U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program

131 M Street, NE, Mailstop 2235 Washington, DC 20529



December 3, 2015

John Chen Southern California EB-5 Regional Center, LLC 10295 Century Woods Dr. Los Angeles, CA 90067

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

Southern California EB-5 Regional Center, LLC

Re:

Initial Regional Center Designation

Southern California EB-5 Regional Center, LLC

RCW1424751876 / ID1424751876

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on September 4, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Southern California EB-5 Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
	Los Angeles County
California	Riverside County
	Orange County
I I	San Diego County

Southern California EB-5 Regional Center, LLC ID1424751876 RCW1424751876 Page 2

B. Industry Categories¹

NAICS	Industry Name
2361	Residential Building Construction
2362	Nonresidential Building Construction
53112	Lessors of Nonresidential Buildings

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Southern California EB-5 Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Southern California EB-5 Regional Center, LLC ID1424751876 RCW1424751876 Page 3

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter-of-Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September $30^{\rm th}$ of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December $29^{\rm th}$ of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and

Southern California EB-5 Regional Center, LLC ID1424751876 RCW1424751876 Page 4

activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <a href="https://doi.org/10.1007/journal.org/10.1007/

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Mileles Columi

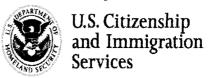
cc: William Sun Hong

Veris LLP P.O. Box 305

La Mirada, CA 90637

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street, NE Washington, DC 20529



December 2, 2015

Marcello J. Perna EB5 West LLC 5285 Meadows Road, Suite 100 Lake Oswego, OR 97035

RE: Reaffirmation of Regional Center Designation RC ID#: 1210850644

DECISION

This notice is in reference to the regional center designation of EB5 West LLC ("the Regional Center"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on May 29, 2013. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395"). Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On July 7, 2015, USCIS notified the Regional Center of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to continue to promote economic growth (including increased export sales, improved regional productivity, job creation, and increased domestic capital investment). The Notice of Intent to Terminate ("NOIT") provided the Regional Center an opportunity to offer evidence in opposition to the grounds stated in the NOIT.

On August 6, 2015, in response to the NOIT, the Regional Center submitted evidence to USCIS of its various efforts to promote economic growth. After considering the evidence, USCIS reaffirms the existing regional center designation for the Regional Center.

Sincerely,

Nicholas Colucci

Julis Colmi

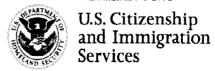
Chief

Immigrant Investor Program Office

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

cc: Robert W. Donaldson
Black Helterline LLP
805 SW Broadway, Suite 1900
Portland, OR 97205

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



November 24, 2015

Kevin Stamper C/O Chicago First Regional Center 800 Fifth Avenue, Suite 4120 Seattle, WA 98104

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Chicago First Regional Center, Inc.

Re:

Initial Regional Center Designation Chicago First Regional Center, Inc. RCW1508452633 / ID1508452633

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on March 25, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Chicago First Regional Center, Inc. as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Chicago First Regional Center, Inc. ID1508452633 RCW1508452633 Page 2

A. Geographic Area

State	Counties			
Illinois	Cook	DuPage	Grundy	
	Kendall	McHenry	Will	

B. Industry Categories¹

NAICS Code	NAICS Description
236	Construction of Buildings
531	Real Estate
722	Food Services and Drinking Places

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Chicago First Regional Center, Inc. ID1508452633 RCW1508452633 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Chicago First Regional Center, Inc., in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov. Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program

Chicago First Regional Center, Inc. ID1508452633 RCW1508452633 Page 4

will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

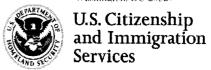
Mileles Columi

cc: Molly Wessel

C/o Chen Lin and Wessel LLP 800 East Colorado Blvd, Ste. 890

Pasadena, CA 91101

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



November 20, 2015

Patrick Francis Hogan 7819 42nd Street West Rock Island, IL 61201

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

CMB Export LLC

ID1031910156

Re:

Request to Amend Regional Center Designation

Project: CMB Export Infrastructure Investment Group 31 LP

RCW1433552004

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on December 1, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the CMB Export Infrastructure Investment Group 31 LP project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that CMB Export Infrastructure Investment Group 31 LP will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least jobs. USCIS will give deference to the applicant's estimates of actual job creation

