



U.S. Citizenship  
and Immigration  
Services

May 27, 2010

Joseph J. Walsh, Jr.  
South Atlantic Regional Center, LLC  
15535 Sunward Street  
Wellington, Florida 33414

Application: Request for Designation as a Regional Center  
Applicant(s): Joseph J. Walsh, Jr.

Re: South Atlantic Regional Center  
W09001240

Pursuant to Section 610 of the Appropriations Act of 1993, on December 24, 2009, Joseph J. Walsh submitted a proposal seeking approval and designation by U.S. Citizenship and Immigration Services (USCIS) of the South Atlantic Regional Center.

Based on its review and analysis of your proposal, and of your response to the USCIS Request For Evidence, USCIS hereby designates South Atlantic Regional Center as a Regional Center within the Immigrant Investor Pilot Program and approves the request as described below:

**FOCUS OF INVESTMENT ACTIVITY:**

As depicted in the economic model, the general proposal and the economic analysis, the Regional Center will engage in the following economic activities: real estate financing, construction and development.

The Regional Center for EB-5 Immigrant purposes shall focus investments into new commercial enterprises in the following eight (8) target industry economic clusters:

1. Hotels
2. Manufacturing
3. Retail Shopping Centers
4. Restaurants
5. General Retail
6. Offices
7. Medical Offices
8. Assisted Living/Nursing Homes

If any investment opportunities arise that are beyond the scope of the approved industry clusters, then an amendment would be required to add that cluster.

**GEOGRAPHIC AREA:**

The South Atlantic Regional Center shall have a geographic scope of the Florida county of Palm Beach.

The geographic focus of this area may contain some High Unemployment Targeted Employment Areas (TEAs) as designated by the State of Florida 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 commercial enterprises located in the Regional Center area must fulfill all of the requirements set forth in 8 CFR 204.6, except that the petition need not show that the new commercial enterprises created ten new jobs indirectly as a result of the immigrant investor's investment. This determination has been established by way of USCIS' acceptance 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. Rather, the investor must show at the time of removal of conditions that they performed the activities described in the model and on which the approved methodology is based.

In addition, where job creation or preservation of existing jobs is claimed based on a multiplier rooted in underlying new "direct jobs", 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 any new direct jobs for "qualifying employees" to be achieved/realized within two years pursuant to 8 CFR 204.6(j)(4)(B).

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 direct jobs or the creation of new indirect jobs based on a multiplier tied to underlying new direct jobs needs to be properly supported by evidence of job creation. To support the full number of direct and indirect new jobs being claimed in connection with removal of conditions, the petition will need to be supported by probative evidence of the number of new direct full time (35 hours per week) jobs for qualified employees whose positions have been created as a result of the alien's investment. Such evidence may include copies of quarterly state employment tax reports, Forms W-2, Forms I-9, and any other

pertinent employment records sufficient to demonstrate the number of qualified employees whose jobs were created directly.

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

Based upon the review of your proposal, the South Atlantic Mixed Use Development I (consisting of a mixed-use commercial center that will include shopping and office facilities) is approved as a Capital Investment Project for your regional center. To demonstrate that an individual alien investor is associated with this project and your regional center, each alien entrepreneur petition, in conjunction with addressing all the requirements for that petition, shall contain supporting evidence relating to this project and the regional center designation, as follows:

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. Private Placement Memorandum; Samples/Drafts submitted May 1, 2010
  - b. Limited Partnership Agreement; Samples/Drafts dated December 24, 2009
  - c. Subscription Agreement; and Samples/Drafts dated December 24, 2009
  - d. Escrow Agreement Samples/Drafts dated December 24, 2009

**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 on a quarterly basis in order to report to USCIS upon request the following year to date information for each Federal Fiscal Year<sup>1</sup>, commencing with the initial year as follows:

1. Provide the principal authorized official and point of contact of the Regional Center responsible for the normal operation, management and administration of the Regional Center.

---

<sup>1</sup> A Federal Fiscal Year runs for twelve consecutive months from October 1<sup>st</sup> to September 30<sup>th</sup>.

2. Be prepared to explain how you are administering the Regional Center and how you will be actively engaged in supporting a due diligence screening of its alien investors' lawful source of capital and the alien investor's ability to fully invest the requisite amount of capital.
3. Be prepared to explain the following:
  - a. How the Regional Center is actively engaged in the evaluation, oversight and follow up on any proposed commercial activities that will be utilized by alien investors.
  - b. How the Regional Center is actively engaged in the ongoing monitoring, evaluation, oversight and follow up on any investor commercial activity affiliated through the Regional Center that will be utilized by alien investors in order to create direct and/or indirect jobs through qualifying EB-5 capital investments into commercial enterprises within the Regional Center.
4. Be prepared to provide:
  - a. the name, date of birth, petition receipt number, and alien registration number (if one has been assigned by USCIS) of each principal alien investor who has made an investment and has filed an EB-5/I-526 Petition with USCIS, specifying whether:
    - i. the petition was filed,
    - ii. was approved,
    - iii. denied, or
    - iv. withdrawn by the petitioner, together with the date(s) of such event.
  - b. The total number of visas represented in each case for the principal alien investor identified in 4.a. above, plus his/her dependents (spouse and children) for whom immigrant status is sought or has been granted.
  - c. The country of nationality of each alien investor who has made an investment and filed an EB-5/I-526 petition with USCIS.
  - d. The U.S. city and state of residence (or intended residence) of each alien investor who has made an investment and filed an EB-5/I-526 petition with USCIS.
  - e. For each alien investor listed in item 4.a., above, identify the following:
    - i. the date(s) of investment in the commercial enterprise;
    - ii. the amount(s) of investment in the commercial enterprise; and
    - iii. the date(s), nature, and amount(s) of any payment/remuneration/profit/return on investment made to the alien investor by the commercial enterprise and/or Regional Center from when the investment was initiated to the present.

5. Be prepared to identify/list each of the target industry categories of business activity within the geographic boundaries of your Regional Center that have:
  - a. received alien investors' capital, and in what aggregate amounts;
  - b. received non-EB-5 domestic capital that has been combined and invested together, specifying the separate aggregate amounts of the domestic investment capital;
  - c. of the total investor capital (alien and domestic) identified above in 5.a and 5.b, identify and list the following:
    - i. The name and address of each "direct" job creating commercial enterprise.
    - ii. The industry category for each indirect job creating investment activity.
6. Be prepared to provide:
  - a. The total aggregate number of approved EB-5 alien investor I-526 petitions per each Federal Fiscal Year to date made through your Regional Center.
  - b. The total aggregate number of approved EB-5 alien investor I-829 petitions per each Federal Fiscal Year to date through your Regional Center.
7. The total aggregate sum of EB-5 alien capital invested through your Regional Center for each Federal Fiscal Year to date since your approval and designation.
8. The combined total aggregate of "new" direct and/or indirect jobs created by EB-5 investors through your Regional Center for each Federal Fiscal Year to date since your approval and designation.
9. If applicable, the total aggregate of "preserved" or saved jobs by EB-5 alien investors into troubled businesses through your Regional Center for each Federal Fiscal Year to date since your approval and designation.
10. If for any given Federal Fiscal Year your Regional Center did or does not have investors to report, then provide:
  - a. a detailed written explanation for the inactivity,
  - b. a specific plan which specifies the budget, timelines, milestones and critical steps to:
    - i. actively promote your Regional Center program,
    - ii. identify and recruit legitimate and viable alien investors, and
    - iii. a strategy to invest into job creating enterprises and/or investment activities within the Regional Center.

11. Regarding your website, if any, please be prepared to provide a hard copy which represents fully what your Regional Center has posted on its website, as well as providing your web address. Additionally, please provide a packet containing all of your Regional Center's hard copy promotional materials such as brochures, flyers, press articles, advertisements, etc.
  
12. Finally, please be aware that it is incumbent on each USCIS approved and designated Regional Center, in order to remain in good standing, to notify the USCIS within 15 business days at USCIS.ImmigrantInvestorProgram@dhs.gov of any change of address or occurrence of any material change in:
  - the name and contact information of the responsible official and/or Point of Contact (POC) for the RC
  - the management and administration of the RC,
  - the RC structure,
  - the RC mailing address, web site address, email address, phone and fax number,
  - the scope of the RC operations and focus,
  - the RC business plan,
  - any new, reduced or expanded delegation of authority , MOU, agreement, contract, etc. with another party to represent or act on behalf of the RC,
  - the economic focus of the RC, or
  - any material change relating to your Regional Center's basis for its most recent designation and/or reaffirmation by USCIS.

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,



Christina Poulos  
Director  
California Service Center

cc: Reid A. Nelson, Esq.

## G-28, Notice of Entry of Appearance as Attorney or Accredited Representative

Department of Homeland Security

### Part 1. Notice of Appearance as Attorney or Accredited Representative

**A. This appearance is in regard to immigration matters before:**

- USCIS - List the form number(s): \_\_\_\_\_  CBP - List the specific matter in which appearance is entered: \_\_\_\_\_
- ICE - List the specific matter in which appearance is entered: \_\_\_\_\_

**Regional Center Application**

**B. I hereby enter my appearance as attorney or accredited representative at the request of:**

List Petitioner, Applicant, or Respondent. **NOTE:** Provide the mailing address of Petitioner, Applicant, or Respondent being represented, and not the address of the attorney or accredited representative, except when filed under VAWA.

<b>Principal Petitioner, Applicant, or Respondent</b>			A Number or Receipt Number, if any <input type="checkbox"/> Petitioner <input type="checkbox"/> Applicant <input type="checkbox"/> Respondent
Name: Last	First	Middle	
SOUTHERN ATLANTIC	REGIONAL CENTER		
Address: Street Number and Street Name . Apt. No.		City	State Zip Code
15535 Sunward St.		Wellington	FL 33414

Pursuant to the Privacy Act of 1974 and DHS policy, I hereby consent to the disclosure to the named Attorney or Accredited Representative of any record pertaining to me that appears in any system of records of USCIS, USCBP, or USICE.

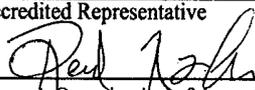
Signature of Petitioner, Applicant, or Respondent: Joseph J. Walsh, Sr.  Date: 05-01-2010

### Part 2. Information about Attorney or Accredited Representative (Check applicable items(s) below)

- A.  I am an attorney and a member in good standing of the bar of the highest court(s) of the following State(s), possession(s), territory(ies), commonwealth(s), or the District of Columbia: Texas
- I am not  or  am subject to any order of any court or administrative agency disbarring, suspending, enjoining, restraining, or otherwise restricting me in the practice of law (If you are subject to any order(s), explain fully on reverse side).
- B.  I am an accredited representative of the following qualified non-profit religious, charitable, social service, or similar organization established in the United States, so recognized by the Department of Justice, Board of Immigration Appeals pursuant to 8 CFR 1292.2. Provide name of organization and expiration date of accreditation: \_\_\_\_\_
- C.  I am associated with \_\_\_\_\_  
 The attorney or accredited representative of record previously filed Form G-28 in this case, and my appearance as an attorney or accredited representative is at his or her request (If you check this item, also complete item A or B above in Part 2, whichever is appropriate).

### Part 3. Name and Signature of Attorney or Accredited Representative

I have read and understand the regulations and conditions contained in 8 CFR 103.2 and 292 governing appearances and representation before the Department of Homeland Security. I declare under penalty of perjury under the laws of the United States that the information I have provided on this form is true and correct.

Name of Attorney or Accredited Representative		Attorney Bar Number(s), if any
Reid A. Nelson		Texas Bar No. 00794362
Signature of Attorney or Accredited Representative		Date
Reid A. Nelson 		05-01-2010
Complete Address of Attorney or Organization of Accredited Representative (Street Number and Street Name, Suite No., City, State, Zip Code)		
210 English Oaks Circle, Boerne, Texas 78006		
Phone Number (Include area code)	Fax Number, if any (Include area code)	E-Mail Address, if any
(210) 260-5161		reid.nelson@connectmyinsurance.com

		Application/Petition REGIONAL CENTER PROPOSAL
Receipt # W09001240		
Notice Date April 21, 2010	Page 1 of 4	Regional Center South Atlantic Regional Center (SARC)

REC'D CSC 10 MAY 3 5:08

AL3100621

Reid A. Nelson  
South Atlantic Regional Center (SARC)  
210 English Oaks Circle  
Boerne, Texas 78006

Request for Evidence

**IMPORTANT: WHEN YOU HAVE COMPLIED WITH THE INSTRUCTIONS ON THIS FORM, RESUBMIT THIS NOTICE ON TOP OF ALL REQUESTED DOCUMENTS AND /OR INFORMATION TO THE ADDRESS BELOW. THIS OFFICE HAS RETAINED YOUR PETITION/APPLICATION WITH SUPPORTING DOCUMENTS.**

**THE INFORMATION REQUESTED BELOW MUST BE RECEIVED BY THIS OFFICE NO LATER THAN EIGHTY-FOUR (84) DAYS FROM THE DATE OF THIS NOTICE. IF YOU DO NOT PROVIDE THE REQUESTED DOCUMENTATION WITHIN THE TIME ALLOTTED, YOUR APPLICATION WILL BE CONSIDERED ABANDONED PURSUANT TO 8 C.F.R. 103.2(B)(13) AND, AS SUCH, WILL BE DENIED.**

WS 24064/CSC3700 DIV III

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

**Note:** You are given until JULY 14, 2010 in which to submit the information requested.

**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 non-US Postal Service  
Attn: EB 5 RC Proposal  
24000 Avilla Road, 2<sup>nd</sup> Floor  
Laguna Niguel, CA 92677**

You will be notified separately about any other applications or petitions you filed. Save a photocopy of 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:

**U.S. CITIZENSHIP AND IMMIGRATION SERVICES  
CALIFORNIA SERVICE CENTER  
Attn: EB 5 RC Proposal  
P.O. BOX 10590  
LAGUNA NIGUEL, CA 92607-0526**



## 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](http://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.

Besides the basic general proposal, the Regional Center Proposal may now be approved to include two optional requests, review of the enterprise's organization and operational documents and/or a specific investment project. Thus, documentation submitted in support of the Regional Proposal may be grouped into two categories: mandatory, required for the basic general proposal: and optional, needed for the two options.

### **What is the Immigrant Investor Pilot Program?**

The Immigrant Investor Pilot Program ("Pilot Program") was created by Section 610 of Public Law 102-395 (October 6, 1992). This is different in certain ways from the basic EB-5 investor program.

The Pilot Program began in accordance with a Congressional mandate aimed at stimulating economic activity and creating jobs for U.S. workers, while simultaneously affording eligible aliens the opportunity to become lawful permanent residents. Through this innovative program, foreign investors are encouraged to invest funds in an economic unit known as a "Regional Center."

A Regional Center is defined as any economic unit, public or private, engaged in the promotion of economic growth, improved regional productivity, job creation and increased domestic capital investment.

8 CFR 204.6 (m)(3) describes specific evidence that must be submitted before consideration for eligibility for this benefit may proceed. After review of your proposal in the light of these requirements, the following information, evidence or clarification is needed to proceed.

It is always best to start with a cover letter that acts as an executive summary followed by a table of contents of the various tabbed sections to follow.

### **Regional Center Proposals must meet all the Requirement of 8 CFR 103.2.**

#### **Mandatory Evidence for the Basic General Proposal**

#### **Indirect Job Creation (8 CFR 204.6(m)(3)(ii)):**

Under the provisions of the INA which apply to the Immigrant Investor Pilot Program and specific amendments to the statute, especially in the 2002 amendment Per Public Law 107-273, enacted November 2, 2002, which clearly states:

A regional center shall have jurisdiction over a limited geographic area, which shall be described in the proposal and consistent with the purpose of concentrating pooled investment in defined economic zones. The establishment of a regional center may be based on general predictions, contained in the proposal, concerning the kinds of commercial enterprises that will receive capital from aliens, the jobs that will be created directly or indirectly as a result of such capital investments and the other positive economic effects such capital investments will have.

Also 8 CFR 204.6(m)(3)(ii) requires you to:

Provide in verifiable detail how jobs will be created indirectly;

Moreover, 8 C.F.R. 204.6(e) states in pertinent part:

Capital means cash, equipment, inventory, other tangible property, cash equivalents, and indebtedness secured by assets owned by the alien entrepreneur, provided the alien entrepreneur is personally and primarily liable and that the assets of the new commercial enterprise upon which the petition is based are not used to secure any of the indebtedness. All capital shall be valued at fair market value in United States dollars...

Invest means to contribute capital.

Furthermore, 8 C.F.R. 204.6(j)(2) states:

To show that the petitioner has invested or is actively in the process of investing the required amount of capital, the petition must be accompanied by evidence that the petitioner has placed the required amount of capital at risk for the purpose of generating a return on the capital placed at risk.

In Matter of Izumij, the Service held that an alien cannot receive guaranteed payments from a new commercial enterprise while he owes money to the new commercial enterprise. Where an alien is guaranteed a distribution on capital while the alien owes money to the enterprise, title to the funds may change but there is no actual infusion of new funds into the commercial enterprise. In addition, as there is no certainty that the commercial enterprise will generate sufficient profits during any given period to pay the alien the guaranteed return, there is a possibility that the return will be drawn from the funds of future investors or from funds already contributed. Finally, where the alien's contribution to the enterprise is conditioned on the enterprise making the guaranteed return payments, the petitioner has shifted the risk of loss to the enterprise. Therefore, the sum of the guaranteed proceeds cannot constitute a contribution of capital.

*Redemption Agreements as it relates to Job Creation*

(b)(4)



(b)(4)



**General issues related to Regional Centers**

**Attorney Representation (8 CFR 103.2(a)(3))**

Although Parts 1 and 3 of the G-28 were signed and dated, Part 2 "Information about Attorney or Accredited Representative" was not completed. Complete all parts on the form and submit a new and properly executed G-28, signed and dated by a principal of the Regional Center and the attorney of record.

**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.

**Copies:**

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.



(b)(4)

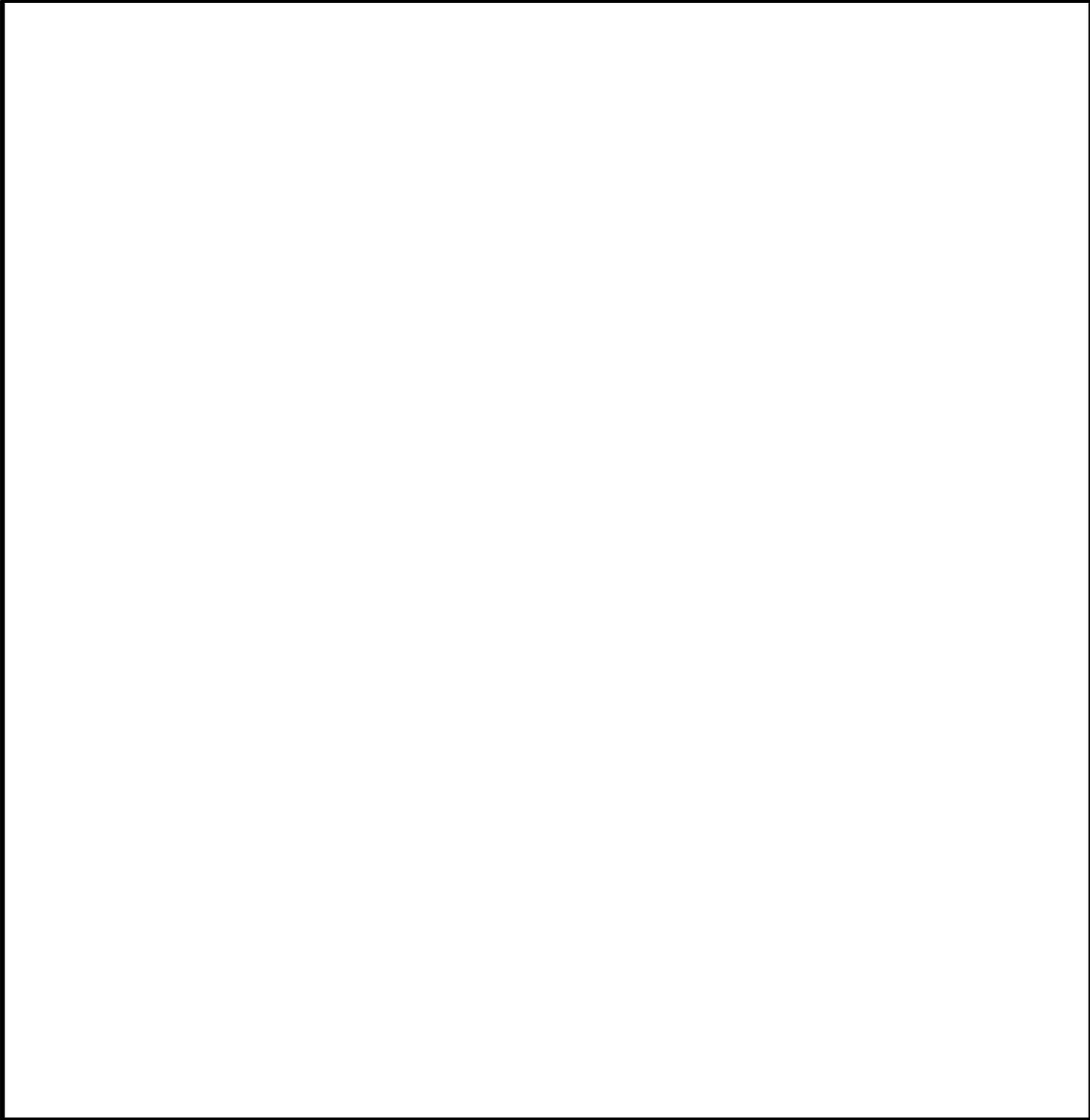
(b)(4)

**Southern Atlantic Regional Center Application  
Response to Request for Evidence  
May 1, 2010**

**Exhibit Index**

<b>EXHIBIT</b>	<b>DOCUMENT</b>
1	Revised Page 30 of the PPM
2	FULL REVISED PPM (Provided in it's entirety Revision to Page 30 Only)
3	Fully Executed Form G-28

(b)(4)



***Management of the Limited Partnership***

**General Partners**

**Joseph J. Walsh, SR, General Partner-** Mr. Walsh has in excess of thirty years in all phases of land acquisition and development. He has been directly responsible for project development from project design to project completion for many successful real estate ventures in the states of

17

\_\_\_\_\_

\_\_\_\_\_

Michigan, California, Texas and Florida. As founder of a unique online art, antique and collectible marketplace. Mr. Walsh developed several retail stores in Florida, Michigan, California and Texas. The business was sold to a California executive in 2005. Artfest was positioned as a fully reporting SEC qualified company. Recently, in 2008 Artfest began trading as an OTC:BB listed Small Cap Stock Trading.

