2006, and I have owned two companies, Comforhome Realty Investment Corporation and Bayhome Financial Corporation in Palo Alto, California since 2006 and in 2009 achieved sales record of US \$100 million.

The capital committed into AAA CA RC is for its regional center entity setup and its designation application, and its future operations upon the approval of the designation application. (b) (4)

The table below shows the amount of money currently committed, as well as the planned expenditures and expenses already incurred with regard to the regional center designation application and setup.

AAA CALIFORNIA REGIONAL CENTER LLC

Money deposited and committed into AAA California Regional Center LLC's account

(b) (4)

Budget including expenditure already incurred and projected expenditures

(b) (4)

AAA CALIFORNIA REGIONAL CENTER LLC

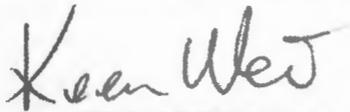
II. Promotional Activities

Promotional activities will commence after the regional center obtains its designation. The

(b) (4)

A large rectangular area of the document is redacted with a solid grey fill, obscuring several lines of text.

If you have any questions on the above, please feel free to contact me.

A handwritten signature in black ink that reads "Keen Wei".

Keen Wei, LLC Member and President
AAA California Regional Center



美國第一銀行
First Commercial Bank (USA)

1141 South De Anza Blvd., San Jose, CA 95129
TEL: (408) 253-4666 • FAX: (408) 343-0666

August 06, 2011

To Whom It may Concern:

At the request of our depositor AAA California Regional Center LLC

We hereby certify that the following account(s) is/are presently maintained with
First Commercial Bank (USA).

Account Name(s): AAA California Regional Center LLC

Address: 20380 Town Center Lane #172
Cupertino, CA 95014

Account Number: (b) (4)

Type of Account: Balance Checking Account

Date account was opened: (b) (4)

On 08-05-2011 account balance: (b) (4)

Our response is solely a matter of courtesy for which no responsibility is attached
to our institution or any of our officers.

Sincerely,

Michael Wang / FVP & Branch Manager

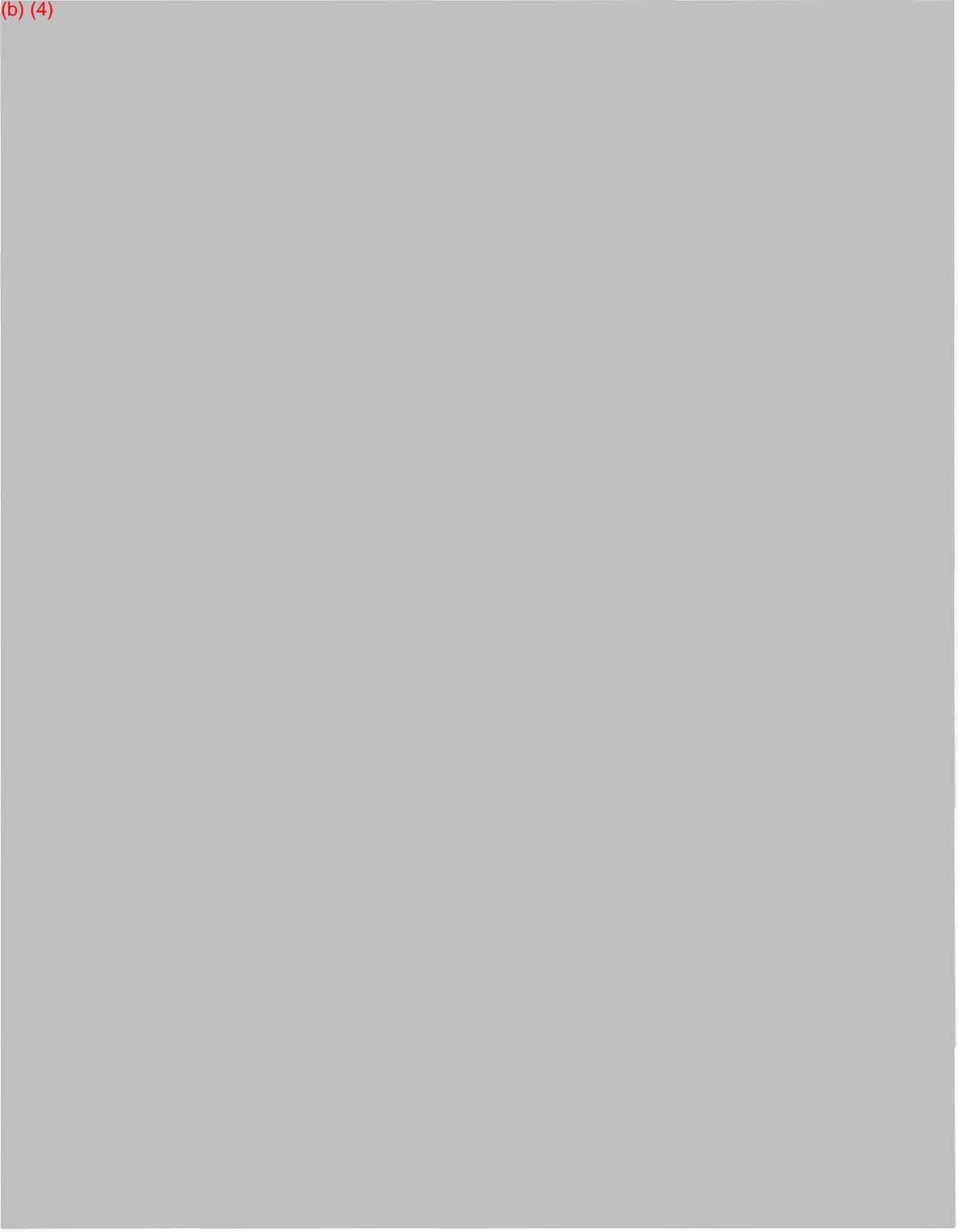
SAMPLE OFFERING MEMORANDUM

(b) (4)



SAMPLE SUBSCRIPTION AGREEMENT

(b) (4)



**AGREEMENT OF LIMITED PARTNERSHIP
OF
[AAA L.P.1]
a California limited partnership**

(b) (4)



JOINT ESCROW INSTRUCTIONS

(b) (4)





State of California Secretary of State

LLC-1

File # 201014510105

LIMITED LIABILITY COMPANY ARTICLES OF ORGANIZATION

ENDORSED - FILED in the office of the Secretary of State of the State of California

MAY 24 2010

A \$70.00 filing fee must accompany this form.

IMPORTANT - Read instructions before completing this form.

This Space For Filing Use Only

ENTITY NAME (End the name with the words "Limited Liability Company," or the abbreviations "LLC" or "L.L.C." The words "Limited" and "Company" may be abbreviated to "Ltd." and "Co.," respectively.)

1. NAME OF LIMITED LIABILITY COMPANY

AAA CALIFORNIA REGIONAL CENTER LLC

PURPOSE (The following statement is required by statute and should not be altered.)

2. THE PURPOSE OF THE LIMITED LIABILITY COMPANY IS TO ENGAGE IN ANY LAWFUL ACT OR ACTIVITY FOR WHICH A LIMITED LIABILITY COMPANY MAY BE ORGANIZED UNDER THE BEVERLY-KILLEA LIMITED LIABILITY COMPANY ACT.

INITIAL AGENT FOR SERVICE OF PROCESS (If the agent is an individual, the agent must reside in California and both Items 3 and 4 must be completed. If the agent is a corporation, the agent must have on file with the California Secretary of State a certificate pursuant to Corporations Code section 1505 and Item 3 must be completed (leave Item 4 blank).)

3. NAME OF INITIAL AGENT FOR SERVICE OF PROCESS

MARY WONG

4. IF AN INDIVIDUAL, ADDRESS OF INITIAL AGENT FOR SERVICE OF PROCESS IN CALIFORNIA CITY STATE ZIP CODE

15513 HARBOR WAY

SAN LEANDRO CA 94579

MANAGEMENT (Check only one)

5. THE LIMITED LIABILITY COMPANY WILL BE MANAGED BY:

ONE MANAGER

MORE THAN ONE MANAGER

ALL LIMITED LIABILITY COMPANY MEMBER(S)

ADDITIONAL INFORMATION

6. ADDITIONAL INFORMATION SET FORTH ON THE ATTACHED PAGES, IF ANY, IS INCORPORATED HEREIN BY THIS REFERENCE AND MADE A PART OF THIS CERTIFICATE.

EXECUTION

7. I DECLARE I AM THE PERSON WHO EXECUTED THIS INSTRUMENT, WHICH EXECUTION IS MY ACT AND DEED.

DATE

5/20/2010

SIGNATURE OF ORGANIZER

[Handwritten Signature]

MARY WONG

TYPE OR PRINT NAME OF ORGANIZER



OPERATING AGREEMENT

OF

**AAA CALIFORNIA REGIONAL CENTER LLC,
A CALIFORNIA LIMITED LIABILITY COMPANY**

From: (213) 830-9933
Jean Gan
Global Law Group
909 El Centro Street, Suite 1
South Pasadena, CA 91030

Origin ID: WHPA



Ship Date: 22JUL11
ActWgt: 1.0 LB
CAD: 3464367/NET3180



Delivery Address Bar Code



SHIP TO: (213) 830-9933 X 101

ATTN: RFE

USCIS California Service Center
24000 AVILA RD., Room 200
P.O. BOX 10590
LAGUNA NIGUEL, CA 92677

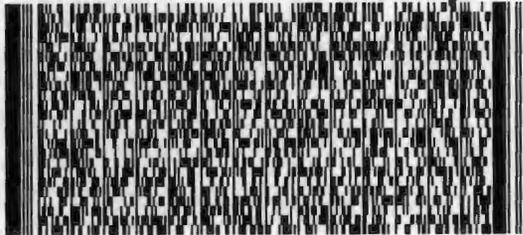
CSC
STAMP #0
C30070

Ref # AAA California Regional Center
Invoice #
PO #
Dept #

C30159

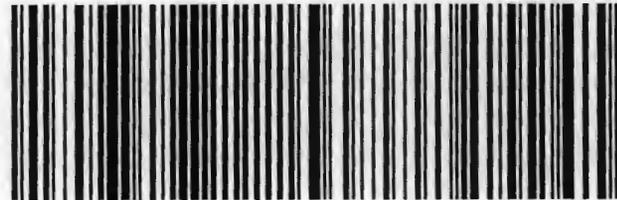
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TRK# 7973 3535 3842
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92677
CA-US
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Global Law Group

A Professional Law Corporation

October 15, 2010

Via Federal Express (Tracking # 7938 8610 3727)

ATTN: EB-5 Regional Center Unit
California Service Center
U.S. Citizenship and Immigration Services
24000 Avila Road, 2nd Floor, Room 2326
P.O. BOX 10526
Laguna Niguel, CA. 92677

**EB-5 Regional
Center Designation
Application**

RE: EB-5 Regional Center Designation Application

Name of Regional Center: AAA California Regional Center
**Name of Applicant: AAA California Regional Center LLC, dba
AAA California Regional Center**

Dear Sir/ Madam:

This office represents the above-referenced applicant in connection with its request for USCIS designation of **AAA California Regional Center** under the Immigrant Investor Pilot Program. The purpose of this application is to demonstrate the qualifications of **AAA California Regional Center** to be designated as a regional center under Immigration and Nationality Act ("INA") § 203 (b)(5) and Title 8, Code of Federal Regulations (8 C.F.R.) § 204.6(m).

Enclosed within this binder please find the following items pertaining to the proposed **AAA California Regional Center**:

1. Form G-28, Entry of Appearance as Attorney
2. Letter from Applicant
3. Executive Summary
4. Overall Business Plan
5. Operational Plan
6. Economic Impact Report
7. Sample Investment Agreements, including
 - (a) Private Offering Memorandum
 - (b) Subscription Agreement
 - (c) Limited Partnership Agreement
 - (d) Joint Escrow Instructions
 - (e) Investor Questionnaire

350 S. Figueroa St., Suite 760, Los Angeles, CA 90071

Tel: (213) 830-9933 ♦ Fax: (213) 830-9930 ♦ E-mail: contact@GlobalLawGroup.net

www.GlobalLawGroup.net

REC'D CSC#180CT18 10:55

AL3100621



Global Law Group

A Professional Law Corporation

8. Applicant's entity documents:
 - (a) LLC Articles of Organization
 - (b) Bank Statement
 - (c) Fictitious Business Name Statement filings

Thank you for your consideration of this application and your kind assistance. Kindly note that with respect to any third-party request made under the Freedom of Information Act (FOIA), this submission contains confidential commercial information which cannot be released per request by any party under FOIA except if the principal's consent is given.

Sincerely,

Linda Lau, Esq.
Enclosures

AAA California Regional Center

LIST OF EXHIBITS

1. **Form G-28 of Filing Attorney and Letter from Applicant**
2. **Executive Summary**, including summary of:
 - Structure, ownership and control of regional center entity;
 - Geographic area of proposed regional center, with map showing it is contiguous;
 - Targeted Employment Area information;
 - Regional center's administration, oversight, and management functions;
 - Promotional activities for regional center;
 - Due diligence screening of alien investors' lawful source of capital;
 - Industries, with NAICS Codes, that will be focus of EB-5 capital investments;
 - Economic impact analysis report and business plan;
 - Structure of ownership and control of commercial entities to receive EB-5 investor capital, including regional center's equity stake.
3. **Overall Business Plan**
4. **Operational Plan**
5. **Economic Impact Report**
6. **Sample Investment Agreements**
 - a) Offering Memorandum
 - b) Subscription Agreement
 - c) Limited Partnership Agreement
 - d) Joint Escrow Instructions
 - e) Investor Questionnaire
7. **Applicant's entity documents**
 - a) LLC Articles of Organization
 - b) Bank Statement
 - c) Fictitious Business Name Statement copies, showing that AAA California Regional Center LLC is doing business as AAA California Regional Center

AAA CALIFORNIA REGIONAL CENTER LLC



20380 Town Center Lane, #170, Cupertino, CA 95014
Tel: (408)621-2081 . Fax: (408) 973-8247

September 8, 2010

ATTN: EB-5 Regional Center Unit
USCIS - California Service Center
24000 Avila Road, 2nd Floor, Room 2326
Laguna Niguel, CA 92677

RE: EB-5 Regional Center Designation Request

Name of Proposed Regional Center: AAA California Regional Center
Name of Entity Seeking Designation: AAA California Regional Center LLC, *dba*
AAA California Regional Center

To Whom It May Concern:

I am the President and Chief Executive Officer of AAA California Regional Center LLC, a duly organized California Limited Liability Company. Our company hereby seeks the designation of "AAA California Regional Center" as an EB-5 regional center under the Immigrant Investor Pilot Program. The proposed regional center name is a registered fictitious business name of our company.

Our designation request is submitted to the U.S. Citizenship and Immigration Services (USCIS) on our behalf by Global Law Group. Should you have any questions in regards to this matter, please contact attorneys Linda Lau, Tina Lee or K. Lara Baharlo of Global Law Group, as per the enclosed Form G-28.

Thank you for your kind consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keen Wei', is written over a light blue horizontal line.

Keen Wei
President and Chief Executive Officer

Cc: Linda Lau, Esq.
Tina Lee, Esq.
K. Lara Baharlo, Esq.

Enclosures

PROFILE OF AAA CALIFORNIA REGIONAL CENTER

Name of Regional Center: AAA California Regional Center	
<p>Contact: Ms. Keen Wei, President and CEO.</p> <p>AAA California Regional Center LLC</p> <p>20380 Town Center Lane #170 Cupertino, CA 95014</p> <p>Phone: 408-832-8938</p> <p>Email: info@aaacarc.com</p>	<p>Geographic Scope: 8 Contiguous California Counties of San Francisco County, San Mateo County, Contra Costa County, Alameda County, Santa Clara County, San Benito County, Fresno County and Kings County</p> <p>Industries: Retail; Hospitality/Hotel; Food Service; Professional Office; Medical Office; Entertainment; Assisted Living Facility; and Manufacturing/Assembly</p>

Name of Proposed Regional Center: AAA California Regional Center (a registered fictitious business name of AAA California Regional Center LLC)

Applicant: The applicant, AAA California Regional Center LLC, dba AAA California Regional Center, is a California Limited Liability Company formed May 24, 2010. AAA California Regional Center LLC is led by a team of highly experienced and accomplished professionals with extensive investment and private financing experience. AAA California Regional Center LLC is submitting an EB-5 regional center proposal to U.S. Citizenship and Immigration Services (USCIS) requesting approval and designation for participation in the EB-5 Immigrant Investor Pilot Program.

AAA California Regional Center LLC’s primary mission is to identify, evaluate and select qualified projects for funding, monitor job creation, and ensure compliance with requirements under the EB-5 Immigrant Investor Pilot Program.

Primary Contact: The primary contact for AAA California Regional Center LLC is Ms. Keen Wei. She can be reached by email at info@aaacarc.com .

Immigration counsel for AAA California Regional Center LLC is Linda Lau, Esq. of Global Law Group. Ms. Lau can be reached by telephone at (213) 830-9933, ext. 108, or by cellular phone at (213) 700-4023, and by email at linda@globallawgroup.net

Geographic Scope: AAA California Regional Center (“AAA CA RC”) will encompass the following eight (8) contiguous counties in California: San Francisco, San Mateo, Contra Costa, Alameda, Santa Clara, San Benito, Fresno, and Kings.

Industry Clusters and Proposed Economic Activities of AAA California Regional Center LLC: AAA CA RC will finance the development, operation and management of real estate development projects that will create a stable investment opportunity for the company and its shareholders, including immigrant investors, while boosting the local market, employment rates and living standards of the community. AAA CA RC will focus on the following eight industry clusters of economic activity:

- Retail (NAICS Code:44 & 45)
- Hospitality/Hotel (NAICS Code: 721)
- Food Service (NAICS Code: 722)
- Professional Office (NAICS Code: 541)
- Medical Office (NAICS Code: 621)
- Entertainment (NAICS Code: 7139)
- Assisted Living Facility (NAICS Code: 623)
- Manufacturing/Assembly (NAICS Code: 3344)

(b) (4)



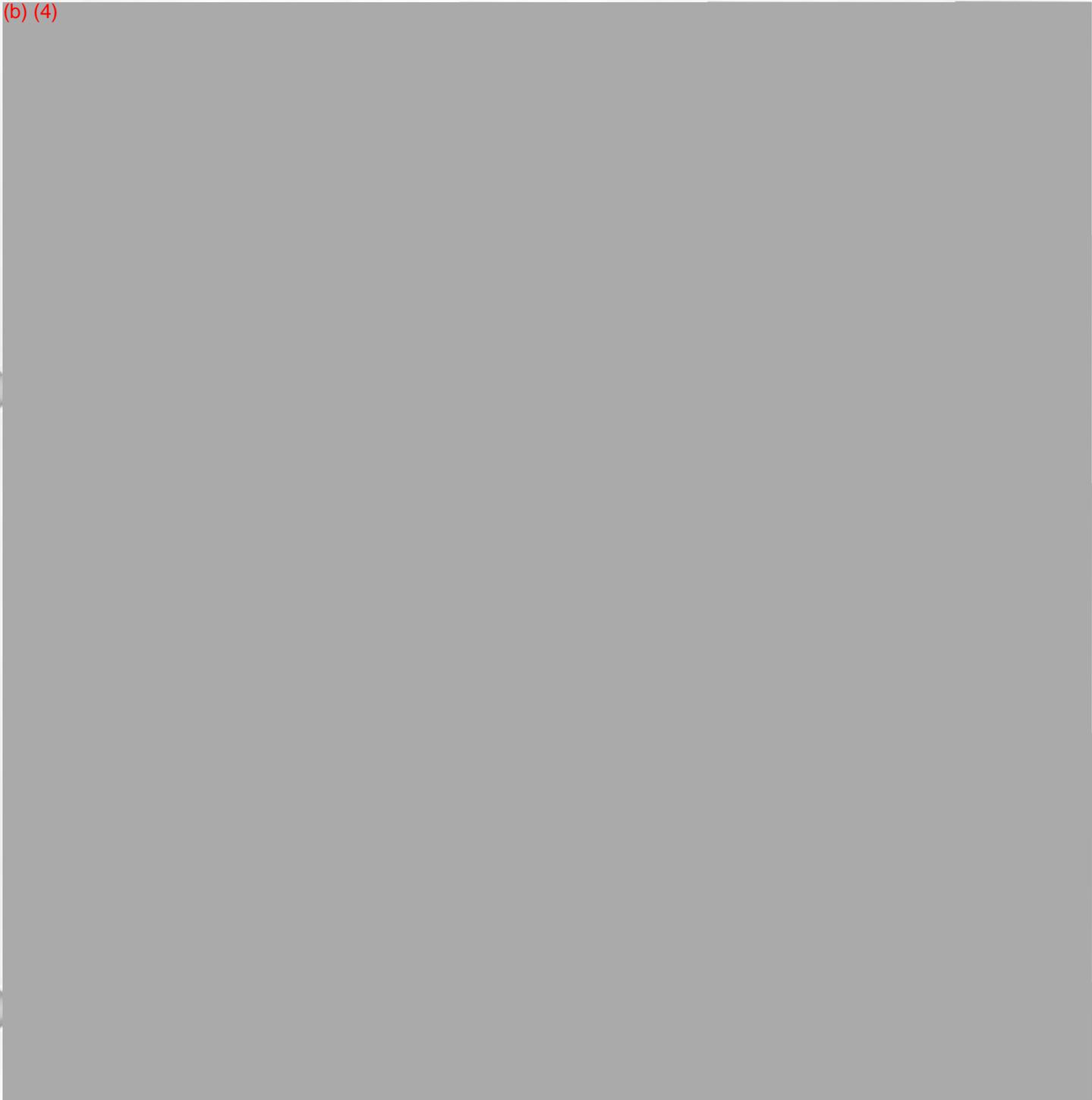
(b) (4)



Summary Table of Sample Projects for AAA California Regional Center				
	Proposed Project name	Planned Square footage	Industries with NAICS Code	Total job creation projected
1	Mixed Use #1 (San Francisco County)	(b) (4)	Professional office space, Hotel, and Retail services [NAICS Codes 541; 721; 44 & 45]	(b) (4)
2	Mixed Use #2 (San Francisco County)	(b) (4)	Retail and Professional office space [NAICS Codes 44 & 45; 541]	(b) (4)
3	Mixed Use #3 (San Francisco County)	(b) (4)	Retail services and medical offices [NAICS Codes 44 & 45; 621]	(b) (4)
4	Food Court (San Francisco County)	(b) (4)	Food Services "Fine Dining" Facilities [NAICS Code 722]	(b) (4)
5	Assisted Living Facility (San Francisco County)	(b) (4)	Assisted Living Facilities and restaurant [NAICS Codes: 623; 722]	(b) (4)
6	Mixed Use #4 (Alameda County)	(b) (4)	Hotel, Restaurant and Spa services [NAICS Codes 721; 722; 7139]	(b) (4)

7	Gilroy Professional Office (Santa Clara County)	(b) (4)	Professional office space [NAICS Code 541]	(b) (4)
8	Coalinga Solar Farm (Fresno County)	(b) (4)	Manufacturing/Assembly [NAICS Code 3344]	(b) (4)

(b) (4)



(b) (4)



Minimum Investment Amount: Under the EB-5 immigrant investor program, an alien can become eligible to obtain U.S. lawful permanent resident status by investing either US\$1,000,000 or US\$500,000 in a new commercial enterprise in the United States. To participate in the immigrant investor program through investing the lower US \$500,000 amount, the alien must invest his or her capital into a geographic area that qualifies as a Targeted Employment Area (“TEA”). INA § 203(b)(5)(B) and 8 C.F.R. § 204.6(e) define a TEA as an area that, at the time of investment, is a rural area or an area that has experienced an unemployment rate that is at least 150 percent of the national average.

Job Creation: In accordance with federal regulations governing the EB-5 regional center program, an Economic Impact Analysis Report was prepared by Evans, Carroll & Associates, an economic forecasting and consulting firm specializing in economic analysis for EB-5 projects, economic impact studies of development projects and new construction, models of state and local tax receipts, impact of current and proposed government legislation, and construction of econometric models for individual industries and companies.

(b) (4)





AAA CALIFORNIA REGIONAL CENTER

OVERALL BUSINESS PLAN

Pursuant to Matter of Ho and 8 CFR 204.6(m)(3)

October 2010

AAA California Regional Center LLC
20380 Town Center Lane #170
Cupertino, CA 95014

Strictly Private and Confidential

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Section 1.0 Regional Center Business Overview

1.1 Summary

Pursuant to the Immigrant Investor Pilot Program, **AAA California Regional Center ("AAA CA RC")** is proposed as a regional center that will fund commercial real estate construction, development and management projects within a contiguous region comprised of 8 counties across the Bay Area and central portions of California including: San Francisco County, San Mateo County, Contra Costa County, Alameda County, Santa Clara County, San Benito County, Fresno County, and Kings County. Job-generating commercial activities within AAA CA RC will focus on the industries: retail, hospitality/hotel, food service, professional office, medical office, entertainment, assisted living facility, and manufacturing/Assembly. Projects may include the development and/or redevelopment of distressed and vacant properties. AAA CA RC is owned and operated by AAA California Regional Center LLC, the applicant.

5 - SF
1 - Alameda
1 - Santa Clara
1 - Fresno

1.2 Geographic Area and Scope

The eight contiguous counties comprising AAA CA RC's geographic area are located in the Bay Area and Central Valley regions of California. With a total area of 11,897 square miles, this geographic region contains a diverse area ranging from agricultural farmlands to high-density city blocks. The estimated 2009 population is 6,970,744, with a density of 582 people per square mile. Situated in the Bay Area and the Central Valley, these regions remain highly desirable locations for living and doing business, with growth expected to continue through the foreseeable future.



AAA CA RC's geographic area includes the following 8 contiguous California counties:

- Alameda
- Fresno
- Kings
- San Benito
- San Francisco
- San Mateo
- Santa Clara
- Contra Costa

1.3 Target Industry Economic Clusters

AAA CA RC will fund the construction, development, and management of facilities in the following industries:

- Retail (NAICS Code:44 & 45)
- Hospitality/Hotel (NAICS Code: 721)
- Food Service (NAICS Code: 722)
- Professional Office (NAICS Code: 541)
- Medical Office (NAICS Code: 621)
- Entertainment (NAICS Code: 7139)
- Assisted Living Facility (NAICS Code: 623)
- Manufacturing/Assembly (NAICS Code: 3344)

(1) Retail, NAICS 44 & 45 (e.g. retail shopping center)

Retail stores are the backbone of a shopping center development. Retail stores attract customers to the shopping center and surrounding office development. Shopping center development benefits the community by creating jobs and producing sales tax revenue, which the government uses to provide services.

(2) Hospitality / Hotel, NAICS 721 (e.g. hotel)

For mixed-use developments, a hotel can be an appropriate complement to office, retail and restaurant users. They provide lodging for corporate and vacationing travelers, and offer convenient rental space for meetings and conventions. Carefully planned resorts and other hospitality developments can bring needed tourists and shoppers to local retail stores and restaurants while diversifying the creation of jobs.

(3) Food Service & Dining, NAICS 722 (e.g. restaurant, food court)

Not only does outside food consumption reflect current economic moods, but it also generates sales and income in a number of supporting industries. Fast food restaurants and sit-down dinners are a key component of the shopping center tenant mix, and complement retail and office users. Cafes and bars can add even more diversity to the retail and office experience.

(4) Professional Office, NAICS 541 (e.g. professional office building)

Office space development diversifies job opportunities, increases employment and provides traffic for nearby retail stores. Professional services tenants benefit the local population and provide a stable rent roll for office buildings.

(5) Medical Office, NAICS 621 (e.g. medical office building)

From general medical and dental offices to specialists needing unique layouts for equipment, medical office space needs to be specially designed for medical equipment and concern for

patient care. These offices also provide needed services to the community and provide highly skilled and professional job opportunities in the area

(6) Entertainment, NAICS 7139 (e.g.: Spa/Fitness Center)

With a growing number of baby boomers reaching retirement age, senior housing facilities will provide seniors with the freedom of housing on their own coupled with the convenience of having basic services handled for them. Such establishments increase traffic for retail, restaurant, and entertainment facilities.

(7) Assisted Living Facility, NAICS 623 (e.g.: assisted living center)

With a growing number of baby boomers reaching retirement age, senior housing facilities will provide seniors with the freedom of housing on their own coupled with the convenience of having basic services handled for them. Such establishments increase traffic for retail, restaurant, and entertainment facilities.

(8) Manufacturing/Assembly, NAICS 3344 (e.g. solar panel assembly)

Manufacturing provides the goods that comprise products at or near the consumer-side of the purchasing cycle. Although the NAICS code for manufacturing technically comprises 31-33, only data from 3344 was included for this document, as it focuses on the manufacture of semi-conductors and electronic products, all of which play a primary role in the manufacturing of solar panels that is necessary to the included sample project (See Section 3.8.0 for further details on 10 Megawatt Farm).

1.4 Regional Center Investment Structure and Project Funding

(b) (4)



(b) (4)



1.5 Targeted Employment Area

Under the EB-5 immigrant investor program, an alien can become eligible for U.S. permanent resident status by investing either US\$1 million or US\$500,000 in a new commercial enterprise in the United States. To participate in the immigrant investor program by investing US\$500,000, the capital must be invested in a qualified Targeted Employment Area ("TEA").

Section 205(b)(5)(B) of the Immigration and Nationality Act defines a TEA as an area that, at the time of investment, is a "rural area" or an area that has experienced "high unemployment", i.e. an unemployment rate that is at least 150 percent of the national average unemployment rate.