(b)(4)

www.uscis.gov

CMB Export LLC ID1031910156 RCW1433552004 Page 2

and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the CMB Export Infrastructure Investment Group 31 LP project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On August 15, 1997, USCIS approved CMB Export LLC for participation in the Immigrant Investor Program as a designated regional center. After subsequent amendments on April 2007, June 2010, May 2012, and July 2013, CMB Export LLC's approved geographical scope includes Nye County in Nevada and the entire State of California. CMB Export LLC now seeks to amend its previously approved regional center designation to include an actual project that will be managed by CMB Export Infrastructure Investment Group 31 LP, an NCE established on May 1, 2014.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document	
			701001007	
CMB Export	Construction and	Business Plan	10/06/2014	
Infrastructure	development of	Economic Analysis	09/03/2014	
Investment	residential and retail	Confidential Private	07/02/2014	
Group LP 31	complex	Placement Memorandum		
LP		Subscription Agreement	07/02/2014	
	Investment:	Limited Partnership	07/02/2014	
Geographic	Loan and equity	Agreement		
Location:				
1531 North St.,		Amendments to Limited	09/03/2014	
Sacramento,		Partnership Agreement		
CA		and Confidential Private		
		Placement Memorandum		
Exemplar of				
Form I-526				

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

CMB Export LLC ID1031910156 RCW1433552004 Page 3

b)(4)	Infrastructure Investment Group LP 31 LP, which was formed in the State of Delaware on May 1, 2014. The CMB Export Infrastructure Investment Group LP 31 project is located within a targeted employment area (TEA) in the City of Sacramento, California. Approximately EB·5 investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of

The requested amendment identifies the NCE of the proposed project as CMB Export

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS 1	Industry Name	Input (\$Millions) Multiplier Jobs	
23	Construction		(b)(4)
54	Professional, Scientific, and		
04	Technical Services		
Total Jobs:			

^{*}Indirect jobs

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.



approximately indirect jobs in construction and professional, scientific, and technical services activities associated with the CMB Export Infrastructure Investment Group 31 LP project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with CMB Export Infrastructure Investment Group 31 LP. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the CMB Export Infrastructure Investment Group 31 LP project</u>

Each individual petition, in order to demonstrate that it is affiliated with the CMB Export LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

CMB Export LLC ID1031910156 RCW1433552004 Page 5

5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws

CMB Export LLC ID1031910156 RCW1433552004 Page 6

and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Miles Columnia

Nicholas Colucci

Chief, Immigrant Investor Program

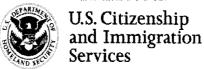
cc: Lincoln Stone, Esq.

Elsie Arias

Stone Grzegorek Gonzalez LLP 800 Wilshire Boulevard, Suite 900

Los Angeles, CA 90017

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street NE, Mailstop 2235 Washington, DC 20529



Date: 11/20/2015

John Shen American Lending Center Illinois, LLC c/o 1 World Trade Center, Suite 1180 Long Beach, CA 90831

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

American Lending Center Illinois, LLC

Re:

Initial Regional Center Designation - Limited Decision

American Lending Center Illinois, LLC RCW1504452596 / ID1504452596

This notice of a limited decision is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 2/13/2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves, in a limited decision, the Form I-924 request to designate American Lending Center Illinois Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation - Limited Decision

The applicant submitted its Form I-924 requesting specific industry categories, geographic regions, and multiple hypothetical projects to be identified for the Regional Center's use.

Upon review of the record, USCIS has determined that not all of the requested geographic regions provided in the Form I-924 represent an appropriate application of a hypothetical project to support the industry categories, and/or geographic regions acceptable for use by the Regional Center.

As such, USCIS has concluded that a limited decision is necessary in this case. Therefore, all requested, approved, and disallowed geographic regions have been identified below along with an opportunity to reopen.

A. Industry Categories and Geographic Regions Requested

The applicant has requested to focus, promote economic growth, and offer capital investment opportunities in the following geographic areas and industry categories:

1. Geographic Areas - Requested

State	Counties			
-11	Bond	Boone	Bureau	Cass
Illinois	Champaign	Christian	Clinton	Coles
	Cook	De Witt	DeKalb	Douglas
	DuPage	Ford	Fulton	Greene
	Grundy	Henry	Iroquois	Jefferson
	Kane	Kankakee	Kendall	Knox
	Lake	LaSalle	Logan	Macon
	Macoupin	Madison	Marion	Marshall
	Mason	McDonough	McHenry	McLean
	Menard	Monroe	Montgomery	Morgan
	Peoria	Piatt	Randolph	Sangamon
	Scott	Shelby	St. Clair	Stark
	Tazewell	Vermillion	Washington	Will
	Winnebago	Woodford		

2. Industry Categories - Requested

NAICS	Industry Name			
236200	Nonresidential building construction			
423000	Merchant wholesalers, durable good			
721100	Traveler accommodation			
623300	Community care facilities for the elderly			
624400	Child daycare services			
611300	Colleges, universities, and professional schools			
623100	Nursing care facilities			

B. Approved Industry Categories and/or Geographic Areas

The following industry categories and/or geographic areas have been determined to represent an appropriate application of a hypothetical project to support the industry categories, and geographic regions acceptable for use by the Regional Center.