## **Team Members**

**Real Estate Consultant-** Several consultancy firms have been identified by SARC.

### **Prudential Florida Realty - Acquisition and Property Management**

Prudential Florida Realty has over 40 locations and more than 1,800 real estate sales associates serving 17 counties throughout Florida. We are a full-service residential and commercial real estate company that offers consumers professional assistance with purchases, sales, seasonal rentals and property management, corporate relocations, referral services, mortgage, title and insurance services. Based on sales volume, the company was ranked as the 32nd largest real estate company in the nation in the July 2008 issue of Realtor Magazine and is ranked as the sixth largest company in the Prudential Real Estate Affiliates network. Prudential Real estate boasts the highest average sales price of any nationwide real estate firm. Use the buttons on the top of this page to view thousands of Florida property photos and virtual tours or to connect with one of our sales professionals.

**Consultant and Construction/Marketing Partner-** Several contractors in the local community have been identified to manage and complete the buildout of the project.

### **Limited Partnership Counsel**

Reid A. Nelson, Esq, 210 English Oaks Circle, Boerne, TX 78006

(b)(4)

(b)(4)

(b)(4)

(b)(4)



(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)



(b)(4)

(b)(4)



(b)(4)

(b)(4)

(b)(4)

(b)(4)

### Exhibit A

- 1. Business Address & Telephone No: \_\_\_\_\_
- 2. Business or Professional Education & Degree: \_\_\_\_\_
- 3. Prior Employment (5 years):

Employer	Nature of Duties	Dates of Employment

4. Prior Investments of Purchaser:

Amount (Cumulative)

	None	Up to \$50,000	\$50-250,000	Over \$250,000
Capital Stock	_____	_____	_____	_____
Bonds	_____	_____	_____	_____
Other	_____	_____	_____	_____

5. Financial Information:

(a) My net worth (exclusive of home, home furnishings and personal automobiles) is in excess of:  
\$100,000,000 \_\_\_\_\_ \$250,000 \_\_\_\_\_ \$500,000 \_\_\_\_\_ \$500,000 \_\_\_\_\_

(b) My gross income, including tax exempt income, for each of the preceding two tax years was equal to or in excess of:

\$100,000,000 \_\_\_\_\_ \$150,000 \_\_\_\_\_ \$200,000 \_\_\_\_\_

(c) My anticipated gross income, including tax exempt income, this year will be equal to or in excess of:

\$100,000,000 \_\_\_\_\_ \$150,000 \_\_\_\_\_ \$200,000 \_\_\_\_\_

(d) (1) I have such knowledge and experience in financial, tax and business matters that I am capable of utilizing the information made available to me in connection with the offering of the Units to evaluate the merits and risks of an investment in the Units and to make an informed investment decision with respect to the Units. I do not desire to utilize a Purchaser Representative in connection with evaluating such merits and risks. I understand that the Limited Partnership may request that I use a Purchaser Representative.

Initial here \_\_\_\_\_

(2) I intend to use the services of the following named person(s) as Purchaser Representative(s) in connection with evaluating the merits and risks of an investment in the Units and hereby appoint such person(s) to act as my Purchaser Representative(s) in connection with my proposed purchase of the Units:

Initial here \_\_\_\_\_

List name(s) of Purchaser Representative(s), if applicable.

\_\_\_\_\_

6. Except as indicated below, any purchases of the Units will be solely for my account and not for the account of any other person or with a view to any resale or distribution thereof.

\_\_\_\_\_

Exception: \_\_\_\_\_

7. I represent to you that the information contained herein is complete and accurate and may be relied upon by you for the purpose of complying with all applicable securities laws. The undersigned agrees to notify the Limited Partnership promptly of any change in the foregoing information which may occur prior to any purchase of the securities of the Limited Partnership by the undersigned.

INDIVIDUAL INVESTOR:

Name: \_\_\_\_\_  
Please Print

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

NON-INDIVIDUAL INVESTOR

Name: \_\_\_\_\_  
Please Print

Signature: \_\_\_\_\_



# EXHIBIT (3)

Fully Executed Form G-28

**FedEx** US Airbill  
Express

FedEx  
Tracking  
Number

8726 0332 4712

0200 Form  
ID No.

FedEx Retrieval Copy

**1 From**

Date May 1-2010 Sender's FedEx Account Number 395 821903

Sender's Name REIDA A. NELSON Phone 305 731-9351

Company Southern ATLANTIC AMTRAK Center

Address 210 ENGLISH OAKS Dept./Floor/Suite/Room

City BOZENE State TX ZIP 78006

**2 Your Internal Billing Reference**

**3 To**

Recipient's Name US CITIZENSHIP AND Phone

IMMIGRATION SERVICE (ALABAMA SERVICE CENTER)

Company EBS RE PROPOSAL

Address 24000 AVILLA ROAD Dept./Floor/Suite/Room

Address 2ND FLOOR

City LAGUNA NISUEL State CA ZIP 92677

**4a Express Package Service** \*To most locations. Packages up to 150 lbs.

**01** FedEx Priority Overnight  
Next business morning.\* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

**05** FedEx Standard Overnight  
Next business afternoon.\* Saturday Delivery NOT available.

**06** FedEx First Overnight  
Earliest next business morning delivery to select locations.\*

**03** FedEx 2Day  
Second business day.\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

**20** FedEx Express Saver  
Third business day.\* Saturday Delivery NOT available.

**4b Express Freight Service** \*\*To most locations. Packages over 150 lbs.

**70** FedEx 1Day Freight  
Next business day.\*\* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected. FedEx 1Day Freight Booking No.

**80** FedEx 2Day Freight  
Second business day.\*\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

**83** FedEx 3Day Freight  
Third business day.\*\* Saturday Delivery NOT available.

**5 Packaging** \*Declared value limit \$500.

**06** FedEx Envelope\*

**02** FedEx Pak\*  
Includes FedEx Small Pak and FedEx Large Pak

**03** FedEx Box

**04** FedEx Tube

**01** Other

**6 Special Handling and Delivery Signature Options**

**03 SATURDAY DELIVERY**

No Signature Required  
Package may be left without obtaining a signature for delivery.

**10** Direct Signature  
Someone at recipient's address may sign for delivery. Fee applies.

**34** Indirect Signature  
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.

**Does this shipment contain dangerous goods?**

One box must be checked.  
 **No**  **04** Yes  
As per attached Shipper's Declaration.

**Yes**  
Shipper's Declaration not required.

**06** Dry Ice  
Dry Ice, 9, UN 1845 \_\_\_\_\_ x \_\_\_\_\_ kg

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.

Cargo Aircraft Only

**7 Payment Bill to:**

Sender's Acct. No. in Section 1 will be billed.  Recipient  Third Party  Credit Card  Cash/Check

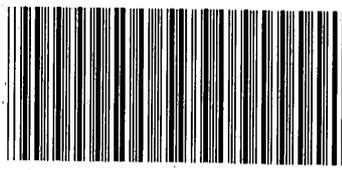
Total Packages 1 Total Weight 1.2 lbs. Credit Card Acct. No. 606

\*Our liability is limited to \$100 unless you declare a higher value. See the current FedEx Service Guide for details.

Rev. Date 2/10 • Part #158220 • ©1994-2010 FedEx • PRINTED IN U.S.A. SRF

fedex.com 1.800.GoFedEx 1.800.463.3339

fedex.com 1.800.GoFedEx 1.800.463.3339



8726 0332 4712

606

		Application/Petition REGIONAL CENTER PROPOSAL
Receipt # W09001240		
Notice Date April 21, 2010	Page 1 of 4	Regional Center South Atlantic Regional Center (SARC)

Reid A. Nelson  
South Atlantic Regional Center (SARC)  
210 English Oaks Circle  
Boerne, Texas 78006

Request for Evidence

**IMPORTANT: WHEN YOU HAVE COMPLIED WITH THE INSTRUCTIONS ON THIS FORM, RESUBMIT THIS NOTICE ON TOP OF ALL REQUESTED DOCUMENTS AND /OR INFORMATION TO THE ADDRESS BELOW. THIS OFFICE HAS RETAINED YOUR PETITION/APPLICATION WITH SUPPORTING DOCUMENTS.**

**THE INFORMATION REQUESTED BELOW MUST BE RECEIVED BY THIS OFFICE NO LATER THAN EIGHTY-FOUR (84) DAYS FROM THE DATE OF THIS NOTICE. IF YOU DO NOT PROVIDE THE REQUESTED DOCUMENTATION WITHIN THE TIME ALLOTTED, YOUR APPLICATION WILL BE CONSIDERED ABANDONED PURSUANT TO 8 C.F.R. 103.2(B)(13) AND, AS SUCH, WILL BE DENIED.**

WS 24064/CSC3700 DIV III

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

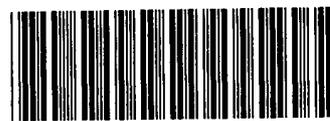
**Note:** You are given until JULY 14, 2010 in which to submit the information requested.

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 non-US Postal Service  
Attn: EB 5 RC Proposal  
24000 Avilla Road, 2<sup>nd</sup> Floor  
Laguna Niguel, CA 92677

You will be notified separately about any other applications or petitions you filed. Save a photocopy of 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:

U.S. CITIZENSHIP AND IMMIGRATION SERVICES  
CALIFORNIA SERVICE CENTER  
Attn: EB 5 RC Proposal  
P.O. BOX 10590  
LAGUNA NIGUEL, CA 92607-0526



W09 001 245

## 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](http://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.

Besides the basic general proposal, the Regional Center Proposal may now be approved to include two optional requests, review of the enterprise's organization and operational documents and/or a specific investment project. Thus, documentation submitted in support of the Regional Proposal may be grouped into two categories: mandatory, required for the basic general proposal: and optional, needed for the two options.

### **What is the Immigrant Investor Pilot Program?**

The Immigrant Investor Pilot Program ("Pilot Program") was created by Section 610 of Public Law 102-395 (October 6, 1992). This is different in certain ways from the basic EB-5 investor program.

The Pilot Program began in accordance with a Congressional mandate aimed at stimulating economic activity and creating jobs for U.S. workers, while simultaneously affording eligible aliens the opportunity to become lawful permanent residents. Through this innovative program, foreign investors are encouraged to invest funds in an economic unit known as a "Regional Center."

A Regional Center is defined as any economic unit, public or private, engaged in the promotion of economic growth, improved regional productivity, job creation and increased domestic capital investment.

8 CFR 204.6 (m)(3) describes specific evidence that must be submitted before consideration for eligibility for this benefit may proceed. After review of your proposal in the light of these requirements, the following information, evidence or clarification is needed to proceed.

It is always best to start with a cover letter that acts as an executive summary followed by a table of contents of the various tabbed sections to follow.

### **Regional Center Proposals must meet all the Requirement of 8 CFR 103.2.**

#### **Mandatory Evidence for the Basic General Proposal**

##### **Indirect Job Creation (8 CFR 204.6(m)(3)(ii)):**

Under the provisions of the INA which apply to the Immigrant Investor Pilot Program and specific amendments to the statute, especially in the 2002 amendment Per Public Law 107-273, enacted November 2, 2002, which clearly states:

A regional center shall have jurisdiction over a limited geographic area, which shall be described in the proposal and consistent with the purpose of concentrating pooled investment in defined economic zones. The establishment of a regional center may be based on general predictions, contained in the proposal, concerning the kinds of commercial enterprises that will receive capital from aliens, the jobs that will be created directly or indirectly as a result of such capital investments and the other positive economic effects such capital investments will have.

Also 8 CFR 204.6(m)(3)(ii) requires you to:

Provide in verifiable detail how jobs will be created indirectly;

Moreover, 8 C.F.R. 204.6(e) states in pertinent part:

Capital means cash, equipment, inventory, other tangible property, cash equivalents, and indebtedness secured by assets owned by the alien entrepreneur, provided the alien entrepreneur is personally and primarily liable and that the assets of the new commercial enterprise upon which the petition is based are not used to secure any of the indebtedness. All capital shall be valued at fair market value in United States dollars...

Invest means to contribute capital.

Furthermore, 8 C.F.R. 204.6(j)(2) states:

To show that the petitioner has invested or is actively in the process of investing the required amount of capital, the petition must be accompanied by evidence that the petitioner has placed the required amount of capital at risk for the purpose of generating a return on the capital placed at risk.

In Matter of Izumij, the Service held that an alien cannot receive guaranteed payments from a new commercial enterprise while he owes money to the new commercial enterprise. Where an alien is guaranteed a distribution on capital while the alien owes money to the enterprise, title to the funds may change but there is no actual infusion of new funds into the commercial enterprise. In addition, as there is no certainty that the commercial enterprise will generate sufficient profits during any given period to pay the alien the guaranteed return, there is a possibility that the return will be drawn from the funds of future investors or from funds already contributed. Finally, where the alien's contribution to the enterprise is conditioned on the enterprise making the guaranteed return payments, the petitioner has shifted the risk of loss to the enterprise. Therefore, the sum of the guaranteed proceeds cannot constitute a contribution of capital.

*Redemption Agreements as it relates to Job Creation*

The record is not clear as to whether EB-5 investor capital will be fully placed at risk to create the requisite jobs because Page 30 of the Private Placement Memorandum states that EB-5 investors are eligible for a \$30,000 annual return for 5 years before calculating distributions. Provide clarification on the source of funds and whether this arrangement constitutes a guaranteed return of funds to EB-5 investors. How does this impact the required \$500,000 investment for each EB-5 investor?

While not directly related to the general Regional Center Proposal issues, it is noted that this aspect of the regional center plan may not be acceptable at either the I-526, Immigrant Petition by Alien Entrepreneur, stage or the I-829, Removal of Conditions by an Alien Entrepreneur, stage. The alien entrepreneur must establish that he has invested or is in the process of investing in specific job creating activities and those activities will be sustained through out the two year period.

Moreover, it would be inappropriate, misleading to future investors, and serve no purpose to approve this Regional Center proposal based upon evidence that potential investors in this program will not be eligible to have their I-526 Immigrant Petition by Alien Entrepreneur approved.

### **General issues related to Regional Centers**

#### **Attorney Representation (8 CFR 103.2(a)(3))**

Although Parts 1 and 3 of the G-28 were signed and dated, Part 2 "Information about Attorney or Accredited Representative" was not completed. Complete all parts on the form and submit a new and properly executed G-28, signed and dated by a principal of the Regional Center and the attorney of record.

#### **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.

#### **Copies:**

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.

		Application/Petition REGIONAL CENTER PROPOSAL
Receipt # W09001240		
Notice Date March 12, 2010	Page 1 of 6	Regional Center South Atlantic Regional Center (SARC)

Joseph Walsh, Sr.  
South Atlantic Regional Center (SARC)  
15535 Sunward St.  
Wellington, FL 33414-8335

Request for Evidence

**IMPORTANT: WHEN YOU HAVE COMPLIED WITH THE INSTRUCTIONS ON THIS FORM, RESUBMIT THIS NOTICE ON TOP OF ALL REQUESTED DOCUMENTS AND /OR INFORMATION TO THE ADDRESS BELOW. THIS OFFICE HAS RETAINED YOUR PETITION/APPLICATION WITH SUPPORTING DOCUMENTS.**

**THE INFORMATION REQUESTED BELOW MUST BE RECEIVED BY THIS OFFICE NO LATER THAN EIGHTY-FOUR (84) DAYS FROM THE DATE OF THIS NOTICE. IF YOU DO NOT PROVIDE THE REQUESTED DOCUMENTATION WITHIN THE TIME ALLOTTED, YOUR APPLICATION WILL BE CONSIDERED ABANDONED PURSUANT TO 8 C.F.R. 103.2(B)(13) AND, AS SUCH, WILL BE DENIED.**

WS 24064/CSC3700 DIV III

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

**Note:** You are given until FRIDAY, JUNE 18, 2010 in which to submit the information requested.

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 non-US Postal Service  
Attn: EB 5 RC Proposal  
24000 Avilla Road, 2<sup>nd</sup> Floor  
Laguna Niguel, CA 92677

You will be notified separately about any other applications or petitions you filed. Save a photocopy of 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:

U.S. CITIZENSHIP AND IMMIGRATION SERVICES  
CALIFORNIA SERVICE CENTER  
Attn: EB 5 RC Proposal  
P.O. BOX 10590  
LAGUNA NIGUEL, CA 92607-0526



W09001245

AL3100621  
REC'D CSC 10 MAR 31 5:52

## 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](http://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.

Besides the basic general proposal, the Regional Center Proposal may now be approved to include two optional requests, review of the enterprise's organization and operational documents and/or a specific investment project. Thus, documentation submitted in support of the Regional Proposal may be grouped into two categories, mandatory, required for the basic general proposal, and optional, needed for the two options.

**What is the Immigrant Investor Pilot Program?**

The Immigrant Investor Pilot Program ("Pilot Program") was created by Section 610 of Public Law 102-395 (October 6, 1992). This is different in certain ways from the basic EB-5 investor program.

The Pilot Program began in accordance with a Congressional mandate aimed at stimulating economic activity and creating jobs for U.S. workers, while simultaneously affording eligible aliens the opportunity to become lawful permanent residents. Through this innovative program, foreign investors are encouraged to invest funds in an economic unit known as a "Regional Center."

A Regional Center is defined as any economic unit, public or private, engaged in the promotion of economic growth, improved regional productivity, job creation and increased domestic capital investment.

8 CFR 204.6 (m)(3) describes specific evidence that must be submitted before consideration for eligibility for this benefit may proceed. After review of your proposal in the light of these requirements, the following information, evidence or clarification is needed to proceed.

It is always best to start with a cover letter that acts as an executive summary followed by a table of contents of the various tabbed sections to follow.

**Regional Center Proposals must meet all the Requirement of 8 CFR 103.2.**

**The proposal must be signed by a principal of the Economic Entity filing the proposal.**

8 CFR 103.2(a)(2) requires that the applicant or petitioner must sign their petition or application. While no specific form is required for a Regional Center Proposal, the proposal must include a signature of a principle and the point of contact of the proposed Regional Center, generally found on the letter requesting the benefit. In this case the requesting letter was signed only by the attorney of record. Since there is no claim that the attorney is also a principal of the Regional Center the Proposal has not been properly filed by a principal of the Regional Center. Therefore, provide a new and updated request signed by a Regional Center principal.

**Mandatory Evidence for the Basic General Proposal**

**Indirect Job Creation (8 CFR 204.6(m)(3)(ii)):**

Under the provisions of the INA which apply to the Immigrant Investor Pilot Program and specific amendments to the statute, especially in the 2002 amendment Per Public Law 107-273, enacted November 2, 2002, which clearly states:

A regional center shall have jurisdiction over a limited geographic area, which shall be described in the proposal and consistent with the purpose of concentrating pooled investment in defined economic zones. The establishment of a regional center may be based on general predictions, contained in the proposal, concerning the kinds of commercial enterprises that will receive capital from aliens, the jobs that will be created directly or indirectly as a result of such capital investments and the other positive economic effects such capital investments will have.