For any other projects within the boundary of the regional center, the minimum capital investment threshold for any individual immigrant investment into an approved commercial enterprise throughout the regional center will be \$500,000 if the investment is made in a TEA, or \$1,000,000 if outside of a TEA. Evidence that the proposed commercial project is in a TEA within the regional center boundary will be provided with the individual 1-526 Petitions of EB-5 investors.

1.6 AAA California Regional Center LLC Management Team

Keen Wei, President and CEO

Keen Wei will be the President and CEO of AAA California Regional Center. Ms. Wei has a strong history of success in real estate with a special focus in the San Francisco and the Greater Bay Area of Northern California. Since 2006, she has founded 2 companies Comforhome Realty Investments Corp. and Bayhome Financial Corp. Her company's 2009 sales exceeded US\$100 million. Ms. Wei received her B.S. in Business from Japan University in Tokyo, Japan and her M.S. in Computer Science at Northwestern Polytechnic University in Fremont, California.

Zhen Zhen Li, General Manger

Zhen Zhen Li will be the General Manager of the regional center. Ms. Li has been a land and commercial property developer for over 10 years. Her recent projects include a joint venture with the Redevelopment Agency of the City of San Jose for a major renovation of a historic building in downtown San Jose, the construction of a school in the City of Fairfield, and major renovation projects in San Mateo.

Lisa Zhang, Vice President of Marketing

Lisa Zhang will be the Vice President of Marketing for the regional center. Ms. Zhang has been the Director of International Marketing at UNIS Enterprise of TsingHua University since 2006. She has more than twenty years of experience of working with overseas investment groups and individuals.

Ms. Zhang attended Centenary College and received her Executive MBA at Chinese People's University.

1.7 Economic Analysis Experts

Dr. Michael K. Evans, Evans, Carroll & Associates, Inc, Chairman

Dr. Michael K. Evans is the Chairman of Evans, Carroll & Associates (formerly Evans Economics), which has been providing economic forecasting and consulting to clients since 1981. The firm, based in Boca Raton, Florida, specializes in economic analysis for EB-5 programs, economic impact studies of development projects and new construction, models of state and local tax receipts, impact of current and proposed government legislation, and construction of econometric models for individual industries and companies. As Chief Economist for the American Economics Group from 2000 to the present, Dr. Evans has also built a comprehensive state modeling system that provides economic analysis for a variety of consulting projects. Previously Dr. Evans was founder and president of Chase Econometric Associates (1970-1980), and served as Clinical Professor of Economics at Kellogg Graduate School of Management, Northwestern University (1996-99) and Assistant and Associate Professor of Economics, Wharton School, University of Pennsylvania (1964-69). Dr. Evans holds a Ph. D. in Economics from Brown University.

1.8 Immigration Counsel

Linda Lau, Esq., Global Law Group

Linda Lau is an attorney licensed in California with over twenty-two years of experience handling business immigration matters. Ms. Lau provides legal representation to domestic and international companies and represents firms in the connection with the transfer and employment of executives, managers and professionals on both a temporary and permanent basis. Ms. Lau also has extensive experience advising companies and individuals on the development of significant immigrant investor (EB-5) projects. She holds a B.A. degree from the University of California at Berkeley and an M.S.W. degree from University of Michigan, Ann Arbor. She received her J.D. degree from the UCLA School of Law. Ms. Lau is also admitted as a solicitor of England and Wales.

1.9 Architect

Salvatore Caruso, AIA, Founder, Salvatore Caruso Design Corporation

A former chairman of the A.I.A. Government Affairs Commission and member of the City of San Jose Planning Commission, Mr. Caruso has more than twenty years' worth of commercial and residential design and construction supervising experience. His major projects include a five-star hotel in Napa Valley, mass residential projects in the City of Mountain View, and shopping centers across the Bay Area. Mr. Caruso studied architecture in Italy at the Institute D'Architettura D'Italia. Mr. Caruso is currently licensed with the California Architects Board through September, 2011.

1.10 Banking Institution & Escrow

(b) (4)



1.11 Sample Investment Agreements

The following sample investment agreements are included in AAA CA RC's designation application:

1. Private Offering Memorandum
2. Subscription Agreement
3. Limited Partnership Agreement
4. Joint Escrow Instructions

The above listed sample agreements reflect the intended use of limited partnerships as the investment vehicles for AAA CA RC, as well as the intended use of escrow pending the receipt of each alien investor's I-526 petition by USCIS.

Section 2.0 Regional Center Market Analysis

(b) (4)



Section 3.0 Sample Projects Details

AAA CA RC has 8 proposed Sample Projects to be completed in the Counties of San Francisco, Alameda, Santa Clara and Fresno. The projects cover all of the proposed industries and include many mixed-use facilities. For purposes of this application of this application, the 8 sample projects will also be called "hypothetical" sample projects because the project locations have not been finalized.

Below is a summary table of the 8 Sample Projects proposed for AAA CA RC:

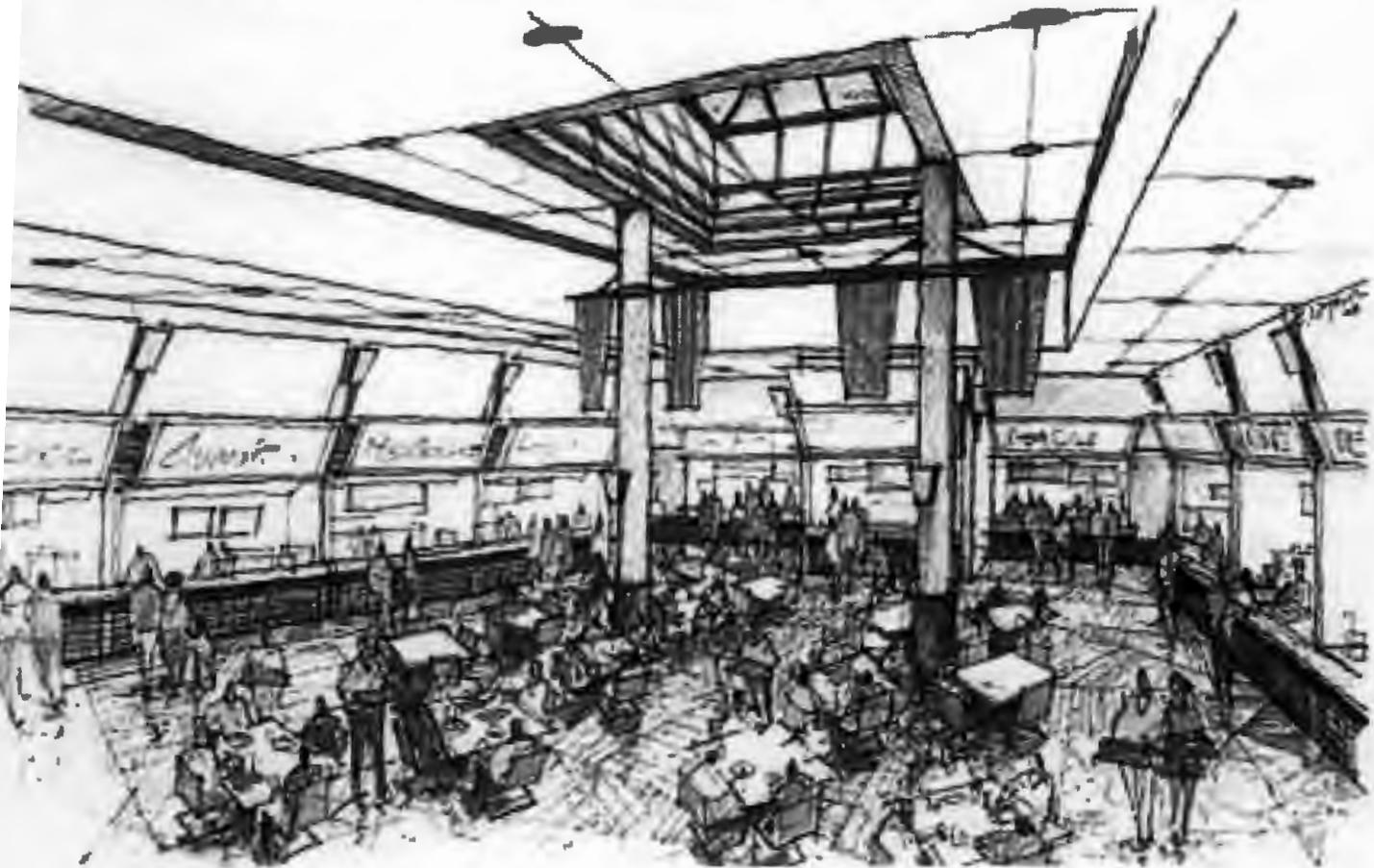
Summary Table of Sample Projects for AAA California Regional Center				
	Proposed Project name	Planned Square footage	Industries with [NAICS Code]	Total job creation projected
1	Mixed Use #1 (San Francisco County)	(b) (4)	Professional office space, Hotel, and Retail services [NAICS Codes 541; 721; 44 & 45]	(b) (4)
2	Mixed Use #2 (San Francisco County)		Retail and Professional office space [NAICS Codes 44 & 45; 541]	
3	Mixed Use #3 (San Francisco County)		Retail services and medical offices [NAICS Codes 44 & 45; 621]	
4	Food Court (San Francisco County)		Food Services "Fine Dining" Facilities [NAICS Code 722]	
5	Assisted Living Facility (San Francisco County)		Assisted Living Facilities and restaurant [NAICS Codes: 623; 722]	
6	Mixed Use #4 (Alameda County)		Hotel, Restaurant and Spa services [NAICS Codes 721; 722; 7139]	
7	Professional Office (Santa Clara County)		Professional office space [NAICS Code 541]	
8	Coalinga Solar Farm (Fresno County)		Manufacturing/Assembly [NAICS Code 3344]	

*5 SF
Alameda
Santa Clara*

For all projects to be undertaken within AAA CA RC, the exact amounts of EB-5 investment that will be raised will vary depending upon the job creation projections from the project and qualification of the project site and a Targeted Employment Area.



AAA CALIFORNIA REGIONAL CENTER



OPERATIONAL PLAN October 2010

AAA California Regional Center LLC
20380 Town Center Lane #170
Cupertino, CA 95014

Strictly Private and Confidential

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1.0 REGIONAL CENTER OVERVIEW

1.1 BUSINESS SUMMARY

PROPOSED REGIONAL CENTER	AAA California Regional Center
REGIONAL CENTER APPLICANT	AAA California Regional Center LLC, a California Limited Liability Company organized on May 24, 2010 ("Applicant")
GEOGRAPHIC SCOPE	Contiguous counties of San Francisco, San Mateo, Contra Costa, Alameda, Santa Clara, San Benito, Fresno and Kings County within the state of California
TARGETED INDUSTRIES	<p>Activities within AAA California Regional Center will focus on the following industry clusters:</p> <ul style="list-style-type: none">• Retail (NAICS Code:44 & 45)• Hospitality/Hotel (NAICS Code: 721)• Food Service (NAICS Code: 722)• Professional Office (NAICS Code: 541)• Medical Office (NAICS Code: 621)• Entertainment (NAICS Code: 7139)• Assisted Living Facility (NAICS Code: 623)• Manufacturing/Assembly (NAICS Code: 3344)

For further detail regarding the planned activities of AAA California Regional Center within the targeted industries, please refer to the overall business plan and economic impact analysis.

INVESTMENT STRUCTURE

(b) (4)



PROJECT FUNDING

(b) (4)



1.2 OPERATIONS SUMMARY

**ADMINISTRATIVE
OVERSIGHT**

Applicant will be responsible for the administration of all regional center operations, including marketing, project selection and oversight, investor recruitment, and record-keeping.

DUE DILIGENCE

(b) (4)



MARKETING STRATEGY

**FUNDING FOR
OPERATIONS**

POINT OF CONTACT

Ms. Keen Wei
President and CEO
AAA California Regional Center LLC
20380 Town Center Lane #170
Cupertino, California 95014
Email: info@aaacarc.com
Tel: (408)832-8938

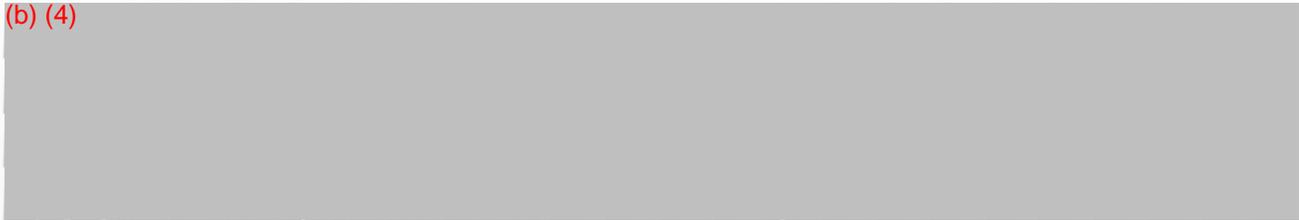
Upon designation of AAA California Regional Center by USCIS, Applicant will be responsible for overseeing and monitoring all regional center operations for EB-5 program compliance so that its designation is maintained. Applicant will keep records, data and information related to all investors as well as the investments, the projects involved, and the movement of funds to and from each limited partnership established within AAA California Regional Center. In addition, Applicant will compile specific reports as requested by USCIS on an annual basis.

2.0 ADMINSTRATIVE OVERSIGHT

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3.0 DUE DILIGENCE

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4.0 PROMOTIONAL EFFORTS

(b) (4)



(b) (4)



5.0 FUNDING FOR REGIONAL CENTER OPERATIONS

(b) (4)



**Economic Impact of Eight Initially Proposed Projects as part
of the proposed AAA California Regional Center LLC**

**Prepared for:
AAA California Regional Center LLC**

**Prepared by:
Michael K. Evans
Evans, Carroll & Associates, Inc.
2785 NW 26th St.
Boca Raton, FL 33434
561-470-9035**

mevans@evanscarrollecon.com

October, 2010

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1. Executive Summary

AAA California Regional Center LLC seeks USCIS designation as an EB-5 regional center that will encompass the eight contiguous California counties of San Francisco, San Mateo, Alameda, Contra Costa, Santa Clara, San Benito, Fresno and Kings. This report provides an analysis of the economic impact of eight sample projects initially proposed within the proposed regional center's geographic boundary. The sample projects are summarized as follows:

1. **Mixed-use Building #1 in San Francisco (San Francisco County):** (b) (4)

2. **Mixed-use Building #2 in San Francisco (San Francisco County):** (b) (4)

3. **Mixed-use Building #3 in San Francisco (San Francisco County):** (b) (4)

4. **Food Court in San Francisco (San Francisco County):** (b) (4)

5. **Assisted Living Center in San Francisco (San Francisco County):** (b) (4)

6. **Mixed-Use Building in Fremont (Alameda County):** (b) (4)

7. **Professional Office Building in Gilroy (Santa Clara County):** (b) (4)

8. **Solar Farm Project in Coalinga (Fresno County):** (b) (4)

The economic impact analyses for the above sample projects were calculated using the RIMS II model and its final demand multipliers. The multipliers for the projects were based on

- for the projects in San Francisco County and Alameda County: data for San Francisco, San Mateo, Alameda, and Contra Costa counties;
- for the office building in Gilroy: data for Santa Clara and San Benito counties; and
- for the solar farm in Coalinga: data for Fresno and Kings counties.

(b) (4)



(b) (4)



6. Location of Projects in San Francisco and Alameda Counties

Figure 1 shows a map of all the counties in California. Figure 2 shows a map of San Francisco County, and Figure 3 shows a map of Alameda County, the two Bay Area Counties in which sample projects are currently planned.

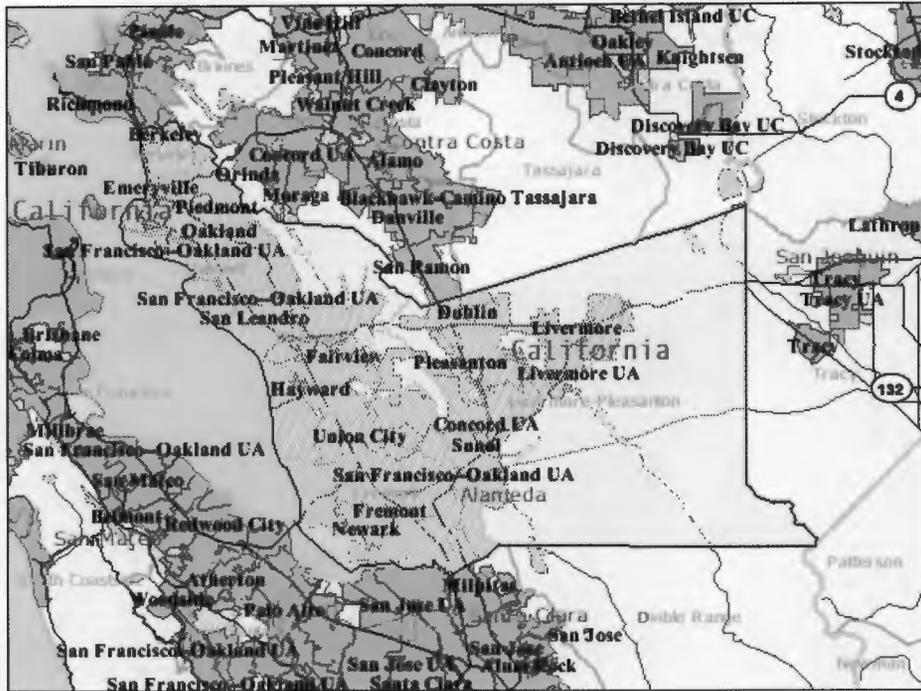
Figure 1. Map of All California Counties



Figure 2. Map of San Francisco County



Figure 3. Map of Alameda County



7. Commuting Patterns for Santa Clara and Fresno Counties

Table 2 shows the commuting patterns for the two counties in Central California where projects will be developed. The Santa Clara figures show only 76.9% of the workforce residing in that county; (b) (4)

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Table 2. Commuting Patterns for Santa Clara and Fresno Counties

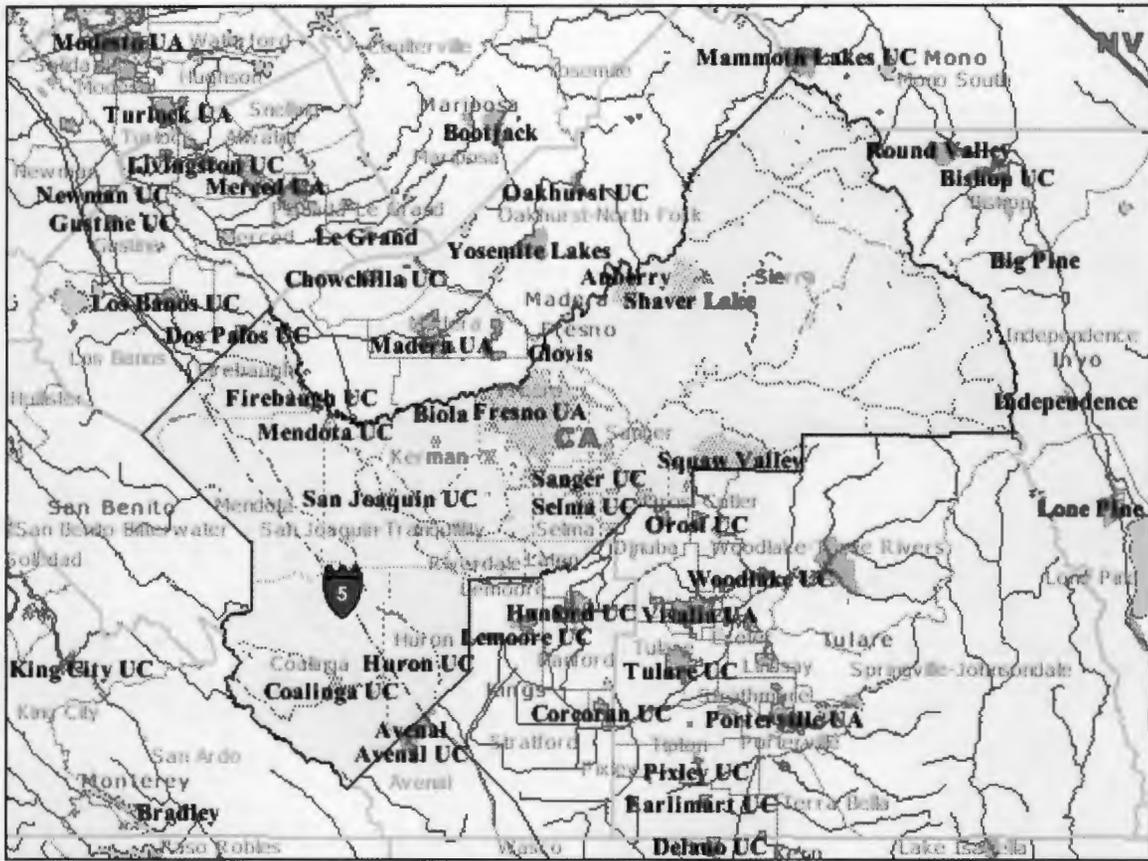
	Santa Clara		Fresno	
All counties	946756	100.0%	All counties	298428 100.0%

Alameda	69669	7.4%	Fresno	273212	91.6%
Contra Costa	10145	1.1%	Kings	3959	1.3%
San Francisco	15868	1.7%			
San Mateo	55473	5.9%			
Santa Clara	727915	76.9%			
San Benito	8054	0.9%			

8. Location of Projects in Santa Clara and Fresno Counties

Figure 4 shows the maps of Santa Clara County, and Figure 5 shows the location of Fresno County. The Santa Clara County office building will be located in Gilroy, near the southern end of the county. The solar farm will be located in Coalinga, which is near the southern end of Fresno County.

Figure 5. Map of Fresno County



Part 3. Economic Impact Analysis for Proposed Projects in San Francisco and Alameda Counties (the Bay Area)

9. Introduction and Summary of Proposed Projects in Bay Area

The types of businesses proposed for San Francisco and Alameda Counties, i.e. the Bay Area section of the EB-5 regional center will include professional offices, medical offices, retail space, food services, hotels, spa, and assisted living. The six projects in the Bay Area can be briefly summarized as follows:

1. **Mixed-use Building #1 in San Francisco** (San Francisco County): (b) (4)

[Redacted]

2. **Mixed-use Building #2 in San Francisco** (San Francisco County): (b) (4)

[Redacted]

3. **Mixed-use Building #3 in San Francisco** (San Francisco County): (b) (4)

[Redacted]

4. **Food Court in San Francisco** (San Francisco County): (b) (4)

[Redacted]

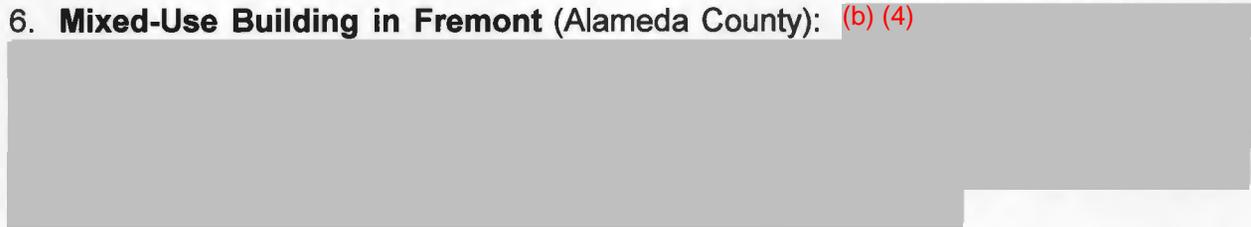
5. **Assisted Living Center in San Francisco** (San Francisco County): (b) (4)

[Redacted]

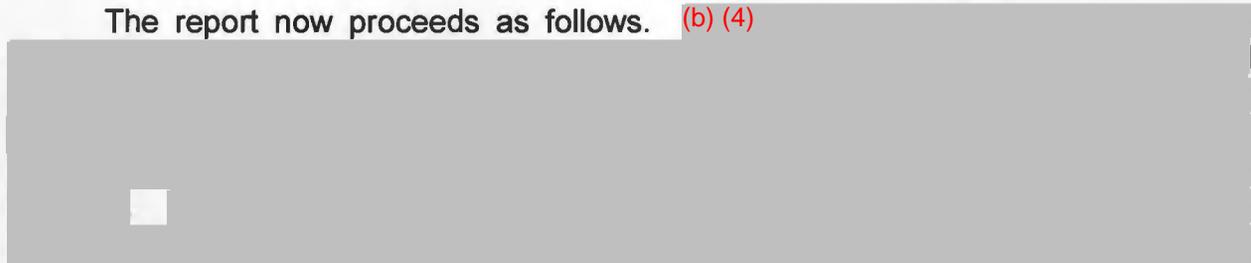
(b) (4)



6. Mixed-Use Building in Fremont (Alameda County): (b) (4)



The report now proceeds as follows. (b) (4)



Revenue discussions and generic economic impact tables are presented for the following seven categories.

1. Construction
2. Hotel space
3. Restaurants and food courts
4. Retail stores by individual category
5. Professional and medical office space by category
6. Spa/fitness center
7. Assisted living with memory care

10. Economic Impact of Construction Projects

(b) (4)



Resume of Dr. Michael K. Evans

mevans@evanscarrollecon.com

CURRENT AND PREVIOUS POSITIONS

- Chairman, *Evans, Carroll & Associates, Inc.*, 1980-present (previously Evans Economics)

Economic consulting firm specializing in EB-5 immigration analysis, economic impact studies of development projects and new construction, models of state and local tax receipts, impact of current and proposed government legislation, and construction of econometric models for individual industries and companies.

- Chief Economist, *American Economics Group*, 2000-present.

Built a comprehensive state modeling system that provides economic analysis for a variety of consulting projects (see below).

- Clinical Professor of Economics, Department of Managerial Economics and Decision Sciences (MEDS), Kellogg Graduate School of Management, Northwestern University, 1996-99.

Taught courses in macroeconomics and business forecasting. Wrote textbooks for both courses.

- Winner of Blue Chip Economic Indicator Award for most accurate macroeconomic forecasts during the past four years, November 1999
- Founder and President, *Chase Econometric Associates*, 1970-1980
- Assistant and Associate Professor of Economics, Wharton School, University of Pennsylvania, 1964-69. Co-developer of the original Wharton Model.
- Visiting Professor, Radford University, (Radford, VA), 1987

Chairman of Institute for International Economic Competitiveness

- Visiting Lecturer, Hebrew University (Jerusalem), 1966-67

Built econometric model of the Israeli economy

Ph. D. in Economics, Brown University. Dissertation, "A Postwar Quarterly Model of the United States Economy, 1948-1962". A. B. in Mathematical Economics, Brown University

PREVIOUS ACTIVITIES AND EDUCATION

- Contributing Editor, *Industry Week*

Wrote a column in each issue on economic and financial trends as they impact the manufacturing sector.

- Editor, *The Evans Report*

Weekly newsletter discussing economic trends and financial markets. Pioneered the concept of the Monthly Tracking Model to incorporate recent economic releases into the overall economic forecast, including methods to predict these economic data.

- Consultant, *National Printing Equipment and Supply Association*

Prepares quarterly forecasts of shipments of printing equipment and graphic arts supplies by product line, based on an econometric model constructed for NPES. Also prepares analysis and forecasts of exports and imports by principal product line.

- Consultant, *APICS -- The Educational Society for Resource Management*,

In 1993, designed and developed the *APICS Business Outlook Index*, which uses survey data collected by the Evans Group to measure current production, production plans, shipments, employment, new orders, unfilled orders, inventory stocks, and the comparison of the actual to desired inventory/sales ratio to predict short-term changes in manufacturing sector activity. The results of this survey appeared every month in *APICS: The Performance Advantage*

- Consultant, *American Hardware Manufacturing Association*

Wrote a separate weekly edition of the Evans Report analyzing recent trends in the hardware and housing industries, including forecasts of the hardware industry based on an econometric model developed for AHMA.

- Board of Economists, *Los Angeles Times*

Wrote column every 6 weeks (5 other economists on the Board)

- Columnist, *United Press International*

Wrote twice-weekly column, "Dollars and Trends"

- Consultant, Senate Finance Committee,

Built the first large-scale supply-side model of the U. S. economy

- Consultant, Environmental Protection Agency and Council on Environmental Quality

Estimated inflationary impact of government regulations

- Consultant, National Aeronautics and Space Administration

Estimate impact of R&D spending on productivity growth

- Consultant, U. S. Treasury

Estimated impact of investment tax credit and accelerated depreciation on capital spending by industry

- Consultant, U. S. Department of Agriculture

Built large-scale econometric model of agricultural sector of U. S. economy

- Consultant, Organization of Economic Cooperation and Development

Built econometric model of the French economy

SAMPLE OF RECENT CONSULTING PROJECTS

For more information on these projects, see www.evansb5.com

A. Economic Impact of EB-5 Immigrant Investor Programs and New Markets Tax Credits

- Calculated the economic impact for a fractional-ownership marina in Port Charlotte, FL, plus office space, retail stores, restaurants, and a home brokerage office.
- Calculated the economic impact of construction and operation of four retirement homes in Vermont.