1. Geographic Areas – Approved

State	Counties			
Illinois	Bureau	Cook	DeKalb	DuPage
	Grundy	Kane	Kankakee	Kendall
	Lake	LaSalle	McHenry	Will

2. Industry Categories - Approved

NAICS	Industry Name
236200	Nonresidential building construction
423000	Merchant wholesalers, durable good
721100	Traveler accommodation

C. Disallowed Industry Categories and/or Geographic Areas

The following geographic areas have been disallowed because it has been determined that they do not represent an appropriate application of a hypothetical project to support the geographic regions acceptable for use by the Regional Center.

1. Geographic Areas - Disallowed

State	Counties			
	Bond	Boone	Cass	Champaign
Illinois	Christian	Clinton	Coles	De Witt
	Douglas	Ford	Fulton	Greene
	Henry	Iroquois	Jefferson	Knox
	Logan	Macon	Macoupin	Madison
	Marion	Marshall	Mason	McDonough
	McLean	Menard	Monroe	Montgomery
	Morgan	Peoria	Piatt	Randolph
	Sangamon	Scott	Shelby	St. Clair
	Stark	Tazewell	Vermillion	Washington
	Winnebago	Woodford		

2. Industry Categories - Disallowed

NAICS	Industry Name
623300	Community care facilities for the elderly
624400	Child daycare services
611300	Colleges, universities, and professional schools
623100	Nursing care facilities

The original submission requested the entire State of Illinois, and a Request for Evidence response, received October 29, 2015 revised the request to 36 counties in Illinois.

Section 610(a) of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993, as amended, provides in part: "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." Furthermore, pages 13-14 of USCIS Policy Memorandum 602-0083 suggests that the reasonableness of proposed regional center geographic boundaries may be demonstrated through evidence that the proposed area is contributing significantly to the supply chain, as well as the labor pool, of the proposed projects.

(b)(4)		

D. Conclusion - Decision to Disallow

Some aspects of the submitted proposal, as presently constituted, do not meet the regulatory requirements at 8 C.F.R. § 204.6. Therefore the request to grant the specific geographic areas listed above cannot be approved.

The decision to disallow the geographic areas identified above does not preclude the filing of Form I-526 petitions related to a subsequent project using the disallowed industry categories, geographic areas, and/or hypothetical project(s). Any future petitions will be adjudicated on their own merit.

There is no appeal to this decision to disallow the specified industry categories and/or geographic scope explained above. However, pursuant to 8 CFR 103.5, a motion can be filed on Form I-290B. Such motion must be accompanied by the proper fee and filed within 30 days of this notice.

Please note that if the I-924 applicant elects to timely file a motion with USCIS and if said motion is granted the application will be reopened and/or reconsidered and a new decision rendered. If the applicant's proposal submitted in support of its motion meets the regulatory requirements at 8 C.F.R. § 204.6 the applicant will be accorded the geographic areas that meet EB-5 requirements. If no motion is filed within the time allowed this decision is final.

III. Job Creation

USCIS approves the geographic area and industry categories noted below based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal. The approval of this Form I-924 application is based upon the economically and statistically valid assumptions and estimates provided in the business plan for job creation. Please refer to the input and multiplier analysis table above.

A hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998). As such, USCIS's approval of any hypothetical job creation estimates presented in a Form I-924 is not accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the American Lending Center Illinois Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational and transactional documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <a href="https://doi.org/10.1007/journal.org/10.1007/

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milels Coloni

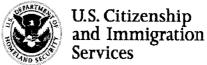
cc: Adrian Toh

Law Office of Adrian Toh Esq

PO Box 80006

San Marino, CA 91118

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* 131 M Street, NE. Mailstop 2235 Washington. DC 20529



January 12, 2016

Bruce Gjovig North Dakota/Minnesota EB-5 Regional Center 4200 James Drive Grand Forks, ND 58203

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

North Dakota/Minnesota EB-5 Regional Center

Re:

Request to Amend Regional Center Designation North Dakota/Minnesota EB-5 Regional Center

RCW1427951900 / ID1031910017

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 6, 2014. The Form I-924 application was filed to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

A. Effective the date of this notice, USCIS approves the additional industry categories listed in Section III of this notice.