Also 8 CFR 204.6(m)(3)(ii) requires you to:

Provide in verifiable detail how jobs will be created indirectly;

In addition, INA 203(b)(5)(B)(i) states:

(B) Set-aside for targeted employment areas.-

- (b)(4) (i) In general. - Not less than 3,000 of the visas made available under this paragraph in each fiscal year shall be reserved for qualified immigrants who invest in a new commercial enterprise described in subparagraph (A) which will create employment in a targeted employment area.



**Regional Center's Operational Plan (8 CFR 204.6(m) and 8 CFR 204.6):**

Provide a Regional Center Operational plan that shows how the Regional Center will identify, assess and evaluate proposed investor projects and activities, and enterprises. In addition the Regional Center plan must address the following areas:

- **Regional Center's Operational Plan- Recruitment and Due Diligence:**

Also, for any individual alien investor who will be solicited by a Regional Center to invest the requisite capital into a Regional Center commercial activity, it will be incumbent on the Regional Center to engage in a due diligence process to establish that all sources of capital can be fully explained and clearly shown to have been lawfully obtained.

- Submit a proposed Regional Center operation's plan which addresses how investors will be recruited and how the Regional Center will conduct its due diligence to accommodate the requirement that all immigrant investor funds will be lawfully obtained and describe what measures will be taken by the Regional Center to ensure and validate this. Will the submission of certain financial documents be required of foreign investors or will the Regional Center, for example, utilize a professional investigating firm to vet a potential investor's source of funds? What are your plans in this regard?

- **Administrative Oversight:**

The regulations at 8 CFR 204.6(m)(6), require 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 an approved and designated 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 on a quarterly basis in order to report to USCIS upon request the following year to date information for each Federal Fiscal Year<sup>1</sup>, commencing with the initial year as follows:

- Submit a description of your plans to administer, oversee, and manage the proposed Regional Center, including but not limited to such things as to identify, assess and evaluate proposed immigrant investor projects and enterprises; how the proposed Regional Center would perform "due diligence" as to whether investment capital to be sought will consist solely of alien investor capital or a combination of alien investor capital and domestic capital; and to maintain records, data and information on projects, investors, business activities, etc., in order to report to USCIS for each Federal Fiscal Year. This is known as "due diligence" and is coupled with "oversight reporting responsibilities" to be fully explained if approved and designated.

---

<sup>1</sup> A Federal Fiscal Year runs for twelve consecutive months from October 1<sup>st</sup> to September 30<sup>th</sup>.

**Optional Evidence --  
Review of the commercial enterprise's organizational documents**

USCIS will review the documents listed below to determine if they are in compliance with EB-5 eligibility requirements. By providing these documents, the Regional Center may facilitate the adjudication of relating I-526 petitions by identifying, up front, any issues that could pose problems at the Immigrant Investor Petition level.

- Operating Agreement
- Partnership Agreement
- Subscription Agreement
- Escrow Agreements and Instructions (one for capital and one for any service fees).
- List of proposed reputable financial institutions to serve as the Escrow Agent(s).
- An Offering Letter, Memorandum, Confidential Private Placement Memorandum, or similar offering made in writing to an immigrant investor through the Regional Center.
- 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 -Articles of Incorporation, state registration documents etc.

(b)(4)



**General issues related to Regional Centers**

**Attorney Representation (8 CFR 103.2(a)(3))**

If the Regional Center wishes to be represented by an outside attorney, that is, an attorney that is neither an employee nor principal of the Regional Center, that attorney must submit a properly executed form G-28, signed by a principal of the Regional Center.

**Posting of Regional Center information on the USCIS Web site:**

If the regional center proposal is approved, then public 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
- Point of Contact
- Phone/Fax
- E-mail/Web Page

**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.

**Copies:**

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.

(b)(4)

## EXHIBIT 2

Form G-28 - Resigned

## G-28, Notice of Entry of Appearance as Attorney or Accredited Representative

Department of Homeland Security

### Part 1. Notice of Appearance as Attorney or Accredited Representative

**A. This appearance is in regard to immigration matters before:**

USCIS - List the form number(s): \_\_\_\_\_

CBP - List the specific matter in which appearance is entered:

ICE - List the specific matter in which appearance is entered: \_\_\_\_\_

**B. I hereby enter my appearance as attorney or accredited representative at the request of:**

List Petitioner, Applicant, or Respondent. **NOTE:** Provide the mailing address of Petitioner, Applicant, or Respondent being represented, and not the address of the attorney or accredited representative, except when filed under VAWA.

<b>Principal Petitioner, Applicant, or Respondent</b>			A Number or Receipt Number, if any	<input type="checkbox"/> Petitioner	
				<input type="checkbox"/> Applicant	
					<input type="checkbox"/> Respondent
Name: Last	First	Middle			
SOUTHERN ATLANTIC	REGIONAL CENTER				
Address: Street Number and Street Name		Apt. No.	City	State	Zip Code
15535 Sunward St.			Wellington	FL	33414

Pursuant to the Privacy Act of 1974 and DHS policy, I hereby consent to the disclosure to the named Attorney or Accredited Representative of any record pertaining to me that appears in any system of records of USCIS, USCBP, or USICE.

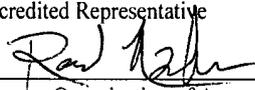
Signature of Petitioner, Applicant, or Respondent	Date
Joseph J. Walsh, Sr. 	03-30-2010

### Part 2. Information about Attorney or Accredited Representative (Check applicable items(s) below)

- A.  I am an attorney and a member in good standing of the bar of the highest court(s) of the following State(s), possession(s), territory(ies), commonwealth(s), or the District of Columbia: Texas
- I am not  or  am subject to any order of any court or administrative agency disbaring, suspending, enjoining, restraining, or otherwise restricting me in the practice of law (If you are subject to any order(s), explain fully on reverse side).
- B.  I am an accredited representative of the following qualified non-profit religious, charitable, social service, or similar organization established in the United States, so recognized by the Department of Justice, Board of Immigration Appeals pursuant to 8 CFR 1292.2. Provide name of organization and expiration date of accreditation:
- C.  I am associated with \_\_\_\_\_  
The attorney or accredited representative of record previously filed Form G-28 in this case, and my appearance as an attorney or accredited representative is at his or her request (If you check this item, also complete item A or B above in Part 2, whichever is appropriate).

### Part 3. Name and Signature of Attorney or Accredited Representative

I have read and understand the regulations and conditions contained in 8 CFR 103.2 and 292 governing appearances and representation before the Department of Homeland Security. I declare under penalty of perjury under the laws of the United States that the information I have provided on this form is true and correct.

Name of Attorney or Accredited Representative		Attorney Bar Number(s), if any
Reid A. Nelson		Texas Bar No. 00794362
Signature of Attorney or Accredited Representative		Date
Reid A. Nelson 		03-30-2010
Complete Address of Attorney or Organization of Accredited Representative (Street Number and Street Name, Suite No., City, State, Zip Code)		
210 English Oaks Circle, Boerne, Texas 78006		
Phone Number (Include area code)	Fax Number, if any (Include area code)	E-Mail Address, if any
2102605161		reid.nelson@connectmyinsurance.com

(b)(4)

[ THIS PAGE LEFT INTENTIONALLY BLANK ]

(b)(4)

## **ABOUT IMPLAN**

The IMPLAN system is a menu-driven microcomputer program that performs complex calculations in the methods and assumptions used to generate social accounts and Input/Output multipliers. The software performs the necessary calculations, using the study area data, to create the models. The system allows users to make in-depth examinations of regional, state, multi-county, county or sub-county economies.

The IMPLAN data and accounts closely follow the accounting conventions used in the "Input/Output Study of the U.S. Economy" by the Bureau of Economic Analysis and the rectangular format recommended by the United Nations.

Comprehensive and detailed data coverage of the entire U.S. by county and the ability to incorporate user supplied data at each stage of the model building process provides a high degree of flexibility both in terms of geographic coverage and model formulation.

## EXHIBIT 1

### *A Summary of the Processes and Calculations Used Within the IMPLAN Program to Perform the Econometric Studies*

Final consumption drives input-output models. Industries respond to meet demands directly or indirectly. Each industry that produces goods and services generates demands for other goods and services and so on. **Multipliers** describe these repetitive actions. There are two different multipliers developed for predictive modeling: Type I and Type II. We start with deriving a matrix by dividing each industry element by the total of all industry elements. This matrix is known as the **A Matrix**. The A Matrix then provides us with **production functions**. A production function shows where an industry spends and in what proportions to generate each dollar of output.

Through imbedded algorithmic computations within the A Matrix, IMPLAN derives the multipliers. The resulting equation is the **predictive model**:

$$X = (I - A)^{-1} * Y$$

Where:

X = Total industry output

I = Identity matrix

A = A Matrix

Y = Final Demand.

This can also be interpreted as:

$\Delta X = (I - A)^{-1} * \Delta Y$  or Change in Total Industry Output =  $(I - A)^{-1} * \text{Change in Final Demand}$ .  
The predictive model shows how output will change with a given change in final demand.

Multipliers report the effects on economic activity through three components:

1. **Direct effects** are the changes in the industries to which a final demand change was made.
2. **Indirect effects** are the changes in inter-industry purchases as they respond to the new demands of the directly affected industries.
3. **Induced effects** typically reflect changes in spending from households as income increases or decreases due to the changes in production.

The **Type I multiplier** measures the direct and indirect effects of a change in economic activity. It captures the inter-industry effects only, i.e. industries buying from local industries.

A **Type II multiplier** captures direct and indirect effects. In addition to the inter-industry effects, the Type II also takes into account the income and expenditures of households. The household income and the household expenditures are treated as industries. This internalizes the household sector, including the induced or household spending effects. The Type II multiplier is calculated

by dividing household expenditures by the total of all household incomes. The Type II multiplier says that for a one dollar change in final demand for an industry, increases occur in inter-industry economic activity (as in Type I). But it also says the incomes of people employed producing the output of that industry increase. These people spend their increased income on personal consumption, which leads to demands from local industries. Households that live in the region, make consumption expenditures with only disposable income as well as making payments to taxes as well as savings. These refined calculations result in a more complete and realistic presentation of total economic activity.

Income multipliers are derived from the relationship between income and output. In the IMPLAN study area data there is total industry output and total income for each sector. From this data we can calculate income per dollar of output. An employment multiplier is created in the same manner as the income multiplier, but using output per worker ratios instead of output per dollar of income.

Input-output modeling is based on several assumptions:

- Constant Returns to Scale
- No Supply Constraints
- Fixed Commodity Input Structure
- Homogenous Sector Output
- Industry Technology Assumption

The first assumption is that the *production functions* (an industry's list of expenditures) are assumed to *have constant returns to scale*. This means the production functions are considered linear; if additional output is required, all inputs increase proportionately.

*No supply constraints* means supplies are unlimited. An industry has unlimited access to raw materials and its output is limited only by the demand for its products.

A *fixed commodity input structure* implies that price changes do not cause a firm to buy substitute goods. This structure assumes that changes in the economy will affect the industry's output but not the mix of commodities and services it requires to make its products.

The fourth assumption is that there is *homogeneous sector output*. In other words: the proportions of all the commodities produced by that industry remain the same, regardless of total output. An industry won't increase the output of one product without proportionately increasing the output of all its other products.

The *industry technology assumption* assumes that an industry uses the same technology to produce all its products.

Economic impact analysis involves applying a final demand change to a predictive economic input-output model, and then analyzing the resulting changes in the economy. A concise definition of impact analysis is:

**An assessment of change in overall economic activity as a result of some change in one or several economic activities.**

In practice, economic impact analysis can mean many different things. It might measure the impacts of a new factory moving into an area. It might involve estimating the local impacts of a professional football team moving into an area or the effects of tourist spending. Governments use impact analysis for policy decisions and planning.

Researchers use impact analysis to study relationships of different elements in an economy. An impact analysis begins by converting a *project* to a set of economic issues and those elements involved with the impact. Once the issues have been identified, the elements involved can be identified and their actions converted to a set of expenditures. These expenditures are the initial changes that stimulate further economic activity. The actions and the economic activity they stimulate are the impact.

If the expenditure dollars are for a year different than the model's data, a *deflator* is applied. Deflators account for the changes in actual value of the dollar over the years. Price changes need to be accounted for otherwise the impacts will be estimated incorrectly.

Please review the following sample computations to further illustrate the calculations involved. These calculations are employment calculation examples of each industry cluster in the economic report.

For further review, please see the attached industry multiplier charts. We have included the multiplier charts for employment, output, indirect business taxes and employee compensation. The basis for impact remains constant, as represented below.

### **Nursing Home Industry Cluster, Palm Beach County, Florida**

Step One:

- A. Construction costs per square foot are derived from the 27<sup>th</sup> Annual RS Means "Cost per Square Foot" guide.

Nursing Home	\$123.11	X	50,000	Sq. ft.	\$6,155,700
--------------	----------	---	--------	---------	-------------

Step Two:

- A. Total construction cost is inputted as the basis for employment to the IMPLAN input-output model.
- B. The in-region model is built using data from Palm Beach County.

- C. IMPLAN algorithms then determine the multipliers that are used to estimate employment, output, employee compensation and indirect business taxes. Multipliers are based upon \$1,000,000.00 of direct construction cost.

EMPLOYMENT MULTIPLIER CHART					
sector	description	direct	indirect	induced	total
34	Construct new nonresidential commercial	7.052061	1.695135	3.158666	11.905862

- D. The following chart shows the results of multiplying 6.1557 (\$6,155,700.00/\$1,000,000.00) by the multipliers produced by IMPLAN.

EMPLOYMENT RESULTS					
sector	description	direct	indirect	induced	total
34	Construct new nonresidential commercial	43.4103719	10.434743	19.443800	73.288915

- E. A deflator is applied to the results to account for changes in the dollar between the year of the data (2007) and the year that the construction will take place (2010). IMPLAN software then rounds to one eighth.

DEFLATION RESULTS					
sector	description	direct	indirect	induced	total
34	Construct new nonresidential commercial	38.9	9.4	17.4	65.7

### Step Three:

- A. Direct employment is based upon a 50,000 square foot facility housing 100 residents. Florida nursing homes have an average occupancy rate of 83.9%<sup>44</sup>
- B. IMPLAN models are based upon an average daily rate of \$215.37, rate period July 1, 2007 and June 30, 2008.<sup>45</sup>

<sup>44</sup> [www.statehealthfacts.org](http://www.statehealthfacts.org), The Henry J. Kaiser family foundation.

<sup>45</sup> Department of Social Services Overview of Nursing Facilities Rate Setting, Craig J. Lubitski Consulting LLC, September 2008.

Nursing Home Revenue	
# of Beds	100
Average Daily Rate	215.37
Occupancy Rate	83.9%
Total Annual Revenue	\$6,595,383

- C. The in-region model is built using data from Palm Beach County.
- D. IMPLAN algorithms then determine the multipliers that are used to estimate employment. Multipliers are based upon \$1,000,000.00 of annual gross revenue.

NURSING HOME EMPLOYMENT MULTIPLIERS				
sector	description	direct	indirect	induced
398	Nursing & Residential Care Facilities	17.633821	1,184771	3.854047

- E. The following chart represents the results of multiplying 6.595383 (\$6,595,383/\$1,000,000) by the multipliers produced by IMPLAN.

NURSING HOME EMPLOYMENT				
sector	description	direct	indirect	induced
398	Nursing & Residential Care Facilities	116.30180	7.8140185	25.418916

- F. A deflator is applied to the results to account for changes in the dollar between the year of the data (2007) and the first year that the operations will take place (2011). IMPLAN software then rounds to one eighth.

The numbers were rounded to a eighth of an employee and reported in the operation summary charts in this report.

NURSING HOME EMPLOYMENT MULTIPLIERS				
sector	description	direct	indirect	induced
398	Nursing & Residential Care Facilities	98.6	6.6	21.6

(b)(4)

(b)(4)

[THIS PAGE INTENTIONALLY LEFT BLANK]

## EXHIBIT 4

### Sample Investor Questionnaire

## EB5 INVESTOR QUESTIONNAIRE

### Instructions for completing this Questionnaire:

- Answer all questions fully and accurately. If any item does not apply, please write "N/A".  
Do not leave any space blank.
- Type or print legibly in ink.
- If a Translator has assisted in completing answers in the English language, the Translator must attach a Translator's Certificate.
- All documents which are not in English must be submitted in their original language together with an English translation. Translators must complete the attached Document Translator's Certificate.
- \* Copies of all requested documents will suffice, however original documents must be available to submit to an immigration officer or consular official upon request. The attached Copies Certification must be completed and returned to this office together with any photocopies of documents.
- \* Please note when certified, CIVIL documents are requested. In such instances, the U.S. Citizenship & Immigration Services (USCIS)- will require certified, CIVIL (issued by a government agency) documents.
- \* If additional space is needed, attach separate sheets indicate item number, and date and sign each sheet.

### PART A. BIOGRAPHICAL INFORMATION - INVESTOR

(to be completed by INVESTOR)

1. Full Name: (first, middle, last) \_\_\_\_\_
2. Full Name in Native Alphabet: (if Roman letter not used) \_\_\_\_\_
3. Other Names used: (if married woman, give maiden name) \_\_\_\_\_
4. Present Street Address: \_\_\_\_\_
5. Present Mailing Address: \_\_\_\_\_
6. Home Phone/Fax Number/E-mail: \_\_\_\_\_
7. Work Phone/Fax Number/E-Mail: \_\_\_\_\_

8. Addresses where you lived since age 16 (include street address, city, province/state, country, and dates of residence (month, year)):

9. Last Address Outside of the United States of More Than One Year (include dates of residence (month, year))

10. Date of Birth: (date, month, and year) \_\_\_\_\_

11. City and Country of Birth: (attach certified copy of CIVIL birth certificate:

12. Country(ies) of Citizenship: attach copy of all identification pages, stamped pages and visa pages of all passports)

13. Nationality (Country to which you owe permanent allegiance):

14. Sex:  Male  Female

15. Personal Description;

a. Color of hair: \_\_\_\_\_

b. Color of eyes: \_\_\_\_\_

c. Height: \_\_\_\_\_

d. Complexion: \_\_\_\_\_

e. Marks of Identification; \_\_\_\_\_

16. U.S. Social Security Number, if any: \_\_\_\_\_

17. Full Name and Address of Father: \_\_\_\_\_

18. Father's Date, City and County of Birth: \_\_\_\_\_

19. Father's Country of Citizenship: \_\_\_\_\_

20. Full Name and Address of Mother: (including Maiden name - if deceased, so state, giving year of death) \_\_\_\_\_

21. Mother's date, City and Country of Birth:

22. Mother's Country of Citizenship: \_\_\_\_\_

23. If neither parent is living provide name and address of next of kin (nearest relative) in your home country, and state his/her relationship to you.

24. Marital Status: (check all that apply):

Married      Single  Widowed  Divorced

25. Number of times married: (including present marriage, if any) \_\_\_\_\_

26. If married, give full name of spouse (include maiden name), date and place of birth, and date and place of marriage: (attach certified copy of CIVIL marriage certificate.)

27. Will you present spouse accompany or follow to join you in the U.S.?  Yes     No

**\*If yes, complete Questionnaire for Spouse of Investor\***

28. Has your spouse ever before applied for permanent resident status in the U.S.?  Yes  
No.

If yes, give date and place of filing and final disposition (include Alien Registration Number, if any) \_\_\_\_\_

29. If you were previously married give the full name(s) (including maiden names) of the former spouse(s), their date(s), date(s) of birth, place(s) and date(s) of marriage(s), and date(s) and location(s) where each marriage was terminated (attach certified copy of CIVIL divorce decree or CIVIL annulment or death certification of each former spouse).

30. List full name, date of birth, and place of birth and present address of all of your children. State if each child is 1) legitimate, 2) adopted, 3) a step-child or 4) an orphan. Explain your answer. As to any child who has sought or obtained admission to the United States, provide that child's Alien Registration Number (A#) (issued by U.S. US CIS), if any.

31. Name of any child listed in number 30 who will accompany or follow to join you to the U.S.

**\*Complete One Questionnaire for Child of investor for EACH such child**

32. Have you ever before applied for a permanent residence visa for the U.S.?  Yes  No.

If yes, state where and when, and was the visa issued or refused. Explain. ( Include Alien Registration Number (A#), if any.) 33. Have you ever applied for a visa to enter the U.S. other than for permanent residence?

Yes  No. If yes, state where and when, and was the visa issued or refused.  
Please explain.

34. If you have ever been in the United States, answer the following (a through h) for each and every state in the United States.: (If never, write "never")

a. State the type of visa.

- b. State the immigration status under which you were admitted at the Port of Entry.
- c. US CIS File Number (if known) and Alien Registration Number (A#), if any.
- d. Period you were in the U.S. (date, month, year)
- e. Location in the U.S. where you stated.
- f. Did you depart within the period of authorized stay? \_\_\_ Yes \_\_\_ No
- g. If you overstayed an authorized period of admission, state the length of the overstay in total days.
- h. If you otherwise violated your immigration status, please explain.