- Calculated the economic impact of an upscale retail shopping center in Vail, CO. and a medical office building in Edwards, CO (both in Eagle County).
- Calculated economic impact of a wind turbine manufacturing plant in Larimer County, CO
- Calculated economic impact of a hotel, retail stores, restaurants, office buildings, and bank facilities in Pasadena, CA
- Calculated economic impact of a luxury hotel and condominiums in Destin, FL

- Calculated economic impact of constructing and operating a mixed-use commercial project in Jupiter, FL
- Determined whether 17 possible restaurant locations in - and Broward Counties qualified as Targeted Employment Areas.
- Determined the economic impact of opening and operating a slot-machine casino in Hanover, MD, as part of a proposed EB-5 regional center for the Baltimore metropolitan area.
- Calculated the economic impact of renovating and expanding a restaurant on Martha's Vineyard, MA, as part of an EB-5 regional center in that state.
- Determined the economic impact of assembling and installing solar panels for residences in the state of LA.
- Determined a Targeted Employment Area for Dallas, TX as part of a proposed EB-5 regional center for the Dallas area. **APPROVED**
- Calculated the economic impact for various mixed used projects for a proposed regional center for the entire State of Texas, including shopping centers, office buildings, restaurants, assisted living centers, medical technology facilities, and other personal and business services.
- Calculated the economic impact for the construction and operation of several fast-food restaurants in 10 counties in central California.
- Calculated the economic impact for the renovation and expansion of a shopping mall in Greenville, SC.
- Calculated the economic impact of buying existing apartment buildings at deep discount prices, renovating and operating them, in 21 counties in FL.

- Calculated the economic impact of building and operating an institute for proton cancer therapy for a proposed EB-5 regional center in Brooklyn, NY.
- Calculated the economic impact of building and operating a mixed-use facility with medical offices, hotels, and apartments for a proposed EB-5 regional center in Queens, NY.
- Determined a Targeted Employment Area for Philadelphia, PA as part of a proposed EB-5 regional center for the Philadelphia area.
- Calculated the economic impact of a proposed office building and mixed-use facility for an EB-5 regional center in Dallas, Texas
- Calculated the economic impact for various mixed-use projects for a proposed EB-5 regional center in the greater New York City area, including an extended stay hotel, urgent care center, financial lending firm for alternative assets, retail stores, apartments, office space, warehouses, industrial "flex" space, entertainment centers, restaurants, conference and convention centers, nursing home and assisted living facilities, medical offices, medical technology facilities, and high-tech manufacturing.
- Calculated the economic impact of "green" hotels in 10 counties in Central California.
- Calculated the economic impact of generic projects in manufacturing, financial services, health services, hotels, and restaurants for a proposed regional center for the state of .
- Calculated the economic impact of 12 different types of economic activity for an expansion of the Palm Beach Regional Center to five contiguous counties. **APPROVED**
- Calculated the economic impact of a new auto parts plant in Alabama to supply parts to Kia automobiles.
- Calculated the economic impact of opening fast-food restaurants in - and Broward counties in FL.
- Calculated the economic impact of a mixed-use commercial center in Flushing, Queens County, NY.
- Calculated the economic impact of revitalizing and renovating part of the Brooklyn Navy Yard for "green" manufacturing facilities.
- Calculated the economic impact of 12 different types of economic activity for various counties in Charlotte and Sarasota counties, FL
- Calculated the economic impact of four new manufacturing and distribution companies in Palm Beach County, FL.

- Calculated the economic impact of developing a resort area and building residences in rural Tennessee.
- Calculated the economic impact of developing and operating a resort area in Southern Arizona.
- Calculated the economic impact of revitalizing the depressed East Side of Cleveland, Ohio, with new commercial and industrial buildings. **APPROVED**
- Determined the nationwide economic impact of a \$1 billion investment in Mississippi for a new hybrid motor vehicle plant.
- Determined the economic impact of expanding a shipyard in Southeastern Louisiana. **APPROVED**
- Calculated the economic impact of a new shopping center in Buena Vista, California, and two other generic shopping centers in Los Angeles and San Bernardino counties. **APPROVED**
- Calculated the economic impact of enhancing resort areas in eight rural counties in Colorado.
- Calculated the economic impact of the rehabilitation of Fitzsimons Village in Aurora, Colorado, by adding an office building with medical labs, hotel, shopping center, and residences.
- Determined the economic impact of a mixed-use commercial center for the Kansas City metropolitan area.
- Calculated the number of jobs created for a film production company in New York City.
- Calculated economic impact of small-scale rooftop solar panels in various counties in California.
- Calculated economic impact of 7 different types of proposed businesses for a proposed regional center in the Bay Area of California. **APPROVED**
- Determined the economic impact of a new biological research park, office building, and logistics center in Wooster, Ohio. **APPROVED**

- Calculated the economic effect of a mixed-use urban renewal project in Cleveland, Ohio. **APPROVED**
- Calculated economic impact of dairy farm and cheese processing plant in Northern California.
- Determined economic impact of a shipyard, food processing plant, and semiconductor plant for a proposed regional center in Louisiana and Mississippi. **APPROVED**
- Calculated the economic impact of a new gaming casino in Natchez, Mississippi.
- Developed an Input/Output Model for Guam, which was then used to calculate the economic impact of several generic projects. **APPROVED**
- Calculated the economic impact of a retail shopping center in suburban Los Angeles County. **APPROVED**
- Prepared an economic impact analysis for the “timber to homes” project for a proposed regional center in Colorado. **APPROVED**
- Calculated the economic impact for a proposed regional center in Baltimore, Maryland that would include the rebuilding of depressed areas in East Baltimore and along the riverfront.
- Prepared the economic analysis for a proposed EB-5 regional center for the entire state of that included impact calculations for 14 different types of industries. **APPROVED**
- Prepared the economic analysis for a proposed EB-5 regional center in the San Francisco Bay area that included calculations for 10 different types of industries. **APPROVED**
- Prepared economic impact calculations for proposed EB-5 regional centers in New York City and Northeastern New Jersey. **APPROVED**
- Calculated the economic impact of a rehabilitated office building in Albuquerque, New Mexico, including the increase in high quality jobs.
- Calculated the economic impact of a rehabilitated skilled nursing center in East Los Angeles, California, including the impact on nearby census tracts.

- Calculated the economic impact of development of warehouse and light industrial manufacturing space in Las Vegas, Nevada. **APPROVED**
- Calculated the economic impact of rehabilitation and expansion of a vacation and health spa in Sharon Springs, New York
- Calculated economic impact of revitalizing an old resort hotel and adding new facilities for Lake Geneva, WI.
- Calculated the employment and tax effects for a portfolio of projects undertaken under the New Market capital program.
- Calculated generic employment changes for proposed EB-5 project for an Inland Port in Palm Beach County, FL **APPROVED**
- Calculated the economic impact of construction of El Monte Village in El Monte, CA. **APPROVED**
- Built an input/output model of Guam to be used to calculate economic impact of EB-5 projects. Used this model to estimate impact of various proposed projects. **APPROVED**
- Calculated the economic impact of moving the Social Security Administration building in Birmingham, AL, and revitalizing the surrounding neighborhood.
- Calculated the economic impact of rehabbing and expanding the Everett Mall in Everett, WA.
- Determined the economic impact of building a new medical center in Charleston, SC
- Calculated economic impact of expanding Sugarbush resort in VT. Study included expansion of existing facilities and addition of new facilities. **APPROVED**
- Calculated economic impact for new market tax credit program in Portsmouth, N.H. Study included both overall economic impact, and the increase in employment and income and the decrease in the unemployment rate and incidence of poverty in individual census tracts.
- Calculated the economic benefits of EB-5 programs for foreign investors for a mixed-use construction project, including a hotel, retail stores, apartments, and a sports stadium in the Washington, D. C. metropolitan area **APPROVED**

- Calculated the economic benefits of EB-5 programs for foreign investors for a mixed-used retail shopping center in the New York City metropolitan area. **APPROVED**
- Calculated the economic benefits of EB-5 programs for foreign investors for proposed shopping centers in five separate counties in Southern California, including differential impacts of building the shopping centers in different counties. **APPROVED**

B. Projects for State and Local Governments

- Constructed an econometric model for the State of New York and determined the change in employment, labor income, and tax revenues for 43 different tax changes proposed by the Governor's office.
- Constructed a detailed econometric model for the State of Pennsylvania to determine the economic impact of the complete panoply of state taxes levied; the model contains over 1,000 equations. In cooperation with American Economics Group, the model was developed to simulate the effect of changes in any state tax rate on households and businesses by income deciles, household status, age of individuals, size of households, and many other demographic variables. The change in business taxes can also be simulated for detailed industry classifications.
- Determined whether the Washington, D.C. water and sewer authority should accept a high bid for a new waste disposal system. Decision to reject has saved the authority over \$200 million, as construction prices turned down sharply as predicted.
- Built an econometric model to determine the "tax gap" caused by Internet sales for the state of Minnesota.
- Determined appropriate levels of shelter grants individual counties in New York State, and for utility allowances in New York City. Reviewed and prepared testimony in ongoing court cases in these areas.
- Calculated the economic impact of the revitalization of downtown Milwaukee, Wisconsin.

C. Economic Impact of Casino Gaming

- Built an econometric model to predict the growth of the gaming industry over the next decade, and the economic impact of that industry on employment and tax revenues at the Federal and state levels.

- Estimated the economic impact of Indian casino gaming nationally and for the State of Wisconsin.
- Determined the economic impact of the Oneida Indian gaming casino on the Green Bay metropolitan area.
- Estimated the negative economic impact on the Milwaukee area if a new Indian gaming casino were to be built in Kenosha, Wisconsin.

D. Economic Impact of Smoking Bans and Higher Taxes

- Testified on economic impact of smoking bans in Canada; certified as an expert witness by the Court.
- Examined the impact of smoking bans on restaurant sales in several different locations in the U.S. to determine how much sales changed when these bans were imposed, and the differential effects depending on whether these bans were partial or total.
- Determined the cross-border effects on retail sales from differential rates in cigarette, gasoline, and alcohol excise taxes
- Determined the economic impact of higher cigarette taxes on minority group employment.
- Estimated the economic impact and loss of Federal and state tax revenues when higher cigarette prices lead to increased smuggling.

E. Consulting Projects for Travel and Tourism

- Built an econometric model to predict tourism trips and revenues for the major regions of the U.S. economy.
- Constructed econometric models to predict tourism in Las Vegas and Orlando.
- Using the IMPLAN model, predicted economic impact of tourism and travel expenditures for all counties in Pennsylvania.

F. Other Private Sector Consulting Projects

- Calculated the revenue gain at the Federal, state and local level generated by domestic manufacturing of Airbus parts and equipment.
- Calculated the economic impact of proposed EPA bans on fluoropolymer production.
- Estimated the size and economic importance of the fluoropolymer industry, and calculated economic impact of shutting down domestic production.
- Built an econometric model to examine how U.S. tax and regulatory policies help determine whether the gold mining industry would invest in the U.S. or other countries. Testified before Congress to help defeat legislation inimical to the mining industry.
- Built an econometric model to predict consumer bankruptcies, based on recent growth in consumer credit outstanding, the overall economic environment, and recent changes in credit regulations
- Estimated the economic impact of the ethanol subsidy on the U.S. economy and Farm Belt States, including the impact on the balance of payments, employment, and tax receipts. Testified before Congress to help pass legislation to extend subsidies to the ethanol industry.
- Built an econometric model to determine the impact of updating and improving the system of locks on the Upper Mississippi River on corn prices and exports, farm income, and the overall economy.

BOOKS PUBLISHED

Macroeconomics for Managers, Blackwell, 2003

-Practical Business Forecasting, Blackwell, 2002

Economic Impact of the Demand for Ethanol, Diane Publishing Company, 1998

How to Make Your Shrinking Salary Support You in Style for the Rest of Your Life, Random House, 1991

The Truth About Supply-Side Economics. Basic Books, 1983.

A Supply-Side Model of the U. S. Economy, mimeo (prepared for Senate Finance Committee), 1980.

An Econometric Model of the French Economy: A Short-Term Forecasting Model. O.E.C.D, March 1969.

Econometric Gaming (with L. R. Klein and M. J. Hartley). Random House, 1969.

Macroeconomic Activity: Theory, Forecasting and Control. Harper & Row, 1969.

The Wharton Econometric Forecasting Model (with L.R. Klein), Economics Research Unit, Wharton School: University of Pennsylvania Press, 1967. Enlarged edition, 1968.

Over 30 articles in major academic journals and publications (list on request)

Private Offering
Memorandum

SAMPLE OFFERING MEMORANDUM

(b) (4)



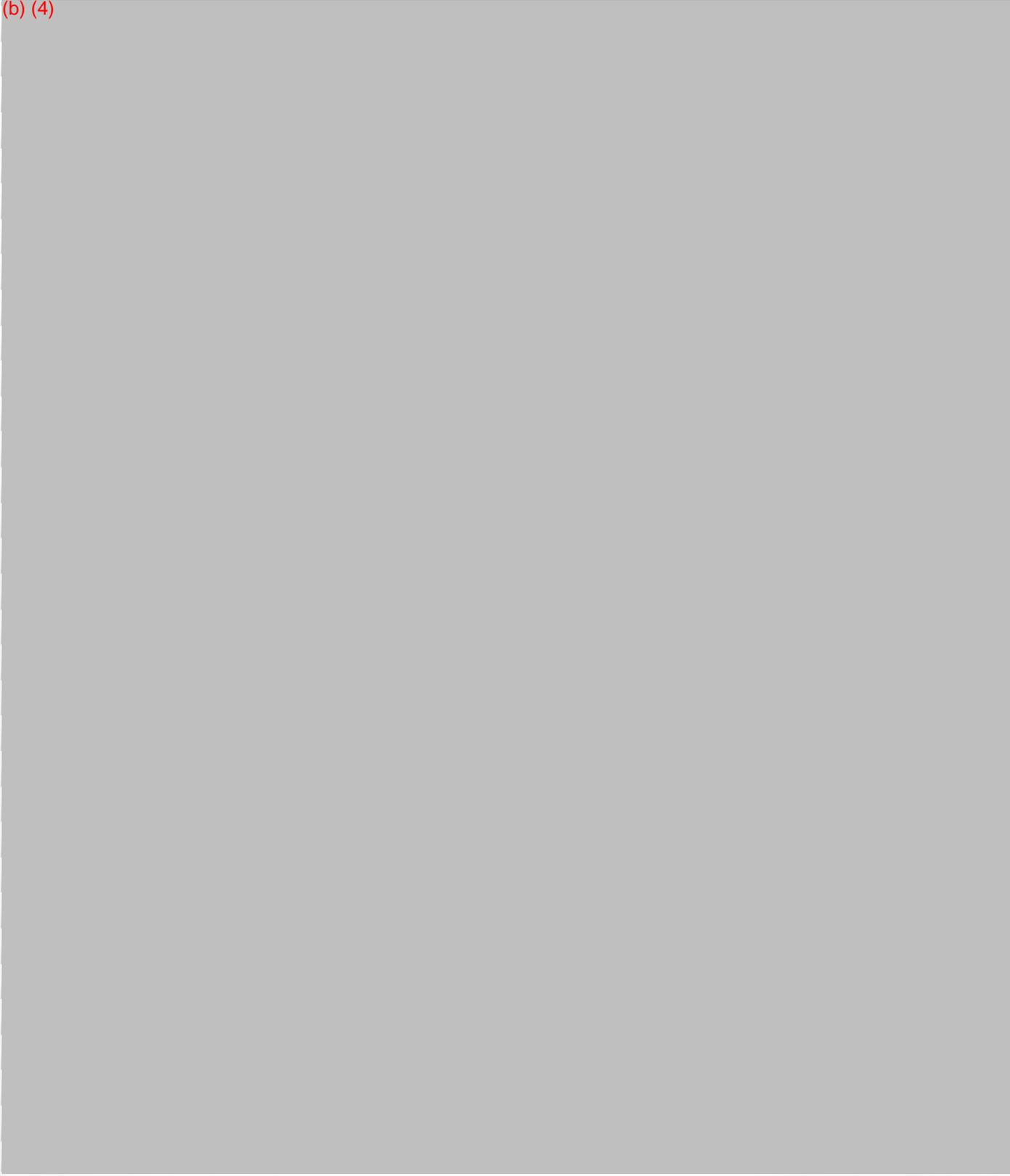
**AGREEMENT OF LIMITED PARTNERSHIP
OF
[AAA L.P.1]
a California limited partnership**

(b) (4)



JOINT ESCROW INSTRUCTIONS

(b) (4)



State of California
Secretary of State



I, DEBRA BOWEN, Secretary of State of the State of California, hereby certify:

That the attached transcript of 1 page(s) is a full, true and correct copy of the original record in the custody of this office.



IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this day of

MAY 28 2010

Debra Bowen

DEBRA BOWEN
Secretary of State



**State of California
Secretary of State**

LLC-1

File #

201014510105

**LIMITED LIABILITY COMPANY
ARTICLES OF ORGANIZATION**

A \$70.00 filing fee must accompany this form.

IMPORTANT - Read instructions before completing this form.

ENDORSED - FILED
in the office of the Secretary of State
of the State of California

MAY 24 2010

This Space For Filing Use Only

ENTITY NAME (End the name with the words "Limited Liability Company," or the abbreviations "LLC" or "L.L.C." The words "Limited" and "Company" may be abbreviated to "Ltd." and "Co.," respectively.)

1. NAME OF LIMITED LIABILITY COMPANY

AAA CALIFORNIA REGIONAL CENTER LLC

PURPOSE (The following statement is required by statute and should not be altered.)

2. THE PURPOSE OF THE LIMITED LIABILITY COMPANY IS TO ENGAGE IN ANY LAWFUL ACT OR ACTIVITY FOR WHICH A LIMITED LIABILITY COMPANY MAY BE ORGANIZED UNDER THE BEVERLY-KILLEA LIMITED LIABILITY COMPANY ACT.

INITIAL AGENT FOR SERVICE OF PROCESS (If the agent is an individual, the agent must reside in California and both Items 3 and 4 must be completed. If the agent is a corporation, the agent must have on file with the California Secretary of State a certificate pursuant to Corporations Code section 1505 and Item 3 must be completed (leave Item 4 blank).)

3. NAME OF INITIAL AGENT FOR SERVICE OF PROCESS

MARY WONG

4. IF AN INDIVIDUAL, ADDRESS OF INITIAL AGENT FOR SERVICE OF PROCESS IN CALIFORNIA CITY STATE ZIP CODE

15513 HARBOR WAY SAN LEANDRO CA 94579

MANAGEMENT (Check only one)

5. THE LIMITED LIABILITY COMPANY WILL BE MANAGED BY:

- ONE MANAGER
 MORE THAN ONE MANAGER
 ALL LIMITED LIABILITY COMPANY MEMBER(S)

ADDITIONAL INFORMATION

6. ADDITIONAL INFORMATION SET FORTH ON THE ATTACHED PAGES, IF ANY, IS INCORPORATED HEREIN BY THIS REFERENCE AND MADE A PART OF THIS CERTIFICATE.

EXECUTION

7. I DECLARE I AM THE PERSON WHO EXECUTED THIS INSTRUMENT, WHICH EXECUTION IS MY ACT AND DEED.

5/20/2010
DATE

SIGNATURE OF ORGANIZER

MARY WONG
TYPE OR PRINT NAME OF ORGANIZER





美國第一銀行
First Commercial Bank (USA)

Silicon Valley Branch
1141 South De Anza Blvd., San Jose, CA 95129
TEL: (408) 253-4666 • FAX: (408) 343-0666

Date: September 09, 2010

To Whom It may Concern:

At the request of our depositor AAA California Regional Center LLC

We hereby certify that the following account(s) is/are presently maintained with
First Commercial Bank (USA).

Account Name(s): AAA California Regional Center LLC

Address: 20380 Town Center Lane Ste.#172
Cupertino, CA 95014

Account Number: (b) (4)

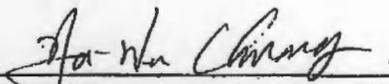
Type of Account: Balance Checking Account

Date account was opened: (b) (4)

On 09/08/2010 account balance: (b) (4)

Our response is solely a matter of courtesy for which no responsibility is attached
to our institution or any of our officers.

Sincerely,


Ya-Wen Chuang / Assistant Ops. Officer

PATRICK O'CONNELL, Alameda County Clerk-Recorder
1106 Madison Street, First Floor
Oakland, CA 94607 Telephone (510) 272-6362

AUG 17 2010

PATRICK O'CONNELL, County Clerk
By [Signature] Deputy

FICTITIOUS BUSINESS NAME STATEMENT
USE BLACK OR DARK BLUE INK ONLY

FILING FEE:

Please call (510) 272-6362 for current filing fees or visit our website at www.acgov.org.

FILE NUMBER: 441829
DO NOT WRITE ABOVE THIS LINE

PLEASE READ INSTRUCTIONS ON BACK OF THIS FORM - TYPE OR PRINT LEGIBLY

A FICTITIOUS BUSINESS NAME(S) *
AAA California Regional Center

B Street Address of Principal Place of Business (P.O. Box not acceptable) ** City County State Zip
20380 Town Center Ln #170 Cupertino Santa Clara CA 95014
Mailing Address (Optional) City County State Zip

C ① Show full name of 1st Registrant (If Registrant is Corporation, LLC or LLP, show full name of Entity.)***
AAA California Regional Center
Residence Street Address (P.O. Box not acceptable)
20380 Town Center Ln #170
City State Zip
Cupertino CA 95014
(If a corporation or LLC, show state where registered.)

② Show full name of 2nd Registrant if any. (If Registrant is Corporation, LLC or LLP, show full name of Entity.)***
Residence Street Address (P.O. Box not acceptable)
City State Zip
If a corporation or LLC, show state where registered.

③ Show full name of 3rd Registrant if any. (If Registrant is Corporation, LLC or LLP, show full name of Entity.)***
Residence Street Address (P.O. Box not acceptable)
City State Zip
If a corporation or LLC, show state where registered.

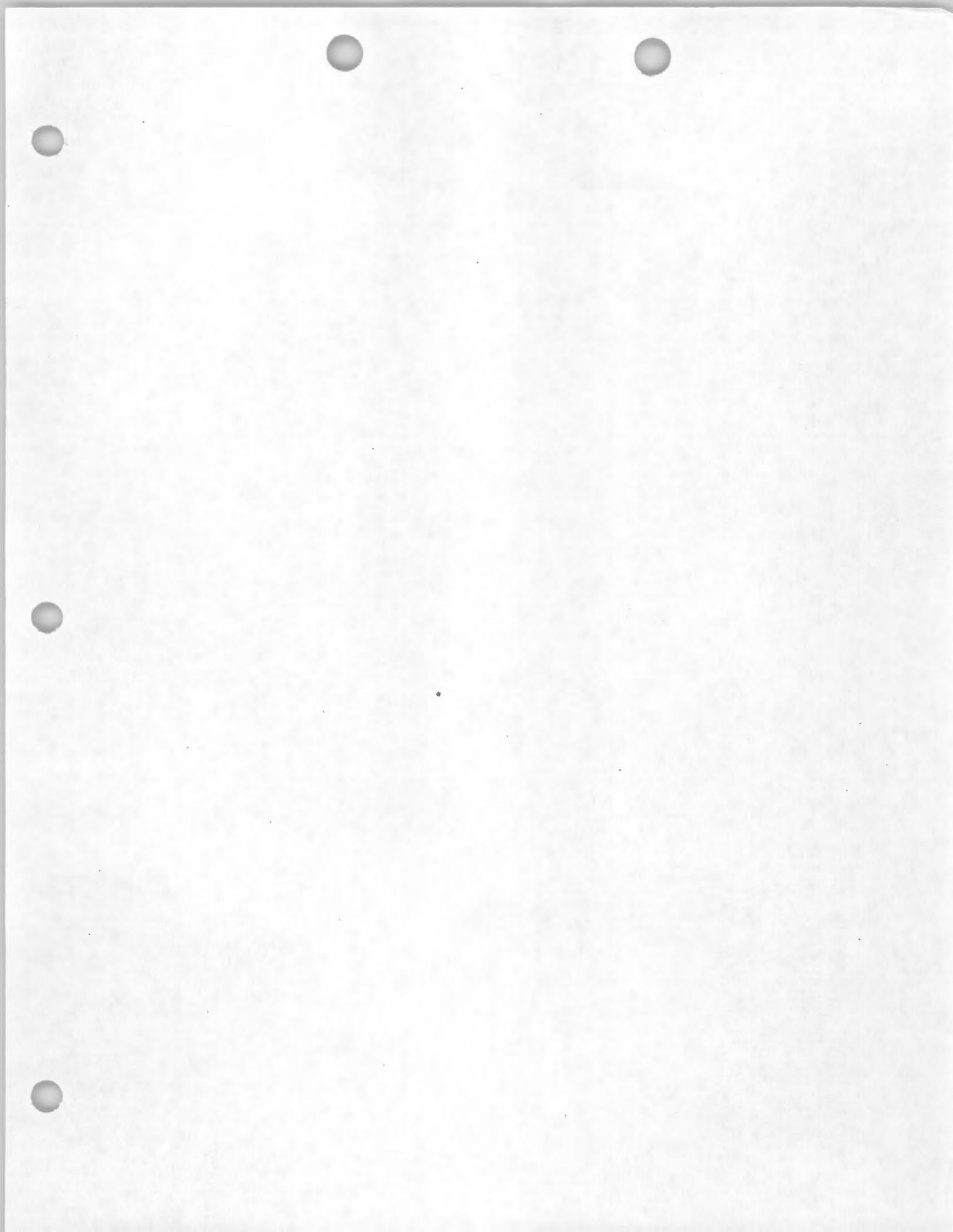
④ Show full name of 4th Registrant if any. (If Registrant is Corporation, LLC or LLP, show full name of Entity.)***
Residence Street Address (P.O. Box not acceptable)
City State Zip
If a corporation or LLC, show state where registered.

D BUSINESS CONDUCTED BY: ***
 an individual Husband and wife State or local registered domestic partners Co-partners
 a Joint venture a General partnership a Limited liability partnership a Trust
 a Corporation a Limited partnership a Limited liability company
(Check only 1 box) an Unincorporated association other than a partnership

E The registrant began to transact business under the fictitious business name(s) listed above on N/A (date)
(Write "N/A" on the line above if you have not yet begun transacting business using the fictitious business name.)

I DECLARE THAT ALL INFORMATION IN THIS STATEMENT IS TRUE AND CORRECT. (A REGISTRANT WHO DECLARES AS TRUE INFORMATION WHICH HE OR SHE KNOWS TO BE FALSE IS GUILTY OF A CRIME.)
NOTICE: IN ACCORDANCE WITH BUSINESS AND PROFESSIONS CODE SECTION 17920(A), THE FICTITIOUS NAME STATEMENT EXPIRES 5 YEARS FROM THE DATE ON WHICH IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK EXCEPT, AS PROVIDED IN SUBDIVISION (B) OF SECTION 17920, WHEN IT EXPIRES 40 DAYS AFTER ANY CHANGE IN THE FACTS AS SET FORTH IN THE STATEMENT PURSUANT TO SECTION 17913 OTHER THAN A CHANGE IN THE RESIDENCE ADDRESS OF A REGISTERED OWNER. A NEW FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED BEFORE THE EXPIRATION.
The filing of this statement does not of itself authorize the use in this state of a fictitious business name in violation of the rights of another under federal, state, or common law (see Section 13411 et seq., Business and Professions Code).

SIGNATURE OF REGISTRANT: Keen Wei
Manager
PRINT NAME AND TITLE OF PERSON SIGNING, EXCEPT INDIVIDUAL
Keen Wei



FILE # 10-323

KINGS COUNTY CLERK RECORDER
1400 W. LACEY BLVD
HANFORD, CA 93230

This space reserved for County Clerk

TYPE OF FILING (Check one)
 Original
 New Filing
(Change(s) in facts from previous filing)
 Refile
(No Change(s) in facts from previous filing)
Previous file # _____

FICTITIOUS BUSINESS NAME STATEMENT

Filing valid only in Kings County
FILING FEE
\$26.00 FOR FIRST BUSINESS NAME ON STATEMENT
\$ 7.00 FOR EACH ADDITIONAL BUSINESS NAME FILED ON SAME STATEMENT AND DOING BUSINESS AT THE SAME LOCATION
\$ 7.00 FOR EACH ADDITIONAL OWNER IN EXCESS OF ONE OWNER

ORIGINAL FILED
AUG 12 2010
**KEN BAIRD
KINGS COUNTY CLERK**

The following person (persons) is (are) doing business as:

* AAA California Regional Center
Print Fictitious Business Name(s)
** 20380 Town Center Lane #170
Street address of principal place of business
Cupertino CA 95014 San Jose
City State Zip COUNTY City State Zip
Mailing address if different

*** REGISTERED OWNER(S):
1. AAA California Regional Center LLC
Full Name
20380 Town Center Lane #170
Residence Address
Cupertino CA 95014
City State Zip
If Corporation or LLC - Print State of Incorporation/Organization

2. _____
Full Name
Residence Address
City State Zip
If Corporation or LLC - Print State of Incorporation/Organization

3. _____
Full Name
Residence Address
City State Zip
If Corporation or LLC - Print State of Incorporation/Organization

4. _____
Full Name
Residence Address
City State Zip
If Corporation or LLC - Print State of Incorporation/Organization

IF MORE THAN FOUR REGISTRANTS, ATTACH ADDITIONAL SHEET SHOWING OWNER INFORMATION

**** THIS BUSINESS IS CONDUCTED BY: (Check one)
 an Individual a General Partnership a Limited Partnership a Limited Liability Company
 an Unincorporated Association other than a Partnership a Corporation a Trust Copartners
 Husband and Wife Joint Venture State or Local Registered Domestic Partners a Limited Liability Partnership

***** The registrant commenced to transact business under the fictitious business name or names listed above on N/A
(Insert N/A above if you haven't started to transact business)

I declare that all information in this statement is true and correct.
(A registrant who declares as true information which he or she knows to be false is guilty of a crime.)