II. Procedural History

On April 19, 2011, USCIS approved the North Dakota/Minnesota EB·5 Regional Center for participation in the Immigrant Investor Program as a designated regional center. Based on the initial designation and subsequently approved designation amendments, the North Dakota/Minnesota EB·5 Regional Center obtained approval for the following industry categories:

North Dakota/Minnesota EB·5 Regional Center ID1031910017 RCW1427951900 Page 2

Industry Categories				
NAICS	Industry Name	Approval Date		
23	Construction	5/2/14		
32-33	Manufacturing	5/2/14		
48-49	Transportation and Warehousing	5/2/14		
62	Health Care and Social Assistance	5/2/14		
72	Accommodation and Food Service	5/2/14		
11	Agriculture, Forestry, Fishing & Hunting	4/11/11		
31	Manufacturing	4/11/11		
33312	Construction Machinery Manufacturing	4/11/11		
333131	Mining Machinery Manufacturing	4/11/11		
3364	Aerospace Products & Parts Manufacturing	4/11/11		
51	Information	4/11/11		
541711	Research and Development in Biotechnology	4/11/11		
22112	Electric Power Transmission, Control and	4/11/11		
	Distribution	!		
53	Real Estate	4/11/11		

An amendment request is required if investment opportunities arise that are outside the previously approved geographic area, industry categories, and capital investment projects. If changes are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the new evidence to ensure compliance with EB-5 program requirements.

III. Amendment Request1

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following changes:

A. Industry Categories

USCIS approves the applicant's amendment request to include the following industry categories:

NAICS	Industry Name
423	Merchant Wholesalers, Durable Goods
5413	Architectural, Engineering and Related Services

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

North Dakota/Minnesota EB-5 Regional Center ID1031910017 RCW1427951900 Page 3

IV. Job Creation

USCIS approves the industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the North Dakota/Minnesota EB·5 Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

North Dakota/Minnesota EB-5 Regional Center ID1031910017 RCW1427951900 Page 4

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

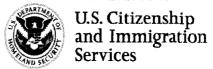
Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Mileles Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



October 26, 2015

Kirk Eicholtz Florida Equity & Growth Fund 1110 North Florida Avenue, Suite 200 Tampa, FL 33602

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Florida Equity & Growth Fund Regional Center LLC

Re:

Request to Amend Regional Center Designation

Florida Equity & Growth Fund Regional Center LLC

RCW1418451799 / RC ID 1031910124

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on May 30, 2014. The Form I-924 application was filed to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

A. Effective the date of this notice, USCIS approves the additional geographic area to include those areas listed in Section III of this notice.

II. Procedural History

On May 21, 2013, USCIS approved the Florida Equity & Growth Fund Regional Center LLC for participation in the Immigrant Investor Program as a designated regional center. Based on the initial designation the Florida Equity & Growth Fund Regional Center LLC obtained approval for the following geographic area and industry categories:

Florida Equity & Growth Fund Regional Center LLC ID1031910124 RCW1418451799 Page 2

Geographic A State	Counties	Approval Date
Florida	Alachua	01/09/2009
	Brevard	01/09/2009
	Citrus	01/09/2009
	DeSoto	01/09/2009
	Flagler	01/09/2009
	Hardee	01/09/2009
	Hernando	01/09/2009
	Highlands	01/09/2009
	Hillsborough	01/09/2009
	Lake	01/09/2009
	Levy	01/09/2009
	Manatee	01/09/2009
	Marion	01/09/2009
	Orange	01/09/2009
	Osceola	01/09/2009
	Pasco	01/09/2009
	Pinellas	01/09/2009
	Polk	01/09/2009
	Putnam	01/09/2009
	Sarasota	01/09/2009
	Seminole	01/09/2009
	Sumter	01/09/2009
	Volusia	01/09/2009

An amendment request is required if investment opportunities arise that are outside the previously approved geographic area. If changes are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the new evidence to ensure compliance with EB-5 program requirements.

III. Amendment Request1

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following changes:

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Florida Equity & Growth Fund Regional Center LLC ID1031910124 RCW1418451799 Page 3

A. Geographic Area

USCIS approves the applicant's amendment request to include the following geographic area:

State	Counties
Florida	All Counties

IV. Job Creation

USCIS approves the geographic area noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Florida Equity & Growth Fund Regional Center LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

Florida Equity & Growth Fund Regional Center LLC ID1031910124 RCW1418451799 Page 4

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. <u>Legal Notice</u>

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any

Florida Equity & Growth Fund Regional Center LLC ID1031910124 RCW1418451799 Page 5

information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

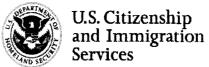
Chief, Immigrant Investor Program

cc: Carolyn Lee

PO Box 6435 Ithaca, NY 14851

Mileles Coloni

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* 131 M Street, NE. Mailstop 2235 Washington, DC 20529



November 16, 2015

Lucy Gao First American Regional Center 3218 E Holt Ave West Covina, CA 91791

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): First American Regional Center, LLC