35. Have you ever worked in the U.S without authority of the U.S Citizenship & Immigration Service (USCIS)?

Yes \_\_\_ No \_\_\_ If yes, state the circumstantial and describe any actions taken by US CIS on account of your status.

36. If you are in the U.S. now, state the date, place and manner of your arrival, the status under which admitted and the date to which admitted. Give the 1-94 (arrival/departure) record number. Provide a copy of both sides of the 1-94 record and a copy of the visa.

37. If you are in the U.S. now and you changed status while in the U.S., please state your current status and provide copies of your 1-979, Notice of Action granting approval of your current status. \_\_\_\_\_

38. List employment since age 16, including your job title, name and address of employer and dates of employment (month and year) \_\_\_\_\_

39. Provide a summary of your educational qualifications.  
(Name and address of school or university, date attendance, degree(s), awards, major fields of study)

40. List all languages you can speak, read and/or write: (specify whether you speak, read and/or write the language) \_\_\_\_\_

41. State the U.S. Consulate you want notified if this petition is approved and if any requested adjustment of status cannot be granted. \_\_\_\_\_

42. Have you ever been required to engage in Special Registration (NSEERS) upon admission to the U.S., during your time in the U.S. or upon departure from the U.S.? Yes No. If yes, have you always complied with these requirements? Yes \_\_\_ No \_\_\_ If no, Please explain. \_\_\_\_\_

43. Have you ever been required to notify INS or CIS of your change of address while in the U.S.? Yes \_\_\_ No \_\_\_ If yes, did you comply by filing and AR-11, Change of Address Form? Yes \_\_\_ No \_\_\_ If no, please explain \_\_\_\_\_

## PART B. ADMISSIBILITY ISSUES

The U.S. Immigration Laws contain a number of restrictions on the ability of a person to enter the U.S. for permanent residence. To ascertain whether any of these apply to you, please provide the information requested carefully and in detail.

### 1. Medical and Health Issues

a. You will be required to undergo a medical examination to prove that you do not have "a communicable disease of public health consequence". This is considered to include: cancrroids, gonorrhoea, granuloma inguinale, human immunodeficiency virus (HIV) infection, leprosy (infectious), lymphogranuloma venerum, syphilis (infectious stage) or tuberculosis (active). Is there any reason to believe that you might test positive for any of these conditions? Yes \_\_\_ No \_\_\_

b. Might you be consider to have, or to have had in the past, a physical or mental disorder and behavior associated with that disorder that may pose, or has posed, a threat to the property, safety or welfare of yourself or others? This might include a conviction for DWI (drinking while intoxicated)

Yes \_\_\_ No. If yes, give details. \_\_\_\_\_

c. Have you ever been treated in an institution or hospital or other place for insanity or other mental disease? Yes \_\_\_ No \_\_\_  
If yes, give details. \_\_\_\_\_

d. Is there any possibility that you would be considered a drug addict or abuse? Yes \_\_\_ No \_\_\_  
If yes, give details. \_\_\_\_\_

e. Do you have a disease, disability or other condition or circumstance that might impair your ability to earn a living? Yes \_\_\_ No \_\_\_ If yes, give details. \_\_\_\_\_

### 2. Criminal Issues

a. Have you ever been convicted of a crime(s) or admitted the acts that constitute a crime(s)? Yes \_\_\_ No \_\_\_ Provide an original police certificate concerning the existence or non-existence of a police record and certified court records for all criminal prosecutions. **(This certificate will need to be re-issued later in your immigration process. We will tell you when to seek an updated police certificate.)**

If you answered yes, also answer the following for each and every conviction or admission. If more than one, please photocopy this page and answer 1-9 completely for each incident:

1. What was the crime you committed? \_\_\_\_\_ , \_\_\_\_\_

2. Where was it committed? \_\_\_\_\_
3. Were you arrested for the crime?\_
4. Were you convicted of the crime?
5. What was the name of the court?
6. On what date was the crime committed?
7. If you were convicted, what was the maximum possible penalty for the crime?
8. If you were convicted, what was the sentence that you received (regardless of the time you actually served?)
9. What was the date of conviction or sentencing? \_\_\_\_\_
- b. Have you ever been arrested, even if you were not convicted? Yes \_\_\_ No \_\_\_ If yes, give details, including dates and locations. \_\_\_\_\_
- c. Have you ever knowingly committed any crime of moral turpitude or a drug-related offense for which you have not been arrested? Yes \_\_\_ No \_\_\_ If yes, give details, including dates and locations.
- d. Have you committed any acts that might be considered a crime, even if you were not arrested or convicted? Yes \_\_\_ No \_\_\_ If yes, give details, including dates and locations.
- e. Have you ever violated or conspired to violate, or been convicted of violating or conspiring to violate, any law of any country or jurisdiction relating to a controlled (regulated) substance? Yes \_\_\_ No \_\_\_ If yes, give details.
- f. Have you ever been, or would a consular or immigration officer have reason to believe that you have ever been, an illicit trafficker in any controller (regulated) substance or assisted others in any way with illicit trafficking in controlled substances? Yes \_\_\_ No \_\_\_ If yes, give details.
- g. Have you ever been the beneficiary of a pardon, amnesty, rehabilitation decree, other act of clemency or similar action? Yes \_\_\_ No \_\_\_ If yes, give details.
- h. Have you ever exercised diplomatic immunity to avoid prosecution for a criminal offense in the U.S.? Yes \_\_\_ No \_\_\_ If yes, give details.
- i. Have you received public assistance in the U.S. from any source, including the U.S. government or any state, county, city or municipality (other than emergency medical treatment), or are you likely to receive public assistance in the future? Yes \_\_\_ No \_\_\_ If yes, give details.
- j. Do you intend to engage in prostitution, procure or import prostitutes or receive proceeds of prostitution, or have you engaged in prostitution, directly procured or attempted to procure or import prostitutes or received the proceeds of prostitution within the past ten years? Yes No. If yes, give details.

k. Are you coming to the U.S. to engage in any unlawful commercialized vice? Yes \_\_\_  
No \_\_\_ If yes, give details. \_\_\_\_\_

l. Are there or have there been any judgments or pending governmental CIVIL or criminal actions, governmental administrative proceedings, or any private CTIVIL actions involving monetary judgments, against you from any court in or outside the United States within the past fifteen years? Yes \_\_\_ No \_\_\_ If yes, give details and provide certified copies of such judgments.

### 3. Security and Related Issues

a. Would a consular officer or the USCIS have any ground to believe that you seek to enter the U.S. to engage in any activity in violation of U.S. law relating to sabotage or espionage, or to violate or evade laws prohibiting export from the U.S. of goods, technology or sensitive information? ; \_ Yes \_\_\_ No \_\_\_ If yes, give details. \_\_\_\_\_

b. Would a consular officer or the USCIS have any grounds to believe that you seek to enter the U.S. to engage in any unlawful activity, or any activity with the purpose of opposition, control or overthrow of the U.S. government by forces, violence or other unlawful means? Yes \_\_\_ No \_\_\_ If yes, give details.

c. Have you engaged in, assisted with or solicited assistance with membership in or would a consular officer or the USCIS have grounds to believe you will engage in, terrorist activity? This is defined as an activity that is unlawful in the country commuted and that involves:

1. The hijacking or sabotage of any conveyance, or;
2. The seizing or detaining and threatening to kill, injure or detain an individual to compel a third person or government organization to act or not act, or;
3. A violent attack upon an internationally protected person or that person's liberty, or;
4. Assassination, or;
5. The use of any biological or chemical agent, any nuclear weapon or device, or explosive or firearm with the intent to endanger the safety of a person or persons, or to cause substantial damage to property. A threat, attempt or conspiracy to perform any of these acts are included. Preparation or planning of such an act, gathering information on potential targets for terrorist activity, provision of material support, solicitation of funds or other things of value, or solicitation of membership in a terrorist organization or activity also included in this definition.

Yes \_\_\_ No \_\_\_ (If yes to any of the above, please explain.)

d. Are you an official, representative or spokesman of the Palestine Liberation Organization? Yes \_\_\_ No \_\_\_ If yes, please explain. \_\_\_\_\_

e. Would your entry or proposed activities in the U.S. be believed to have potentially serious adverse foreign policy consequences for the U.S. Yes \_\_\_ No \_\_\_ If yes, give details. \_\_\_\_\_

f. Have you ever been a member of or affiliated with the Communist or any other totalitarian party, or subdivision or affiliate of such party? Yes \_\_\_ No \_\_\_ If yes, please answer the following:

1. When was the membership or affiliation terminated? \_\_\_\_\_
  2. Where was the party located, and does it control, or has it ever controlled the government?
  3. Is or was your membership or affiliation involuntary, solely when under 16 year of age, or for the necessary purposes of obtaining employment, food rations or other essentials of living? Explain.
  4. Might a consular officer or the USCIS regard you as a threat to the security of the U.S.? Explain.
- g. From March 23, 1933, to May 8, 1945, were you under the direction of or in association with the Nazi Government of Germany, any government occupied by Nazi Germany's military forces, any government or any government which was an ally of Nazi Germany's government, or did you order, incite, assist or otherwise participate in the persecution of any person because of race, religion, national origin or political opinion? Yes \_\_\_ No \_\_\_ If yes, give details. \_\_\_\_\_
- h. Have you ever engaged in or ordered, incited, or assisted conduct that might be genocide? Yes \_\_\_ No \_\_\_ If yes, give details. \_\_\_\_\_
- i. List your present and past membership in or affiliation with every organization, association; fund, foundation, party, club, society or similar group in the U.S. or in any other country or place and your foreign military service. Include name of organization, location, dates of membership, and the nature of the organization. If none, write "none".

#### 4. Miscellaneous Issues

- a. Have you ever departed from or remained outside of the U.S. to avoid training or service in the armed forces in a time of war or national emergency? Yes \_\_\_ No \_\_\_ If yes, give details. \_\_\_\_\_
- b. Are you coming to the U.S. to practice polygamy? Yes \_\_\_ No. If yes, give details.
- c. Will you be accompanying as guardian another foreign national who has been ordered excluded and deported and certified to be helpless from sickness, mental or physical disability? Yes \_\_\_ No \_\_\_ If yes, give details. \_\_\_\_\_
- d. Are you detaining, retaining or withholding custody of a U.S. citizen child, outside the U.S. from a person granted custody of that child by an order of a court in the U.S.? Yes \_\_\_ No \_\_\_ If yes, give details. \_\_\_\_\_
- e. Have you ever held Exchange Visitor (J) status in the U.S., been subject to the two-year foreign residency requirement, AND not resided and been physically present in your country of nationality or last residence for a total of at least two years following departure from the U.S.; AND not been granted a waiver of the two-year foreign residence requirement? Yes \_\_\_ No \_\_\_ If yes, please give details \_\_\_\_\_
- f. Have you ever been excluded from the U.S. or ever deported or removed from the U.S.? If so, give details, including reasons for exclusion, deportation or removal; Immigration Court or Port of Entry where action occurred; and date of action. (Provide copies of all government documents.) \_\_\_\_\_

- g. Have you ever procured or sought to procure a visa, documentation, entry into the U.S. or other benefits provided under U.S. immigration law by fraud or willfully misrepresenting a material fact? Might a consular officer or the US CIS have some reason to believe you have done so? Yes \_\_\_ No \_\_\_ Explain

5. Applicability to Family Members

- a. Would any family member (spouse or unmarried child under age 21) who might be immigrating with you answer "yes" to any of the above (Part B – Admissibility Issues 1-4)? Yes \_\_\_ No \_\_\_ If yes, attach a detailed explanation of each application issue.
- b. If there is any information you have which you have not yet furnished that may possibly affect your admissibility to the United States, or that of your spouse and children (unmarried and under the age of 21 years), please enter it here. If you are not sure state the matter that concerns you. If none, state "none".

PART C. INVESTMENT ISSUES

1. The required investment to be made is \$500,000.00 U.S. and it is required that these assets have been acquired by lawful means and be available immediately. To meet these requirements please provide the following information (be prepared to document all responses):

- a. Do you possess assets of more than \$500,000.00 U.S. which are available to be invested? Yes \_\_\_ No \_\_\_
- b. In what form are these assets, where are they located and are you the sole owner? If you are not, who are the owners and will the assets involved be available immediately for investment by you? Explain. Provide documents to evidence your current ownership of these assets. (For example: bank statements, security account statements; trust instruments, deeds with valuation statements; share certificates of publicly traded companies or closely held companies with valuation certificates.)
- c. How did you or will you acquire the assets? Provide documents that trace your ownership of these assets. (For example: records of inheritance; records of the purchase or sale of assets; income records.)
- d. Have you filed any tax returns of any kind within the past five years? Through an organization or personally? With any taxing authority in or outside the United States? If so, please provide signed copies for the last five (5) tax years.
- e. Is there any restriction upon your ability to transfer your assets out of the country where located and to the U.S. lawfully, for the proposed investment? Yes \_\_\_ No \_\_\_ Explain.

**ATTESTATION**

I hereby swear under oath that:

- 1) I understand the questions asked in this questionnaire and the answers that I have given;
- 2) these answers may be relied upon by the investments enterprise, its owners, employees and legal representatives who will use my answers to assist me to obtain lawful permanent residence in the U.S.;
- 3) the information contained in this questionnaire is true and accurate to the best of my knowledge and belief; and
- 4) copies of documents submitted are exact photocopies of unaltered original documents and I understand that I may be required to submit original documents to an immigration or consular official at a latter date.

Signature \_\_\_\_\_

Date \_\_\_\_\_

**FedEx**® **US Airbill**

Express 8704 5970 2632

0200

FedEx Retrieval Copy

**1 From**  
Date: 3-30-10  
Sender's FedEx Account Number: *888 888 888*

Sender's Name: *JOSPHAL WASH*  
Company: *Southern Atlantic Regional Center*  
Address: *15535 Soward St*  
City: *WELLINGTON*  
State: *FL* ZIP: *33414*  
Phone: *305 731-9301*

**2 Your Internal Billing Reference**

**3 To**  
Recipient's Name: *EBS RC Proposal*  
Company: *USCIS*  
Address: *2400 Avilla Road 2nd Floor*  
City: *Laguna Niguel*  
State: *CA* ZIP: *92677*

Print FedEx location address for HOLD Weekday  
Print FedEx location address for HOLD Saturday  
Print FedEx location address for HOLD First Day Delivery  
Print FedEx location address for HOLD Next Business Day Delivery

Address: *LAQUAN ALGER*  
City: *LAQUAN ALGER*  
State: *CA* ZIP: *92677*



8704 5970 2632

**4a Express Package Service**  
1  Next Business Morning  
2  Next Business Afternoon  
3  Next Business Evening  
4  Next Business Saturday  
5  Next Business Sunday  
6  Next Business Monday  
7  Next Business Tuesday  
8  Next Business Wednesday  
9  Next Business Thursday  
10  Next Business Friday  
11  Next Business Saturday  
12  Next Business Sunday

**4b Express Freight Service**  
1  Next Business Morning  
2  Next Business Afternoon  
3  Next Business Evening  
4  Next Business Saturday  
5  Next Business Sunday  
6  Next Business Monday  
7  Next Business Tuesday  
8  Next Business Wednesday  
9  Next Business Thursday  
10  Next Business Friday  
11  Next Business Saturday  
12  Next Business Sunday

**5 Packaging**  
1  Flat Rate Box  
2  FedEx Pak  
3  FedEx Box  
4  FedEx Tube  
5  Other

**6 Signature Options**  
1  No Signature Required  
2  Direct Signature  
3  Indirect Signature  
4  Signature Required

**7 Payment Bill to:**  
1  Sender  
2  Recipient  
3  Third Party  
4  Credit Card  
5  Cash/Check

**8 Special Handling and Delivery Signature Options**  
1  Fragile  
2  Perishable  
3  Hazardous  
4  Live Animals  
5  High Value  
6  Restricted  
7  Other

Print FedEx location address for HOLD Weekday  
Print FedEx location address for HOLD Saturday  
Print FedEx location address for HOLD First Day Delivery  
Print FedEx location address for HOLD Next Business Day Delivery

**9 Payment Bill to:**  
1  Sender  
2  Recipient  
3  Third Party  
4  Credit Card  
5  Cash/Check

**10 Special Handling and Delivery Signature Options**  
1  Fragile  
2  Perishable  
3  Hazardous  
4  Live Animals  
5  High Value  
6  Restricted  
7  Other

**11 Payment Bill to:**  
1  Sender  
2  Recipient  
3  Third Party  
4  Credit Card  
5  Cash/Check

**12 Special Handling and Delivery Signature Options**  
1  Fragile  
2  Perishable  
3  Hazardous  
4  Live Animals  
5  High Value  
6  Restricted  
7  Other

**Department of Homeland Security**  
**U.S. Citizenship and Immigration Services**

# **Cover Sheet**

# **Record of Proceeding**

**NOTE:** This is a permanent record of the U. S. Citizenship and Immigration Services. Any part of this record that is removed **must be returned** after it has served its purpose.

## **Instructions**

1. Place a separate cover sheet on the top of each Record of Proceeding.
2. Each Record of Proceeding must be fastened on the inner left side of the file jacket in chronological order.
3. Any person temporarily removing any part of this record must make, date and sign a notation to this effect that must be retained in this record, below the cover sheet. The signer is responsible for replacing the removed material as soon as it has served its purpose.
4. See AM 2710 for detailed instructions

		Application/Petition REGIONAL CENTER PROPOSAL
Receipt # W09001240		
Notice Date March 12, 2010	Page 1 of 6	Regional Center South Atlantic Regional Center (SARC)

Joseph Walsh, Sr.  
South Atlantic Regional Center (SARC)  
15535 Sunward St.  
Wellington, FL 33414-8335

Request for Evidence

**IMPORTANT: WHEN YOU HAVE COMPLIED WITH THE INSTRUCTIONS ON THIS FORM, RESUBMIT THIS NOTICE ON TOP OF ALL REQUESTED DOCUMENTS AND /OR INFORMATION TO THE ADDRESS BELOW. THIS OFFICE HAS RETAINED YOUR PETITION/APPLICATION WITH SUPPORTING DOCUMENTS.**

**THE INFORMATION REQUESTED BELOW MUST BE RECEIVED BY THIS OFFICE NO LATER THAN EIGHTY-FOUR (84) DAYS FROM THE DATE OF THIS NOTICE. IF YOU DO NOT PROVIDE THE REQUESTED DOCUMENTATION WITHIN THE TIME ALLOTTED, YOUR APPLICATION WILL BE CONSIDERED ABANDONED PURSUANT TO 8 C.F.R. 103.2(B)(13) AND, AS SUCH, WILL BE DENIED.**

WS 24064/CSC3700 DIV III

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

**Note:** You are given until FRIDAY, JUNE 18 2010 in which to submit the information requested.

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 non-US Postal Service  
Attn: EB 5 RC Proposal  
24000 Avilla Road, 2<sup>nd</sup> Floor  
Laguna Niguel, CA 92677

You will be notified separately about any other applications or petitions you filed. Save a photocopy of 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:

U.S. CITIZENSHIP AND IMMIGRATION SERVICES  
CALIFORNIA SERVICE CENTER  
Attn: EB 5 RC Proposal  
P.O. BOX 10590  
LAGUNA NIGUEL, CA 92607-0526



W09 001 245

## 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](http://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.

Besides the basic general proposal, the Regional Center Proposal may now be approved to include two optional requests, review of the enterprise's organization and operational documents and/or a specific investment project. Thus, documentation submitted in support of the Regional Proposal may be grouped into two categories, mandatory, required for the basic general proposal, and optional, needed for the two options.

**What is the Immigrant Investor Pilot Program?**

The Immigrant Investor Pilot Program ("Pilot Program") was created by Section 610 of Public Law 102-395 (October 6, 1992). This is different in certain ways from the basic EB-5 investor program.

The Pilot Program began in accordance with a Congressional mandate aimed at stimulating economic activity and creating jobs for U.S. workers, while simultaneously affording eligible aliens the opportunity to become lawful permanent residents. Through this innovative program, foreign investors are encouraged to invest funds in an economic unit known as a "Regional Center."

A Regional Center is defined as any economic unit, public or private, engaged in the promotion of economic growth, improved regional productivity, job creation and increased domestic capital investment.

8 CFR 204.6 (m)(3) describes specific evidence that must be submitted before consideration for eligibility for this benefit may proceed. After review of your proposal in the light of these requirements, the following information, evidence or clarification is needed to proceed.

It is always best to start with a cover letter that acts as an executive summary followed by a table of contents of the various tabbed sections to follow.