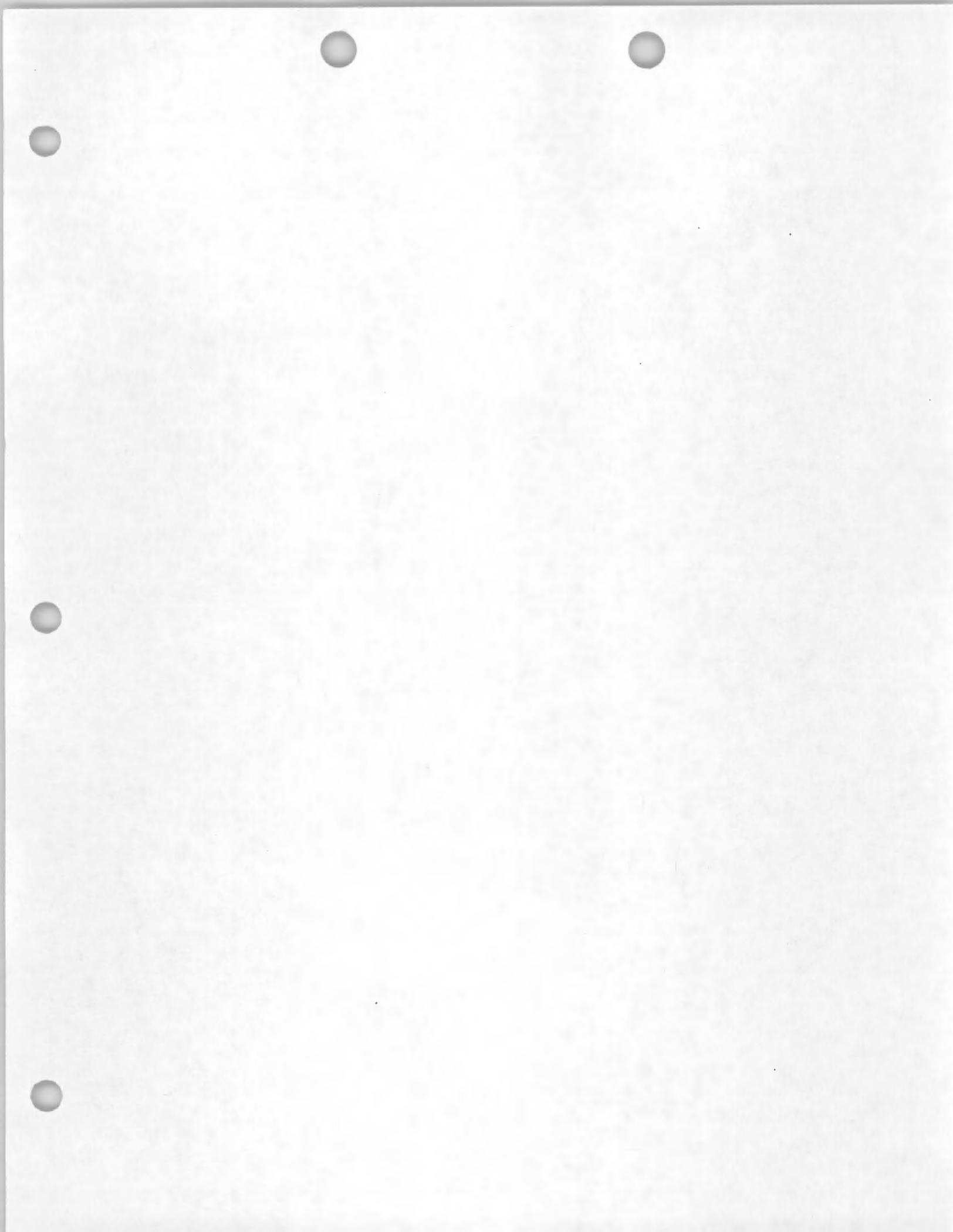
SIGNATURE OF REGISTRANT Keen Wei
KEEN WEI
Print name of person signing. If corporation, also print corporate title of officer. If LLC, also print title of officer or manager.

This statement was filed with the County Clerk of KINGS COUNTY on the date indicated by the filed stamp in the upper right corner.
NOTICE - IN ACCORDANCE WITH SUBDIVISION (a) OF SECTION 17920, A FICTITIOUS NAME STATEMENT GENERALLY EXPIRES AT THE END OF FIVE YEARS FROM THE DATE ON WHICH IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK, EXCEPT, AS PROVIDED IN SUBDIVISION (b) OF SECTION 17920, WHERE IT EXPIRES 40 DAYS AFTER ANY CHANGE IN THE FACTS SET FORTH IN THE STATEMENT PURSUANT TO SECTION 17913 OTHER THAN A CHANGE IN THE RESIDENCE ADDRESS OF A REGISTERED OWNER. A NEW FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED BEFORE THE EXPIRATION.
THE FILING OF THIS STATEMENT DOES NOT OF ITSELF AUTHORIZE THE USE IN THIS STATE OF A FICTITIOUS BUSINESS NAME IN VIOLATION OF THE RIGHTS OF ANOTHER UNDER FEDERAL, STATE, OR COMMON LAW (SEE SECTION 14411 ET SEQ., BUSINESS AND PROFESSIONS CODE).

I HEREBY CERTIFY THAT THIS COPY IS A CORRECT COPY OF THE ORIGINAL STATEMENT ON FILE IN MY OFFICE.

KEN BAIRD, KINGS COUNTY CLERK

BY: [Signature] Deputy



READ INSTRUCTIONS ON REVERSE SIDE BEFORE

A MAILING NAME AND ADDRESS (OPTIONAL)

NAME _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

File Number: **540258**

No. of Pages: **1**

File Date: **7/19/2010**

Expires: **7/19/2015**

Fee Total: **37.35**

Clerk ID: **024**



FICTITIOUS BUSINESS NAME STATEMENT

FILED WITH THE COUNTY CLERK-RECORDER OF SANTA CLARA COUNTY ON THE DATE IDENTIFIED ON THE FILING LABEL

**REGINA ALCOMENDRAS, County Clerk - Recorder
SANTA CLARA COUNTY CLERK - RECORDER'S OFFICE**

The following person (persons) is (are) doing business as: (Use the ADDENDUM page to list additional fictitious business names.)

1. FICTITIOUS BUSINESS NAME(S)
 (1) AAA California Regional Center (2)

at (DO NOT USE P.O. BOX, PRIVATE MAIL BOX ADDRESSES)

2. STREET ADDRESS OF PRINCIPAL PLACE OF BUSINESS CITY STATE ZIP COUNTY
20380 Town Center Lane. #170 Cupertino CA 95014 Santa Clara

If the principal place of business identified in #2 above is not in Santa Clara County, a current fictitious business name statement for the fictitious business name(s) identified in #1 above shall be on file at the above-identified County that is the principal place of business. If applicable, please complete #3 below.

3. THE PRINCIPAL PLACE OF BUSINESS IS IN Santa Clara COUNTY AND A CURRENT FICTITIOUS BUSINESS NAME STATEMENT IS ON FILE AT THE COUNTY CLERK-RECORDER'S OFFICE OF SAID COUNTY.

This business is owned by: (An asterisk (*) item requires proof of registration with the California Secretary of State's Office)

4. AN INDIVIDUAL A GENERAL PARTNERSHIP *A LIMITED PARTNERSHIP *A LIMITED LIABILITY COMPANY
 AN UNINCORPORATED ASSOCIATION OTHER THAN A PARTNERSHIP *A CORPORATION A TRUST COPARTNERS
 HUSBAND AND WIFE JOINT VENTURE STATE OR LOCAL REGISTERED DOMESTIC PARTNERS *LIMITED LIABILITY PARTNERSHIP

The name and residence address of the owner(s) / registrant(s) is (are):

(DO NOT USE P.O. BOX, PRIVATE MAIL BOX ADDRESSES)

NOTE: General Partnerships, Copartnership, Joint Venture, Limited Liability Partnership, Unincorporated Association, and Limited Partnership - insert name and residence address of each General Partner, Trusts - insert the full name and residence address of each trustee; Limited Liability Company and Corporation - insert full name and address of Limited Liability Company or Corporation as registered with the California Secretary of State's Office; State or local registered Domestic Partners - insert full name and residence address of each Domestic Partner. USE THE ADDENDUM PAGE TO LIST ADDITIONAL NAMES AND ADDRESSES.

5. NAME ADDRESS CITY STATE ZIP
AAA California Regional Center LLC

NAME ADDRESS CITY STATE ZIP
20380 Town Center Ln #170, Cupertino CA 95014

NAME ADDRESS CITY STATE ZIP
AAA California Regional Center LLC #170, Cupertino CA 95014

Registrant/Owner began transacting business under the fictitious business name(s) listed above on:

This filing is a:

6. DATE: _____ NOT APPLICABLE

7. First Filing (Publication Required)
 Refile of previous file # _____ (check appropriate boxes, below)
 Refiled prior to expiration or within 40 days past expiration, with NO CHANGES
 With changes (Publication Required)
 After 40 days of expiration date (Publication Required)
 Due to publication requirement not met on previous filing (Publication Required)



CLERK-RECORDER SEAL

I hereby certify that this copy is a correct copy of the original Fictitious Business Name Statement on file in my office.

Regina Alcomendras, Santa Clara County Clerk-Recorder

By MARY RATTANAPANYA, Deputy

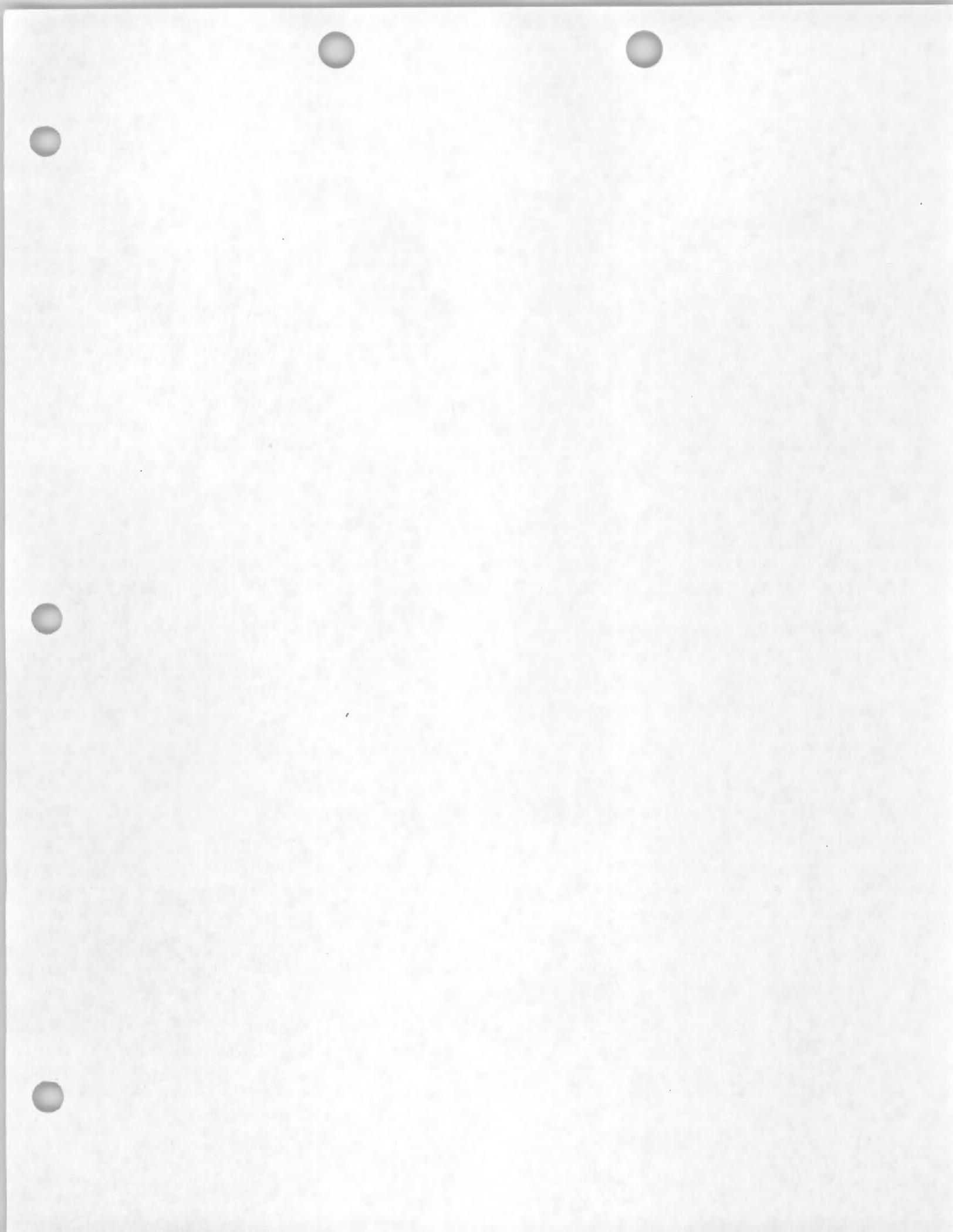
8. I declare that all information in this statement is true and correct. (A registrant who declares as true information which he or she knows to be false is guilty of a crime.)

SIGNED X Keen Wei PRINTED NAME KEEN WEI

If a CORPORATION, LIMITED LIABILITY COMPANY, LIMITED PARTNERSHIP or LIMITED LIABILITY PARTNERSHIP, the following must be completed:

ENTITY NAME AAA California Regional Center LLC TITLE / CAPACITY OF SIGNER member manager
ARTICLE / REG # 201014510105 (from CA Sec of State's Office) ABOVE ENTITY WAS FORMED IN THE STATE OF California

NOTICE - IN ACCORDANCE WITH SUBDIVISION (a) OF SECTION 17920, A FICTITIOUS BUSINESS NAME STATEMENT GENERALLY EXPIRES AT THE END OF FIVE YEARS FROM THE DATE ON WHICH IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK, EXCEPT, AS PROVIDED IN SUBDIVISION (b) OF SECTION 17920, WHERE IT EXPIRES 40 DAYS AFTER ANY CHANGE IN THE FACTS SET FORTH IN THE STATEMENT PURSUANT TO SECTION 17913 OTHER THAN A CHANGE IN THE RESIDENCE ADDRESS OF A REGISTERED OWNER. A NEW FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED BEFORE THE EXPIRATION. THE FILING OF THIS STATEMENT DOES NOT OF ITSELF AUTHORIZE THE USE IN THIS STATE OF A FICTITIOUS BUSINESS NAME IN VIOLATION OF THE RIGHTS OF ANOTHER UNDER FEDERAL, STATE, OR COMMON LAW (SEE SECTION 14411 ET SEQ., BUSINESS AND PROFESSIONS CODE).



FILE # 240420
 TYPE OF FILING (Check one)
 Original
 New Filing
 (Change(s) in facts from previous filing)
 Refile
 (No Change(s) in facts from previous filing)
 Previous file # _____

OFFICE OF THE SAN MATEO COUNTY CLERK
 555 County Center 1ST Floor
 Redwood City CA 94063

This space reserved for County Clerk

FICTITIOUS BUSINESS NAME STATEMENT

FILED ENDORSED
 IN THE OFFICE OF THE
 COUNTY CLERK, COUNTY OF
 SAN MATEO COUNTY, CALIF.

AUG 12 2010

WARREN SLOCUM, County Clerk
 By _____
 DEPUTY CLERK

FILING FEE
\$34.00 FOR FIRST BUSINESS NAME ON STATEMENT
\$5.00 FOR EACH ADDITIONAL BUSINESS NAME FILED ON SAME
 STATEMENT AND DOING BUSINESS AT THE SAME LOCATION
\$5.00 FOR EACH ADDITIONAL OWNER IN EXCESS OF ONE OWNER

The following person (persons) is (are) doing business as:

ANSHU NAND

* AAA California Regional Center
 Print Fictitious Business Name(s)
 ** 20350 Town Center Ln #1170 | 3090 La Selva Cir.
 Street address of principal place of business | Mailing address if different
Cupertino CA 95014 | San Mateo CA 94403
 City State Zip COUNTY City State Zip

*** REGISTERED OWNER(S):

1. AAA California Regional Center 2. _____
 Full Name Full Name
20350 Town Center Ln #1170 _____
 Residence Address Residence Address
Cupertino CA 95014 _____
 City State Zip City State Zip

If Corporation or LLC - Print State of Incorporation/Organization

3. _____ 4. _____
 Full Name Full Name
 Residence Address Residence Address
 City State Zip City State Zip

If Corporation or LLC - Print State of Incorporation/Organization

IF MORE THAN FOUR REGISTRANTS, ATTACH ADDITIONAL SHEET SHOWING OWNER INFORMATION

**** THIS BUSINESS IS CONDUCTED BY: (Check one)
 an Individual a General Partnership a Limited Partnership a Limited Liability Company
 an Unincorporated Association other than a Partnership a Corporation a Trust Copartners
 Husband and Wife Joint Venture State or Local Registered Domestic Partners a Limited Liability Partnership

***** The registrant commenced to transact business under the fictitious business name or names listed above on _____
 (Insert N/A above if you haven't started to transact business)

I declare that all information in this statement is true and correct.
(A registrant who declares as true information which he or she knows to be false is guilty of a crime.)

SIGNATURE OF REGISTRANT Keen Wei
Manager

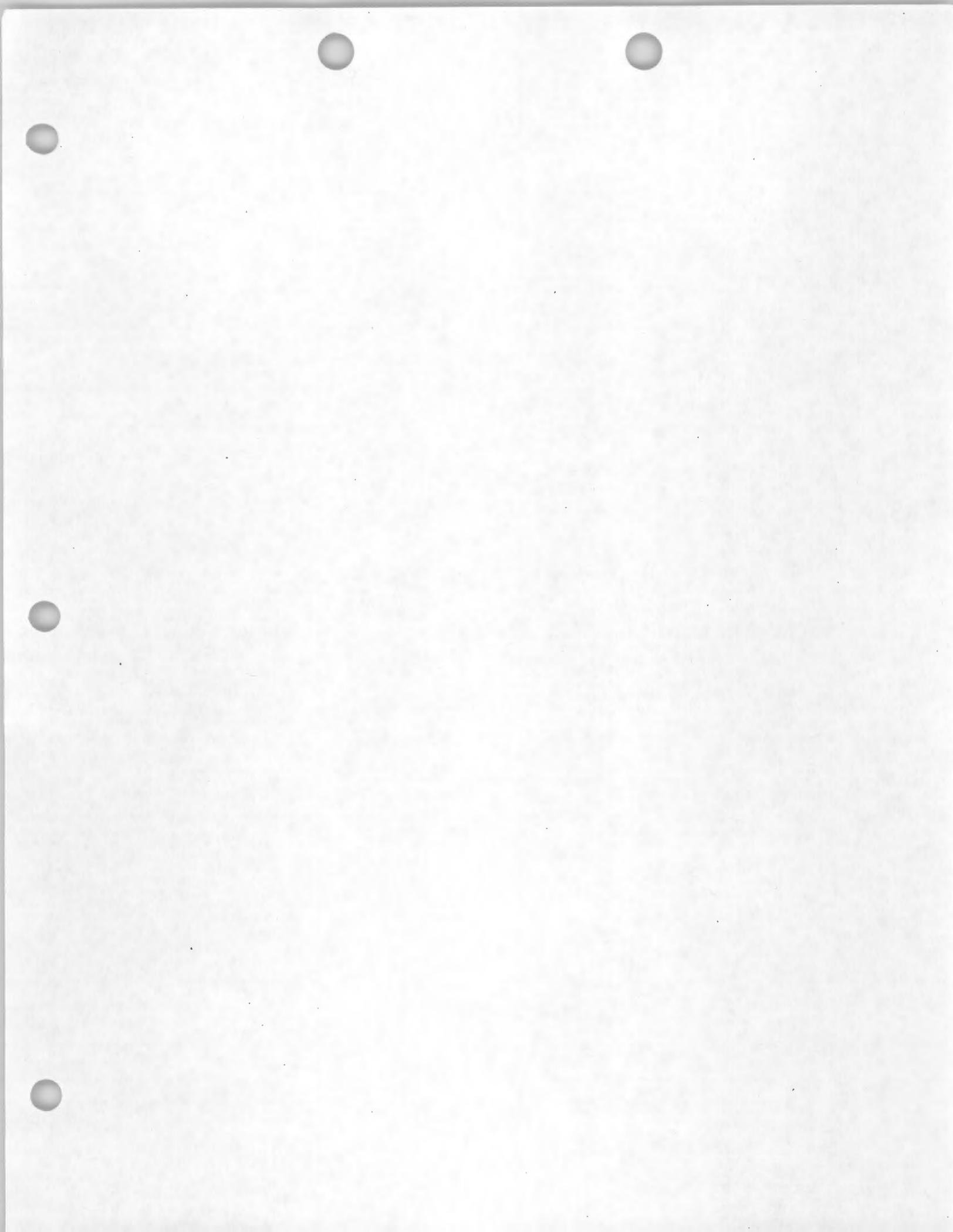
Print name of person signing. If corporation, also print corporate title of officer. If LLC, also print title of officer or manager.

This statement was filed with the County Clerk of SAN MATEO COUNTY on the date indicated by the filed stamp in the upper right corner.
 NOTICE - IN ACCORDANCE WITH SUBDIVISION (a) OF SECTION 17920, A FICTITIOUS NAME STATEMENT GENERALLY EXPIRES AT THE END OF FIVE YEARS FROM THE DATE ON WHICH IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK, EXCEPT, AS PROVIDED IN SUBDIVISION (b) OF SECTION 17920, WHERE IT EXPIRES 40 DAYS AFTER ANY CHANGE IN THE FACTS SET FORTH IN THE STATEMENT PURSUANT TO SECTION 17913 OTHER THAN A CHANGE IN THE RESIDENCE ADDRESS OF A REGISTERED OWNER. A NEW FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED BEFORE THE EXPIRATION.

THE FILING OF THIS STATEMENT DOES NOT OF ITSELF AUTHORIZE THE USE IN THIS STATE OF A FICTITIOUS BUSINESS NAME IN VIOLATION OF THE RIGHTS OF ANOTHER UNDER FEDERAL, STATE, OR COMMON LAW (SEE SECTION 14411 ET SEQ., BUSINESS AND PROFESSIONS CODE).

I HEREBY CERTIFY THAT THIS COPY IS A CORRECT COPY OF THE ORIGINAL STATEMENT ON FILE IN MY OFFICE.

WARREN SLOCUM, SAN MATEO COUNTY CLERK BY: _____, Deputy



Joe Paul Gonzalez
San Benito County Clerk
440 5th St., Room 206
Hollister, CA 95023-3843
San Benito



FBN Number: 2010-0000256
This statement was filed in the office of
Joe Paul Gonzalez, County Clerk
of San Benito County,
on August 17, 2010,

By: DIANNA SMITH
Deputy

FICTITIOUS BUSINESS NAME STATEMENT FIRST FILING - PUBLICATION REQUIRED WITHIN 30 DAYS

Began Transacting Business : Not Applicable
Statement Expires On : 8/17/2015

Business Is Conducted By : Limited Liability Company

Business Address :
150 SAN FELIPE ROAD
HOLLISTER, CA 95023
County of San Benito

Mailing Address :
20380 TOWN CENTER LANE #170
CUPERTINO, CA 95014

Fictitious Business Name(s) :
A A A CALIFORNIA REGIONAL
CENTER

Registrant Address(es) :
A A A CALIFORNIA REGIONAL
CENTER
20380 TOWN CENTER LANE
#170
CUPERTINO, CA 95014

NOTICE - IN ACCORDANCE WITH SUBDIVISION (a) OF SECTION 17920, A FICTITIOUS NAME STATEMENT GENERALLY EXPIRES AT THE END OF FIVE YEARS FROM THE DATE ON WHICH IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK, EXCEPT, AS PROVIDED IN SUBDIVISION (b) OF SECTION 17920, WHERE IT EXPIRES 40 DAYS AFTER ANY CHANGE IN THE FACTS SET FORTH IN THE STATEMENT PURSUANT TO SECTION 17913 OTHER THAN A CHANGE IN THE RESIDENCE ADDRESS OF A REGISTERED OWNER. A NEW FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED BEFORE THE EXPIRATION.

THE FILING OF THIS STATEMENT DOES NOT OF ITSELF AUTHORIZE THE USE IN THIS STATE OF A FICTITIOUS BUSINESS NAME IN VIOLATION OF THE RIGHTS OF ANOTHER UNDER FEDERAL, STATE, OR COMMON LAW (SEE SECTION 14411 ET SEQ., BUSINESS AND PROFESSIONS CODE).

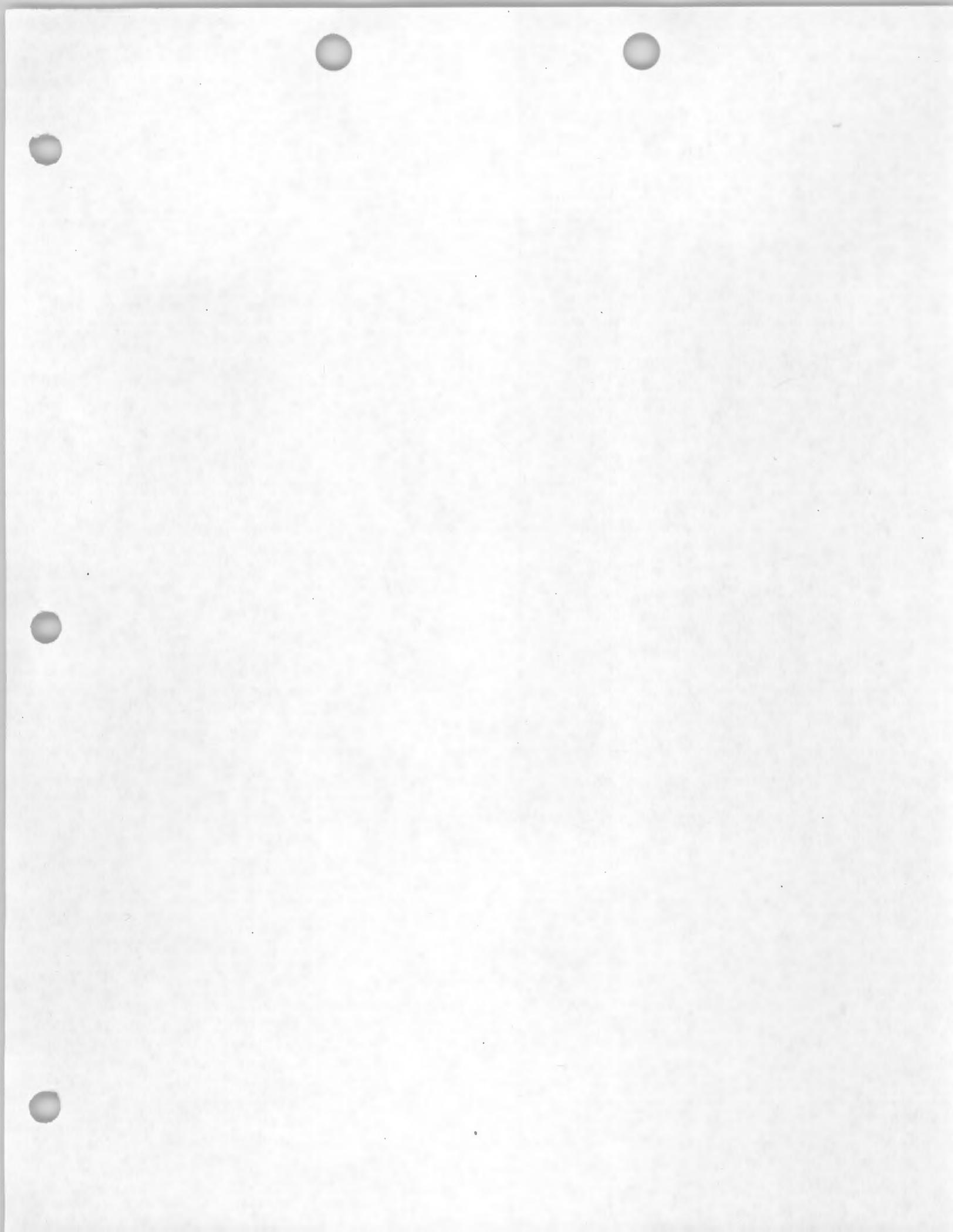
I declare that all information in this statement is true and correct. (A registrant who declares as true information which he or she knows to be false is guilty of a crime.)