Re: Initial Regional Center Designation

First American Regional Center, LLC RCW1505652611 / RC-ID1505652611

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on February 25, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate First American Regional Center, LLC ("FARC") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State				
California	Los Angeles	Orange	San Bernardino	Riverside
	Dan Diego			programme and the contract of

First American Regional Center, LLC RCW1505652611 / RC·ID1505652611 Page 2

B. Industry Categories¹

Industry Category	NAICS code
Residential Building Construction	2361
Nonresidential Building Construction	2362
Furniture & Home Furnishing Merchant Wholesalers	4232
Lessors of Real Estate	5311
Architectural, Engineering & Related Services	5413
Traveler Accommodation	7211
Restaurants and Other Eating Places	7225

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

First American Regional Center, LLC RCW1505652611 / RC-ID1505652611 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with FARC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho. 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program

First American Regional Center, LLC RCW1505652611 / RC-ID1505652611 Page 4

will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milels Coloni

cc: Linda Lau

Global Law Group

909 El Centro Street Ste. 1 South Pasadena, CA 91030

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



November 13, 2015

Alexey Burya BART Investment Group, LLC 290 174th Street, #1712 Sunny Isles Beach, FL 33160

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

BART Investment Group, LLC

Re:

Initial Regional Center Designation BART Investment Group, LLC RCW1507052623 / ID1507052623

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on March 11, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate BART Investment Group, LLC ("BART-IG") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State			Counties	
Florida	Broward	Miami Dade	Palm Beach	

B. Industry Categories¹

Industry Category	NAICS code
Residential Construction	2361
Real Estate	531
Management, Scientific & Technical Consulting Services	541610

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with BART-IG, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

¹ USCIS issued a Policy Memorandum (PM·602·0083) on the subject of "EB·5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

BART Investment Group, LLC RCW1507052623 / ID1507052623 Page 3

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

BART Investment Group, LLC RCW1507052623 / ID1507052623 Page 4

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Mileles Colmi

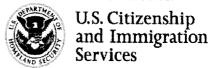
cc: Julian Montero

Arnstein & Lehr. LLP

200 S Biscayne Blvd., Ste. 3600

Miami, FL 33131

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



January 7, 2016

Herbert Howard Entwistle Americas Green Card Regional Center One International Place, Suite 1400 Boston, MA 02110

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Americas Green Card Regional Center

Re: Initial Regional Center Designation

Americas Green Card Regional Center

RCW1406551698/ID1406551698

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on March 6, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Americas Green Card Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

www.uscis.gov

B. Geographic Area

State	Counties
States of Massachusetts, Maine and New Hampshire	York, Cumberland, Oxford and Androscoggin counties in Maine; Strafford and Rockingham counties in New Hampshire; Essex, Norfolk, Plymouth, Suffolk and Middlesex counties in Massachusetts

C. Industry Categories¹

NAICS Code	Industry
2379	Other Heavy & Civil Engineering Construction
7139	Other Amusement and Recreation Industries
2362	Non-Residential Building Construction
5413	Architectural Engineering and Related Services
5311	Lessors of Real Estate

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give

USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions. USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Americas Green Card Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 5. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 6. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 7. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 8. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant

must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

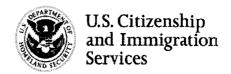
Nicholas Colucci

Chief, Immigrant Investor Program

Milels Colum

cc: William G. Hicks 7380 Sand Lake Road, Suite 500 Orlando, FL 32819

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* Washington, DC 20529



March 19, 2015

Robert C. Lowe C/O Iconic Caribbean EB-5, LLC 1760 Loiza Street, Suite 301 San Juan, PR 00911

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Regional Center:

Iconic Caribbean EB-5, LLC

ID1206050605

Re:

Request to Amend Regional Center Designation

Project: Four Seasons Resort & Golf Club Puerto Rico at Cayo Largo

RCW1419851815

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on July 17, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Four Seasons Resort & Golf Club Puerto Rico at Cayo Largo project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the EB5 United Puerto Rico FS, LP will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at

www.uscis.gov

(b)(4)

least obs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Four Seasons Resort & Golf Club Puerto Rico at Cayo Largo project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On July 25, 2013, USCIS approved the Iconic Caribbean EB-5, LLC (ICERC) for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the entire Commonwealth of Puerto Rico. ICERC now seeks to amend its previously approved regional center designation to include an actual project that will be managed by EB5 United Puerto Rico FS, LP, an NCE established on April 17, 2014

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
EB5 United	Resort & Golf Club	Business Plan	May 27, 2014
Puerto Rico FS,		Economic Analysis	May 16, 2014
LP	Investment: Loan	Confidential Private Offering Memorandum	May 27, 2014
Geographic		Subscription Agreement	May 27, 2014
Location: Commonwealth of Puerto Rico		Limited Partnership Agreement	April 18, 2014
Exemplar of		Escrow Agreement	June 3, 2014
Form I-526		Loan & Security Agreement	May 20, 2014