**Regional Center Proposals must meet all the Requirement of 8 CFR 103.2.**

**The proposal must be signed by a principal of the Economic Entity filing the proposal.**

8 CFR 103.2(a)(2) requires that the applicant or petitioner must sign their petition or application. While no specific form is required for a Regional Center Proposal, the proposal must include a signature of a principle and the point of contact of the proposed Regional Center, generally found on the letter requesting the benefit. In this case the requesting letter was signed only by the attorney of record. Since there is no claim that the attorney is also a principal of the Regional Center the Proposal has not been properly filed by a principal of the Regional Center. Therefore, provide a new and updated request signed by a Regional Center principal.

### **Mandatory Evidence for the Basic General Proposal**

#### **Indirect Job Creation (8 CFR 204.6(m)(3)(ii)):**

Under the provisions of the INA which apply to the Immigrant Investor Pilot Program and specific amendments to the statute, especially in the 2002 amendment Per Public Law 107-273, enacted November 2, 2002, which clearly states:

A regional center shall have jurisdiction over a limited geographic area, which shall be described in the proposal and consistent with the purpose of concentrating pooled investment in defined economic zones. The establishment of a regional center may be based on general predictions, contained in the proposal, concerning the kinds of commercial enterprises that will receive capital from aliens, the jobs that will be created directly or indirectly as a result of such capital investments and the other positive economic effects such capital investments will have.

Also 8 CFR 204.6(m)(3)(ii) requires you to:

Provide in verifiable detail how jobs will be created indirectly;

In addition, INA 203(b)(5)(B)(i) states:

(B) Set-aside for targeted employment areas.-

(i) In general. - Not less than 3,000 of the visas made available under this paragraph in each fiscal year shall be reserved for qualified immigrants who invest in a new commercial enterprise described in subparagraph (A) which will create employment in a targeted employment area.

Please clarify the actual number of industry clusters for job creation within the regional center because the attorney's cover states that there are nine (9) industry clusters but lists seven (7) and the Executive Summary states that there are ten (10) industry clusters but lists and provides job creation multipliers for eight (8).

#### **Regional Center's Operational Plan (8 CFR 204.6(m) and 8 CFR 204.6):**

Provide a Regional Center Operational plan that shows how the Regional Center will identify, assess and evaluate proposed investor projects and activities, and enterprises. In addition the Regional Center plan must address the following areas:

- **Regional Center’s Operational Plan- Recruitment and Due Diligence:**

Also, for any individual alien investor who will be solicited by a Regional Center to invest the requisite capital into a Regional Center commercial activity, it will be incumbent on the Regional Center to engage in a due diligence process to establish that all sources of capital can be fully explained and clearly shown to have been lawfully obtained.

- Submit a proposed Regional Center operation’s plan which addresses how investors will be recruited and how the Regional Center will conduct its due diligence to accommodate the requirement that all immigrant investor funds will be lawfully obtained and describe what measures will be taken by the Regional Center to ensure and validate this. Will the submission of certain financial documents be required of foreign investors or will the Regional Center, for example, utilize a professional investigating firm to vet a potential investor’s source of funds? What are your plans in this regard?

- **Administrative Oversight:**

The regulations at 8 CFR 204.6(m)(6), require 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 an approved and designated 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 on a quarterly basis in order to report to USCIS upon request the following year to date information for each Federal Fiscal Year<sup>1</sup>, commencing with the initial year as follows:

- Submit a description of your plans to administer, oversee, and manage the proposed Regional Center, including but not limited to such things as to identify, assess and evaluate proposed immigrant investor projects and enterprises; how the proposed Regional Center would perform “due diligence” as to whether investment capital to be sought will consist solely of alien investor capital or a combination of alien investor capital and domestic capital; and to maintain records, data and information on projects, investors, business activities, etc., in order to report to USCIS for each Federal Fiscal Year. This is known as “due diligence” and is coupled with “oversight reporting responsibilities” to be fully explained if approved and designated.

---

<sup>1</sup> A Federal Fiscal Year runs for twelve consecutive months from October 1<sup>st</sup> to September 30<sup>th</sup>.

**Optional Evidence --  
Review of the commercial enterprise's organizational documents**

USCIS will review the documents listed below to determine if they are in compliance with EB-5 eligibility requirements. By providing these documents, the Regional Center may facilitate the adjudication of relating I-526 petitions by identifying, up front, any issues that could pose problems at the Immigrant Investor Petition level.

- Operating Agreement
- Partnership Agreement
- Subscription Agreement
- Escrow Agreements and Instructions (one for capital and one for any service fees).
- List of proposed reputable financial institutions to serve as the Escrow Agent(s).
- An Offering Letter, Memorandum, Confidential Private Placement Memorandum, or similar offering made in writing to an immigrant investor through the Regional Center.
- 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 -Articles of Incorporation, state registration documents etc.

(b)(4)



**General issues related to Regional Centers**

**Attorney Representation (8 CFR 103.2(a)(3))**

If the Regional Center wishes to be represented by an outside attorney, that is, an attorney that is neither an employee nor principal of the Regional Center, that attorney must submit a properly executed form G-28, signed by a principal of the Regional Center.

**Posting of Regional Center information on the USCIS Web site:**

If the regional center proposal is approved, then public 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
- Point of Contact
- Phone/Fax
- E-mail/Web Page

**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.

**Copies:**

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.

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)



## G-28, Notice of Entry of Appearance as Attorney or Accredited Representative

Department of Homeland Security

### Part 1. Notice of Appearance as Attorney or Accredited Representative

**A. This appearance is in regard to immigration matters before:**

- USCIS - List the form number(s): \_\_\_\_\_  CBP - List the specific matter in which appearance is entered: \_\_\_\_\_
- ICE - List the specific matter in which appearance is entered: \_\_\_\_\_

**B. I hereby enter my appearance as attorney or accredited representative at the request of:**

List Petitioner, Applicant, or Respondent. **NOTE:** Provide the mailing address of Petitioner, Applicant, or Respondent being represented, and not the address of the attorney or accredited representative, except when filed under VAWA.

<b>Principal Petitioner, Applicant, or Respondent</b>			A Number or Receipt Number, if any  <input type="checkbox"/> Petitioner <input type="checkbox"/> Applicant <input type="checkbox"/> Respondent
Name: Last	First	Middle	
SOUTHERN ATLANTIC	REGIONAL CENTER		
Address: Street Number and Street Name		Apt. No.	City
			State
			Zip Code

Pursuant to the Privacy Act of 1974 and DHS policy, I hereby consent to the disclosure to the named Attorney or Accredited Representative of any record pertaining to me that appears in any system of records of USCIS, USCBP, or USICE.

Signature of Petitioner, Applicant, or Respondent	Date
Reid A. Nelson	12-04-2009

### Part 2. Information about Attorney or Accredited Representative *(Check applicable item(s) below)*

- A.  I am an attorney and a member in good standing of the bar of the highest court(s) of the following State(s), possession(s), territory(ies), commonwealth(s), or the District of Columbia: Texas
- I am not  or  am subject to any order of any court or administrative agency disbaring, suspending, enjoining, restraining, or otherwise restricting me in the practice of law (If you are subject to any order(s), explain fully on reverse side).
- B.  I am an accredited representative of the following qualified non-profit religious, charitable, social service, or similar organization established in the United States, so recognized by the Department of Justice, Board of Immigration Appeals pursuant to 8 CFR 1292.2. Provide name of organization and expiration date of accreditation:
- C.  I am associated with \_\_\_\_\_  
 The attorney or accredited representative of record previously filed Form G-28 in this case, and my appearance as an attorney or accredited representative is at his or her request (If you check this item, also complete item A or B above in Part 2, whichever is appropriate).

### Part 3. Name and Signature of Attorney or Accredited Representative

I have read and understand the regulations and conditions contained in 8 CFR 103.2 and 292 governing appearances and representation before the Department of Homeland Security. I declare under penalty of perjury under the laws of the United States that the information I have provided on this form is true and correct.

Name of Attorney or Accredited Representative		Attorney Bar Number(s), if any
Reid A. Nelson		Texas Bar No. 00794362
Signature of Attorney or Accredited Representative		Date
Reid A. Nelson		12-04-2009
Complete Address of Attorney or Organization of Accredited Representative (Street Number and Street Name, Suite No., City, State, Zip Code)		
210 English Oaks Circle, Boerne, Texas 78006		
Phone Number (Include area code)	Fax Number, if any (Include area code)	E-Mail Address, if any
(210) 787-7974		reid.nelson@connectmyinsu



## CURRICULUM VITAE OF JOSEPH WALSH

Name: Joseph J. Walsh, SR.

15535 Sunward

Wellington, Fl 33414

561.282.6102

877.309.7287

joew@USREDA.com

### Professional Experience

#### **Private Owner – Palm Motors Key West , Marathon and Palm Beach**

2005-Present

Developed and co-founded Palm Motors that has become the Florida Keys largest Independent Dealership with multiple locations, 10 service bays offering used cars in the \$10,000 range. Palm Motors is consistently rated in the top 5 retailers monthly by Credit Acceptance Corporation in both penetration and deal closing. With approximately \$350,000 personal investment we sold \$600,000 and achieved \$75,000 in reserves in 2007 and have sold over \$700,000 and achieved over \$600,000 in our reserve accounts to date in 2008.

#### **President CEO – Artfest International, Inc.**

2001-2005

Founder of a unique online art, antique and collectible marketplace. Developed several retail stores in Florida, Michigan, California and Texas. Sold business to California executive in 2005. Artfest was positioned as a fully reporting SEC qualified company. Recently, in 2008 Artfest began trading as an OTC:BB listed Small Cap Stock Trading.

#### **President CEO – Epoch Resources Inc.**

1995- 2001

Consulting and Software Development firm. Development of CD-ROM based training for multi-national corporations. Epoch is a design firm with extensive capabilities in the design and production of all aspects of the Internet and Digital Production. Internet related business reflects 65% of billings, 20% of billings reflect CD-ROM Production for training, 15% Digital Print and production. EPOCH is a privately held corporation with approximately \$3 million dollars in billings annually.

#### **President CEO – Resource Finance Group, Inc.**

1993 –1995

RFG, Inc. was a publicly traded company on the NASDAQ exchange (RFGP - OTC:BB). RFG developed and sold Multimedia computers systems to consumers and business. The systems were designed at RFG's Research and Development facility in Fremont, California. Each system had advanced full motion video architecture. RFG sold through multiple merchandizing arms: RFG SYSTEMS –Private Label; RFG INTECH – Business Systems; FLOPPY JOE'S COMPUTER STORES – Retail.

Mr. Walsh structured a purchase of a software company based in Utah DSI, Inc, (DISI OTC:BB). After purchasing the assets of the company via a long term cash and stock buyout, the companies were merged to form a new entity, Intelligent Decision Systems, Inc., IDSI (NASDAQ – EBB: IDSI). The merged company developed a sophisticated turn-key solution for the Health Care Industry targeted at Nursing Homes throughout the US. The Vision System was manufactured and built in the Utah plant. Mr. Walsh left the operation in 1995 to form his own company but stayed on in a consultant role for 18 months.

**President** – Falcon Group, Canada/ Europe

**President** – Falcon Group, USA

1990 - 1993

Falcon is a multi-national multimedia corporation that developed and integrated large scale kiosk systems and desktop applications for business and commercial uses. Falcon created a system for a subsidiary of the multi-billion dollar insurance giant Sun Alliance, UK. The system won Best of Show, Comdex Fall and numerous other international design awards. Falcon, USA secured a \$40 million USD contract to design and build the hardware CPU and the man-to-machine interface with EDS (Eand the US Postal Service. The system, called Postal Buddy, was the largest multimedia project to date worldwide. EDS handled the data processing at its government Services Division, Herndon, VA. Falcon managed the European software development team and the US hardware team that developed the system.

**Founder and Consultant** – Digital Visions International, Inc.

Digital Visions International, Inc. developed and integrated an entirely new digital interactive system based on Intel's processor called DVI. Digital Visions International, Inc. developed the first motherboard using Intel's chipset, which was later introduced in subsequent multimedia machines.

**President** – Visual Image Productions, Inc.

VIP was a full broadcast video facility with complete computer graphics, animation and digital video. VIP co-developed with Abacus, a computer textbook publisher, a training series for computer based learning with a video component. The system was sold to Fortune 1000 companies to train employees nationwide in DOS, Lotus, and Word Perfect. A multi-year contract was established to train Amway employees. VIP also developed the Video Job Center for The State of Michigan. The Video Job Center was a pioneering interactive multimedia kiosk that informed students of curriculum choices, career options, and current job openings.

**President** – Joseph & Company

Directed the sales, marketing and creative services for the development of television programs. This included the upscale TV magazine "Robb Report Exchange" and the AAA Automobile Club promotional program called "SuperTrip."

**Advertising Account Executive – J.W. Messner**

Developed a marketing survey for the automotive industry that enabled the agency to grow from \$2 million in billings to over \$55 million in two years. J.W. Messner is now the largest Chevrolet advertising group in the country with over \$110 million in billings.

Education: B.S.T. Bell & Howell Schools, 1976

Associations: Who's Who International, AITPA (Association for Technical Professionals, Board Member of Local Chapter)





**Electronic Articles of Organization  
For  
Florida Limited Liability Company**

L09000115805  
FILED 8:00 AM  
December 04, 2009  
Sec. Of State  
clewis

**Article I**

The name of the Limited Liability Company is:

SOUTHERN ATLANTIC REGIONAL CENTER, LLC

**Article II**

The street address of the principal office of the Limited Liability Company is:

15535 SUNWARD  
WELLINGTON, FL. 33414

The mailing address of the Limited Liability Company is:

125 SOUTH STATE ROAD 7  
STE 104-178  
WELLINGTON, FL. 33414

**Article III**

The purpose for which this Limited Liability Company is organized is:

ANY AND ALL LAWFUL BUSINESS.

**Article IV**

The name and Florida street address of the registered agent is:

STEVEN DUNKLE  
125 S. STATE ROAD 7  
STE 104-178  
WELLINGTON, FL. 33414

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

Registered Agent Signature: STEVEN DUNKLE

### Article V

The name and address of managing members/managers are:

Title: MGR  
JOSEPH J WALSH SR  
15535 SUNWARD  
WELLINGTON, FL. 33414

Title: MGRM  
USREDA  
125 SOUTH STATE ROAD 7 STE 104-178  
WELLINGTON, FL. 33414

L09000115805  
FILED 8:00 AM  
December 04, 2009  
Sec. Of State  
clewis

### Article VI

The effective date for this Limited Liability Company shall be:

01/01/2010

Signature of member or an authorized representative of a member

Signature: JOSEPH WALSH



MAP OF PROPOSED REGIONAL CENTER  
GEOGRAPHICAL AREA - PALM BEACH COUNTY, FL







**CHARLIE CRIST**  
GOVERNOR

September 25, 2008

Barbara Q. Velarde  
Chief, Office of Service Center Operations  
U.S. Citizenship and Immigration Services  
20 Massachusetts Avenue, NW (Room 2123)  
Washington, DC 20529

Re: Delegation of Authority to the State of Florida Agency for Workforce Innovation to  
Certify High Unemployment Areas Pursuant to 8 CFR 204.6(i)

Dear Ms. Velarde:

Pursuant to the provisions of the Immigration Act of 1990 and 8 CFR 204.6(i), I, Charlie Crist, Governor of the State of Florida, hereby designate the Agency for Workforce Innovation as the appropriate agency of the State of Florida to certify that a particular geographic or political subdivision is a high unemployment area.

Sincerely,

A handwritten signature in black ink that reads "Charlie Crist".

Charlie Crist

cc: Monesia T. Brown, Director  
Agency for Workforce Innovation





**Charlie Crist**  
Governor  
**Cynthia Lorenzo**  
Director

November 18, 2009

Mr. Joseph Walsh  
South Atlantic Regional Center  
15535 Sunward Street  
Wellington, Florida 33414

Dear Mr. Walsh:

In response to your request, the Labor Market Statistics has verified that 9100-9250 Belvedere Road in Palm Beach County, Florida is located in Census tract 78.18. The area consisting of contiguous Census tracts 78.18 and 78.19 qualifies as a high unemployment area under the provisions of the Immigration Act of 1990. The 2008 annual average unemployment rate for Census tract 78.18 and 78.19 combined was 14.2 percent, above the qualifying rate of 8.7 percent for that time period. The method used to estimate the unemployment rate in this area is called Census-share disaggregation, a standard U.S. Department of Labor, Bureau of Labor Statistics procedure used to calculate rates for small subcounty areas.

Since this area is located in the Miami-Fort Lauderdale-Pompano Beach Metropolitan Statistical Area, it is not considered a rural area. The area does qualify as Targeted Employment Area however, due to its high unemployment rate.

Please call Susanna Patterson at 850-245-7268, if you have any questions.

Sincerely,

Rebecca Rust  
Director  
Labor Market Statistics Center

**Agency for Workforce Innovation • Labor Market Statistics Center**  
The Caldwell Building • MSC G-020 • 107 East Madison Street • Tallahassee, Florida • 32399-4111  
Telephone (850) 245-7205 • Fax (850) 245-7204 • (TTY/TDD 1-800-955-8771-Voice1-800-955-8770)

For more information go to [www.labormarketinfo.com](http://www.labormarketinfo.com)

An equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers on this document may be reached by persons using TTY/TDD equipment via the Florida Relay Service at 711.



**Charlie Crist**  
Governor  
**Cynthia Lorenzo**  
Director

November 18, 2008

Mr. Joseph Walsh  
South Atlantic Regional Center  
15535 Sunward Street  
Wellington, Florida 33414

Dear Mr. Walsh:

In response to your request, the Labor Market Statistics Center has determined that the Census tracts listed on the enclosed table in Palm Beach County, Florida qualify as high unemployment areas under the provisions of the Immigration Act of 1990. The 2008 annual average unemployment rate for all of these areas was at or above 8.7 percent, the qualifying rate for that time period. The method used to estimate the unemployment rate in these areas is called Census-share disaggregation, a standard U.S. Department of Labor, Bureau of Labor Statistics procedure used to calculate rates for small subcounty areas.

Since these Census tracts are located in the Miami-Fort Lauderdale-Pompano Beach Metropolitan Statistical Area, they are not considered rural areas. The areas do qualify as Targeted Employment Areas however, due to their high unemployment rates.

Please call Susanna Patterson at 850-245-7268, if you have any questions.

Sincerely,

Rebecca Rust  
Director  
Labor Market Statistics Center

Enclosure

**Agency for Workforce Innovation • Labor Market Statistics Center**  
The Caldwell Building • MSC G-020 • 107 East Madison Street • Tallahassee, Florida • 32399-4111  
Telephone (850) 245-7205 • Fax (850) 245-7204 • (TTY/TDD 1-800-955-8771-Voice 1-800-955-8770)

For more information go to [www.labormarketinfo.com](http://www.labormarketinfo.com)

An equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers on this document may be reached by persons using TTY/TDD equipment via the Florida Relay Service at 711.

**LABOR FORCE ESTIMATES FOR SELECTED CENSUS TRACTS  
PALM BEACH COUNTY, FLORIDA  
2008 ANNUAL AVERAGES  
(ranked by unemployment rate)**

Tract	Labor		Unemployment	
	Force	Employment	Level	Rate (%)
80.01	1,652	1,204	448	27.1
22	811	596	215	26.5
83.02	1,634	1,204	430	26.3
82.01	2,149	1,629	520	24.2
14.03	1,654	1,277	377	22.8
23	1,345	1,058	287	21.3
21	1,800	1,459	341	18.9
81.01	3,437	2,809	628	18.3
80.02	2,594	2,128	466	18.0
13.01	1,509	1,240	269	17.8
83.01	710	584	126	17.7
68.01	3,359	2,785	574	17.1
82.02	1,206	1,009	197	16.3
78.19	3,226	2,724	502	15.6
19.02	1,152	973	179	15.5
48.13	1,061	900	161	15.2
57.01	2,311	1,970	341	14.8
19.09	1,364	1,167	197	14.4
51	5,125	4,390	735	14.3
14.02	801	693	108	13.5
82.03	2,147	1,860	287	13.4
59.31	674	584	90	13.4
52.02	2,894	2,517	377	13.0
16	2,348	2,043	305	13.0
13.02	2,457	2,152	305	12.4
14.04	1,747	1,532	215	12.3
31.01	3,379	2,967	412	12.2
31.02	3,531	3,101	430	12.2
40.08	3,010	2,651	359	11.9
56	3,768	3,320	448	11.9
45	2,870	2,529	341	11.9
15	2,008	1,775	233	11.6
11.01	4,041	3,575	466	11.5
64.01	1,401	1,240	161	11.5
40.05	1,250	1,107	143	11.4
61	2,688	2,383	305	11.3
12	2,700	2,395	305	11.3
68.02	2,081	1,848	233	11.2
29	2,421	2,152	269	11.1
69.07	1,450	1,289	161	11.1
49.01	5,255	4,681	574	10.9
40.09	2,142	1,909	233	10.9
58.08	856	766	90	10.5
30	2,391	2,140	251	10.5

Source: Florida Agency for Workforce Innovation, Labor Market Statistics Center, Local Area Unemployment Statistics program (unpublished data).