Registrant other than an individual sign below:

Signature _____
Print Name _____

Entity Name AAA California Regional
Signature Keen Wei
Print Officer's Name
and Title KZZN WZJ
Manager

Joe Paul Gonzalez



File with:	VICTOR E. SALAZAR FRESNO COUNTY CLERK 2221 Kern Street FRESNO, CA 93721 (559) 488-3295	(Space Below for Use by County Clerk Only) FILED AUG 17 2010
------------	------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------

FICTITIOUS BUSINESS NAME STATEMENT		FRESNO COUNTY CLERK By <i>Blanca H. Avalos</i> DEPUTY
File No.	2201010004747	

THE FOLLOWING PERSON(S) IS(ARE) CONDUCTING BUSINESS AS

NEW FILING **RENEWAL**

1) Fictitious Business Name(s): (Type or Print) AAA CALIFORNIA REGIONAL CENTER	Phone (Optional)
------------------------------------------------------------------------------------------	------------------

Street Address, City, State, Zip Code, County of Principal Place of Business (P.O. Box not acceptable)
154 E. ELM ST, COALINGA, CA 93210 , FRESNO

Mailing Address (if different than above)
20380 TOWN CENTER LANE STE #170, CUPERTINO, CA 95014

2) Full Name of Registrant AAA CALIFORNIA REGIONAL CENTER	Residence Address 20380 TOWN CENTER LANE STE #170, CUPERTINO, CA 95014	Phone (Optional)
---------------------------------------------------------------------	--------------------------------------------------------------------------------------	------------------

3) Registrant commenced to transact business under the Fictitious Business Name(s) listed above on: <input type="checkbox"/> (Date)	4) Registrant has not yet commenced to transact business under the Fictitious Business Name(s) listed above. <input checked="" type="checkbox"/>	5) This business conducted by: LIMITED LIABILITY CO.
----------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------

6) Articles of Incorporation (If Applicable) 201014510105	<input type="checkbox"/> This Statement has been executed pursuant to section 17919 of the Business and Professions code. (Do not publish this sentence unless box is checked).
--------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

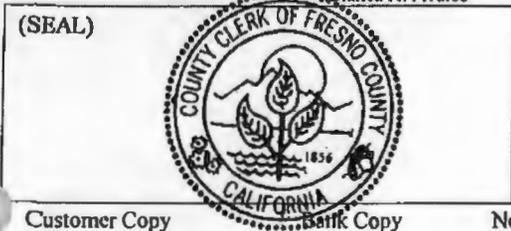
7) Type or Print Signature and Title KEEN WEI, MANAGER	(Signed) <i>Keen Wei</i> "I declare that all information in this statement is true and correct. (A registrant who declares as true information which he or she knows to be false is guilty of a crime.)"
------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

THE FILING OF THIS STATEMENT DOES NOT OF ITSELF AUTHORIZE THE USE IN THIS STATE OF A FICTITIOUS BUSINESS NAME IN VIOLATION OF THE RIGHTS OF ANOTHER UNDER FEDERAL, STATE OR COMMON LAW (SEE SECTION 14411 ET SEQ, BUSINESS AND PROFESSIONS CODE)

8) Filed with the FRESNO COUNTY CLERK on: 08/17/2010 NOTICE: THIS STATEMENT EXPIRES ON:

VICTOR E. SALAZAR, COUNTY CLERK.
Blanca H. Avalos
Blanca H. Avalos

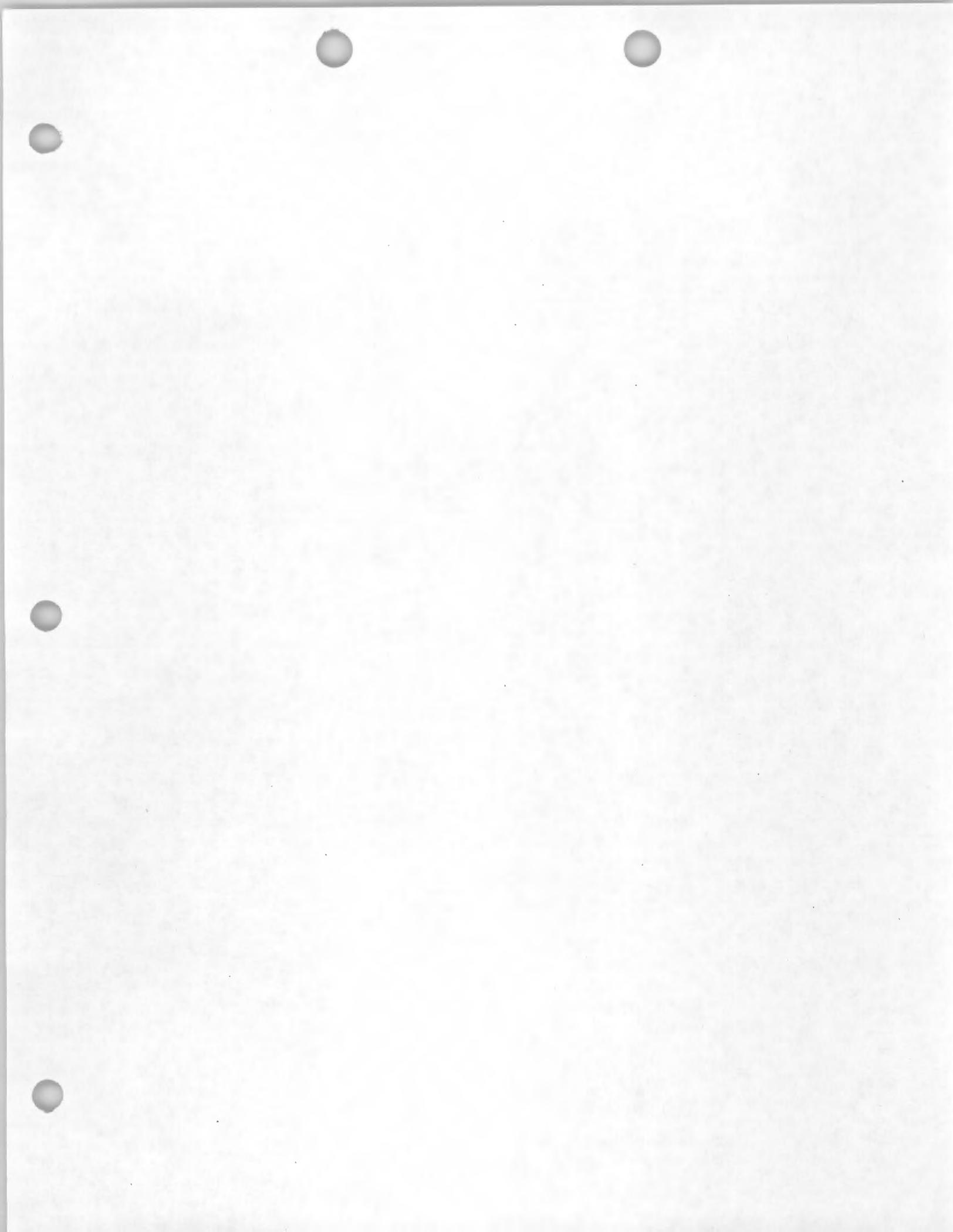
08/16/2015
A NEW STATEMENT MUST BE FILED PRIOR TO THE EXPIRATION DATE.



Space Below for Use of County Clerk Only – Do Not Publish Certification

Certification

I hereby certify that the foregoing is a correct copy of the original on file in my office.
DATED: FRESNO, California VICTOR E. SALAZAR, COUNTY CLERK
AUG 17 2010 *Blanca H. Avalos* Deputy



STA 004
#451794

THIS STATEMENT IS A PUBLIC RECORD
(SEE REVERSE SIDE FOR LEGAL REQUIREMENTS)

ENDORSED
A-0329755-00
FILED
San Francisco County Clerk

Taxes Paid
 Tax Exempt

SF County Clerk
City Hall, Room 168
San Francisco, CA 94102-4678

AUG 17, 2010

FILING FEE: (Payable by cash, money order, or check with a preprinted name made payable to SF County C)
\$45000 For 1st Business Name and 1st Registrant
\$10.00 For each additional business name or each additional registrant (owner) on SAME statement
ITEMS #1 THROUGH #6 MUST BE LEGIBLE AND FULLY COMPLETED

by: JENNIFER WONG
Deputy County Clerk

FICTITIOUS BUSINESS NAME STATEMENT (Instructions for completion - see reverse side)

1. Fictitious Business Name(s): AAA California Regional Center

2. 20380 Town Center Ln #170 Cupertino CA 95014
Street Address, City, State and Zip code of Principal Place of Business (P.O. Box **NOT** allowed) MUST ENTER COUNTY OF FBN ADDRESS:
San Francisco

<p>3. <u>AAA California Regional Center</u> (California) Full name of registrant #1 (If Corporation or Limited Liability Company, also indicate State of Incorporation or organization) <u>20380 Town Center Ln #170</u> Residence Address (P.O. Box NOT allowed) <u>Cupertino CA 95014</u> City, State and Zip Code</p>	<p>Full name of registrant #2 (If Corporation or Limited Liability Company, also indicate State of Incorporation or organization) Residence Address (P.O. Box NOT allowed) City, State and Zip Code</p>
<p>Full name of registrant #3 (If Corporation or Limited Liability Company, also indicate State of Incorporation or organization) Residence Address (P.O. Box NOT allowed) City, State and Zip Code</p>	<p>Full name of registrant #4 (If Corporation or Limited Liability Company, also indicate State of Incorporation or organization) Residence Address (P.O. Box NOT allowed) City, State and Zip Code</p>

4. The business is conducted by: an individual a general partnership a corporation a limited partnership
 an unincorporated association other than a partnership a trust co-partners husband and wife
 joint venture limited liability company state or local registered domestic partners a limited liability partnership

5. The registrant commenced to transact business under the above-listed fictitious business name or names on: (enter EXACT date OR if future date, enter "not applicable") ▶ N/A

6. I declare that all information in this statement is true and correct. (A registrant who declares as true information of which he or she knows to be false is guilty of a crime.)

If registrant is a Corporation or Limited Liability Company, sign below
Signed _____ Corporation or LLC Name: AAA California Regional Center LLC
Signature Keen Wei
Printed Name _____ Printed Name & Title: Keen Wei, Manager member

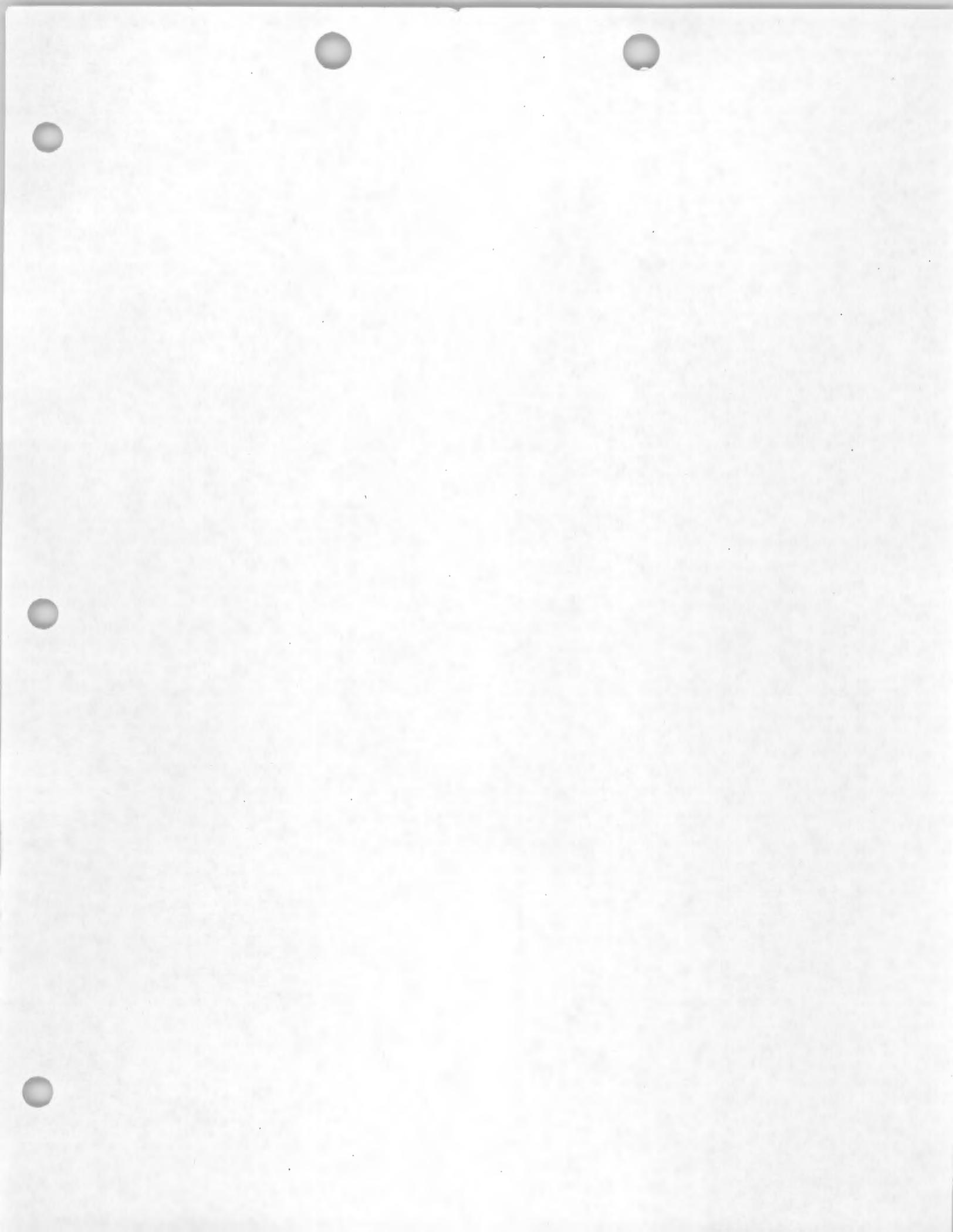
This statement was filed with the San Francisco County Clerk on date indicated by the file stamp above.

NOTICE—IN ACCORDANCE WITH SUBDIVISION (a) OF SECTION 17920, A FICTITIOUS NAME STATEMENT GENERALLY EXPIRES AT THE END OF FIVE YEARS FROM THE DATE ON WHICH IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK, EXCEPT, AS PROVIDED IN SUBDIVISION (b) OF SECTION 17920, WHERE IT EXPIRES 40 DAYS AFTER ANY CHANGE IN THE FACTS SET FORTH IN THE STATEMENT PURSUANT TO SECTION 17913 OTHER THAN A CHANGE IN THE RESIDENCE ADDRESS OF A REGISTERED OWNER; A NEW FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED BEFORE THE EXPIRATION. THE FILING OF THIS STATEMENT DOES NOT OF ITSELF AUTHORIZE THE USE IN THIS STATE OF A FICTITIOUS BUSINESS NAME IN VIOLATION OF THE RIGHTS OF ANOTHER UNDER FEDERAL, STATE, OR COMMON LAW (SEE SECTION 17411 ET. SEQ., BUSINESS AND PROFESSIONS CODE).

I hereby certify that the foregoing is a correct copy of the original on file at the Office of San Francisco

CERTIFICATION
By [Signature] Deputy County Clerk





COMFORHOME
STEPHEN L. WEIR
COUNTY CLERK - RECORDER
555 Escobar St.
P.O. Box 350, Martinez, Ca 94553-0135
(925) 335-7900

PAGE 01/01
F-0006357-00
FILED
CONTRA COSTA Co Clerk's Office

PLEASE PRINT OR TYPE

SEE REVERSE SIDE FOR INSTRUCTIONS

FILING FEE
\$30.00 - FOR FIRST BUSINESS NAME ON STATEMENT
\$ 7.00 - FOR EACH ADDITIONAL BUSINESS NAME FILED ON SAME STATEMENT AND DOING BUSINESS AT THE SAME LOCATION
\$ 7.00 - FOR EACH ADDITIONAL OWNER IN EXCESS OF ONE OWNER

STEPHEN L. WEIR, County Clerk

SEP 07, 2010

by: L. Barajas
Deputy County Clerk

FICTITIOUS BUSINESS NAME STATEMENT

NEW RENEW

THE NAME(S) OF THE BUSINESS(ES):

* AAA California Regional Center

Print Fictitious Business Name(s) on Line Above

* * 42 Foxcroft Pl
Street Address of Principal Place of Business

120380 Town Center Lane, #172
Mailing Address, if Different

San Ramon, CA 94583
City State Zip

C.C. Cupertino, CA 95014
County City State Zip

REGISTERED OWNER(S):

* * * (1) AAA California Regional Center
Full Name - Type/Print

20380 Town Center Lane, #172
Residence Address

Cupertino CA 95014
City State Zip

CA
If Corporation or LLC, Print State of Incorporation/Organization

(13) Full Name - Type/Print

Residence Address
City State Zip

If Corporation or LLC, Print State of Incorporation/Organization
(If More Than 4 Registrants - Attach Additional Sheet Showing Owner Information)

(2) Full Name - Type/Print

Residence Address
City State Zip

If Corporation or LLC, Print State of Incorporation/Organization

(24) Full Name - Type/Print

Residence Address
City State Zip

If Corporation or LLC, Print State of Incorporation/Organization
(If More Than 4 Registrants - Attach Additional Sheet Showing Owner Information)

* * * * This business is conducted by: an Individual Husband and Wife a General Partnership
 a Limited Partnership a Corporation a Trust Co-Partners a Joint Venture
 an Unincorporated Association - other than a Partnership a Limited Liability Co. State or Local Registered Domestic Partners

* * * * The registrant commenced to transact business under the fictitious business name or names listed above on 09/07/10
(Insert N/A if You Haven't Started to Transact Business)

SIGNATURE OF REGISTRANT: [Signature]

ADAMING QIU, Manager
Print Name of Person Signing. If Corporation, also print corporate title of officer. If LLC, also print title of officer or manager

THIS STATEMENT WAS FILED WITH THE COUNTY CLERK OF CONTRA COSTA COUNTY ON DATE INDICATED BY FILE STAMP ABOVE

N-O-T-I-C-E THIS FICTITIOUS BUSINESS NAME STATEMENT EXPIRES ON 09-7-2015. A NEW

FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED PRIOR TO 09-7-2015.

NOTICE - IN ACCORDANCE WITH SUBDIVISION (b) OF SECTION 17920, A FICTITIOUS NAME STATEMENT GENERALLY EXPIRES AT THE END OF FIVE YEARS FROM THE DATE ON WHICH IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK, EXCEPT AS PROVIDED IN SUBDIVISION (b) OF SECTION 17920, WHERE IT EXPIRES 40 DAYS AFTER ANY CHANGE IN THE FACTS SET FORTH IN THE STATEMENT PURSUANT TO SECTION 17913 OTHER THAN A CHANGE IN THE RESIDENCE ADDRESS OF A REGISTERED OWNER. A NEW FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED BEFORE THE EXPIRATION.
THE FILING OF THIS STATEMENT DOES NOT OR IT DOES NOT AUTHORIZE THE USE IN THIS STATE OF A FICTITIOUS BUSINESS NAME IN VIOLATION OF THE RIGHTS OF ANOTHER UNDER FEDERAL, STATE, OR COMMON LAW (SEE SECTION 14111 ET SEQ., BUSINESS AND PROFESSIONS CODE).

I HEREBY CERTIFY THAT THIS COPY IS A CORRECT COPY OF THE ORIGINAL STATEMENT ON FILE IN MY OFFICE.
Stephen L. Weir, Contra Costa County Clerk

BY: [Signature] DEPUTY



Global Law Group

A Professional Law Corporation

Tina Lee
Attorney at Law

World Trade Center
350 South Figueroa Street, Suite 760
Los Angeles, CA 90071 U.S.A.

Tel: 213.830.9933 Fax: 213.830.9930
Skype: Tina.global
Tina@GlobalLawGroup.net
www.GlobalLawGroup.net



Global Law Group

A Professional Law Corporation

Linda Lau
Attorney at Law
Solicitor of England & Wales

World Trade Center
350 South Figueroa Street, Suite 760
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www.GlobalLawGroup.net



**AAA
CALIFORNIA
REGIONAL
CENTER**



AAA CALIFORNIA REGIONAL CENTER

**REGIONAL CENTER
DESIGNATION APPLICATION**

From: Origin ID: EMTA (213) 830-9933
Anna Baran
Global Law Group
350 S Figueroa St Ste 760

Los Angeles, CA 90071



J1829108888225

Ship Date: 07SEP10
ActWgt: 4.0 LB
CAD: 3464367/NET3060

JORA

Delivery Address Bar Code



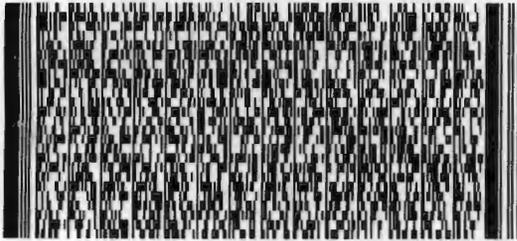
SEP 18 2010
STAMP #122

Ref # RE: AAA CA RC
Invoice #
PO #
Dept #

SHIP TO: (213) 830-9933 X 101 BILL SENDER
USCIS California Service Center
Attn: EB5 Regional Center Proposal
24000 AVILA RD FL 2ND
RM 2326, P.O. BOX 10526
LAGUNA NIGUEL, CA 92677

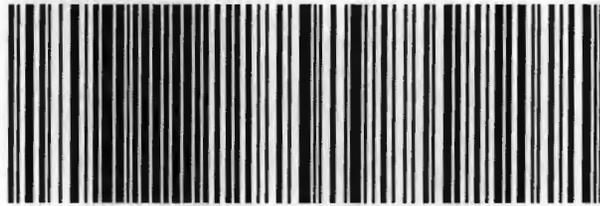
WED - 08 SEP A2
STANDARD OVERNIGHT

TRK# 7938 8610 3727
0201



92677
CA-US
SNA

QZ JORA



0803/0292/AA24

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Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.



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A Professional Law Corporation

1

June 15, 2012

By FedEx (Tracking No.: 793667966674)
 U.S. Citizenship and Immigration Services
 24000 Avila Road, 2nd Floor
 Laguna Niguel, CA 92677

REC'D CSC 12 JUN 19 7:38

Re: Approval Notice Name Correction
 Regional Center Name: AAA California Regional Center
 Receipt Number: [REDACTED] ✓

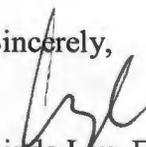
Dear Sir or Madam: ---

We represent AAA California Regional Center and filed its regional center designation application in 2011. Our G-28 is on the file with USCIS.

We received the regional center approval notice on October 14, 2011 and found there is a typo on the regional center name on the first page, second paragraph. The designated regional center name should read "AAA California Regional Center" instead of "Admiralty California Regional Center." We contacted USCIS by email for this matter on October 19, 2011 and received reply on October 20, 2011 that a corrected approval notice would be mailed out shortly, however we did not receive it in the mail. To be certain that USCIS has our office's updated mailing address on the file, we hereby resubmit the G-28, and wish the new approval notice with the corrected regional center name to be mailed to our office address at: 909 El Centro Street, Suite 1, South Pasadena, CA 91030.

Thank you for your prompt attention and assistance in this matter.

Sincerely,


 Linda Lau, Esq.
 Enclosures

ACTION COMPLETED
 APPROVED FOR FILING
 JUL 19 2012
 INITIALS:
 FOC: CSC

C30010

REC'D CSC 12 JUN 21 11:35

11/12

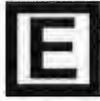
FedEx Ship Manager - Print Your Label(s)

CSC

From: (213) 830-9933
Michele Galatovich Winters
Global Law Group
909 El Centro, Suite 1

Origin ID: WHPA

FedEx Express



J12101112190225

Ship Date: 11JUN12
ActWgt: 1.0 LB
CAD: 3464367/NET3250

AM JUN 19 2012

South Pasadena, CA 91030

Delivery Address Bar Code



STAMP #119

Keen Wei

SHIP TO: (800) 375-5283

BILL SENDER

California Service Center
USCIS
PO Box 10129
24000 AVILA RD Second Floor
LAGUNA NIGUEL, CA 92607

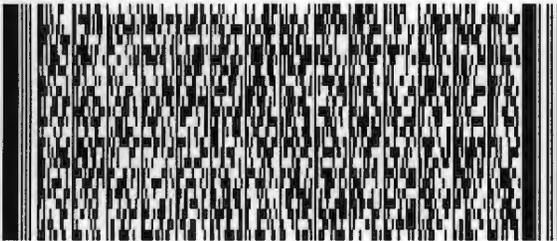
Ref # Keen Wei
Invoice #
PO #
Dept #

FedEx
TRK# 7936 6796 6674
0201

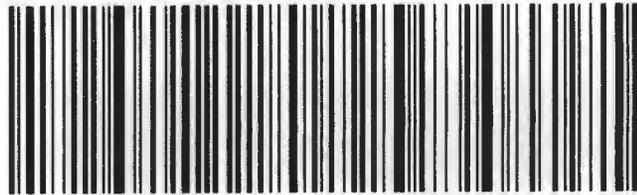
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EXPRESS SAVE

Part 6607435 R1A091408

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CA-US SNA



SA JORA



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Use of this system constitutes your agreement to the service con not be responsible for any claim in excess of \$100 per package, misinformation, unless you declare a higher value, pay an addi found in the current FedEx Service Guide apply. Your right to r sales, income interest, profit, attorney's fees, costs, and other for the greater of \$100 or the authorized declared value. Recovery value is \$500, e.g. jewelry, precious metals, negotiable instrum within strict time limits, see current FedEx Service Guide.

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of
to

Dec 2007
REC'D CSC 12 JUN 21 22:48



**U.S. Citizenship
and Immigration
Services**

Date: OCT 14 2011

Keen Wei
AAA California Regional Center, LLC
20380 Town Center Lane # 170
Cupertino, CA 95014

Application: Request for Designation as a Regional Center
Applicant(s): Keen Wei

Re: AAA California Regional Center
RCW1031910073/ID1031910073/(Formerly W09002720)

****Corrected****

Pursuant to Section 610 of the Appropriations Act of 1993, on October 18, 2010, Keen Wei submitted a proposal seeking approval and designation by U.S. Citizenship and Immigration Services (USCIS) of the AAA California Regional Center.

USCIS hereby designates AAA California Regional Center as a Regional Center within the Immigrant Investor Pilot Program and approves the request as described below:

GEOGRAPHIC AREA:

The AAA California Regional Center shall have a geographic scope to include the counties of San Francisco, San Mateo, Contra Costa, Alameda, Santa Clara, San Benito, Fresno and Kings in the State of California.

FOCUS OF INVESTMENT ACTIVITY:

As depicted in the economic model, the general proposal, business plan and associated economic analysis, the Regional Center will engage in the following economic activities: the development, operation and management of new commercial enterprises in the Regional Center area.

The Regional Center shall focus on offering EB-5 compliant capital investment opportunities into new commercial enterprises or a mix of commercial enterprises in the following target industry economic categories:

1. Retail:
 - a. Supermarkets and Other Grocery (except Convenience) Stores – NAICS 445110
 - b. Pharmacies and Drug Stores – NAICS 446110
 - c. Women's Clothing Stores – NAICS 448120
 - d. Sporting Goods Stores – NAICS 451110
 - e. All Other General Merchandise Stores – NAICA 452990
2. Hospitality:
 - a. Hotels (except Casino Hotels) and Motels – NAICA 721110
3. Food Services:
 - a. Limited-Service Restaurants – NAICS 722211
4. Professional Offices:
 - a. Offices of Lawyers – NAICS 541110
 - b. Offices of Certified Public Accountants – NAICS 541211
 - c. Engineering Services – NAICS 541330
 - d. Custom Computer Programming Services – NAICA 541511
 - e. Other Management Consulting Services – NAICA 541618
 - f. Advertising Agencies – NAICS 541810
5. Medical Offices:
 - a. Offices of Physicians (except Mental Health Specialists) – NAICS 621111
6. Entertainment:
 - a. Fitness and Recreational Sports Centers – NAICS 713940
7. Assisted Living Facility:
 - a. Nursing Care Facilities – NAICS 623110
8. Alternative Energy Structure Construction:
 - a. Power and Communication Line and Related Structures Construction – NAICS 237130

If any investment opportunities arise that are beyond the scope of the approved industry categories, then an I-924 amendment application would be required to add that category.

Aliens seeking immigrant visas through the Immigrant Investor Pilot Program may file individual petitions with USCIS for capital investments in new commercial enterprises located within and affiliated with the approved Regional Center area.

The geographic focus of this area may contain some High Unemployment Targeted Employment Areas (TEAs) as designated by the State of California and rural TEAs, as defined in 8 CFR 204.6(e). Therefore, the minimum capital investment threshold for any individual immigrant investment into an approved commercial enterprise throughout the Regional Center shall be not less than \$500,000, if the investment target is located within a TEA or \$1,000,000 if it is located outside of a TEA. No debt arrangement will be acceptable unless it is secured by assets owned by the alien entrepreneur. A full capital investment must be made and placed at risk.

For any alien requesting the reduced threshold of \$500,000 based upon an investment in a Targeted Employment Area, the alien must establish at the time of filing of the I-526 petition that either the investment will be made in a TEA designated area or was in a TEA designated area at the time of the alien's initial investment into the enterprise.

EMPLOYMENT CREATION

Immigrant investors who file petitions for capital investments in new commercial enterprises located within and affiliated with the Regional Center area must fulfill all of the requirements set forth in INA 203(b)(5), 8 CFR 204.6, and 8 CFR 216.6, except that the petition need not show that the new commercial enterprises created ten new jobs directly as a result of the immigrant investor's investment. The determination whether the alien investor has met the job creation requirements will be established by a review of the required initial evidence at 8 CFR 204.6(j) and 8 CFR 216.6(a)(4) for the Form I-526 and Form I-829 petitions, respectively. The capital investment and job creation activities outlined in the individual petitions must fall within the bounds of the final economic analysis that is contained as part of the approved Regional Center proposal and its indirect job creation model and multipliers contained within the final approved Regional Center application package. The immigrant investor must show at the time of removal of conditions that they performed the activities described in Form I-526 petition, and the activities must be based on the approved regional center methodology for demonstrating job creation. The approved econometric model is RIMS II.

In addition, where job creation is claimed based on multipliers rooted in revenue generated by businesses occupying space and estimated project costs expenditures, the immigrant investor's individual I-526 petition affiliated with your Regional Center, should include as supporting evidence:

- A comprehensive detailed business plan with supporting financial, marketing and related data and analysis providing a reasonable basis for projecting creation of indirect and/or induced jobs to be achieved/realized within two years pursuant to 8 CFR 204.6(j)(4)(B) and reasonable methodologies pursuant to 8 CFR 204.6(m)(7)(ii).

An alien investor's I-829 petition to remove the conditions which was based on an I-526 petition approval that involved the creation of new indirect jobs based on multipliers tied to job creation inputs such as revenue generated by businesses occupying space and estimated project expenditures costs, needs to be supported by evidence showing the space is occupied by such businesses and that the funds were expended in the job-creating activity. Such evidence may include reasonable methodologies like multiplier tables, feasibility studies, and other economically or statistically valid forecasting devices which indicate the likelihood that the alien's investment has resulted in increased employment.