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment promotes a construction and development project to include a 136-room, 5-star luxury hotel and 18-hole golf course in Fajardo, Puerto Rico. Project focus will include construction, professional and scientific, and the traveler accommodation

industries. As mentioned, the NCE of the proposed project will be EB5 United Puerto Rico FS, LP – a limited partnership formed in the State of Washington on April 17, 2014. The NCE will be comprised of a General Partner (EB5 United Puerto Rico, LLC), and the Limited Partners, or EB-5 foreign investors. The project's job-creating entity, or JCE, will be Resort at Cayo Largo, LLC – a Delaware limited liability company formed on March 9, 2007. The JCE also serves as the project Developer and Owner.

With the project located inside a targeted employment area (TEA), and up to in EB-5 funds being sought, a total of Limited Partnerships will be available. The total subscription price of per unit is comprised of a Capital Contribution of and an Administrative Fee of per EB-5 investor.	(b)(4)
	(b)(4)

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the Puerto Rico Input/Output Model · PRIM economic model:

NAICS 1	Industry Name	Input (\$Millions)	Multiplier	Jobs	
2362	Non-Residential Building Construction				
4232	FF&E (indirect & induced jobs only)				(b)(4
5413	Architect, Engineer & Related Services				(~)(.
7211	Traveler Accommodation				
Total Job	s:				

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using PRIM multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately direct and indirect and induced jobs from construction, planning, and travel accommodation activities associated with the Four Seasons Resort & Golf Club Puerto Rico at Cayo Largo project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with the Four Seasons Resort & Golf Club Puerto Rico at Cayo Largo project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I·526. When filing Form I·829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the Four Seasons Resort & Golf Club Puerto Rico at Cayo Largo project</u>

Each individual petition, in order to demonstrate that it is affiliated with Iconic Caribbean EB-5, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.

(b)(4)

- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milels Coloni

cc: Robert C. Divine

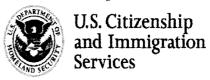
Baker Donelson Beaman Caldwell & Berkowitz, P.C. 1800 Republic Centre 633 Chestnut Street

Chattanooga, TN 37450

Iconic Caribbean EB-5, LLC 1760 Loiza Street, Suite 301 San Juan, PR 00911

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street, NE Washington, DC 20529



November 16, 2015

Andre Hurst American General Realty Advisors Regional Center P.O. Box 369 Cardiff-by-the-Sea, CA 92007

RE: Reaffirmation of Regional Center Designation RC ID#: 1106250174

DECISION

This notice is in reference to the regional center designation of American General Realty Advisors Regional Center ("the Regional Center"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on October 31, 2011. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395"). Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On July 7, 2015, USCIS notified the Regional Center of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to continue to promote economic growth (including increased export sales, improved regional productivity, job creation, and increased domestic capital investment). The Notice of Intent to Terminate ("NOIT") provided the Regional Center an opportunity to offer evidence in opposition to the grounds stated in the NOIT.

On August 10, 2015, in response to the NOIT, the Regional Center submitted evidence to USCIS of its various efforts to promote economic growth. After considering the evidence, USCIS reaffirms the existing regional center designation for the Regional Center.

Sincerely,

Nicholas Colucci

Julis Colmi

Chief

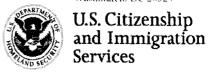
Immigrant Investor Program Office

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

cc: Benjamin L. Meeker Law Offices of Ben Meeker 91 Avenida del Mar, Suite 300 San Clemente, CA 92672

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



Date: October 6, 2015

Stephen Hennessey Smith Central Western Regional Center LLC 9500 Roosevelt Way, NE Suite 300 Seattle, WA 98115

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

Central Western Regional Center LLC

Re:

Initial Regional Center Designation Central Western Regional Center LLC RCW1505552608 / ID1505552608

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on January 8, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Central Western Regional Center LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
State of Illinois	All Counties
State of Indiana	All Counties
State of Ohio	All Counties