**LABOR FORCE ESTIMATES FOR SELECTED CENSUS TRACTS  
PALM BEACH COUNTY, FLORIDA  
2008 ANNUAL AVERAGES  
(ranked by unemployment rate)**

Tract	Labor Force	Employment	Unemployment	
			Level	Rate (%)
77.39	1,735	1,556	179	10.3
63	3,004	2,699	305	10.2
67	1,245	1,119	126	10.1
59.10	905	815	90	9.9
64.02	1,984	1,787	197	9.9
52.01	4,218	3,806	412	9.8
35.03	553	499	54	9.8
69.03	2,057	1,860	197	9.6
69.08	2,622	2,371	251	9.6
47.04	3,399	3,076	323	9.5
37	3,436	3,113	323	9.4
33	2,294	2,079	215	9.4
44.02	2,306	2,091	215	9.3
2.02	3,673	3,332	341	9.3
18.01	3,096	2,809	287	9.3
62.03	1,014	924	90	8.9
46.02	2,628	2,395	233	8.9
59.28	1,038	948	90	8.7

NOTE: Items may not add to totals or compute to displayed percentages due to rounding. All data are subject to revision. U.S. unemployment rate for the corresponding time period was 5.8 percent so areas with rates at or above 8.7 percent (150 percent higher than the national average) qualify as Targeted Employment Areas.



(b)(4)



(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

## **ABOUT IMPLAN**

The IMPLAN system is a menu-driven microcomputer program that performs complex calculations in the methods and assumptions used to generate social accounts and Input/Output multipliers. The software performs the necessary calculations, using the study area data, to create the models. The system allows users to make in-depth examinations of regional, state, multi-county, county or sub-county economies.

The IMPLAN data and accounts closely follow the accounting conventions used in the "Input/Output Study of the U.S. Economy" by the Bureau of Economic Analysis and the rectangular format recommended by the United Nations.

Comprehensive and detailed data coverage of the entire U.S. by county and the ability to incorporate user supplied data at each stage of the model building process provides a high degree of flexibility both in terms of geographic coverage and model formulation.

## EXHIBIT 1

### *A Summary of the Processes and Calculations Used Within the IMPLAN Program to Perform the Econometric Studies*

Final consumption drives input-output models. Industries respond to meet demands directly or indirectly. Each industry that produces goods and services generates demands for other goods and services and so on. *Multipliers* describe these repetitive actions. There are two different multipliers developed for predictive modeling: Type I and Type II. We start with deriving a matrix by dividing each industry element by the total of all industry elements. This matrix is known as the *A Matrix*. The A Matrix then provides us with *production functions*. A production function shows where an industry spends and in what proportions to generate each dollar of output.

Through imbedded algorithmic computations within the A Matrix, IMPLAN derives the multipliers. The resulting equation is the *predictive model*:

$$X = (I - A)^{-1} * Y$$

Where:

X = Total industry output

I = Identity matrix

A = A Matrix

Y = Final Demand.

This can also be interpreted as:

$\Delta X = (I - A)^{-1} * \Delta Y$  or Change in Total Industry Output =  $(I - A)^{-1} * \text{Change in Final Demand}$ .  
The predictive model shows how output will change with a given change in final demand.

Multipliers report the effects on economic activity through three components:

- 1. Direct effects** are the changes in the industries to which a final demand change was made.
- 2. Indirect effects** are the changes in inter-industry purchases as they respond to the new demands of the directly affected industries.
- 3. Induced effects** typically reflect changes in spending from households as income increases or decreases due to the changes in production.

The *Type I multiplier* measures the direct and indirect effects of a change in economic activity. It captures the inter-industry effects only, i.e. industries buying from local industries.

A *Type II multiplier* captures direct and indirect effects. In addition to the inter-industry effects, the Type II also takes into account the income and expenditures of households. The household income and the household expenditures are treated as industries. This internalizes the household sector, including the induced or household spending effects. The Type II multiplier is calculated

by dividing household expenditures by the total of all household incomes. The Type II multiplier says that for a one dollar change in final demand for an industry, increases occur in inter-industry economic activity (as in Type I). But it also says the incomes of people employed producing the output of that industry increase. These people spend their increased income on personal consumption, which leads to demands from local industries. Households that live in the region, make consumption expenditures with only disposable income as well as making payments to taxes as well as savings. These refined calculations result in a more complete and realistic presentation of total economic activity.

Income multipliers are derived from the relationship between income and output. In the IMPLAN study area data there is total industry output and total income for each sector. From this data we can calculate income per dollar of output. An employment multiplier is created in the same manner as the income multiplier, but using output per worker ratios instead of output per dollar of income.

Input-output modeling is based on several assumptions:

- Constant Returns to Scale
- No Supply Constraints
- Fixed Commodity Input Structure
- Homogenous Sector Output
- Industry Technology Assumption

The first assumption is that the *production functions* (an industry's list of expenditures) are assumed to *have constant returns to scale*. This means the production functions are considered linear; if additional output is required, all inputs increase proportionately.

*No supply constraints* means supplies are unlimited. An industry has unlimited access to raw materials and its output is limited only by the demand for its products.

A *fixed commodity input structure* implies that price changes do not cause a firm to buy substitute goods. This structure assumes that changes in the economy will affect the industry's output but not the mix of commodities and services it requires to make its products.

The fourth assumption is that there is *homogeneous sector output*. In other words: the proportions of all the commodities produced by that industry remain the same, regardless of total output. An industry won't increase the output of one product without proportionately increasing the output of all its other products.

The *industry technology assumption* assumes that an industry uses the same technology to produce all its products.

Economic impact analysis involves applying a final demand change to a predictive economic input-output model, and then analyzing the resulting changes in the economy. A concise definition of impact analysis is:

**An assessment of change in overall economic activity as a result of some change in one or several economic activities.**

In practice, economic impact analysis can mean many different things. It might measure the impacts of a new factory moving into an area. It might involve estimating the local impacts of a professional football team moving into an area or the effects of tourist spending. Governments use impact analysis for policy decisions and planning.

Researchers use impact analysis to study relationships of different elements in an economy. An impact analysis begins by converting a *project* to a set of economic issues and those elements involved with the impact. Once the issues have been identified, the elements involved can be identified and their actions converted to a set of expenditures. These expenditures are the initial changes that stimulate further economic activity. The actions and the economic activity they stimulate are the impact.

If the expenditure dollars are for a year different than the model's data, a *deflator* is applied. Deflators account for the changes in actual value of the dollar over the years. Price changes need to be accounted for otherwise the impacts will be estimated incorrectly.

Please review the following sample computations to further illustrate the calculations involved. These calculations are employment calculation examples of each industry cluster in the economic report.

For further review, please see the attached industry multiplier charts. We have included the multiplier charts for employment, output, indirect business taxes and employee compensation. The basis for impact remains constant, as represented below.

### **Nursing Home Industry Cluster, Palm Beach County, Florida**

Step One:

- A. Construction costs per square foot are derived from the 27<sup>th</sup> Annual RS Means "Cost per Square Foot" guide.

Nursing Home	\$123.11	X	50,000	Sq. ft.	\$6,155,700
--------------	----------	---	--------	---------	-------------

Step Two:

- A. Total construction cost is inputted as the basis for employment to the IMPLAN input-output model.
- B. The in-region model is built using data from Palm Beach County.

- C. IMPLAN algorithms then determine the multipliers that are used to estimate employment, output, employee compensation and indirect business taxes. Multipliers are based upon \$1,000,000.00 of direct construction cost.

EMPLOYMENT MULTIPLIER CHART					
sector	description	direct	indirect	induced	total
34	Construct new nonresidential commercial	7.052061	1.695135	3.158666	11.905862

- D. The following chart shows the results of multiplying 6.1557 (\$6,155,700.00/\$1,000,000.00) by the multipliers produced by IMPLAN.

EMPLOYMENT RESULTS					
sector	description	direct	indirect	induced	total
34	Construct new nonresidential commercial	43.4103719	10.434743	19.443800	73.288915

- E. A deflator is applied to the results to account for changes in the dollar between the year of the data (2007) and the year that the construction will take place (2010). IMPLAN software then rounds to one eighthth.

DEFLATION RESULTS					
sector	description	direct	indirect	induced	total
34	Construct new nonresidential commercial	38.9	9.4	17.4	65.7

### Step Three:

- A. **Direct employment** is based upon a 50,000 square foot facility housing 100 residents. Florida nursing homes have an average occupancy rate of 83.9%<sup>44</sup>
- B. IMPLAN models are based upon an average daily rate of \$215.37, rate period July 1, 2007 and June 30, 2008.<sup>45</sup>

<sup>44</sup> [www.statehealthfacts.org](http://www.statehealthfacts.org), The Henry J. Kaiser family foundation.

<sup>45</sup> Department of Social Services Overview of Nursing Facilities Rate Setting, Craig J. Lubitski Consulting LLC, September 2008.

Nursing Home Revenue	
# of Beds	100
Average Daily Rate	215.37
Occupancy Rate	83.9%
Total Annual Revenue	\$6,595,383

- C. The in-region model is built using data from Palm Beach County.
- D. IMPLAN algorithms then determine the multipliers that are used to estimate employment. Multipliers are based upon \$1,000,000.00 of annual gross revenue.

NURSING HOME EMPLOYMENT MULTIPLIERS				
sector	description	direct	indirect	induced
398	Nursing & Residential Care Facilities	17.633821	1,184771	3.854047

- E. The following chart represents the results of multiplying 6.595383 (\$6,595,383/\$1,000,000) by the multipliers produced by IMPLAN.

NURSING HOME EMPLOYMENT				
sector	description	direct	indirect	induced
398	Nursing & Residential Care Facilities	116.30180	7.8140185	25.418916

- F. A deflator is applied to the results to account for changes in the dollar between the year of the data (2007) and the first year that the operations will take place (2011). IMPLAN software then rounds to one eighthth.

The numbers were rounded to a eighthth of an employee and reported in the operation summary charts in this report.

NURSING HOME EMPLOYMENT MULTIPLIERS				
sector	description	direct	indirect	induced
398	Nursing & Residential Care Facilities	98.6	6.6	21.6

(b)(4)

(b)(4)





(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

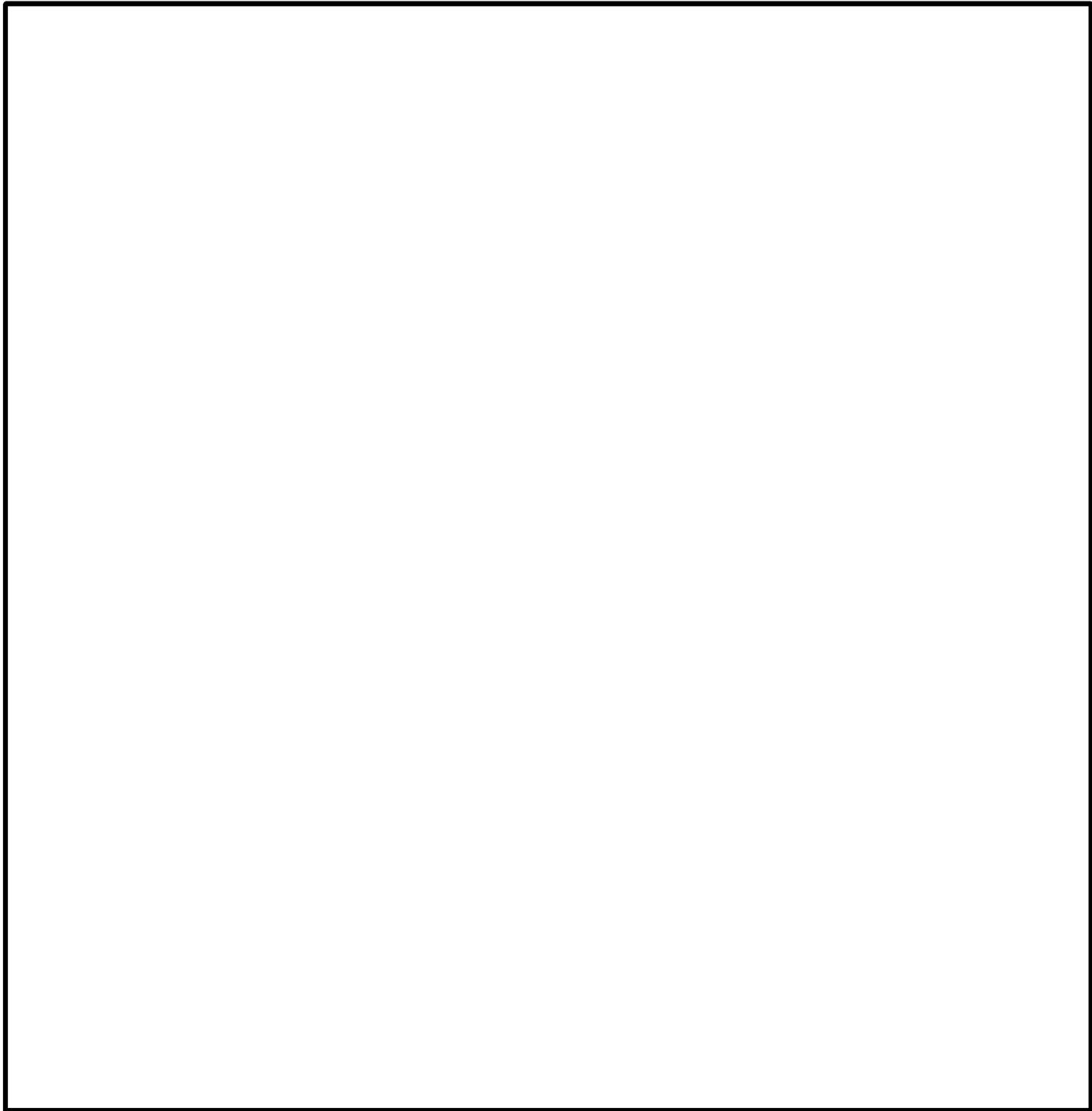
(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)



***Management of the Limited Partnership***

**General Partners**

**Joseph J. Walsh, SR, General Partner-** Mr. Walsh has in excess of thirty years in all phases of land acquisition and development. He has been directly responsible for project development from project design to project completion for many successful real estate ventures in the states of Michigan, California, Texas and Florida. As founder of a unique online art, antique and

collectible marketplace. Mr. Walsh developed several retail stores in Florida, Michigan, California and Texas. The business was sold to a California executive in 2005. Artfest was positioned as a fully reporting SEC qualified company. Recently, in 2008 Artfest began trading as an OTC:BB listed Small Cap Stock Trading.

## **Team Members**

**Real Estate Consultant-** Several consultancy firms have been identified by SARC.

### **Prudential Florida Realty - Acquisition and Property Management**

Prudential Florida Realty has over 40 locations and more than 1,800 real estate sales associates serving 17 counties throughout Florida. We are a full-service residential and commercial real estate company that offers consumers professional assistance with purchases, sales, seasonal rentals and property management, corporate relocations, referral services, mortgage, title and insurance services. Based on sales volume, the company was ranked as the 32nd largest real estate company in the nation in the July 2008 issue of Realtor Magazine and is ranked as the sixth largest company in the Prudential Real Estate Affiliates network. Prudential Real estate boasts the highest average sales price of any nationwide real estate firm. Use the buttons on the top of this page to view thousands of Florida property photos and virtual tours or to connect with one of our sales professionals.

**Consultant and Construction/Marketing Partner-** Several contractors in the local community have been identified to manage and complete the buildout of the project.

### **Limited Partnership Counsel**

Reid A. Nelson, Esq, 210 English Oaks Circle, Boerne, TX 78006

(b)(4)



(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

### Exhibit A

- 1. Business Address & Telephone No: \_\_\_\_\_
- 2. Business or Professional Education & Degree: \_\_\_\_\_
- 3. Prior Employment (5 years):

Employer	Nature of Duties	Dates of Employment

4. Prior Investments of Purchaser:

Amount (Cumulative)

Capital Stock	None	Up to \$50,000	\$50-250,000	Over \$250,000
	_____	_____	_____	_____
Bonds	None	Up to \$50,000	\$50-250,000	Over \$250,000
	_____	_____	_____	_____
Other	None	Up to \$50,000	\$50-250,000	Over \$250,000
	_____	_____	_____	_____

5. Financial Information:

(a) My net worth (exclusive of home, home furnishings and personal automobiles) is in excess of:  
\$100,000,000 \_\_\_\_\_ \$250,000 \_\_\_\_\_ \$500,000 \_\_\_\_\_ \$500,000 \_\_\_\_\_

(b) My gross income, including tax exempt income, for each of the preceding two tax years was equal to or in excess of:

\$100,000,000 \_\_\_\_\_ \$150,000 \_\_\_\_\_ \$200,000 \_\_\_\_\_

(c) My anticipated gross income, including tax exempt income, this year will be equal to or in excess of:

\$100,000,000 \_\_\_\_\_ \$150,000 \_\_\_\_\_ \$200,000 \_\_\_\_\_

(d) (1) I have such knowledge and experience in financial, tax and business matters that I am capable of utilizing the information made available to me in connection with the offering of the Units to evaluate the merits and risks of an investment in the Units and to make an informed investment decision with respect to the Units. I do not desire to utilize a Purchaser Representative in connection with evaluating such merits and risks. I understand that the Limited Partnership may request that I use a Purchaser Representative.

Initial here \_\_\_\_\_

(2) I intend to use the services of the following named person(s) as Purchaser Representative(s) in connection with evaluating the merits and risks of an investment in the Units and hereby appoint such person(s) to act as my Purchaser Representative(s) in connection with my proposed purchase of the Units:

Initial here \_\_\_\_\_

List name(s) of Purchaser Representative(s), if applicable.

\_\_\_\_\_

6. Except as indicated below, any purchases of the Units will be solely for my account and not for the account of any other person or with a view to any resale or distribution thereof.

\_\_\_\_\_

Exception: \_\_\_\_\_

7. I represent to you that the information contained herein is complete and accurate and may be relied upon by you for the purpose of complying with all applicable securities laws. The undersigned agrees to notify the Limited Partnership promptly of any change in the foregoing information which may occur prior to any purchase of the securities of the Limited Partnership by the undersigned.

INDIVIDUAL INVESTOR:

Name: \_\_\_\_\_  
Please Print

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

NON-INDIVIDUAL INVESTOR

Name: \_\_\_\_\_  
Please Print

Signature: \_\_\_\_\_







(b)(4)



(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

EXHIBIT A

**NAMES, ADDRESSES AND SSNs OF PARTNERS**

**GENERAL PARTNER:**

SOUTHERN ATLANTIC REGIONAL CENTER, LLC.  
c/o Joseph J. Walsh, Sr., Manager  
15535 Sunward  
Wellington, Fl 33414

**INITIAL LIMITED PARTNER:**

Steven Dunkle  
10279 Trianon Place  
Wellington, Florida, 33449

**LIMITED PARTNERS:**



(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)



[SAMPLE]

**SOUTHERN ATLANTIC REGIONAL CENTER GROUP, LLC  
CAPITAL CONTRIBUTION ESCROW AGREEMENT**

**THIS ESCROW AGREEMENT** is made this \_\_\_\_\_ day of \_\_\_\_\_, 200\_.

BETWEEN:

**SOUTH ATLANTIC REGIONAL CENTER GROUP, LLC**  
(hereinafter called the "Promoter")

-and-

(hereinafter called the "Escrow Agent")

**WHEREAS** the Promoter has established an investment program to be known as South Atlantic Regional Center Group, LLC ("SARC"), as described in the Private Placement Memorandum ("PPM") to which this Escrow Agreement is attached, to permit investors to participate in the EB-5 immigrant investment program (the "Program") established under the United States Immigration and Nationality Act;

**AND WHEREAS** the SARC will offer investments pursuant to the PPM to potential investors to make investments permitted under the Program;

**AND WHEREAS** investors who wish to invest in SARC are required to complete the subscription for a unit offered pursuant to a PPM, including paying the subscription price (the "Subscription Proceeds") therefore;

**AND WHEREAS** the Subscription Proceeds are to be held in escrow in accordance with the terms of this Escrow Agreement;

**NOW THEREFORE** it is agreed:

1. **Definitions**

All capitalized terms used herein and not otherwise defined shall have the meanings ascribed thereto in the PPM, as amended.

2. **Currency**

All dollar amounts expressed herein are in currency of the United States.

3. **Appointment of Escrow Agent**

The Escrow Agent is hereby appointed to act, and the Escrow Agent agrees to act, as escrow agent in accordance with the terms and conditions of this Escrow Agreement.

4. **Subscription Proceeds**

Each investor who completes a subscription for a Limited Partnership unit shall Deliver forty thousand dollars (\$40,000.00) to the Managing Member (the "Managing Member") of SARC for delivery to the Escrow Agent by certified check made payable to the Escrow Agent or to the Escrow Agent by wire transfer of funds, as payment of the Subscription Proceeds.