Additional Guidelines for individual Immigrant Investors Visa Petition (I-526)

Each individual petition, in order to demonstrate that it is associated with the Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain as supporting evidence relating to this Regional Center designation, the following:

1. A copy of this letter, the Regional Center approval and designation.
2. A copy of the USCIS approved Regional Center narrative proposal and business plan.
3. A copy of the job creation methodology required in 8 CFR 204.6(j)(4)(iii), as contained in the final Regional Center economic analysis which has been approved by USCIS, which reflects that investment by an individual immigrant investor will create not fewer than ten (10) full-time employment positions, either directly or indirectly, per immigrant investor.
4. A legally executed copy of the USCIS approved documents:

- | | |
|----------------------------------|----------------------------------|
| a. Operating Agreement | Draft dated June 6, 2010 |
| b. Offering Memorandum | Draft dated October 1, 2010 |
| c. Subscription Agreement | Draft dated October 1, 2010 |
| d. Escrow Agreement | Submission date October 18, 2010 |
| e. Limited Partnership Agreement | Draft dated October 1, 2010 |

Note: Each petition must also include any other evidence that is relevant to a proposed investment project, such as, licenses and permits, building contracts, construction costs, building projections and timelines, advisory opinions, feasibility studies, etc.

DESIGNEE'S RESPONSIBILITIES INHERENT IN CONDUCT OF THE REGIONAL CENTER:

The law, as reflected in the regulations at 8 CFR 204.6(m)(6), requires that an approved Regional Center in order to maintain the validity of its approval and designation must continue to meet the statutory requirements of the Immigrant Investor Pilot Program by serving the purpose of promoting economic growth, including increased export sales (where applicable), improved regional productivity, job creation, and increased domestic capital investment. Therefore, in order for USCIS to determine whether your Regional Center is in compliance with the above cited regulation, and in order to continue to operate as a USCIS approved and designated Regional Center, your administration, oversight, and management of your Regional Center shall be such as to monitor all investment activities under the sponsorship of your Regional Center and to maintain records, data and information in order to provide the information required on the Form I-924A supplement. Form I-924A, Supplement to Form I-924 is available in the "Forms" section on the USCIS website at www.uscis.gov.

Effective November 23, 2010, the failure to timely file a Form I-924A Supplement for each fiscal years in which the regional center has been designated for participation in the Immigrant Investor Pilot Program will result in the issuance of an intent to terminate the participation of the regional center in the Pilot Program, which may ultimately result in the termination of the approval and designation of the regional center.

Note: The requirement for the filing of Form I-924A Supplement commences in fiscal year 2011. Each regional center that remains designated for participation in the pilot program as of September 30, 2011 must submit the Form I-924A Supplement with the required supporting documentation on or before December 29, 2011.

If you have any questions concerning the Regional Center approval and designation under the Immigrant Investor Pilot Program, please contact the USCIS by Email at USCIS.ImmigrantInvestorProgram@dhs.gov.

Sincerely,



Rosemary Langley Melville
Director
California Service Center

cc: Linda Lau, Esq.



**U.S. Citizenship
and Immigration
Services**

Date: **OCT 14 2011**

Keen Wei
AAA California Regional Center, LLC
20380 Town Center Lane # 170
Cupertino, CA 95014

Application: Request for Designation as a Regional Center
Applicant(s): Keen Wei

Re: AAA California Regional Center
RCW1031910073/(Formerly W09002720)

Pursuant to Section 610 of the Appropriations Act of 1993, on October 18, 2010, Keen Wei submitted a proposal seeking approval and designation by U.S. Citizenship and Immigration Services (USCIS) of the AAA California Regional Center.

USCIS hereby designates Admiralty California Regional Center as a Regional Center within the Immigrant Investor Pilot Program and approves the request as described below:

GEOGRAPHIC AREA:

The AAA California Regional Center shall have a geographic scope to include the counties of San Francisco, San Mateo, Contra Costa, Alameda, Santa Clara, San Benito, Fresno and Kings in the State of California.

FOCUS OF INVESTMENT ACTIVITY:

As depicted in the economic model, the general proposal, business plan and associated economic analysis, the Regional Center will engage in the following economic activities: the development, operation and management of new commercial enterprises in the Regional Center area.

The Regional Center shall focus on offering EB-5 compliant capital investment opportunities into new commercial enterprises or a mix of commercial enterprises in the following target industry economic categories:

1. Retail:
 - a. Supermarkets and Other Grocery (except Convenience) Stores – NAICS 445110

- b. Pharmacies and Drug Stores – NAICS 446110
- c. Women's Clothing Stores – NAICS 448120
- d. Sporting Goods Stores – NAICS 451110
- e. All Other General Merchandise Stores – NAICA 452990
- 2. Hospitality:
 - a. Hotels (except Casino Hotels) and Motels – NAICA 721110
- 3. Food Services:
 - a. Limited-Service Restaurants – NAICS 722211
- 4. Professional Offices:
 - a. Offices of Lawyers – NAICS 541110
 - b. Offices of Certified Public Accountants – NAICS 541211
 - c. Engineering Services – NAICS 541330
 - d. Custom Computer Programming Services – NAICA 541511
 - e. Other Management Consulting Services – NAICA 541618
 - f. Advertising Agencies – NAICS 541810
- 5. Medical Offices:
 - a. Offices of Physicians (except Mental Health Specialists) – NAICS 621111
- 6. Entertainment:
 - a. Fitness and Recreational Sports Centers – NAICS 713940
- 7. Assisted Living Facility:
 - a. Nursing Care Facilities – NAICS 623110
- 8. Alternative Energy Structure Construction:
 - a. Power and Communication Line and Related Structures Construction – NAICS 237130

If any investment opportunities arise that are beyond the scope of the approved industry categories, then an I-924 amendment application would be required to add that category.

Aliens seeking immigrant visas through the Immigrant Investor Pilot Program may file individual petitions with USCIS for capital investments in new commercial enterprises located within and affiliated with the approved Regional Center area.

The geographic focus of this area may contain some High Unemployment Targeted Employment Areas (TEAs) as designated by the State of California and rural TEAs, as defined in 8 CFR 204.6(e). Therefore, the minimum capital investment threshold for any individual immigrant investment into an approved commercial enterprise throughout the Regional Center shall be not less than \$500,000, if the investment target is located within a TEA or \$1,000,000 if it is located outside of a TEA. No debt arrangement will be acceptable unless it is secured by assets owned by the alien entrepreneur. A full capital investment must be made and placed at risk.

For any alien requesting the reduced threshold of \$500,000 based upon an investment in a Targeted Employment Area, the alien must establish at the time of filing of the I-526 petition that either the investment will be made in a TEA designated area or was in a TEA designated area at the time of the alien's initial investment into the enterprise.

EMPLOYMENT CREATION

Immigrant investors who file petitions for capital investments in new commercial enterprises located within and affiliated with the Regional Center area must fulfill all of the requirements set forth in INA 203(b)(5), 8 CFR 204.6, and 8 CFR 216.6, except that the petition need not show that the new commercial enterprises created ten new jobs directly as a result of the immigrant investor's investment. The determination whether the

alien investor has met the job creation requirements will be established by a review of the required initial evidence at 8 CFR 204.6(j) and 8 CFR 216.6(a)(4) for the Form I-526 and Form I-829 petitions, respectively. The capital investment and job creation activities outlined in the individual petitions must fall within the bounds of the final economic analysis that is contained as part of the approved Regional Center proposal and its indirect job creation model and multipliers contained within the final approved Regional Center application package. The immigrant investor must show at the time of removal of conditions that they performed the activities described in Form I-526 petition, and the activities must be based on the approved regional center methodology for demonstrating job creation. The approved econometric model is RIMS II.

In addition, where job creation is claimed based on multipliers rooted in revenue generated by businesses occupying space and estimated project costs expenditures, the immigrant investor's individual I-526 petition affiliated with your Regional Center, should include as supporting evidence:

- A comprehensive detailed business plan with supporting financial, marketing and related data and analysis providing a reasonable basis for projecting creation of indirect and/or induced jobs to be achieved/realized within two years pursuant to 8 CFR 204.6(j)(4)(B) and reasonable methodologies pursuant to 8 CFR 204.6(m)(7)(ii).

An alien investor's I-829 petition to remove the conditions which was based on an I-526 petition approval that involved the creation of new indirect jobs based on multipliers tied to job creation inputs such as revenue generated by businesses occupying space and estimated project expenditures costs, needs to be supported by evidence showing the space is occupied by such businesses and that the funds were expended in the job-creating activity. Such evidence may include reasonable methodologies like multiplier tables, feasibility studies, and other economically or statistically valid forecasting devices which indicate the likelihood that the alien's investment has resulted in increased employment.

Additional Guidelines for individual Immigrant Investors Visa Petition (I-526)

Each individual petition, in order to demonstrate that it is associated with the Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain as supporting evidence relating to this Regional Center designation, the following:

1. A copy of this letter, the Regional Center approval and designation.
2. A copy of the USCIS approved Regional Center narrative proposal and business plan.
3. A copy of the job creation methodology required in 8 CFR 204.6(j)(4)(iii), as contained in the final Regional Center economic analysis which has been approved by USCIS, which reflects that investment by an individual immigrant investor will create not fewer than ten (10) full-time employment positions, either directly or indirectly, per immigrant investor.
4. A legally executed copy of the USCIS approved documents:
 - a. Operating Agreement
 - b. Offering Memorandum
 - c. Subscription Agreement
 - d. Escrow Agreement

Draft dated June 6, 2010
Draft dated October 1, 2010
Draft dated October 1, 2010
Submission date October 18, 2010

e. Limited Partnership Agreement

Draft dated October 1, 2010

Note: Each petition must also include any other evidence that is relevant to a proposed investment project, such as, licenses and permits, building contracts, construction costs, building projections and timelines, advisory opinions, feasibility studies, etc.

DESIGNEE'S RESPONSIBILITIES INHERENT IN CONDUCT OF THE REGIONAL CENTER:

The law, as reflected in the regulations at 8 CFR 204.6(m)(6), requires that an approved Regional Center in order to maintain the validity of its approval and designation must continue to meet the statutory requirements of the Immigrant Investor Pilot Program by serving the purpose of promoting economic growth, including increased export sales (where applicable), improved regional productivity, job creation, and increased domestic capital investment. Therefore, in order for USCIS to determine whether your Regional Center is in compliance with the above cited regulation, and in order to continue to operate as a USCIS approved and designated Regional Center, your administration, oversight, and management of your Regional Center shall be such as to monitor all investment activities under the sponsorship of your Regional Center and to maintain records, data and information in order to provide the information required on the Form I-924A supplement. Form I-924A, Supplement to Form I-924 is available in the "Forms" section on the USCIS website at www.uscis.gov.

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Sincerely,



Rosemary Langley Melville
Director
California Service Center

cc: Linda Lau, Esq.



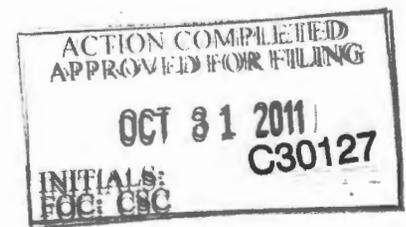
U.S. Citizenship
and Immigration
Services

Date: **OCT 14 2011**

Keen Wei
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20380 Town Center Lane # 170
Cupertino, CA 95014

Application: Request for Designation as a Regional Center
Applicant(s): Keen Wei

Re: AAA California Regional Center
RCW1031910073/ID1031910073/(Formerly W09002720)



****Corrected****

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2. A copy of the USCIS approved Regional Center narrative proposal and business plan.
3. A copy of the job creation methodology required in 8 CFR 204.6(j)(4)(iii), as contained in the final Regional Center economic analysis which has been approved by USCIS, which reflects that investment by an individual immigrant investor will create not fewer than ten (10) full-time employment positions, either directly or indirectly, per immigrant investor.
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- | | |
|----------------------------------|----------------------------------|
| a. Operating Agreement | Draft dated June 6, 2010 |
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| d. Escrow Agreement | Submission date October 18, 2010 |
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If you have any questions concerning the Regional Center approval and designation under the Immigrant Investor Pilot Program, please contact the USCIS by Email at USCIS.ImmigrantInvestorProgram@dhs.gov.

Sincerely,



Rosemary Langley Melville
Director
California Service Center

cc: Linda Lau, Esq.

Department of Homeland Security
P.O. Box 30111-30115
Laguna Niguel, CA 92607-0111



**U.S. Citizenship
and Immigration
Services**



UNITED STATES POSTAGE
U.S. OFFICIAL MAIL
PENALTY FOR
PRIVATE USE \$300
FITNEY BOWES
02 1A
0004206094 OCT 21 2011
MAILED FROM ZIP CODE 92677



NIXIE **OCT** 951 **28** 1 **2011** 00 10/25/11
RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

BC: 92607011111 *1908-11062-21-40



92607@0111

Decision Processing Worksheet

Officer Name: FRLETA		Receipt #: RCW1031910073	
Officer Stamp #: 1298			
Form Type: I-924	Classification: B	III	Team: I
		WS: 22123	
<p style="font-size: 1.2em; font-family: cursive;">George M. Please send out with same date - 10/14/11 - corrected approval notice. Thanks J.F.</p>		<input type="checkbox"/> Revocation <input type="checkbox"/> Auto-terminate <input type="checkbox"/> Auto-revocation <input type="checkbox"/> Relocate	<input type="checkbox"/> Denial <input type="checkbox"/> ITD <input type="checkbox"/> ITR <input type="checkbox"/> CFDO Shelf <input type="checkbox"/> Pre <input type="checkbox"/> Post
		3 rd Review Initials/Date	
		# of Named Beneficiaries:	
		Action Completed:	

I-924 PP Processing

Officer Prepares or Completes (Notice Ordered) RFE/30/42/84 ITD/30 ITR/30 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> (1 st Initial & Last Name) (Date & Time)	Clerical/Officer Completes RFE/ITD/ITR (Notice Sent) (1 st Initial & Last Name) (Date & Time)	RFE/ITD/ITR Response Received (1 st Initial & Last Name) (Date & Time)	Officer Completes Final Decision (Notice Ordered - Approval/Denial) (1 st Initial & Last Name) (Date & Time)	Clerical/Officer Completes Final Action (Notice Sent) (1 st Initial & Last Name) (Date & Time)
Mailer Enclosed? Y N		SCAO Review:	Final Decision:	

Officer's Comment: GEORGE - "corrected" approval notice - please send out with same date - 10/14/11,		DUPLICATE PETITION INCLUDED: <input type="checkbox"/> YES <input type="checkbox"/> NO	
SKELETAL DENIAL: <input type="checkbox"/> Petition filed after 6/17/07 and C3 verified (no other petition filed on the same day with evidence) <input type="checkbox"/> I-130 filed < 2 years from adjudication date <input type="checkbox"/> Not from Haiti/Cuba/Iraq/Japan <input type="checkbox"/> ACD Concur			
Economist Review and Comments:		Senior Advisory Opinion/Comments:	
Supervisor Review and Comments:		J.F.	
Initials/Date:	RFE Response Initial/Date:	Initials/Date:	Initials/Date:
			2 nd Review
			3 rd Review

Clerical Processing Completed: Initials: _____ Date: _____ DUP PETITION PULLED by ISO: <input type="checkbox"/> YES <input type="checkbox"/> NO Duplicate sent to KCC: <input type="checkbox"/> YES <input type="checkbox"/> NO

File Room Processing

To: 103 Hold Shelf Call-Up Date: _____

Rev 06/13/2011

California Service Center Routing Slip

EB-5 Division III

WAC#

A#

W#

STANLEY: ATTN: ZONIA HERRERA W/S: 23055 RPC: RC055

INSTRUCTIONS FOR STANLEY:

- 1. Route to EB-5 Review Complete Shelf(A07): _____
- 2. Route to EB-5 Chang Class Shelf (A07): _____
- 3. Route to PL I-526 Revocation Shelf (A08): _____
- 4. Consolidate with A#, T# or WAC# (Circle One) _____
on EB-5 PL Shelf (NFTS Location) : _____
 Keep on EB-5 Shelf or Forward file/s to: _____
- 5. Rubber Band to A#, T# or WAC# (Circle One) _____
on EB-5 PL Shelf (NFTS Location): _____
 Keep on EB-5 Shelf or Forward attached files to: _____
- 6. Interfile in A#, T# or WAC# (Circle One) _____
on EB-5 Shelf(NFTS Location): _____
 Keep on EB-5 Shelf or Forward file/s to: _____
- 7. Route to National Records Center (NRC)
- 8. Other: Route to EB5 103 Hold Shelf (RC0461)
RFE Sent on _____ (Date)
- 9. Route to Regional Center Proposal Final Decision Shelf (A14): _____

*Comments:

Note: Incomplete or outdated routing sheets will be returned to sender for completion.

Reminder: Receive (RE): To yourself only / Charge Out (CO): if different section code / Reassign (UR): if same section code

FROM	G MENDOZA	Date		EXT		RPC	22120	DIV	
									3

USCIS Immigrant Investor Program

From: Linda [Linda@globallawgroup.net]
Sent: Wednesday, October 19, 2011 5:13 PM
To: Immigrant Investor Program, USCIS
Subject: Regional Center Approval Letter (RCW1031910073)-- typographical error

RE : AAA California Regional Center Approval Letter -- typographical error
Receipt No.: RCW1031910073 (Formerly W09002720)

Dear Sir/Madam,

Thank you for advising our office of the approval of AAA California Regional Center dated 10/14/2011. Our office is the attorney of record in the above-referenced regional center application. Kindly please note the following error on the first page of the approval letter which requires correction:

The 2nd paragraph of the approval letter states "USCIS hereby designates Admiralty California Regional Center as a Regional Center...". It should be AAA California Regional Center.

Kindly make the above-noted correction and reissue a corrected approval notice. Despite the above clerical error, the principal of AAA California Regional Center are very delighted and everyone appreciates your efforts. Thank you very much.

Sincerely,
Linda Lau, Esq

10/20/2011

Form: I924 Receipt: RCW1031910073 Status: APPROVAL NOTICE SENT

Received Date: 10/18/2010

Information About Principal of the Regional Center

Last Name: Middle Name: First Name:

C/O:

Street Address/P.O. Box:

Suite:

City: State: 00 Zip Code:

Date of Birth:

Application Type: A Regional Center ID: ID1031910073

Signed: N

Name of Regional Center: AAA CALIFORNIA REGIONAL CENTER

Street Address/P.O. Box: 20380 TOWN CENTER LANE #170

Street Address 2:

City: CUPERTINO State: CA Zip Code: 95014

Web Site: E-Mail: INFO@AAACARC.COM Fax: Telephone Number: (408) 832-8938

Name of Managing Company:

Street Address/P.O. Box:

Street Address 2:

City: State: 00 Zip Code:

Web Site: E-Mail: Fax: Telephone Number:

Name of Other Agent:

Street Address/P.O. Box:

Street Address 2:

City: State: 00 Zip Code:

Web Site: E-Mail: Fax: Telephone Number:

Contact Information

Last Name: WEI Middle Name: First Name: KEEN

Street Address/P.O. Box: 20380 TOWN CENTER LANE #170

Address 2:

City: CUPERTINO State: CA Zip Code: 95014

Geographic Area of the Regional Center Description: San Francisco, San Mateo, Contra Costa, Alameda, Santa Clara, Kings Counties, California

G28 Information

Last Name: LAU Middle Name: First Name: LINDA

Firm Name: GLOBAL LAW GROUP

Street Address/P.O. Box: 909 EL CENTRO STREET, SUITE 1

City: SOUTH PASADENA State: CA Zip Code: 91030

Action Date	Action	User ID
10/14/2011 08:50:49	APPROVAL NOTICE SENT	GMENDOZA
10/13/2011 14:45:16	APPROVED/NOTICE ORDERED	jjfriea
08/30/2011 09:19:25	DATA CHANGED IN RECORD	jjfriea
08/30/2011 09:16:50	DATA CHANGED IN RECORD	jjfriea
08/30/2011 09:16:09	DATA CHANGED IN RECORD	jjfriea
08/23/2011 15:14:27	RESPONSE TO REQUEST NOTICE TO APPLICATION/PETITION RECEIVED	ajhughs
06/08/2011 10:56:07	REQUEST FOR ADDITIONAL EVIDENCE SENT	jtanudja
06/08/2011 08:41:39	INITIAL AND ADDITIONAL EVIDENCE REQUESTED NOTICE ORDERED	jjfriea
10/18/2010 09:00:00	RECEIVED - FEE COLLECTED ELSEWHERE	

Geographic State/Territory

California

Industry Category Title NAICS Code

Retail	000000
Hospitality/Hotel	000000
Food Service	000000
Professional Office	000000
Medical Office	000000
Entertainment	000000
Assited Living Faciltity	000000
Manufacturing/Assembly	000000

Cancel

Back to Search Results

Decision Processing Worksheet

Rec'd - 10/18/10

Officer Name: FRLEYA	Receipt #: RCW1031910073			
Officer Stamp #: 1298				
Form Type: I-924	Classification: RC	Division: III	Team: I	WS22123

Action:

Approval <input type="checkbox"/> No Record <input type="checkbox"/> Pending Name Check <input type="checkbox"/> Abandonment <input type="checkbox"/> Withdrawal	<input type="checkbox"/> MTR <input type="checkbox"/> Appeal <input type="checkbox"/> Certified Decision	<input type="checkbox"/> RFE Initial <input type="checkbox"/> RFE Additional <input type="checkbox"/> RFE Initial & Additional <input type="checkbox"/> 30 <input type="checkbox"/> 42 <input type="checkbox"/> 84	<input type="checkbox"/> Revocation <input type="checkbox"/> Auto-terminate <input type="checkbox"/> Auto-revocation <input type="checkbox"/> Relocate	<input type="checkbox"/> Denial <input type="checkbox"/> ITD <input type="checkbox"/> ITR <input type="checkbox"/> CFDO Shelf <input type="checkbox"/> Pre <input type="checkbox"/> Post <small>(e.g. ABEFT)</small>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Initials/Date: <i>[Signature]</i>	2 nd Review Initials/Date:	3 rd Review Initials/Date:
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I-129 H2A Expedite Processing:

Date Received: <i>08-30-11</i>	# of Un-Named Beneficiaries:	# of Named Beneficiaries:
Officer Received Date:	AST Action Completed:	

I-129 PP Processing H-1B CAP Master CAP

Officer Prepares or Completes (Notice Ordered) RFE/30/42/84 ITD/30 ITR/30 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> (1 st Initial & Last Name) (Date & Time)	Clerical/Officer Completes RFE/ITD/ITR (Notice Sent) (1 st Initial & Last Name) (Date & Time)	RFE/ITD/ITR Response Received (1 st Initial & Last Name) (Date & Time)	Officer Completes Final Decision (Notice Ordered - Approval/Denial) (1 st Initial & Last Name) (Date & Time)	Clerical/Officer Completes Final Action (Notice Sent) (1 st Initial & Last Name) (Date & Time) OCT 14 2011
Mailer Enclosed? Y N SCAO Review:	Final Decision:			

Officer's Comment:

SKELETAL DENIAL: Petition filed after 6/17/07 and C3 verified (no other petition filed on the same day with evidence) ACD Concur _____

DUPLICATE PETITION INCLUDED: YES NO

Supervisor Review and Comments:
print clean version form to Sasha

Initials/Date: <i>[Signature]</i>	2 nd Review Initials/Date:	3 rd Review Initials/Date: OCT 14 2011
-----------------------------------	---------------------------------------	----------------------------------------------------------

Clerical Processing Completed: Initials: _____ Date: _____

DUP PETITION PULLED by ISO: YES NO Duplicate sent to KCC: YES Date duplicate sent: _____ Initials: _____

File Room Processing

To: 103 Hold Shelf
Call-Up Date: _____

Form: I924 Receipt: RCW1031910073 Status: APPROVED/NOTICE ORDERED

Add/Edit Note

Edit

Received Date: 10/18/2010

Information About Principal of the Regional Center

Last Name: Middle Name: First Name:

C/O:

Street Address/P.O. Box:

Suite:

City: State: 00 Zip Code:

Date of Birth:

Application Type: A Regional Center ID: ID1031910073

Signed: N

G28 Information

Last Name: LAU Middle Name: First Name: LINDA

Firm Name: GLOBAL LAW GROUP

Street Address/P.O. Box: 909 EL CENTRO STREET, SUITE 1

City: SOUTH PASADENA State: CA Zip Code: 91030

Action Date	Action	User ID
10/13/2011 14:45:16	APPROVED/NOTICE ORDERED	jjfrleta
08/30/2011 09:19:25	DATA CHANGED IN RECORD	jjfrleta
08/30/2011 09:16:50	DATA CHANGED IN RECORD	jjfrleta
08/30/2011 09:16:09	DATA CHANGED IN RECORD	jjfrleta
08/23/2011 15:14:27	RESPONSE TO REQUEST NOTICE TO APPLICATION/PETITION RECEIVED	ajhughs
06/08/2011 10:56:07	REQUEST FOR ADDITIONAL EVIDENCE SENT	jtanudja
06/08/2011 08:41:39	INITIAL AND ADDITIONAL EVIDENCE REQUESTED NOTICE ORDERED	jjfrleta
10/18/2010 09:00:00	RECEIVED - FEE COLLECTED ELSEWHERE	

Please Select an Action

Adjudicate

Cancel

Frleta, Joe J

From: Haskell, Alexandra P
Sent: Thursday, October 13, 2011 2:09 PM
To: Frleta, Joe J
Cc: Goto, Blake K
Subject: RE: AAA California Regional Center

Hi Joe,

This looks good to go.

Thanks,

Sasha

From: Frleta, Joe J
Sent: Tuesday, October 04, 2011 3:02 PM
To: Haskell, Alexandra P
Cc: Goto, Blake K
Subject: AAA California Regional Center

Hi Sasha,

Attached is an approval notice for the above regional center. Let us know if it's all right with you to send out. Thanks.

Joe

Frleta, Joe J

From: Frleta, Joe J
Sent: Tuesday, October 04, 2011 12:02 PM
To: Haskell, Alexandra P
Cc: Goto, Blake K
Subject: AAA California Regional Center
Attachments: AAA California Regional Center, LLC.doc

Hi Sasha,

Attached is an approval notice for the above regional center. Let us know if it's all right with you to send out. Thanks.

Joe

10/4/2011



**U.S. Citizenship
and Immigration
Services**

Date:

Keen Wei
AAA California Regional Center, LLC
20380 Town Center Lane # 170
Cupertino, CA 95014

Application: Request for Designation as a Regional Center
Applicant(s): Keen Wei

Re: AAA California Regional Center ~~HC~~
RCW1031910073/(Formerly W09002720)

Pursuant to Section 610 of the Appropriations Act of 1993, on October 18, 2010, Keen Wei submitted a proposal seeking approval and designation by U.S. Citizenship and Immigration Services (USCIS) of the AAA California Regional Center.

USCIS hereby designates Admiralty California Regional Center ~~HC~~ as a Regional Center within the Immigrant Investor Pilot Program and approves the request as described below:

GEOGRAPHIC AREA:

The AAA California Regional Center ~~HC~~ shall have a geographic scope to include the counties of San Francisco, San Mateo, Contra Costa, Alameda, Santa Clara, San Benito, Fresno and Kings in the State of California.

FOCUS OF INVESTMENT ACTIVITY:

As depicted in the economic model, the general proposal, business plan and associated economic analysis, the Regional Center will engage in the following economic activities: the development, operation and management of new commercial enterprises in the Regional Center area.

The Regional Center shall focus on offering EB-5 compliant capital investment opportunities into new commercial enterprises or a mix of commercial enterprises in the following target industry economic categories:

1. Retail:
 - a. Supermarkets and Other Grocery (except Convenience) Stores – NAICS 445110

- b. Pharmacies and Drug Stores – NAICS 446110
- c. Women's Clothing Stores – NAICS 448120
- d. Sporting Goods Stores – NAICS 451110
- e. All Other General Merchandise Stores – NAICA 452990
- 2. Hospitality:
 - a. Hotels (except Casino Hotels) and Motels – NAICA 721110
- 3. Food Services:
 - a. Limited-Service Restaurants – NAICS 722211
- 4. Professional Offices:
 - a. Offices of Lawyers – NAICS 541110
 - b. Offices of Certified Public Accountants – NAICS 541211
 - c. Engineering Services – NAICS 541330
 - d. Custom Computer Programming Services – NAICA 541511
 - e. Other Management Consulting Services – NAICA 541618
 - f. Advertising Agencies – NAICS 541810
- 5. Medical Offices:
 - a. Offices of Physicians (except Mental Health Specialists) – NAICS 621111
- 6. Entertainment:
 - a. Fitness and Recreational Sports Centers – NAICS 713940
- 7. Assisted Living Facility:
 - a. Nursing Care Facilities – NAICS 623110
- 8. Alternative Energy Structure Construction:
 - a. Power and Communication Line and Related Structures Construction – NAICS 237130

If any investment opportunities arise that are beyond the scope of the approved industry categories, then an I-924 amendment application would be required to add that category.

Aliens seeking immigrant visas through the Immigrant Investor Pilot Program may file individual petitions with USCIS for capital investments in new commercial enterprises located within and affiliated with the approved Regional Center area.

The geographic focus of this area may contain some High Unemployment Targeted Employment Areas (TEAs) as designated by the State of California and rural TEAs, as defined in 8 CFR 204.6(e). Therefore, the minimum capital investment threshold for any individual immigrant investment into an approved commercial enterprise throughout the Regional Center shall be not less than \$500,000, if the investment target is located within a TEA or \$1,000,000 if it is located outside of a TEA. No debt arrangement will be acceptable unless it is secured by assets owned by the alien entrepreneur. A full capital investment must be made and placed at risk.