Central Western Regional Center LLC ID1505552608 RCW1505552608 Page 2

State	Counties	Counties	
The state of the s	Berrien	Branch	
State of Michigan	Calhoun	Cass	
	Eaton	Hillsdale	
	Ingham	Jackson	
	Kalamazoo	Lenawee	
	Livingston	Macomb	
	Monroe	Oakland	
	St. Joseph	Van Buren	
	Washtenaw	Wayne	
	Columbia	Dane	
	Dodge	Green	
	Jefferson	Kenosha	
State of Wisconsin	Milwaukee	Ozaukee	
	Racine	Rock	
	Walworth	Washington	
	Waukesha		
1	Allegheny	Armstrong	
ett. J. Pro Linker, Ming. 1987 . d	Beaver	Butler	
State of Pennsylvania	Fayette	Lawrence	
	Washington	Westmoreland	
State of Missouri	Adair	Lewis	
	Andrew	Lincoln	
	Atchison	Linn	
	Audrain	Livingston	
	Boone	Macon	
	Buchanan	Marion	
	Caldwell	Mercer	
	Callaway	Moniteau	
	Carroll	Monroe	
	Cass	Montgomery	
	Chariton	Morgan	
	Clark	Nodaway	
	Clay	Osage	
	Clinton	Pettis	
	Cole	Pike	
	Cooper	Platte	
	Daviess	Putnam	
	DeKalb	Ralls	
	Franklin	Randolph	
	Gasconade	Ray	
	Gentry	Saline	
	Grundy	Schuyler	
	Harrison	Scotland	
	Holt	Shelby	

Central Western Regional Center LLC ID1505552608 RCW1505552608 Page 3

	Howard	St. Charles	
	Jackson	St. Louis	
	Jefferson	St. Louis City	
	Johnson	Sullivan	
	Warren	Knox	
	Worth	Lafayette	
	Douglas	Linn	
	Franklin	Miami	
State of Kansas	Jefferson	Shawnee	
	Johnson	Wyandotte	
	Leavenworth		
	Boone	Kenton	
State of Kentucky	Bullitt	Meade	
	Campbell	Oldham	
	Hardin	Shelby	
	Jefferson		

B. Industry Categories¹

NAICS	Industry Name
237	Heavy and Civil Engineering Construction
236	Construction of Buildings
237990	Other Heavy and Civil Engineering Construction
562910	Remediation Services
33111	Iron and Steel Mills and Ferroalloy Manufacturing
334290	Other Communications Equipment Manufacturing
5413	Architectural, Engineering, & Related Services
5311	Lessors of Real Estate
722	Food Services and Drinking Places
7211	Traveler Accommodation
62331	Continuing Care Retirement Communities and Assisted Living Facilities for the Elderly

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Central Western Regional Center LLC ID1505552608 RCW1505552608 Page 4

approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Central Western Regional Center LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the

Central Western Regional Center LLC ID1505552608 RCW1505552608 Page 5

"Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

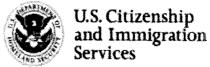
Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Ailela Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



Date:12/21/2015

Tofigh Shirazi Texas Coast Regional Center Corporation 5615 Kirby, Suite 705 Houston, TX 77005

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Texas Coast Regional Center Corporation

Re:

Initial Regional Center Designation

Texas Coast Regional Center Corporation

RCW1509651743/ ID1509651743

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 04/02/2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Texas Coast Regional Center Corporation as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
Texas	Harris, Fort Bend, Montgomery, Brazoria, Galveston, Liberty, Waller,

www.uscis.gov

Texas Coast Regional Center Corporation ID1509651743 RCW1509651743 Page 2

	Charles and America Counting
	Chambers and Austin Counties
1	CIMILIOUS CANALISMS COMMISSION

B. Industry Categories¹

NAICS	Industry Name
236220	Commercial and Institutional Building Construction
721110	Hotels (except Casino Hotels) and Motels
72251	Restaurants and Other Eating Places

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Texas Coast Regional Center Corporation ID1509651743 RCW1509651743 Page 3

Each individual petition, in order to demonstrate that it is affiliated with the Texas Coast Regional Center Corporation, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center

Texas Coast Regional Center Corporation ID1509651743 RCW1509651743 Page 4

in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milels Colmi

cc: Charles Foster / Christian Triantaphyllis, Esq.

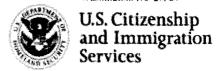
Foster LLP

600 Travis Street, 20th Floor

Houston, TX 77002

Texas Coast Regional Center Corporation 5615 Kirby, Suite 705 Houston, TX 77005

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



Date: 01/04/2016

Bentley S. Zhao New Empire EB5 Regional Center, LLC 4918 3rd Avenue Brooklyn, NY 11220

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): New Empire EB5 Regional Center, LLC

Re: Initial Regional Center Designation – Revised

New Empire EB5 Regional Center, LLC

RCW 1431451970/ ID1431451970

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 11/10/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate New Empire EB5 Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

Name of State(s)	Counties Counties	
New York	Bronx, Dutchess, Kings, Nassau, New York, Orange, Putnam,	
	Queens, Richmond, Rockland, Suffolk, Ulster, and Westchester	

www.uscis.gov

New Empire EB5 Regional Center, LLC ID1431451970 RCW1431451970 Page 2

Counties.

Connecticut

Fairfield, Litchfield and New Haven Counties.