5. **Investor Requirements**

Each investor who completes a subscription for an LLLP unit, shall, in addition to the requirements of section 4, supply to the Escrow Agent, copies of such investor's I-526 Petition, passport and such other documentation that the Escrow Agent deems appropriate in order for the Escrow Agent to satisfy its "know your customer" requirements.

6. **Over Subscription**

In the event that an offering of units is over-subscribed, the Promoter shall promptly notify the Escrow Agent of the investor whose subscription cannot be accepted and the Escrow Agent shall promptly notify the relevant investors to such effect.

7. **Release of Escrowed Funds**

An investor's Subscription Proceeds shall be released by the Escrow Agent upon the earliest to occur of:

- (a) the Promoter delivering written notice to the Escrow Agent within 10 days after approval that the 1-526 Petition of an investor who has completed a subscription for a Limited Partnership Unit and the proposed Qualifying Investment of the LLLP have been approved under the Program, to the LLC; or
- (b) the Promoter delivering written notice to the Escrow Agent that an investor's 1-526 Petition has been refused (which notice the Promoter shall deliver within 7 days of it becoming aware of such refusal), to the investor.

The PPM may provide that it is a further condition of the release of an investor's Subscription Proceeds that such investor successfully complete the Visa Process and in such event the delivery by the Managing Member of written notice to such effect to the

Escrow Agent shall be a further condition for the release of an investor's Subscription Proceeds pursuant to subsection (a) above.

**8. Investment of Escrow Funds**

The Escrow Agent shall invest Deposits and Subscription Balances as directed by the Promoter in writing, in income earning investments guaranteed by the United States of America or a bank regulated therein. Investment Income earned shall be used first to pay the costs and expenses of the Escrow Agent required to be paid pursuant to the Escrow Agreement and the balance will be paid to the Promoter.

**9. Termination**

The Escrow Agreement, other than Section 12 and 13, shall terminate and cease to be of any further force or effect on the date that the last of the escrowed funds have been released pursuant to this Escrow Agreement. The provisions of Section 12 and 13 shall continue in effect indefinitely notwithstanding the resignation or removal of the Escrow Agent, the payment of all amounts required to be paid hereunder or the termination of this Escrow Agreement.

**10. Indemnification of Escrow Agent**

The Promoter agrees to indemnify the Escrow Agent from, and to hold it harmless against, any loss, liability, claims, damages or expense incurred or suffered by it arising from a claim against it made by the parties hereto or a third party in connection with this Escrow Agreement, except to the extent that such loss, liability or expenses is the result of the gross negligence or willful misconduct of the Escrow Agent. The Escrow Agent shall be entitled to rely absolutely on documents and notices delivered to it pursuant to his Escrow Agreement without independent verification or inspection. The Escrow Agent shall not be responsible for any losses resulting from the sale or depreciation in the market value of such investment thereof.

**11. Rights, Duties and Immunities of Escrow Agent**

Acceptance by the Escrow Agent of its duties under this Escrow Agreement is subject to the following terms and conditions, which the parties to this Escrow Agreement hereby agree shall govern and control the rights, duties and immunities of the Escrow Agent.

- (a) The duties and obligations of the Escrow Agent shall be determined solely by the express provisions of this Escrow Agreement and the Escrow Agent shall not be liable except for the performance of such duties and obligations as are specifically set out in this Escrow Agreement. The Escrow Agent shall not be required to inquire as to the performance or observation of any obligation, term or condition under any Escrow Agreement or arrangement by the Promoter. The

[SAMPLE]

Escrow Agent is not a party to, and is not bound by, any agreement or other document out of which this Escrow Agreement may arise. The Escrow Agent shall be under no liability to any party hereto by reason of any failure on the part of any party hereto or any maker, guarantor, endorse or other signatory of any document or any other person to perform such person's obligations under any such document. The Escrow Agent shall not be bound by any waiver, modification, termination or rescission of this Escrow Agreement or any of the terms hereof, unless evidenced by a writing delivered to the Escrow Agent signed by the proper party or parties and, if the duties or rights of the Escrow Agent, are affected, unless it shall give its prior written consent thereto. This Escrow Agreement shall not be deemed to create a fiduciary relationship between the parties hereto under state or federal law.

- (b) The Escrow Agent shall not be responsible in any manner for the validity or sufficiency of this Escrow Agreement or of any property delivered hereunder, or for the value or collectability of any note, check or other instrument, if any, so delivered, or for any representations made or obligations assumed by any party other than the Escrow Agent. Nothing herein contained shall be deemed to obligate the Escrow Agent to deliver any cash, instruments, documents or any other property referred to herein, unless the same shall have first been received by the Escrow Agent pursuant to this Escrow Agreement.
- (c) The Promoter shall deliver to the Escrow Agent a list of authorized signatories with respect to any notice, certificate, instrument, demand, request, direction, instruction, waiver, receipt, consent or other document or communication required or permitted to be furnished to the Escrow Agent hereunder, and the Escrow Agent shall be entitled to reply on such list with respect to any party until a new list is furnished by such party to the Escrow Agent. The Escrow Agent shall be fully protected in acting or and relying upon any written notice, direction, request, waiver, consent, receipts or other paper or document which the Escrow Agent in good faith believes to have been signed and presented by the property party or parties.
- (d) The Escrow Agent shall not be liable for any error of judgment, or for any act done or step taken or omitted by it in good faith or for any mistake in act or law, or for anything which it may do or refrain from doing in connection herewith, except its own gross negligence or willful misconduct.
- (e) The Escrow Agent may seek the advice of legal counsel in the event of any dispute or question as to the construction of any of the provisions

of this Escrow Agreement or its duties hereunder, and it shall incur no liability and shall be fully protected in respect of any action taken, omitted or suffered by it in good faith in accordance with the advice or opinion of such counsel.

- (f) The parties hereto agree that should any dispute arise with respect to the payment, ownership or right of possession of the Escrow Account, the Escrow Agent is authorized and directed to retain in its possession, without liability to anyone, except for its bad faith, willful misconduct or gross negligence, all or any part of the Escrow Account until such dispute shall have been settled either by mutual agreement by the parties concerned or by the final order, decree or judgment of a court or other tribunal of competent jurisdiction in the United States of America, and a notice executed by the parties to the dispute or their authorized representatives shall have been delivered to the Escrow Agent setting forth the resolution of the dispute. The Escrow Agent shall be under the duty whatsoever to institute, defend or partake in such proceedings.

**12. Resignation of Escrow Agent**

The Escrow Agent shall have the right to resign upon thirty (30) days written notice to the Promoter. In the event of such resignation, the Promoter shall appoint a successor escrow agent hereunder by delivering to the Escrow Agent a written notice of such appointment. Upon receipt of such notice, the Escrow Agent shall deliver to the designated successor escrow agent all money and other property held hereunder and shall thereupon be released and discharged from any and all further responsibilities whatsoever under this Escrow Agreement; provided, however, that the Escrow Agent shall not be deprived of its compensation earned prior to such time.

**13. Headings**

The inclusion of headings in this Escrow Agreement is for convenience of reference only and shall not affect the construction or interpretation hereof.

**14. Invalidity of Provisions**

Each of the provisions contained in this Escrow Agreement is distinct and severable and a declaration of invalidity or unenforceability of any such provision or part thereof by a court of competent jurisdiction shall not affect the validity or enforceability of any other provision hereof.

**15. Entire Agreement, Waiver**

This Escrow Agreement constitutes the entire agreement between the parties hereto pertaining to the subject matter hereof. There are no warranties, representations or

agreements between the parties in connection with the subject matter hereof except as specifically set forth or referred to in this Escrow Agreement. Except as expressly provided in this Escrow Agreement, no amendment, waiver or termination of this Escrow Agreement shall be binding unless executed in writing by the party to be bound thereby. No waiver of any provision of this Escrow Agreement shall constitute a waiver of any other provision nor shall any waiver of any provision of this Escrow Agreement constitute a continuing waiver unless otherwise expressly provided.

**16. Governing Law**

This Escrow Agreement shall be governed by and construed in accordance with the laws of Florida and the laws of the United States applicable therein and the courts of Florida shall have exclusive jurisdiction in connection with any disputes under this Escrow Agreement.

**17. Successors and Assigns**

This Escrow Agreement shall be binding upon and ensure to the benefit of the parties and their respective successors and assigns.

**18. Execution of Counterparts**

This Escrow Agreement may be signed in counterparts and each of such counterparts shall constitute an original document and such counterparts, taken together, shall constitute one and the same Escrow Agreement.

**19. Execution by Facsimile**

The signature of any of the parties to this agreement may be evidenced by a facsimile copy of this document bearing such signature.

**IN WITNESS WHEREOF** the parties hereto have executed this agreement as of the date first above written.

**SOUTH ATLANTIC REGIONAL CENTER GROUP, LLC**

By: \_\_\_\_\_  
Its Managing Member

\_\_\_\_\_ as Escrow Agent

By: \_\_\_\_\_

[SAMPLE]



(b)(4)

(b)(4)



(b)(4)

(b)(4)

(b)(4)



# SOUTHERN ATLANTIC REGIONAL CENTER

## ESCROW AGENT BANKS [SAMPLE]

[I] CITIBANK, NA  
111 Wall Street  
New York, NY 10005

1-800-374-9700  
mailstop: international escrow  
<https://www.privatebank.citibank.com>  
[www.citibank.com](http://www.citibank.com)

---

[II] HSBC  
425 5<sup>th</sup> Avenue  
New York, New York 10006

212-525-3888  
[www.us.hsbc.com/1/2/3/business/other/escrow](http://www.us.hsbc.com/1/2/3/business/other/escrow)





U.S. Citizenship  
and Immigration  
Services

HOOPRD 70/6.2.8

JUN 12 2007

Mr. Peter Beitzel  
Metropolitan Milwaukee Association of Commerce  
756 North Milwaukee Street, Suite 400  
Milwaukee, WI 53202

Dear Mr. Beitzel:

By an email request to this office upon the May 1, 2007 approval and designation of the Metropolitan Milwaukee Association of Commerce's Regional Center (MMAC-RC), you asked that this office provide you with additional information on its expectations relating to the expectations of the U.S. Citizenship and Immigration Service (USCIS) regarding the administration of a regional center entity. You noted your desire to follow the correct process, document the information needed, and be aware of reporting expectations, and MMAC's basic responsibilities to appropriately manage its regional center. The following information and guidance is provided to you in response to your request.

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

The regulations at 8 CFR 204.6(m)(6) require 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, 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 on a quarterly basis in order to report to USCIS upon request year to date for each Federal Fiscal Year<sup>1</sup>, commencing with the current year as follows:

<sup>1</sup> A Federal Fiscal Year runs for twelve consecutive months from October 1<sup>st</sup> to September 30<sup>th</sup>.

1. The principal official and point of contact of the MMAC-RC responsible for the normal operation, management and administration of the regional center.
2. How the MMAC-RC is administering its regional center and is actively engaged in supporting a due diligence screening of its alien investors' lawful source of capital and the alien investor's ability to fully invest the requisite amount of capital.
3. How the MMAC-RC is actively engaged in the evaluation, oversight and follow up on any proposed commercial activities that will be utilized by alien investors in order to create direct and/or indirect jobs through qualifying EB-5 capital investments into commercial enterprises within the regional center.
4. The name, date of birth, and alien registration number of each alien investor who makes an investment and files an EB-5 I-526 Petition with USCIS, specifying whether the petition was approved, denied, or withdrawn by the petitioner.
5. The country of nationality of each alien investor who makes an investment and files an EB-5 I-526 petition with USCIS.
6. The U.S. city and state of residence of each alien investor who makes an investment and files an EB-5 I-526 petition with USCIS.
7. The categories of business activity within the geographic boundaries of your regional center that have received the alien investors capital, and in what amount
8. The names and locations of the each job creating commercial enterprise located within the geographic boundaries of your regional center that has received alien investor capital.
9. The amounts of alien investor capital and the amounts of other domestic capital that has been invested together in each job creating commercial enterprise specified in item 8 above, distinguishing the separate totals for each.<sup>2</sup>
10. The total aggregate number of approved EB-5 alien investor I-526 petitions per Federal Fiscal Year to date made through your regional center.
11. The total aggregate number of approved EB-5 alien investor I-829 petitions per Federal Fiscal Year to date through your regional center.
12. The total aggregate of EB-5 alien capital invested through your regional center for each Federal Fiscal Year to date since your approval and designation.
13. The combined total aggregate of "new" direct and/or indirect jobs created by EB-5 investors through your regional center for each Federal Fiscal Year to date since your approval and designation.
14. If applicable, the total aggregate of "preserved" jobs by EB-5 alien investors into troubled businesses through your regional center for each Federal Fiscal Year to date since your approval and designation.
15. If for any given Federal Fiscal Year your regional center does not have investors to report, then provide an explanation for the inactivity along with a specific plan which details timelines and steps to actively promote your regional center program, and recruit legitimate and viable alien investors.
16. Notification to USCIS within 30 days of the occurrence any material change in the structure, operation, administration, focus, or activities relating to your regional center's

---

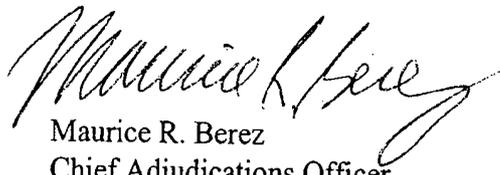
<sup>2</sup> A separate break out by aggregate amount of alien investor capital vs. aggregate amount of domestic capital invested where applicable.

Mr. Peter Beitzel  
Page 3

- basis for its most recent designation and/or reaffirmation by USCIS.
17. The total aggregate of EB-5 alien capital invested through your regional center for each Federal Fiscal Year.

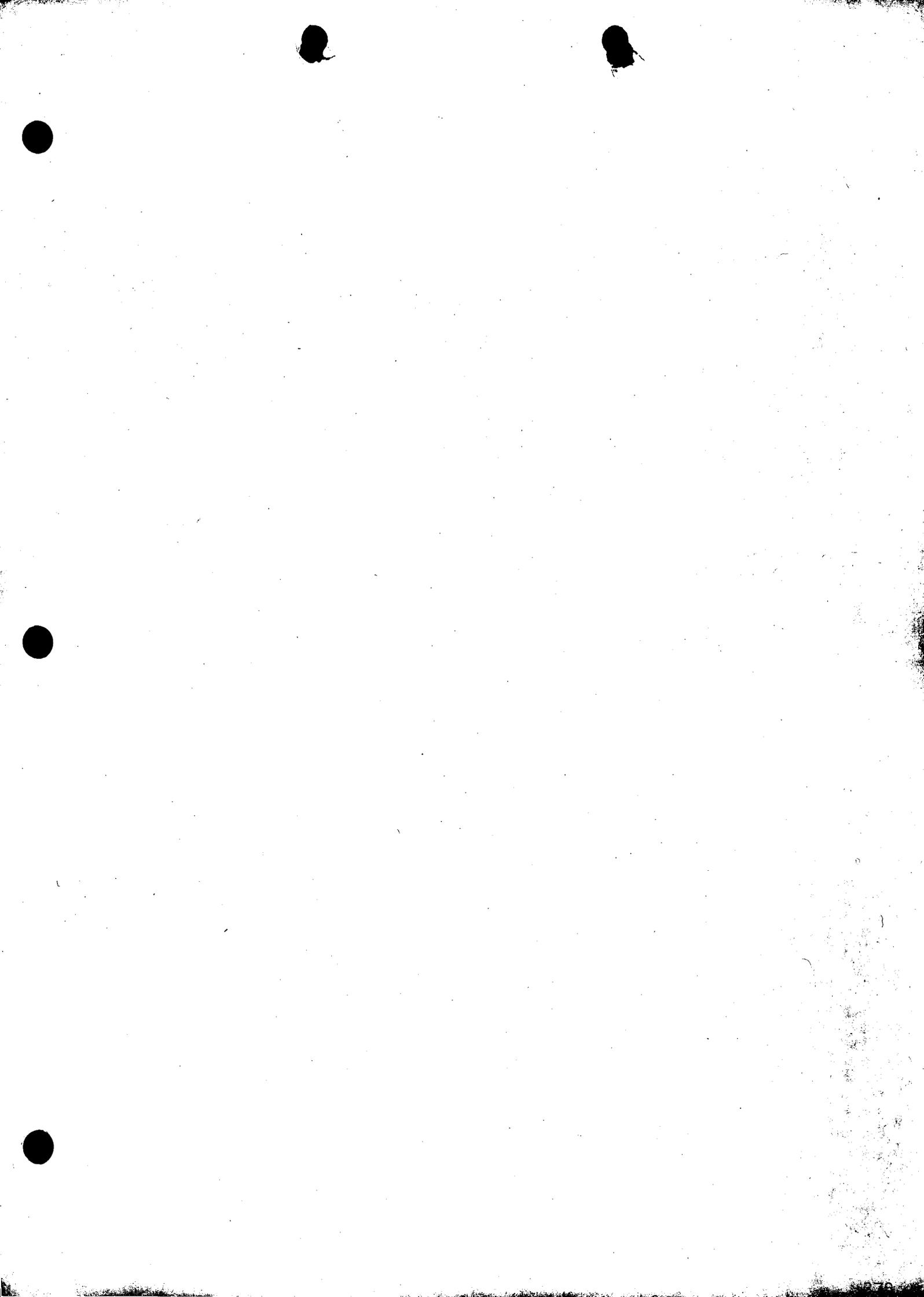
Given that this information and guidance would prove valuable to all currently operational regional centers within the Immigrant Investor Pilot Program, a copy of this letter is being provided to each one as well as to the EB-5 Committee Chair for the American Immigration Lawyers Association (AILA).

Sincerely,



Maurice R. Berez  
Chief Adjudications Officer  
USCIS Foreign Trader, Investor & Regional Center Program  
Service Center Operations Business & Trade Services

CC: AILA EB-5 Committee Chair  
Other USCIS Approved Regional Centers



# IMMIGRANT FAMILY INFORMATION



**Southern Atlantic Regional Center**

View Contact List

View Address Labels



New



Delete



Find



Save as PDF



Save as Excel



Regional Center Name: **Southern Atlantic Regional Center**

Project Name: **Project One**

Immigrant First Name: SARC First name

Immigrant Last Name: SARC Last Name



Insert Picture

Export Picture

## Family Member 1

Family Member 1 TVRC Test Mom

age 1 47

relationship 1 Wife



Insert Picture

Export Picture

## Family Member 2

Family Member 2 TVRC Test Older Boy

age 2 13

relationship 2 Son



Insert Picture

Export Picture

## Family Member 3

Family Member 3 TVRC Test Little Girl

age 3 6

relationship 3 Daughter



Insert Picture

Export Picture

## Family Member 4

Family Member 4 TVRC Little Boy

age 4 5

relationship 4 Son



Insert Picture

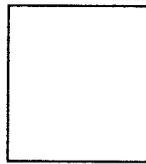
Export Picture

## Family Member 5

Family Member 5

age 5

relationship 5



Insert Picture

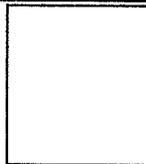
Export Picture

## Family Member 6

Family Member 6

age 6

relationship 6



Insert Picture

Export Picture

## Family Member 7

Family Member 7

age 7

relationship 7



Insert Picture

Export Picture

8684 2604 8770

**FedEx Retrieval Copy**



Form ID No.

**1 From**

Date 12-23-09 Sender's FedEx Account Number 345 821 903

Sender's Name BT WALSH Phone 504 280 6102

Company Extra Atlantic Property Control

Address 15535 Shaward

City WIRECLUSTON State FL ZIP 33414

Dept./Floor/Suite/Room

**2 Your Internal Billing Reference**

**3 To**

Recipient's Name ATTN: FBSRC Proposal Phone

Company US CITIZENSHIP AND IMMIGRATION SERVICES

Recipient's Address CALIFORNIA SERVICE CENTER

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address 2400 AVILA ROAD

To request a package be held at a specific FedEx location, print FedEx address here.

City LAGUNA HIGHL State CA ZIP 92657

Dept./Floor/Suite/Room

**4a Express Package Service**

1  **SAFARI Overnight<sup>SM</sup>** 4  **FedEx Standard Overnight** 6  **FedEx First Overnight**

2  **FedEx 2Day** 3  **FedEx Express Saver**

3  **STAMP #114**

4  **Express Freight Service**

5  **FedEx 2Day Freight** 8  **FedEx 3Day Freight**

6  **FedEx Pak\*** 9  **FedEx Tube**

7  **FedEx Envelope\*** 10  **FedEx Box**

8  **FedEx Large Pak, and FedEx Sundry Pak**

9  **FedEx Tube**

10  **Other**

\*Declared value limit \$500.