For any alien requesting the reduced threshold of \$500,000 based upon an investment in a Targeted Employment Area, the alien must establish at the time of filing of the I-526 petition that either the investment will be made in a TEA designated area or was in a TEA designated area at the time of the alien's initial investment into the enterprise.

EMPLOYMENT CREATION

Immigrant investors who file petitions for capital investments in new commercial enterprises located within and affiliated with the Regional Center area must fulfill all of the requirements set forth in INA 203(b)(5), 8 CFR 204.6, and 8 CFR 216.6, except that the petition need not show that the new commercial enterprises created ten new jobs directly as a result of the immigrant investor's investment. The determination whether the

alien investor has met the job creation requirements will be established by a review of the required initial evidence at 8 CFR 204.6(j) and 8 CFR 216.6(a)(4) for the Form I-526 and Form I-829 petitions, respectively. The capital investment and job creation activities outlined in the individual petitions must fall within the bounds of the final economic analysis that is contained as part of the approved Regional Center proposal and its indirect job creation model and multipliers contained within the final approved Regional Center application package. The immigrant investor must show at the time of removal of conditions that they performed the activities described in Form I-526 petition, and the activities must be based on the approved regional center methodology for demonstrating job creation. The approved econometric model is RIMS II.

In addition, where job creation is claimed based on multipliers rooted in revenue generated by businesses occupying space and estimated project costs expenditures, the immigrant investor's individual I-526 petition affiliated with your Regional Center, should include as supporting evidence:

- A comprehensive detailed business plan with supporting financial, marketing and related data and analysis providing a reasonable basis for projecting creation of indirect and/or induced jobs to be achieved/realized within two years pursuant to 8 CFR 204.6(j)(4)(B) and reasonable methodologies pursuant to 8 CFR 204.6(m)(7)(ii).

An alien investor's I-829 petition to remove the conditions which was based on an I-526 petition approval that involved the creation of new indirect jobs based on multipliers tied to job creation inputs such as revenue generated by businesses occupying space and estimated project expenditures costs, needs to be supported by evidence showing the space is occupied by such businesses and that the funds were expended in the job-creating activity. Such evidence may include reasonable methodologies like multiplier tables, feasibility studies, and other economically or statistically valid forecasting devices which indicate the likelihood that the alien's investment has resulted in increased employment.

Additional Guidelines for individual Immigrant Investors Visa Petition (I-526)

Each individual petition, in order to demonstrate that it is associated with the Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain as supporting evidence relating to this Regional Center designation, the following:

1. A copy of this letter, the Regional Center approval and designation.
2. A copy of the USCIS approved Regional Center narrative proposal and business plan.
3. A copy of the job creation methodology required in 8 CFR 204.6(j)(4)(iii), as contained in the final Regional Center economic analysis which has been approved by USCIS, which reflects that investment by an individual immigrant investor will create not fewer than ten (10) full-time employment positions, either directly or indirectly, per immigrant investor.
4. A legally executed copy of the USCIS approved documents:

- | | |
|---------------------------|----------------------------------|
| a. Operating Agreement | Draft dated June 6, 2010 |
| b. Offering Memorandum | Draft dated October 1, 2010 |
| c. Subscription Agreement | Draft dated October 1, 2010 |
| d. Escrow Agreement | Submission date October 18, 2010 |

e. Limited Partnership Agreement

Draft dated October 1, 2010

Note: Each petition must also include any other evidence that is relevant to a proposed investment project, such as, licenses and permits, building contracts, construction costs, building projections and timelines, advisory opinions, feasibility studies, etc.

DESIGNEE'S RESPONSIBILITIES INHERENT IN CONDUCT OF THE REGIONAL CENTER:

The law, as reflected in the regulations at 8 CFR 204.6(m)(6), requires that an approved Regional Center in order to maintain the validity of its approval and designation must continue to meet the statutory requirements of the Immigrant Investor Pilot Program by serving the purpose of promoting economic growth, including increased export sales (where applicable), improved regional productivity, job creation, and increased domestic capital investment. Therefore, in order for USCIS to determine whether your Regional Center is in compliance with the above cited regulation, and in order to continue to operate as a USCIS approved and designated Regional Center, your administration, oversight, and management of your Regional Center shall be such as to monitor all investment activities under the sponsorship of your Regional Center and to maintain records, data and information in order to provide the information required on the Form I-924A supplement. Form I-924A, Supplement to Form I-924 is available in the "Forms" section on the USCIS website at www.uscis.gov.

Effective November 23, 2010, the failure to timely file a Form I-924A Supplement for each fiscal years in which the regional center has been designated for participation in the Immigrant Investor Pilot Program will result in the issuance of an intent to terminate the participation of the regional center in the Pilot Program, which may ultimately result in the termination of the approval and designation of the regional center.

Note: The requirement for the filing of Form I-924A Supplement commences in fiscal year 2011. Each regional center that remains designated for participation in the pilot program as of September 30, 2011 must submit the Form I-924A Supplement with the required supporting documentation on or before December 29, 2011.

If you have any questions concerning the Regional Center approval and designation under the Immigrant Investor Pilot Program, please contact the USCIS by Email at USCIS.ImmigrantInvestorProgram@dhs.gov.

Sincerely,

Rosemary Langley Melville
Director
California Service Center

cc: Linda Lau, Esq.

I-924 Regional Center Proposal

Receipt Number: RCW1031910078 Attorney: Linda Lau

Regional Center: AAA California Regional Center G-28

General Partner: Keen Wei Requester's Name: Keen Wei

- Economic Unit-Organizational Documents for Regional Center 05-24-2010 Articles of Organization
- Target Non-Target Both
- Geographic Area Delineated: San Francisco, San Mateo, Contra Costa, Alameda, Santa Clara, San Benito, Fresno and Kings Counties.
- Economic Growth Analysis
- Regional or National Impact- Economic Analysis
- Indirect Job Creation:
 Troubled Business Non-Troubled Business
- Econometric Model: RIMS II
- Economic Analysis of Job Creation: Final-demand multiplier
- Business Plan:
 Hypothetical Investment Plan Investment Plan
- Industries: Retail, Hospitality/Hotel, Food Services, Professional Offices,
- Activities: Medical offices, Entertainment, Assisted Living Facility, and manufacturing/assembly
- Operational Plan:
- Project Evaluation and assessment
- Amount and Source of Regional Center's Capital
- Recruitment and Due Diligence
- Promotional Efforts
- Administrative Oversight
- OPTIONAL- Enterprise organizational documents:
- Draft Operating Agreement 6-6-10
- Draft Partnership Agreement 10-1-10
- Draft Subscription Agreement 10-1-10
- Draft Escrow Agreement
- List of Escrow Agents
- Draft Offering Letter etc
- Articles of Incorporation etc for Enterprise
- Other relevant documents: Offering memorandum (10-1-10)



Home Buying Selling Knowledge Center Mortgage Center

Home > About Us

Company Profile:

Comforhome Realty was founded in 2006 by Keen Wei, a brilliant leader in every aspect. From a single small office headquarter in Palo Alto, Comforhome has rapidly grown into three major divisions: Comforhome Real Estate, Bayhome mortgage, and Comforhome real estate investment within 6 months period. It is such an amazing growth and success.

Comforhome is the one stop service center where you can not only listing or buying a home with us; but obtaining the best loan program is what we striving to do. We also utilize the most competitive marketing strategies and cutting edge technology to achieve the best possible results for you.

Comforhome Realty is continually dedicated to becoming and remaining the finest real estate and mortgage team in the area where you can fully utilize our one stop service. This is our promise to you!

One of the key fundamental reasons why we are so successful is we listen to your needs, we care for your needs, and we act to obtain the most benefits for your needs. You are the ONLY asset that brings to our success. Thank You!

We are satisfied to know that we have helped someone to sale the home at the highest price as possible, to find the right home at the best price, and to find the best loan program which benefits you the most.



Keen Wei Principal
as PC

Agent Login form with fields for Login ID, Password, Office (Palo Alto), and buttons for Log In, New Register, Remember Me, Guest Login.

Apply Online
Online Loan Application

Document Checklist
Loan Application

Title Company
Escrow Fee & County/City Tax
California Property Tax

Fidelity National Title
First American Title
Chicago Title
Financial Title
Old Republic Title
North American Title
Steward Title

Useful Info
School Info
Utilities Info

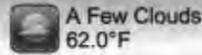
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Search!

California > Cupertino > Bayhome Financial Corporation

Bayhome Financial Corporation

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(408) 996-8828
20380 Town Center Ln
Ste 170
Cupertino, CA 95014

Category: Loans



Show larger map
Driving directions

same address as RC

Reviews

Is this your business?

Reviews and Ratings for Bayhome Financial Corporation

Be the First to Write a Review!

Your Name:

Review Title:

Your Comment:

Characters Remaining: 2000

Rating: ★★★★★

Security Code:

Retype Security Code:

[Submit Review](#)

Dining and Lodging

Hotels

Econo Lodge

(408) 984-3364
3477 El Camino Real, Santa Clara, CA

Comfort Inn

(408) 287-9380
875 N. 13th Street, San Jose, CA

Comfort Inn

(408) 749-8000
595 N. Mathilda Ave., Sunnyvale, CA

Comfort Inn

(408) 244-9000
1071 E. El Camino Real, Sunnyvale, CA

Quality Inn

(408) 744-1100
1280 Persian Dr., Sunnyvale, CA

Comfort Suites San Jose

(408) 392-9009
1510 N. First St., San Jose, CA

Quality Inn

(650) 493-2760
3901 El Camino Real, Palo Alto, CA

Comfort Inn

(650) 967-7888
1561 W. El Camino Real, Mountain View, CA

Food

Pizza My Heart

(408) 253-6000
20530 Stevens Creek Blvd, Cupertino, CA

Rio Adobe Southwest Cafe

(408) 873-1600
10525 S De Anza Blvd, Cupertino, CA

Curry House

(408) 517-1440
10350 S De Anza Blvd, Cupertino, CA

Marie Callenders Restaurant &

(408) 255-2317
20750 Stevens Creek Blvd, Cupertino, CA

Amicis East Coast Pizzeria

(408) 252-3333
10310 S De Anza Blvd, Cupertino, CA

Armadillo Willys BBQ

(408) 252-7427
10100 S De Anza Blvd, Cupertino, CA

Subway Restaurant

(408) 252-9007
10525 S De Anza Blvd, Cupertino, CA

Park Place Seafood Steaks &

(408) 873-1000
10050 S De Anza Blvd, Cupertino, CA

CALIFORNIA SERVICE CENTER ROUTING SLIP

Receipt # _____

A # _____

Rev.08/03/11

DIVISION IX	DIVISION I	DIVISION II	DIVISION III
<input type="checkbox"/> AST Incomng: XB800 <input type="checkbox"/> MR Returns: _____ <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> Incomng: AD477 <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> Incomng: XA925 <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> Incomng: XA930 <input type="checkbox"/> QA Corrections: ET116 <input checked="" type="checkbox"/> W/S: 22123 ATTN: _____
DIVISION IV	DIVISION VII	DIVISION VIII/COUNSEL	DIVISION X-Background Check Unit
<input type="checkbox"/> Incomng: XB641 <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> CPAU Incomng: RS601 <input type="checkbox"/> CFF Incomng: RS902 <input type="checkbox"/> RRU BIA Incomng: RS339 <input type="checkbox"/> RRU Incomng: RS554 <input type="checkbox"/> RRU Ponds : W/S 24201 <input type="checkbox"/> CIS Review Incomng: RC464 <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> Incomng: WR000 <input type="checkbox"/> CSC Counsel <input type="checkbox"/> ATTN: _____ <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> Rap Sheets/ EPS Incomng: SZ132 <input type="checkbox"/> Incomng: SZ131 <input type="checkbox"/> BCU/Top 4: SZ714 <input type="checkbox"/> WS: _____ ATTN: _____
DIVISION V	DIVISION XII	DIVISION XI/CFDO	SCOSS
<input type="checkbox"/> Incomng: XB641 <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> Incomng: XB919 <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> CFDO Incomng: DU000 <input type="checkbox"/> Religious Worker Incomng: DU700 <input type="checkbox"/> ASVVP H1B Incomng: DU701 <input type="checkbox"/> ASVVP DE Incomng: DU702 <input type="checkbox"/> Returns: _____ <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> NTA Shelf (TPS / I-751 / I-539 B1/B2 / I-360 / Misc.): RC445 <input type="checkbox"/> Non-EPS Incomng (I-485 / I-130 / Misc.): RC448 ATTN: _____
DIVISION VI	DIVISION XIII	DIVISION XIV	SCOSS
<input type="checkbox"/> Incomng: XO036 <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> Incomng: XB919 <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> CFDO Incomng: DU000 <input type="checkbox"/> Religious Worker Incomng: DU700 <input type="checkbox"/> ASVVP H1B Incomng: DU701 <input type="checkbox"/> ASVVP DE Incomng: DU702 <input type="checkbox"/> Returns: _____ <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> NTA Shelf (TPS / I-751 / I-539 B1/B2 / I-360 / Misc.): RC445 <input type="checkbox"/> Non-EPS Incomng (I-485 / I-130 / Misc.): RC448 ATTN: _____
ATTN: _____		W/S: _____	RPC: _____
<input type="checkbox"/> NRC Hold Approved: _____ <input type="checkbox"/> NRC Hold Denied: RC417 <input type="checkbox"/> HBG Hold Approved: _____ <input type="checkbox"/> HBG Hold Denied: RC418	<input type="checkbox"/> Return to JIT * RC419 * Specify application / petition type in Comments field below <input type="checkbox"/> SCAN CR I-89 / 698 / 829: RC318 <input type="checkbox"/> FR Backend Appeal Pod: RC410	<input type="checkbox"/> Routing Hub: RC422 <input type="checkbox"/> CIS FTR Review Complete * RC442 * Attach sheet and / or file	<input type="checkbox"/> EDMS PRINTS: RC321 <input type="checkbox"/> I-612 DOS COPY: RC472
<input type="checkbox"/> Interfiling: WS23222 <input type="checkbox"/> I-485 EB: RC474 Approved RDF <input type="checkbox"/> I-485EB: RC475 Denied RDF	<input type="checkbox"/> Backend Scan: RC307 <input type="checkbox"/> SNAP Incomng: RC302 <input type="checkbox"/> 103 Hold (RFE / ITD): RC420 <input type="checkbox"/> I-512 Incomng: RC313	<input type="checkbox"/> Transfer to FCO: RC421 <input type="checkbox"/> TPS Haitian: RC465 (RDF) <input type="checkbox"/> Transfer to NVC: RC438 <input type="checkbox"/> FTC Incomng: RC437 <input type="checkbox"/> I-130 Upgrades: RC055	<input type="checkbox"/> F/R A-File Create: RC413 <input type="checkbox"/> File Consolidate: RC423 <input type="checkbox"/> I-485 File Consolidate: RC439 <input type="checkbox"/> Approved Awaiting I-89: RC428

R F E RESPONSE

Comments Below: _____

REV.08/03/11

Note: The current printable format can be found @ O:Common/Forms/CSC Routing Slip. Incomplete or outdated routing slip

From: SCOSS	Date: 08-25-11	Ext: 3040	RPC: RC 430	DIV: C30033
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Decision Processing Worksheet

Officer Name: <u>FRLETA</u>	Receipt #: <u>KCW1031910073</u>
Officer Stamp #: <u>1248</u>	
Form Type: <u>I-924</u>	Classification:
Division: <u>III</u>	Team: <u>I</u>
WSZ2123	

Action:

Approval <input type="checkbox"/> No Record <input type="checkbox"/> Pending Name Check <input type="checkbox"/> Abandonment <input type="checkbox"/> Withdrawal	<input type="checkbox"/> MTR <input type="checkbox"/> Appeal <input type="checkbox"/> Certified Decision	<input type="checkbox"/> RFE Initial <input type="checkbox"/> RFE Additional <input checked="" type="checkbox"/> RFE Initial & Additional <input type="checkbox"/> 30 <input type="checkbox"/> 42 <input checked="" type="checkbox"/> 84	<input type="checkbox"/> Revocation <input type="checkbox"/> Auto-terminate <input type="checkbox"/> Auto-revocation <input type="checkbox"/> Relocate	<input type="checkbox"/> Denial <input type="checkbox"/> ITD <input type="checkbox"/> ITR <input checked="" type="checkbox"/> CFDO Shelf <input type="checkbox"/> Pre <input type="checkbox"/> Post <small>(e.g. A B E F T)</small>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Initials/Date: <u>JCF</u>	2 nd Review Initials/Date:	3 rd Review Initials/Date:
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I-129 H2A Expedite Processing:

Date Received: <u>03-15-11</u>	# of Un-Named Beneficiaries:	# of Named Beneficiaries:
Officer Received Date:	AST Action Completed:	

I-129 PP Processing H-1B CAP Master CAP

Officer Prepares or Completes (Notice Ordered) RFE/30/42/84 ITD/30 ITR/30	Clerical/Officer Completes RFE/ITD/ITR (Notice Sent)	RFE/ITD/ITR Response Received	Officer Completes Final Decision (Notice Ordered - Approval/Denial)	Clerical/Officer Completes Final Action (Notice Sent)
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> (1 st Initial & Last Name) (Date & Time)	 (1 st Initial & Last Name) (Date & Time)	 (1 st Initial & Last Name) (Date & Time)	 (1 st Initial & Last Name) (Date & Time)	 (1 st Initial & Last Name) (Date & Time)
Mailer Enclosed? Y N SCAO Review:		Final Decision:		

Officer's Comment:

SKELETAL DENIAL: Petition filed after 6/17/07 and C3 verified (no other petition filed on the same day with evidence) ACD Concur _____

DUPLICATE PETITION INCLUDED: YES NO

Supervisor Review and Comments: *USE REVISED TEMPLATE*

Initials/Date: <u>GSE/06-07-11</u>	2 nd Review Initials/Date:	3 rd Review Initials/Date:
------------------------------------	---------------------------------------	---------------------------------------

Clerical Processing Completed: Initials: ST Date: 6/9/11

DUP PETITION PULLED by ISO: YES NO Duplicate sent to KCC: YES Date duplicate sent: _____ Initials: _____

File Room Processing

To: 103 Hold Shelf 8/31/11

Call-Up Date: _____

Rev 03/05/2010

A #	Application/Petition I924, Application for Regional Center under Immigrant Investor Pilot Program	
Receipt # RCW1031910073	Application/Petitioner Aaa California Regional Center	
Notice Date June 8, 2011	Page 1 of 11	Beneficiary

GLOBAL LAW GROUP
C/O LINDA LAU, ESQ.
350 SOUTH FIGUEROA ST, SUITE 760
LOS ANGELES, CA 90071

Request for Evidence

Notice also sent to:

RETURN THIS NOTICE ON TOP OF THE REQUESTED INFORMATION LISTED ON THE ATTACHED SHEET.

Note: You are given until **August 31, 2011** in which to submit the requested information to the address at the bottom of this notice.

Pursuant to 8 C.F.R. 103.2(b)(11) failure to submit ALL evidence requested at one time may result in the denial of your application.

For more information, visit our website at **www.uscis.gov**

Or call us at **1-800-375-5283**

Telephone service for the hearing impaired: 1-800-767-1833

COPY

CSC1298 WS22123 DIV III JT

You will be notified separately about any other applications or petitions you filed. Save this notice. Please enclose a copy of it if you write to us about this case, or if you file another application based on this decision. Our address is:

USCIS - CALIFORNIA SERVICE CENTER
P.O. BOX 10590
LAGUNA NIGUEL, CA 92607-0590
800-375-5283



RCW1031910073

Additional Information for Applicants and Petitioners.

General.

The filing of an application or petition does not in itself allow a person to enter or remain in the United States and does not confer any other right or benefit.

Inquiries.

If you do not hear from us within the processing time given on this notice and you want to know the status of this case, use InfoPass at www.uscis.gov to contact your local USCIS office or call our National Customer Service Center at 1-800-375-5283.

You should follow the same procedures before contacting your local USCIS office if you have questions about this notice.

Please have this form with you whenever you contact a local office about this case.

Requests for Evidence.

If this notice asks for more evidence, you can submit it or you can ask for a decision based on what you have already filed. When you reply, please include a copy of the other side of this notice and also include any papers attached to this notice.

Reply Period.

If this notice indicates that you must reply by a certain date and you do not reply by that date, we will issue a decision based on the evidence on file. No extension of time will be granted. After we issue a decision, any new evidence must be submitted with a new application or petition, motion or appeal, as discussed under "Denials".

Approval for a Petition.

Approval of an immigrant or nonimmigrant petition means that the beneficiary, the person for whom it was filed, has been found eligible for the requested classification. However, approval of a petition does not give any status or right. Actual status is given when the beneficiary is given the proper visa and uses it to enter the United States. Please contact the appropriate U.S. consulate directly if you have any questions about visa issuance.

For nonimmigrant petitions, the beneficiary should contact the consulate after receiving our approval notice. For approved immigrant petitions, the beneficiary should wait to be contacted by consulate.

If the beneficiary is now in the United States and believes he or she may be eligible for the new status without going abroad for a visa, he or she should use InfoPass to contact a local USCIS office about applying here.

Denials.

A denial means that after every consideration, USCIS concluded that the evidence submitted did not establish eligibility for the requested benefit.

If you believe there is more evidence that will establish eligibility, you can file a new application or petition, or you can file a motion to reopen this case. If you believe the denial is inconsistent with precedent decisions or regulations, you can file a motion for reconsideration.

If the front of this notice states that this denial can be appealed and you believe the decision is in error, you can file an appeal.

You can obtain more information about these processes by either using InfoPass to contact your local USCIS office, or by calling the National Customer Service Center.

A request for initial designation as a Regional Center under the Immigrant Investor Pilot Program (“Pilot Program”) or an amendment to an existing Regional Center designation, may also involve:

1. A request for review of an exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, prior to the filing of Form I-526 petitions by individual alien entrepreneurs with USCIS and/or;
2. In the case of a Regional Center amendment request, a review of a specific capital investment project where the regional center designation involved a review of an exemplar capital investment project.

The petitioner is requesting initial designation as a Regional Center under the Pilot Program. The petitioner is requested to provide the following information to include in the review of the RC proposal and the specific investment projects outlined within the RC proposal.

Background:

The proposed Regional Center entity, AAA California Regional Center LLC dba AAA California Regional Center [AAACARC], was established on May 24, 2010 in California, and is structured as a LLC. AAACARC is requesting jurisdiction over a geographic area within the State of California, including San Francisco, San Mateo, Contra Costa, Alameda, Santa Clara, San Benito, Fresno and Kings counties. AAARC plans to offer EB-5 capital investment opportunities in affiliated new commercial enterprises, organized as corporations, focusing on projects in the following industry categories:

1. Retail (NAICS Code: 44 & 45)
2. Hospitality/Hotel (NAICS Code: 721)
3. Food Services (NAICS Code: 722)
4. Professional Office (NAICS Code: 541)
5. Medical Office (NAICS Code: 621)
6. Entertainment (NAICS Code: 7139)
7. Assisted Living Facility (NAICS Code: 623); and
8. Manufacturing/Assembly (NAICS Code: 3344)

The capital investment projects will involve equity investments to job creating enterprises located within the proposed bounds of the Regional Center.

8 CFR 204.6 (m)(3), which is appended to this notice, describes the evidence that must be submitted in support of a Regional Center proposal. After review of your proposal, the following information, evidence and/or clarification is required. Note that in response to this notice, that it is helpful to provide a cover letter that acts as an executive summary, followed by a table of contents with sections that are tabbed at the bottom of the page .

NAICS Codes:

Provide the NAICS codes used by the North American Industry Classification System (NAICS) for each of the 8 target industry economic categories.

(b) (4)



Promotion of Economic Growth within the selected Geographic Area (8 CFR 204.6(m)(3)(i)):

A Regional Center's geographic area must be contiguous and clearly delineated. Please do not confuse the Regional Center's jurisdiction over a geographic area, with the geographic area that is a Targeted Employment Area ("TEA") which may be located within the bounds of your Regional Center's jurisdiction. These are two different and distinct geographic areas and concepts.

Note: For immigrant investors requesting the reduced threshold of \$500,000 based upon an investment in a TEA, the immigrant investor must when filing a Form I-526, establish at the time of filing that the investment will be made either in a TEA designated area or was in a TEA designated area at the time of the alien's initial investment into the enterprise. TEA determinations are not made within the context of the adjudication of Regional Center Proposals and thus cannot be relied on to establish TEA eligibility in prospective Form I-526 petitions.

Regional Center's Operational Plan (8 CFR 204.6(m)(3)(iii) and 8 CFR 204.6(m)(6)):

A proposal must include a detailed statement regarding the amount and source of the capital that has been committed to the Regional Center. USCIS has interpreted the words, "amount and source of capital that has been committed to the Regional Center" to mean the capital sufficient to sustain the Regional Center distinct from immigrant investors' required capital investment in a new commercial enterprise within the Regional Center.

- **Amount and Source of the Regional Center's Operating Capital (8 CFR 204.6(m)(3)(iii)):**

(b) (4)



The detailed statement that is required to meet the regulatory requirement relating to the amount and source of capital committed to the Regional Center should include:

- The exact amount of funds that have been dedicated to the Regional Center to accomplish the goals of the Immigrant Investor Pilot Program;
- The source of such funds;
- Whether the amount is sufficient to sustain the Regional Center.

(b) (4)



(b) (4)



- **Regional Center's Operational Plan-Promotional Efforts (8 CFR 204.6(m)(3)(iii):**

(b) (4)



Review of the commercial enterprise's organizational documents

A Regional Center may provide documentation for USCIS to review for EB-5 compliance within a Regional Center proposal, to include:

- Operating Agreements
- Partnership Agreements
- Subscription Agreements
- Escrow Agreements and Instructions (one for capital and one for any service fees).
- An Offering Memorandum, Private Placement Memorandum, or similar investment offering
- Memorandum of Understanding, Interagency Agreement, Contract, Letter of Intent, Advisory Agreement, or similar agreement to be entered into with any other party, agency or organization to engage in activities on behalf of or in the name of the Regional Center.
- Organizational Documents, such as articles of Incorporation, state registration documents, etc.

(b) (4)

Also, each

document submitted should have a version date so the specific version reviewed can be referenced in the Regional Center designation approval notice. Having this date memorialized in the approval notice will allow all parties to be aware of the specific version of the documents that USCIS reviewed.

General issues

Posting of Regional Center information on the USCIS Web site:

If the Regional Center Proposal is approved, then public contact information relating to the Regional Center will be posted on the USCIS web site. In order to provide accurate and updated information provide the following, as it relates to the Regional Center:

- Name of the Regional Center
- Public address
- Public Point of Contact
- Phone/Fax
- E-mail/Web Page

Any document containing a foreign language submitted to USCIS shall be accompanied by a full English translation that the translator has certified as complete and accurate, and by the translator's certification that he or she is competent to translate from the foreign language into English.

Copies:

RCW 10 319 10073

Page 7

Unless specifically required that an original document be filed with an application or petition, an ordinary legible photocopy may be submitted. Original documents submitted when not required will remain part of the record, even if the submission was not required.

Regulatory References

As reference, this regulatory reference page contains all of the regulations noted in this Request for Evidence.

The regulation at 8 CFR 103.2(a)(3) provides the following definitions:

(3) Representation. An applicant or petitioner may be represented by an attorney in the United States, as defined in 1.1(f) of this chapter, by an attorney outside the United States as defined in 292.1(a)(6) of this chapter, or by an accredited representative as defined in 292.1(a)(4) of this chapter. A beneficiary of a petition is not a recognized party in such a proceeding. An application or petition presented in person by someone who is not the applicant or petitioner, or his or her representative as defined in this paragraph, shall be treated as if received through the mail, and the person advised that the applicant or petitioner, and his or her representative, will be notified of the decision. Where a notice of representation is submitted that is not properly signed, the application or petition will be processed as if the notice had not been submitted.

The regulation at 8 CFR 204.6(e) provides the following definitions:

Qualifying employee

means a United States citizen, a lawfully admitted permanent resident, or other immigrant lawfully authorized to be employed in the United States including, but not limited to, a conditional resident, a temporary resident, an asylee, a refugee, or an alien remaining in the United States under suspension of deportation. This definition does not include the alien entrepreneur, the alien entrepreneur's spouse, sons, or daughters, or any nonimmigrant alien.

Regional center

means any economic unit, public or private, which is involved with the promotion of economic growth, including increased export sales, improved regional productivity, job creation, and increased domestic capital investment.

The regulation at 8 CFR 204.6(j)(4) provides:

Job creation --

(i) General. To show that a new commercial enterprise will create not fewer than ten (10) full-time positions for qualifying employees, the petition must be accompanied by:

(A) Documentation consisting of photocopies of relevant tax records, Forms I-9, or other similar documents for ten (10) qualifying employees, if such employees have already been hired following the establishment of the new commercial enterprise; or

(B) A copy of a comprehensive business plan showing that, due to the nature and projected size of the new commercial enterprise, the need for not fewer than ten (10) qualifying employees will result, including approximate dates, within the next two years, and when such employees will be hired.

(ii) Troubled business. To show that a new commercial enterprise which has been established through a capital investment in a troubled business meets the statutory employment creation requirement, the petition must be accompanied by evidence that the number of existing employees is being or will be maintained at no less than the pre-investment level for a period of at least two years. Photocopies of tax records, Forms I-9, or other relevant documents for the qualifying employees and a comprehensive business plan shall be submitted in support of the petition.

(iii) Immigrant Investor Pilot Program. To show that the new commercial enterprise located within a regional center approved for participation in the Immigrant Investor Pilot Program meets the statutory employment creation requirement, the petition must be accompanied by evidence that the investment will create full-time positions for not fewer than 10 persons either directly or indirectly through revenues generated from increased exports resulting from the Pilot Program. Such evidence may be demonstrated by reasonable methodologies including those set forth in paragraph (m)(3) of this section.

The regulation at 8 CFR 204.6(m)(1) provides:

(1) Scope. The Immigrant Investor Pilot Program is established solely pursuant to the provisions of section 610 of the Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriation Act, and subject to all conditions and restrictions stipulated in that section. Except as provided herein, aliens seeking to obtain immigration benefits under this paragraph continue to be subject to all conditions and restrictions set forth in section 203(b)(5) of the Act and this section.

The regulation at 8 CFR 204.6(m) provides, in pertinent part:

(3) Requirements for regional centers. Each regional center wishing to participate in the Immigrant Investor Pilot Program shall submit a proposal to the Assistant Commissioner for Adjudications, which:

(i) Clearly describes how the regional center focuses on a geographical region of the United States, and how it will promote economic growth through increased export sales, improved regional productivity, job creation, and increased domestic capital investment;

(ii) Provides in verifiable detail how jobs will be created indirectly through increased exports;

(iii) Provides a detailed statement regarding the amount and source of capital which has been committed to the regional center, as well as a description of the promotional efforts taken and planned by the sponsors of the regional center;

(iv) Contains a detailed prediction regarding the manner in which the regional center will have a positive impact on the regional or national economy in general as reflected by such factors as increased household earnings, greater demand for business services, utilities, maintenance and repair, and construction both within and without the regional center; and

(v) Is supported by economically or statistically valid forecasting tools, including, but not limited to, feasibility studies, analyses of foreign and domestic markets for the goods or services to be exported, and/or multiplier tables.

Note that promoting economic growth through increased export sales is no longer a requirement.

The regulation at 8 CFR 204.6(m)(6) provides:

(6) Termination of participation of regional centers. To ensure that regional centers continue to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, or increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis, on a cumulative basis, and/or as otherwise requested by USCIS, using a form designated for this purpose. USCIS will issue a notice of intent to terminate the participation of a regional center in the pilot program if a regional center fails to submit the required information or upon a determination that the regional center no longer serves the purpose of promoting economic growth, including increased export sales, improved regional productivity, job creation, and increased domestic capital investment. The notice of intent to terminate shall be made upon notice to the regional center and shall set forth the reasons for termination. The regional center must be provided 30 days from receipt of the notice of intent to terminate to offer evidence in opposition to the ground or grounds alleged in the notice of intent to terminate. If USCIS determines that the regional center's participation in the Pilot Program should be terminated, USCIS shall notify the regional center of the decision and of the reasons for termination. As provided in 8 CFR 103.3, the regional center may appeal the decision to USCIS within 30 days after the service of notice.

The regulation at 8 CFR 216.6(a)(4) provides:

(4) Documentation. The petition for removal of conditions must be accompanied by the following evidence:

(i) Evidence that a commercial enterprise was established by the alien. Such evidence may include, but is not limited to, Federal income tax returns;

(ii) Evidence that the alien invested or was actively in the process of investing the requisite capital. Such evidence may include, but is not limited to, an audited financial statement or other probative evidence; and

(iii) Evidence that the alien sustained the actions described in paragraph (a)(4)(i) and (a)(4)(ii) of this section throughout the period of the alien's residence in the United States. The alien will be considered to have sustained the actions required for removal of conditions if he or she has, in good faith, substantially met the capital investment requirement of the statute and continuously maintained his or her capital investment over the two years of conditional residence. Such evidence may include, but is not limited to, bank statements, invoices, receipts, contracts, business licenses, Federal or State income tax returns, and Federal or State quarterly tax statements.

(iv) Evidence that the alien created or can be expected to create within a reasonable time ten full-time jobs for qualifying employees. In the case of a "troubled business" as defined in 8 CFR 204.6(j)(4)(ii), the alien entrepreneur must submit evidence that the commercial enterprise maintained the number of existing

employees at no less than the pre-investment level for the period following his or her admission as a conditional permanent resident. Such evidence may include payroll records, relevant tax documents, and Forms I-9.

Eberling, George

From: Eberling, George
Sent: Tuesday, June 07, 2011 10:59 AM
To: Frleta, Joe J
Subject: RE: RCW1031910073
Attachments: AAACaliforniaRegionalCenter-RFE_GGE_06072011.doc

Joe,

I made some changes. Use the attachment.

George

From: Frleta, Joe J
Sent: Tuesday, June 07, 2011 9:36 AM
To: Eberling, George
Subject: RE: RCW1031910073

George,

Here you go. I thought I put one in there, though? I guess not, hey? Sorry about that.

Joe

From: Eberling, George
Sent: Tuesday, June 07, 2011 9:29 AM
To: Frleta, Joe J
Subject: RCW1031910073

Joe,

Can you send me this RFE? I'm reviewing it for Blake.

Thanks,

George

A request for initial designation as a Regional Center under the Immigrant Investor Pilot Program ("Pilot Program") or an amendment to an existing Regional Center designation, may also involve:

1. A request for review of an exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, prior to the filing of Form I-526 petitions by individual alien entrepreneurs with USCIS and/or;
2. In the case of a Regional Center amendment request, a review of a specific capital investment project where the regional center designation involved a review of an exemplar capital investment project.

The petitioner is requesting initial designation as a Regional Center under the Pilot Program. The petitioner is requested to provide the following information to include in the review of the RC proposal and the specific investment projects outlined within the RC proposal.

Background:

The proposed Regional Center entity, AAA California Regional Center LLC dba AAA California Regional Center [AAACARC], was established on May 24, 2010 in California, and is structured as a LLC. AAACARC is requesting jurisdiction over a geographic area within the State of California, including San Francisco, San Mateo, Contra Costa, Alameda, Santa Clara, San Benito, Fresno and Kings counties. AAARC plans to offer EB-5 capital investment opportunities in affiliated new commercial enterprises, organized as corporations, focusing on projects in the following industry categories:

1. Retail (NAICS Code: 44 & 45)
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3. Food Services (NAICS Code: 722)
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5. Medical Office (NAICS Code: 621)
6. Entertainment (NAICS Code: 7139)
7. Assisted Living Facility (NAICS Code: 623); and
8. Manufacturing/Assembly (NAICS Code: 3344)

The capital investment projects will involve equity investments to job creating enterprises located within the proposed bounds of the Regional Center.

8 CFR 204.6 (m)(3), which is appended to this notice, describes the evidence that must be submitted in support of a Regional Center proposal. After review of your proposal, the following information, evidence and/or clarification is required. Note that in response to this notice, that it is helpful to provide a cover letter that acts as an executive summary, followed by a table of contents with sections that are tabbed at the bottom of the page .

Promotion of Economic Growth within the selected Geographic Area (8 CFR 204.6(m)(3)(i)):

A Regional Center's geographic area must be contiguous and clearly delineated. Please do not confuse the Regional Center's jurisdiction over a geographic area, with the geographic area that is a Targeted Employment Area ("TEA") which may be located within the bounds of your Regional Center's jurisdiction. These are two different and distinct geographic areas and concepts.

Note: For immigrant investors requesting the reduced threshold of \$500,000 based upon an investment in a TEA, the immigrant investor must when filing a Form I-526, establish at the time of filing that the investment will be made either in a TEA designated area or was in a TEA designated area at the time of the alien's initial investment into the enterprise. TEA determinations are not made within the context of the adjudication of Regional Center Proposals and thus cannot be relied on to establish TEA eligibility in prospective Form I-526 petitions.

Regional Center's Operational Plan (8 CFR 204.6(m)(3)(iii) and 8 CFR 204.6(m)(6)):

A proposal must include a detailed statement regarding the amount and source of the capital that has been committed to the Regional Center. USCIS has interpreted the words, "amount and source of capital that has been committed to the Regional Center" to mean the capital sufficient to sustain the Regional Center distinct from immigrant investors' required capital investment in a new commercial enterprise within the Regional Center.

- **Amount and Source of the Regional Center's Operating Capital (8 CFR 204.6(m)(3)(iii)):**

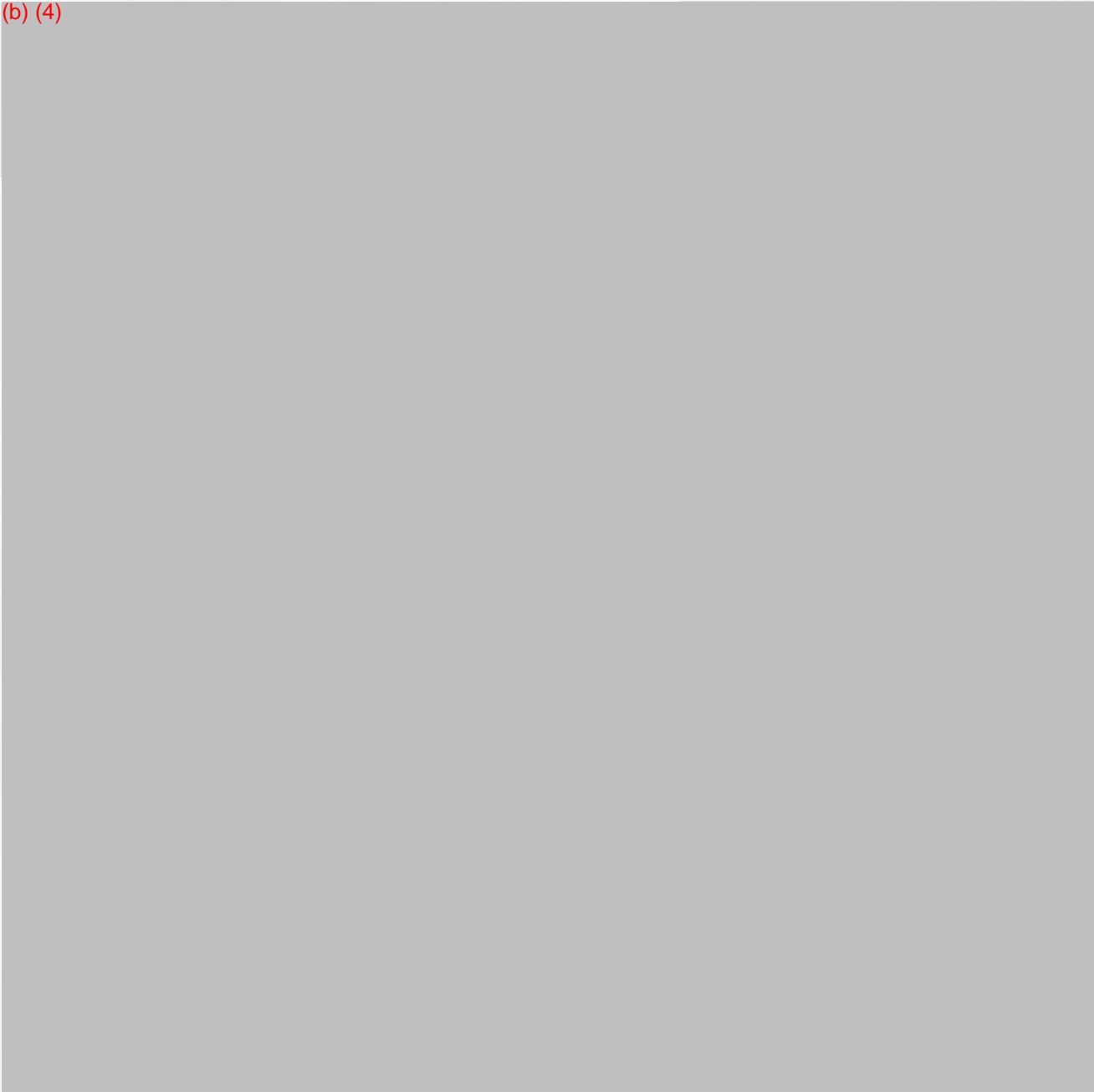
(b) (4)

The detailed statement that is required to meet the regulatory requirement relating to the amount and source of capital committed to the Regional Center should include:

- The exact amount of funds that have been dedicated to the Regional Center to accomplish the goals of the Immigrant Investor Pilot Program;
- The source of such funds;
- Whether the amount is sufficient to sustain the Regional Center.

(b) (4)

(b) (4)



- **Regional Center's Operational Plan-Promotional Efforts (8 CFR 204.6(m)(3)(iii):**

(b) (4)



Review of the commercial enterprise's organizational documents

A Regional Center may provide documentation for USCIS to review for EB-5 compliance within a Regional Center proposal, to include:

- Operating Agreements
- Partnership Agreements
- Subscription Agreements
- Escrow Agreements and Instructions (one for capital and one for any service fees).
- An Offering Memorandum, Private Placement Memorandum, or similar investment offering
- Memorandum of Understanding, Interagency Agreement, Contract, Letter of Intent, Advisory Agreement, or similar agreement to be entered into with any other party, agency or organization to engage in activities on behalf of or in the name of the Regional Center.
- Organizational Documents, such as articles of Incorporation, state registration documents, etc.

(b) (4)



General issues

Posting of Regional Center information on the USCIS Web site:

If the Regional Center Proposal is approved, then public contact information relating to the Regional Center will be posted on the USCIS web site. In order to provide accurate and updated information provide the following, as it relates to the Regional Center:

- Name of the Regional Center
- Public address
- Public Point of Contact
- Phone/Fax
- E-mail/Web Page

NAICS Codes:

move to page 1

Provide the NAICS codes used by the North American Industry Classification System (NAICS) for each of the 8 target industry economic sectors.

(b) (4)



(b) (4)



Translations:

Any document containing a foreign language submitted to USCIS shall be accompanied by a full English translation that the translator has certified as complete and accurate, and by the translator's certification that he or she is competent to translate from the foreign language into English.

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The regulation at 8 CFR 204.6(e) provides the following definitions:

Qualifying employee

means a United States citizen, a lawfully admitted permanent resident, or other immigrant lawfully authorized to be employed in the United States including, but not limited to, a conditional resident, a temporary resident, an asylee, a refugee, or an alien remaining in the United States under suspension of deportation. This definition does not include the alien entrepreneur, the alien entrepreneur's spouse, sons, or daughters, or any nonimmigrant alien.

Regional center

means any economic unit, public or private, which is involved with the promotion of economic growth, including increased export sales, improved regional productivity, job creation, and increased domestic capital investment.

The regulation at 8 CFR 204.6(j)(4) provides:

Job creation --

(i) General. To show that a new commercial enterprise will create not fewer than ten (10) full-time positions for qualifying employees, the petition must be accompanied by:

(A) Documentation consisting of photocopies of relevant tax records, Forms I-9, or other similar documents for ten (10) qualifying employees, if such employees have already been hired following the establishment of the new commercial enterprise; or

(B) A copy of a comprehensive business plan showing that, due to the nature and projected size of the new commercial enterprise, the need for not fewer than ten (10) qualifying employees will result, including approximate dates, within the next two years, and when such employees will be hired.

(ii) Troubled business. To show that a new commercial enterprise which has been established through a capital investment in a troubled business meets the statutory employment creation requirement, the petition must be accompanied by evidence that the number of existing employees is being or will be maintained at no less than the pre-investment level for a period of at least two years. Photocopies of tax records, Forms I-9, or other relevant documents for the qualifying employees and a comprehensive business plan shall be submitted in support of the petition.

(iii) Immigrant Investor Pilot Program. To show that the new commercial enterprise located within a regional center approved for participation in the Immigrant Investor Pilot Program meets the statutory employment creation requirement, the petition must be accompanied by evidence that the investment will create full-time positions for not fewer than 10 persons either directly or indirectly through revenues generated from increased exports resulting from the Pilot Program. Such evidence may be demonstrated by reasonable methodologies including those set forth in paragraph (m)(3) of this section.

The regulation at 8 CFR 204.6(m)(1) provides:

(1) Scope. The Immigrant Investor Pilot Program is established solely pursuant to the provisions of section 610 of the Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriation Act, and subject to all conditions and restrictions stipulated in that section. Except as provided herein, aliens seeking to obtain immigration benefits under this paragraph continue to be subject to all conditions and restrictions set forth in section 203(b)(5) of the Act and this section.

The regulation at 8 CFR 204.6(m) provides, in pertinent part:

(3) Requirements for regional centers. Each regional center wishing to participate in the Immigrant Investor Pilot Program shall submit a proposal to the Assistant Commissioner for Adjudications, which:

(i) Clearly describes how the regional center focuses on a geographical region of the United States, and how it will promote economic growth through increased export sales, improved regional productivity, job creation, and increased domestic capital investment;

(ii) Provides in verifiable detail how jobs will be created indirectly through increased exports;

(iii) Provides a detailed statement regarding the amount and source of capital which has been committed to the regional center, as well as a description of the promotional efforts taken and planned by the sponsors of the regional center;

(iv) Contains a detailed prediction regarding the manner in which the regional center will have a positive impact on the regional or national economy in general as reflected by such factors as increased household earnings, greater demand for business services, utilities, maintenance and repair, and construction both within and without the regional center; and

(v) Is supported by economically or statistically valid forecasting tools, including, but not limited to, feasibility studies, analyses of foreign and domestic markets for the goods or services to be exported, and/or multiplier tables.

Note that promoting economic growth through increased export sales is no longer a requirement.

The regulation at 8 CFR 204.6(m)(6) provides:

(6) Termination of participation of regional centers. To ensure that regional centers continue to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, or increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis, on a cumulative basis, and/or as otherwise requested by USCIS, using a form designated for this purpose. USCIS will issue a notice of intent to terminate the participation of a regional center in the pilot program if a regional center fails to submit the required information or upon a determination that the regional center no longer serves the purpose of promoting economic growth, including increased export sales, improved regional productivity, job creation, and increased domestic capital investment. The notice of intent to terminate shall be made upon notice to the regional center and shall set forth the reasons for termination. The regional center must be provided 30 days from receipt of the notice of intent to terminate to offer evidence in opposition to the ground or grounds alleged in the notice of intent to terminate. If USCIS determines that the regional center's participation in the Pilot Program should be terminated, USCIS shall notify the regional center of the decision and of the reasons for termination. As provided in 8 CFR 103.3, the regional center may appeal the decision to USCIS within 30 days after the service of notice.

The regulation at 8 CFR 216.6(a)(4) provides:

(4) Documentation. The petition for removal of conditions must be accompanied by the following evidence:

(i) Evidence that a commercial enterprise was established by the alien. Such evidence may include, but is not limited to, Federal income tax returns;

(ii) Evidence that the alien invested or was actively in the process of investing the requisite capital. Such evidence may include, but is not limited to, an audited financial statement or other probative evidence; and

(iii) Evidence that the alien sustained the actions described in paragraph (a)(4)(i) and (a)(4)(ii) of this section throughout the period of the alien's residence in the United States. The alien will be considered to have sustained the actions required for removal of conditions if he or she has, in good faith, substantially met the capital investment requirement of the statute and continuously maintained his or her capital investment over the two years of conditional residence. Such evidence may include, but is not limited to, bank statements, invoices, receipts, contracts, business licenses, Federal or State income tax returns, and Federal or State quarterly tax statements.

(iv) Evidence that the alien created or can be expected to create within a reasonable time ten full-time jobs for qualifying employees. In the case of a "troubled business" as defined in 8 CFR 204.6(j)(4)(ii), the alien entrepreneur must submit evidence that the commercial enterprise maintained the number of existing

employees at no less than the pre-investment level for the period following his or her admission as a conditional permanent resident. Such evidence may include payroll records, relevant tax documents, and Forms I-9.

Form: I924
Receipt: RCW1031910073
Status: RECEIVED - FEE COLLECTED ELSEWHERE

Received Date: 10/18/2010

Information About Principal of the Regional Center

Last Name: Middle Name: First Name:

C/O:

Street Address/P.O. Box:

City: State: Zip Code:

Date of Birth:

Application Type: A Regional Number:

Signed: N

Name of Regional Center: AAA California Regional Center

Street Address/P.O. Box: 20380 Town Center Lane #170

City: Cupertino State: CA Zip Code: 95014

Web Site: E-Mail: info@aaacarc.com Fax: Telephone Number: (408) 832-8938

Name of Managing Company:

Street Address/P.O. Box:

Street Address 2:

City: State: Zip Code:

Web Site: E-Mail: Fax: Telephone Number:

Name of Other Agent:

Street Address/P.O. Box:

Street Address 2:

City: State: Zip Code:

Web Site: E-Mail: Fax: Telephone Number:

Contact Information

Last Name: Wei Middle Name: First Name: Keen

Street Address/P.O. Box: 20380 Town Center Lane #170

Address 2:

City: Cupertino State: CA Zip Code: 95014

G28 Information

Last Name: Lau Middle Name: First Name: Linda

Firm Name: Global Law Group

Street Address/P.O. Box: 350 South Figueroa St., Suite 760

City: Los Angeles State: CA Zip Code: 90071

Action Date	Action	User ID
10/18/2010 09:00:00	RECEIVED - FEE COLLECTED ELSEWHERE	

Geographic State/Territory
California

Industry Category Title	NAICS Code
Retail	000000
Hospitality/Hotel	000000
Food Service	000000
Professional Office	000000
Medical Office	000000
Entertainment	000000
Assisted Living Facility	000000
Manufacturing/Assembly	000000

CALIFORNIA SERVICE CENTER ROUTING SLIP

Receipt # _____

A # _____

Rev. 10/14/10

USCIS Director (AA003) Deputy Director (AA002) Special Assistant (AA007) Duty Officer

DIVISION IX	DIVISION I	DIVISION II	DIVISION III
<input type="checkbox"/> AST Incoming: <u>XB800</u>	<input type="checkbox"/> Incoming: <u>AD477</u>	<input type="checkbox"/> Incoming: <u>XA925</u>	<input type="checkbox"/> Incoming: <u>AD477</u>
<input type="checkbox"/> MR Returns: _____	<input type="checkbox"/> W/S: _____	<input type="checkbox"/> W/S: _____	<input type="checkbox"/> QA Corrections: <u>ET116</u>
<input type="checkbox"/> W/S: _____	ATTN: _____	ATTN: _____	<input checked="" type="checkbox"/> W/S: <u>24064</u>
ATTN: _____			ATTN: _____

DIVISION IV	DIVISION VII	DIVISION VIII/ COUNSEL	DIVISION X-Background Check Unit
<input type="checkbox"/> Incoming: <u>XB641</u>	<input type="checkbox"/> CPAU Incoming: <u>RS601</u>	<input type="checkbox"/> Incoming: <u>WR000</u>	<input type="checkbox"/> Rap Sheets/ EPS Incoming: <u>SZ132</u>
<input type="checkbox"/> W/S: _____	<input type="checkbox"/> CFF Incoming: <u>RS902</u>		<input type="checkbox"/> Incoming: <u>SZ131</u>
ATTN: _____	<input type="checkbox"/> RRU BIA <u>RS339</u>	<input type="checkbox"/> CSC Counsel	
	<input type="checkbox"/> Incoming: <u>RS554</u>	ATTN: _____	<input type="checkbox"/> BCU/Top 4: <u>SZ714</u>
	<input type="checkbox"/> RRU Ponds: <u>W/S 24201</u>	<input type="checkbox"/> WS: _____	
<input type="checkbox"/> Incoming: <u>XB641</u>	<input type="checkbox"/> CIS Review <u>RC464</u>		<input type="checkbox"/> WS: _____
<input type="checkbox"/> W/S: _____	<input type="checkbox"/> Incoming: _____		
ATTN: _____	<input type="checkbox"/> W/S: _____		
	ATTN: _____	ATTN: _____	ATTN: _____

DIVISION VI	DIVISION XII	DIVISION XI/CFDO	SCOSS
<input type="checkbox"/> Incoming: <u>XO036</u>	<input type="checkbox"/> Incoming: <u>XB919</u>	<input type="checkbox"/> CFDO: <u>DU000</u>	<input type="checkbox"/> NTA Shelf (TPS / I-485 / I-751 / I-539 B1/B2 / I-360- / Misc.): <u>RC445</u>
<input type="checkbox"/> W/S: _____	<input type="checkbox"/> W/S: _____	<input type="checkbox"/> H1B ASVVP Incoming: <u>AD700</u>	<input type="checkbox"/> Non-EPS Incoming (I-485 / I-130 / Misc.): <u>RC448</u>
	ATTN: _____		
ATTN: _____			

2 new cases per Blake

SCOSS			RPC:
<input type="checkbox"/> NRC Hold Approved: _____	<input type="checkbox"/> Return to JIT * <u>RC419</u>	<input type="checkbox"/> EDMS PRINTS: <u>RC321</u>	
<input type="checkbox"/> NRC Hold Denied: <u>RC417</u>	* Specify application / petition type in Comments field below	<input type="checkbox"/> CIS FTR Review Complete * <u>RC442</u>	ATTN: _____
<input type="checkbox"/> HBG Hold Approved: _____	<input type="checkbox"/> SCAN CR I-89 / 698 / 829: <u>RC318</u>	<input type="checkbox"/> I-612 DOS COPY: <u>RC472</u>	
<input type="checkbox"/> HBG Hold Denied: <u>RC418</u>	<input type="checkbox"/> FR Backend Appeal Pod: <u>RC410</u>		
	* Attach sheet and / or file		
<input type="checkbox"/> Interfiling: <u>WS23222</u>	<input type="checkbox"/> Backend Scan: <u>RC307</u>	<input type="checkbox"/> Transfer to I'CO: <u>RC421</u>	<input type="checkbox"/> F/R A-File Create: <u>RC413</u>
<input type="checkbox"/> Front End Request: <u>RC427</u>	<input type="checkbox"/> SNAP Incoming: <u>RC302</u>	<input type="checkbox"/> TPS Haitian (RDF): <u>RC465</u>	<input type="checkbox"/> File Consolidate: <u>RC423</u>
<input type="checkbox"/> TPS/ICE-DO <u>RC421</u>	<input type="checkbox"/> NBC 103 Hold (RFE / ITD): <u>RC449</u>	<input type="checkbox"/> Transfer to NVC: <u>RC438</u>	<input type="checkbox"/> I-485 File Consolidate: <u>RC439</u>
Approved: _____	<input type="checkbox"/> 103 Hold (RFE / ITD): <u>RC420</u>	<input type="checkbox"/> FTC Incoming: <u>RC437</u>	<input type="checkbox"/> Approved Awaiting I-89: <u>RC428</u>
	<input type="checkbox"/> I-512 Incoming: <u>RC313</u>	<input type="checkbox"/> I-130 Upgrades: <u>RC055</u>	

EBS RC proposal

Comments Below: _____

REV. 10/14/10

Note: The current printable format can be found @ O:Common/Forms/CSC Routing Slip. Incomplete or outdated routing slip

From: **SCOSS CORR UNIT** Date: **10/19/10** Ext: **3030** RPC: **256** DIV: **AL3100621**



RECEIPT NUMBER W09002720		CASE TYPE Regional Center Proposal	
RECEIPT DATE October 18, 2010		REGIONAL CENTER NAME AAA California Regional Center	
		PAGE 1 of 1	
Global Law Group C/O Linda Lau Esq 350 South Figueroa St., Suite 760 Los Angeles, CA 90071			Notice Type: Receipt Notice

Receipt Notice - This notice confirms that USCIS received your Regional Center Proposal. If any of the above information is incorrect, send an e-mail to: USCIS.ImmigrantInvestorProgram@dhs.gov. This notice does not grant any immigration status or benefit. It is not even evidence that this case is still pending. It only shows that the application or petition was filed on the date shown.

Processing Time - The current processing time for this case is estimated at 120 days. Unlike other case types, verification or tracking of this case is not available electronically or on our website. We will notify you by mail when we make a decision on this case or if we need something from you. If you do not receive an initial decision or update from us within our current processing time, you may send an e-mail to: USCIS.ImmigrantInvestorProgram@dhs.gov. or contact us at the address below.

Address Change - If your mailing address changes while your case is pending, you may send an e-mail to: USCIS.ImmigrantInvestorProgram@dhs.gov. Otherwise, you might not receive notice of our action on this case.

Please save this notice and a copy of any papers that you send to us along with proof of delivery.

U.S. CITIZENSHIP & IMMIGRATION SVC
CALIFORNIA SERVICE CENTER
Attn: EB-5 RC Proposal
P.O. BOX 10526
LAGUNA NIGUEL CA 92607-10526

- *Please save this notice for your records. Please enclose a copy if you have to write us or a U. S. Consulate about this case, or if you file another application based on this decision*
- *You will be notified separately about any other applications or petitions you have filed.*

Additional Information

GENERAL.

The filing of an application or petition does not in itself allow a person to enter the United States and does not confer any other right or benefit.

INQUIRIES.

You should contact the office listed on the reverse side of this notice if you have questions about the notice, or questions about the status of your application or petition. *We recommend you call.* However, if you write us, please enclose a copy of this notice with your letter.

APPROVAL OF NONIMMIGRANT PETITION.

Approval of a nonimmigrant petition means that the person for whom it was filed has been found eligible for the requested classification. If this notice indicated we are notifying a U.S. Consulate about the approval for the purpose of visa issuance, and you or the person you filed for have questions about visa issuance, please contact the appropriate U.S. Consulate directly.

APPROVAL OF AN IMMIGRANT PETITION.

Approval of an immigrant petition does not convey any right or status. The approved petition simply establishes a basis upon which the person you filed for can apply for an immigrant or fiance(e) visa or for adjustment of status.

A person is not guaranteed issuance of a visa or a grant of adjustment simply because this petition is approved. Those processes look at additional criteria.

If this notice indicates we have approved the immigrant petition you filed, and have forwarded it to the Department of State Immigrant Visa Processing Center, that office will contact the person you filed the petition for directly with information about visa issuance.

In addition to the information on the reverse of this notice, the instructions for the petition you filed provide additional information about processing after approval of the petition.

For more information about whether a person who is already in the U.S. can apply for adjustment of status, please see Form I-485, *Application to Register Permanent Residence or Adjust Status.*