**5 Packaging**

1  **SATURDAY Delivery**

2  **HOLD Weekday at FedEx Location**

3  **HOLD Saturday at FedEx Location**

4  **Include FedEx address in Section 3**

5  **Does this shipment contain dangerous goods?**

6  **One box must be checked.**

7  **Yes** (Shipper's Declaration)

8  **No** (Shipper's Declaration)

9  **Yes** (Shipper's Declaration)

10  **No** (Shipper's Declaration)

11  **Yes** (Shipper's Declaration)

12  **No** (Shipper's Declaration)

13  **Yes** (Shipper's Declaration)

14  **No** (Shipper's Declaration)

15  **Yes** (Shipper's Declaration)

16  **No** (Shipper's Declaration)

17  **Yes** (Shipper's Declaration)

18  **No** (Shipper's Declaration)

19  **Yes** (Shipper's Declaration)

20  **No** (Shipper's Declaration)

21  **Yes** (Shipper's Declaration)

22  **No** (Shipper's Declaration)

23  **Yes** (Shipper's Declaration)

24  **No** (Shipper's Declaration)

25  **Yes** (Shipper's Declaration)

26  **No** (Shipper's Declaration)

27  **Yes** (Shipper's Declaration)

28  **No** (Shipper's Declaration)

29  **Yes** (Shipper's Declaration)

30  **No** (Shipper's Declaration)

31  **Yes** (Shipper's Declaration)

32  **No** (Shipper's Declaration)

33  **Yes** (Shipper's Declaration)

34  **No** (Shipper's Declaration)

35  **Yes** (Shipper's Declaration)

36  **No** (Shipper's Declaration)

37  **Yes** (Shipper's Declaration)

38  **No** (Shipper's Declaration)

39  **Yes** (Shipper's Declaration)

40  **No** (Shipper's Declaration)

41  **Yes** (Shipper's Declaration)

42  **No** (Shipper's Declaration)

43  **Yes** (Shipper's Declaration)

44  **No** (Shipper's Declaration)

45  **Yes** (Shipper's Declaration)

46  **No** (Shipper's Declaration)

47  **Yes** (Shipper's Declaration)

48  **No** (Shipper's Declaration)

49  **Yes** (Shipper's Declaration)

50  **No** (Shipper's Declaration)

51  **Yes** (Shipper's Declaration)

52  **No** (Shipper's Declaration)

53  **Yes** (Shipper's Declaration)

54  **No** (Shipper's Declaration)

55  **Yes** (Shipper's Declaration)

56  **No** (Shipper's Declaration)

57  **Yes** (Shipper's Declaration)

58  **No** (Shipper's Declaration)

59  **Yes** (Shipper's Declaration)

60  **No** (Shipper's Declaration)

61  **Yes** (Shipper's Declaration)

62  **No** (Shipper's Declaration)

63  **Yes** (Shipper's Declaration)

64  **No** (Shipper's Declaration)

65  **Yes** (Shipper's Declaration)

66  **No** (Shipper's Declaration)

67  **Yes** (Shipper's Declaration)

68  **No** (Shipper's Declaration)

69  **Yes** (Shipper's Declaration)

70  **No** (Shipper's Declaration)

71  **Yes** (Shipper's Declaration)

72  **No** (Shipper's Declaration)

73  **Yes** (Shipper's Declaration)

74  **No** (Shipper's Declaration)

75  **Yes** (Shipper's Declaration)

76  **No** (Shipper's Declaration)

77  **Yes** (Shipper's Declaration)

78  **No** (Shipper's Declaration)

79  **Yes** (Shipper's Declaration)

80  **No** (Shipper's Declaration)

81  **Yes** (Shipper's Declaration)

82  **No** (Shipper's Declaration)

83  **Yes** (Shipper's Declaration)

84  **No** (Shipper's Declaration)

85  **Yes** (Shipper's Declaration)

86  **No** (Shipper's Declaration)

87  **Yes** (Shipper's Declaration)

88  **No** (Shipper's Declaration)

89  **Yes** (Shipper's Declaration)

90  **No** (Shipper's Declaration)

91  **Yes** (Shipper's Declaration)

92  **No** (Shipper's Declaration)

93  **Yes** (Shipper's Declaration)

94  **No** (Shipper's Declaration)

95  **Yes** (Shipper's Declaration)

96  **No** (Shipper's Declaration)

97  **Yes** (Shipper's Declaration)

98  **No** (Shipper's Declaration)

99  **Yes** (Shipper's Declaration)

100  **No** (Shipper's Declaration)

**6 Special Handling**

1  **SATURDAY Delivery**

2  **HOLD Weekday at FedEx Location**

3  **HOLD Saturday at FedEx Location**

4  **Include FedEx address in Section 3**

5  **Does this shipment contain dangerous goods?**

6  **One box must be checked.**

7  **Yes** (Shipper's Declaration)

8  **No** (Shipper's Declaration)

9  **Yes** (Shipper's Declaration)

10  **No** (Shipper's Declaration)

11  **Yes** (Shipper's Declaration)

12  **No** (Shipper's Declaration)

13  **Yes** (Shipper's Declaration)

14  **No** (Shipper's Declaration)

15  **Yes** (Shipper's Declaration)

16  **No** (Shipper's Declaration)

17  **Yes** (Shipper's Declaration)

18  **No** (Shipper's Declaration)

19  **Yes** (Shipper's Declaration)

20  **No** (Shipper's Declaration)

21  **Yes** (Shipper's Declaration)

22  **No** (Shipper's Declaration)

23  **Yes** (Shipper's Declaration)

24  **No** (Shipper's Declaration)

25  **Yes** (Shipper's Declaration)

26  **No** (Shipper's Declaration)

27  **Yes** (Shipper's Declaration)

28  **No** (Shipper's Declaration)

29  **Yes** (Shipper's Declaration)

30  **No** (Shipper's Declaration)

31  **Yes** (Shipper's Declaration)

32  **No** (Shipper's Declaration)

33  **Yes** (Shipper's Declaration)

34  **No** (Shipper's Declaration)

35  **Yes** (Shipper's Declaration)

36  **No** (Shipper's Declaration)

37  **Yes** (Shipper's Declaration)

38  **No** (Shipper's Declaration)

39  **Yes** (Shipper's Declaration)

40  **No** (Shipper's Declaration)

41  **Yes** (Shipper's Declaration)

42  **No** (Shipper's Declaration)

43  **Yes** (Shipper's Declaration)

44  **No** (Shipper's Declaration)

45  **Yes** (Shipper's Declaration)

46  **No** (Shipper's Declaration)

47  **Yes** (Shipper's Declaration)

48  **No** (Shipper's Declaration)

49  **Yes** (Shipper's Declaration)

50  **No** (Shipper's Declaration)

51  **Yes** (Shipper's Declaration)

52  **No** (Shipper's Declaration)

53  **Yes** (Shipper's Declaration)

54  **No** (Shipper's Declaration)

55  **Yes** (Shipper's Declaration)

56  **No** (Shipper's Declaration)

57  **Yes** (Shipper's Declaration)

58  **No** (Shipper's Declaration)

59  **Yes** (Shipper's Declaration)

60  **No** (Shipper's Declaration)

61  **Yes** (Shipper's Declaration)

62  **No** (Shipper's Declaration)

63  **Yes** (Shipper's Declaration)

64  **No** (Shipper's Declaration)

65  **Yes** (Shipper's Declaration)

66  **No** (Shipper's Declaration)

67  **Yes** (Shipper's Declaration)

68  **No** (Shipper's Declaration)

69  **Yes** (Shipper's Declaration)

70  **No** (Shipper's Declaration)

71  **Yes** (Shipper's Declaration)

72  **No** (Shipper's Declaration)

73  **Yes** (Shipper's Declaration)

74  **No** (Shipper's Declaration)

75  **Yes** (Shipper's Declaration)

76  **No** (Shipper's Declaration)

77  **Yes** (Shipper's Declaration)

78  **No** (Shipper's Declaration)

79  **Yes** (Shipper's Declaration)

80  **No** (Shipper's Declaration)

81  **Yes** (Shipper's Declaration)

82  **No** (Shipper's Declaration)

83  **Yes** (Shipper's Declaration)

84  **No** (Shipper's Declaration)

85  **Yes** (Shipper's Declaration)

86  **No** (Shipper's Declaration)

87  **Yes** (Shipper's Declaration)

88  **No** (Shipper's Declaration)

89  **Yes** (Shipper's Declaration)

90  **No** (Shipper's Declaration)

91  **Yes** (Shipper's Declaration)

92  **No** (Shipper's Declaration)

93  **Yes** (Shipper's Declaration)

94  **No** (Shipper's Declaration)

95  **Yes** (Shipper's Declaration)

96  **No** (Shipper's Declaration)

97  **Yes** (Shipper's Declaration)

98  **No** (Shipper's Declaration)

99  **Yes** (Shipper's Declaration)

100  **No** (Shipper's Declaration)

**7 Payment Bill to:**

1  **Sender** 2  **Recipient** 3  **Third Party** 4  **Credit Card** 5  **Cash/Check**

6  **Obtain Receipt**

7  **Obtain Receipt**

8  **Obtain Receipt**

9  **Obtain Receipt**

10  **Obtain Receipt**

11  **Obtain Receipt**

12  **Obtain Receipt**

13  **Obtain Receipt**

14  **Obtain Receipt**

15  **Obtain Receipt**

16  **Obtain Receipt**

17  **Obtain Receipt**

18  **Obtain Receipt**

19  **Obtain Receipt**

20  **Obtain Receipt**

21  **Obtain Receipt**

22  **Obtain Receipt**

23  **Obtain Receipt**

24  **Obtain Receipt**

25  **Obtain Receipt**

26  **Obtain Receipt**

27  **Obtain Receipt**

28  **Obtain Receipt**

29  **Obtain Receipt**

30  **Obtain Receipt**

31  **Obtain Receipt**

32  **Obtain Receipt**

33  **Obtain Receipt**

34  **Obtain Receipt**

35  **Obtain Receipt**

36  **Obtain Receipt**

37  **Obtain Receipt**

38  **Obtain Receipt**

39  **Obtain Receipt**

40  **Obtain Receipt**

41  **Obtain Receipt**

42  **Obtain Receipt**

43  **Obtain Receipt**

44  **Obtain Receipt**

45  **Obtain Receipt**

46  **Obtain Receipt**

47  **Obtain Receipt**

48  **Obtain Receipt**

49  **Obtain Receipt**

50  **Obtain Receipt**

51  **Obtain Receipt**

52  **Obtain Receipt**

53  **Obtain Receipt**

54  **Obtain Receipt**

55  **Obtain Receipt**

56  **Obtain Receipt**

57  **Obtain Receipt**

58  **Obtain Receipt**

59  **Obtain Receipt**

60  **Obtain Receipt**

61  **Obtain Receipt**

62  **Obtain Receipt**

63  **Obtain Receipt**

64  **Obtain Receipt**

65  **Obtain Receipt**

66  **Obtain Receipt**

67  **Obtain Receipt**

68  **Obtain Receipt**

69  **Obtain Receipt**

70  **Obtain Receipt**

71  **Obtain Receipt**

72  **Obtain Receipt**

73  **Obtain Receipt**

74  **Obtain Receipt**

75  **Obtain Receipt**

76  **Obtain Receipt**

77  **Obtain Receipt**

78  **Obtain Receipt**

79  **Obtain Receipt**

80  **Obtain Receipt**

81  **Obtain Receipt**

82  **Obtain Receipt**

83  **Obtain Receipt**

84  **Obtain Receipt**

85  **Obtain Receipt**

86  **Obtain Receipt**

87  **Obtain Receipt**

88  **Obtain Receipt**

89  **Obtain Receipt**

90  **Obtain Receipt**

91  **Obtain Receipt**

92  **Obtain Receipt**

93  **Obtain Receipt**

94  **Obtain Receipt**

95  **Obtain Receipt**

96  **Obtain Receipt**

97  **Obtain Receipt**

98  **Obtain Receipt**

99  **Obtain Receipt**

100  **Obtain Receipt**

**8 Residential Delivery Signature Options**

1  **No Signature Required**

2  **Direct Signature**

3  **Indirect Signature**

4  **Signature Required**

5  **Signature Required**

6  **Signature Required**

7  **Signature Required**

8  **Signature Required**

9  **Signature Required**

10  **Signature Required**

11  **Signature Required**

12  **Signature Required**

13  **Signature Required**

14  **Signature Required**

15  **Signature Required**

16  **Signature Required**

17  **Signature Required**

18  **Signature Required**

19  **Signature Required**

20  **Signature Required**

21  **Signature Required**

22  **Signature Required**

23  **Signature Required**

24  **Signature Required**

25  **Signature Required**

26  **Signature Required**

27  **Signature Required**

28  **Signature Required**

29  **Signature Required**

30  **Signature Required**

31  **Signature Required**

32  **Signature Required**

33  **Signature Required**

34  **Signature Required**

35  **Signature Required**

36  **Signature Required**

37  **Signature Required**

38  **Signature Required**

39  **Signature Required**

40  **Signature Required**

41  **Signature Required**

42  **Signature Required**

43  **Signature Required**

44  **Signature Required**

45  **Signature Required**

46  **Signature Required**

47  **Signature Required**

48  **Signature Required**

49  **Signature Required**

50  **Signature Required**

51  **Signature Required**

52  **Signature Required**

53  **Signature Required**

54  **Signature Required**

55  **Signature Required**

56  **Signature Required**

57  **Signature Required**

58  **Signature Required**

59  **Signature Required**

60  **Signature Required**

61  **Signature Required**

62  **Signature Required**

63  **Signature Required**

64  **Signature Required**

65  **Signature Required**

66  **Signature Required**

67  **Signature Required**

68  **Signature Required**

69  **Signature Required**

70  **Signature Required**

71  **Signature Required**

72  **Signature Required**

73  **Signature Required**

74  **Signature Required**

75  **Signature Required**

76  **Signature Required**

77  **Signature Required**

78  **Signature Required**

79  **Signature Required**

80  **Signature Required**

81  **Signature Required**

82  **Signature Required**

83  **Signature Required**

84  **Signature Required**

85  **Signature Required**

86  **Signature Required**

87  **Signature Required**

88  **Signature Required**

89  **Signature Required**

90  **Signature Required**

91  **Signature Required**

92  **Signature Required**

93  **Signature Required**

94  **Signature Required**

95  **Signature Required**

96  **Signature Required**

97  **Signature Required**

98  **Signature Required**

99  **Signature Required**

100  **Signature Required**



8684 2604 8770

520

Rev. Date 10/06/09 Part #15220-01/09-2008 FedEx PRINTED IN U.S.A. SFE

# I-924 Regional Center Proposal

Receipt Number: WD90D/240 Attorney: REID NELSON

Regional Center: SOUTH ATLANTIC REGIONAL LCTR  G-28  
(SARC)

General Partner: \_\_\_\_\_ Requester's Name: \_\_\_\_\_

- Economic Unit-Organizational Documents for Regional Center ARTICLES OF INCORPORATION
- Target  Non-Target  Both
- Geographic Area Delineated: PALM BEACH COUNTY, FLORIDA
- Economic Growth Analysis
- Regional or National Impact- Economic Analysis
- Indirect Job Creation:
  - Troubled Business
  - Non-Troubled Business
- Econometric Model: IMPLAN
- Economic Analysis of Job Creation: \_\_\_\_\_
- Business Plan:
- Hypothetical Investment Plan  Investment Plan
- Industries: Hotels, Restaurants, Gun Office Development, Medical Office
- Activities: \_\_\_\_\_
- Operational Plan: Retail Automotive Dealership Development, Nursery Homes + Assisted Living Facility + Retail Shopping Centers,
  - 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
  - Draft Partnership Agreement LP AGMT
  - Draft Subscription Agreement
  - Draft Escrow Agreement
  - List of Escrow Agents
  - Draft Offering Letter etc
  - Articles of Incorporation etc for Enterprise
  - Other relevant documents:

ND LTR FROM RC  
PRINCIPAL

## Proposed Projects

① South Atlantic Mixed Use Development I

— Use a LLLP to finance projects

- 80 Partnership units.



<b>RECEIPT NUMBER</b> W09001240		<b>CASE TYPE</b> Regional Center Proposal	
<b>RECEIPT DATE</b> December 24, 2009		<b>REGIONAL CENTER NAME</b> South Atlantic Regional Center (SARC)	
		<b>PAGE</b> 1 of 1	
South Atlantic Regional Center (SARC) C/O Joseph Walsh, Sr. 15535 Sunward St. Wellington, FL 33414-8335		<b>Notice Type:</b>  <b>Receipt Notice</b>	
<p><b>Receipt Notice</b> - This notice confirms that USCIS received your Regional Center Proposal. If any of the above information is incorrect, send an e-mail to: <a href="mailto:USCIS.ImmigrantInvestorProgram@dhs.gov">USCIS.ImmigrantInvestorProgram@dhs.gov</a>. 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.</p> <p><b>Processing Time</b> - 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: <a href="mailto:USCIS.ImmigrantInvestorProgram@dhs.gov">USCIS.ImmigrantInvestorProgram@dhs.gov</a>. or contact us at the address below.</p> <p><b>Address Change</b> - If your mailing address changes while your case is pending, you may send an e-mail to: <a href="mailto:USCIS.ImmigrantInvestorProgram@dhs.gov">USCIS.ImmigrantInvestorProgram@dhs.gov</a>. Otherwise, you might not receive notice of our action on this case.</p> <p>Please save this notice and a copy of any papers that you send to us along with proof of delivery.</p>			
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 of 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.**

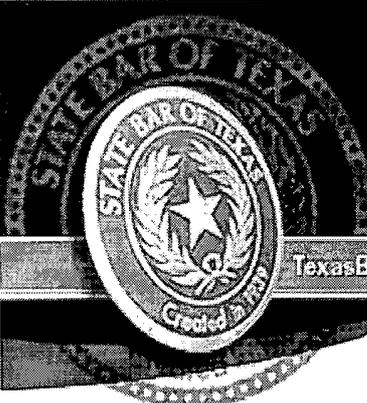
Approval of an immigrant petition does not convey any right or status. The approved petition simply establishes a basis upon which the person you filed for can apply for an immigrant or fiance(e) visa or for adjustment of status.

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*.



# State Bar of Texas

TexasBarCLE

Texas Bar Journal

Texas Young Lawyers

MyBarPage

search

GO

advanced search

## ABOUT THE STATE BAR

[Home](#) → [About the State Bar](#) → [Member Directory](#)

### Search Results

You may re-sort your search results by clicking on the column titles. | [Return to Search](#)

Results For: First Name: reid Last Name: nelson

Please click on the name to view details for the lawyer

Last Name	First(Middle Maiden Name	Organization/Firm	City	State	Phone Number	Status
<a href="#">Nelson</a>	<a href="#">Reid Allen</a>	 Connect Insurance	SAN ANTONIO	TX	(210) 260-5161	
<a href="#">Nelson</a>	<a href="#">Reid T.</a>		TOPEKA	KS	(785) 296-6764	

#### Legend

	Lawyer has an email address
	Lawyer has a photo
	Lawyer has a firm link

#### Member Status

	Eligible to Practice in Texas
	Not Eligible to Practice in Texas
	Inactive or MCLE Non-Practicing
	Deceased

[Return to Search](#)

The Online Membership Directory provides basic information about Attorneys licensed to practice in Texas. Attorney profile information is provided as a public service by the State Bar of Texas as outlined in Section 81.115 of the Texas Government Code. The information contained herein is provided "as is" with no warranty of any kind, express or implied. Neither the State Bar of Texas, nor its Board of Directors, nor any employee thereof may be held responsible for the accuracy of the data. Much of the information has been provided by the attorney and is required to be reviewed and updated by the attorney annually. Texas grievance/disciplinary information will not appear on the profile until a final determination is reached. Access to this site is authorized for public use only. Any unauthorized use of this system is subject to both civil and criminal penalties. This does not constitute a certified lawyer referral service.

- Sections & Committees →
- Other Bar Groups →
- Pro Bono →
- Client Assistance & Grievance →
- Professional Requirements →
- News & Publications →
- Other Services →
- Additional information for the Public →
- About the State Bar →**

- Leadership
- Rules and Procedures
- State Bar Departments
- Events
- Member Directory
- Center for Legal History
- Employment Opportunities
- Contact Us
- Staff Directory

- Diversity Resources →
- eFiling for Courts →
- Member Benefits →
- Marketplace →

★ FIND A LAWYER

Bar Card #

First Name

Last Name

**Search**

**Need a Lawyer?**

Get a Referral

**Advanced Search**

**Print this page** 

[Home](#) [Calendar](#) [Shopping Cart](#) [Contact Us](#) [Site Map](#)

© 1996-2010 State Bar of Texas. [Privacy Policy](#) [Disclaimer](#) [Advertise With Us](#)

JOSEPH J. WALSH, JR.  
SOUTH ATLANTIC REGIONAL CENTER, LLC  
15535 SUNWARD STREET  
WELLINGTON, FLORIDA 33414

REID A. NELSON  
210 ENGLISH OAKS CIRCLE  
BOORNE, TEXAS 78006