Pennsylvania New Jersey

Carbon, Lehigh, Monroe, Northampton and Pike Counties.

Bergen, Essex, Hudson, Hunterdon, Mercer, Middlesex, Monmouth,

Morris, Ocean, Passaic, Somerset, Sussex, Union and Warren

Counties.

B. Industry Categories¹

NAICS	Industry Name	
2362	Non-residential building construction	
7211	Traveler Accommodation	
4232	Furniture and Home Furnishing Merchant Wholesalers	
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers	
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

New Empire EB5 Regional Center, LLC ID1431451970 RCW1431451970 Page 3

business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the New Empire EB5 Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

New Empire EB5 Regional Center, LLC ID1431451970 RCW1431451970 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Mileles Coloni

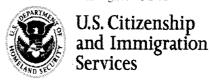
New Empire EB5 Regional Center, LLC ID1431451970 RCW1431451970 Page 5

cc: Marianna Tarantur, Esq. Wright Johnson, Ltd. 197 S Federal Hwy., Suite 200 Boca Raton, FL 33432

New Empire EB5 Regional Center, LLC 4918 $3^{\rm rd}$ Avenue Brooklyn, NY 11220

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street, NE Washington, DC 20529



October 29, 2015

Thomas J. Yee New Energy Horizons Regional Center 51 Forest Avenue, Unit 158 Old Greenwich, CT 06870

RE: Reaffirmation of Regional Center Designation RC ID#: 1031910060

DECISION

This notice is in reference to the regional center designation of New Energy Horizons Regional Center ("the Regional Center"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on October 14, 2011. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395"). Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On July 7, 2015, USCIS notified the Regional Center of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to continue to promote economic growth (including increased export sales, improved regional productivity, job creation, and increased domestic capital investment). The Notice of Intent to Terminate ("NOIT") provided the Regional Center an opportunity to offer evidence in opposition to the grounds stated in the NOIT.

On August 7, 2015, in response to the NOIT, the Regional Center submitted evidence to USCIS of its various efforts to promote economic growth. After considering the evidence, USCIS reaffirms the existing regional center designation for the Regional Center.

Sincerely,

Nicholas Colucci

Julis Colmi

Chief

Immigrant Investor Program Office

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

cc: Larry J. Behar Behar Law Group

888 Southeast Third Avenue, Suite 400

Fort Lauderdale, FL 33316

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



Date: 10/05/2015

Lawrence Chang MCFI – Northern California, LLC Suite 570 30 Columbia Corporate Center 10440 Little Patuxent Parkway Columbia, MD 21044

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

MCFI - Northern California, LLC

Re:

Initial Regional Center Designation MCFI – Northern California, LLC RCW1509352639 / ID1509352639

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 04/03/2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate MCFI – Northern California as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

MCFI – Northern California ID1509352639 RCW1509352639 Page 2

State	Counties	Counties
	Alameda	Contra Costa
California	El Dorado	Marin
	Napa	Nevada
	Placer	Sacramento
	San Francisco	San Mateo
	Sierra	Solano
	Sonoma	Sutter
	Yuba	

B. Industry Categories¹

NAICS	Industry Name
236220	Commercial and institutional building construction
236115	New single-family housing construction (except for-sale builders)
722511	Full-service restaurants

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

MCFI – Northern California ID1509352639 RCW1509352639 Page 3

Each individual petition, in order to demonstrate that it is affiliated with the MCFI – Northern California, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

MCFI – Northern California ID1509352639 RCW1509352639 Page 4

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.</u>

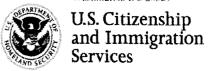
Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milels Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



October 26, 2015

Gary McCormick Spackman c/o Timothy P. Post, Esq. 736 S. Center Street Reno, NV 89501

Application: Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center: Arkansas Regional Economic Development Center, LLC

RCW1421051828/ID1232050815

Re: Request to Amend Regional Center Designation

Project: Emerald Falls Hotel and Resort

RCW1421051828

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on July 29, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition, the applicant has sought USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Emerald Falls Hotel and Resort project based on the evidence submitted with the above referenced Form I-924. The applicant has shown by a preponderance of the evidence that the Emerald Falls Hotel and Resort will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least ______obs. USCIS will give deference to the revised estimates of actual job creation and economic analysis in subsequent related filings of any Form I-526 filed by an individual investor associated with the Emerald Falls Hotel and Resort project.

(b)(4)

www.uscis.gov

Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On March 20, 2014, USCIS approved the Arkansas Regional Economic Development Center, LLC ("AREDC") for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of Baxter, Benton, Boone, Carroll, Izard, Lawrence, Marion, Sharp, and Washington counties in Arkansas; and Delaware, Mayes, and Wagoner counties in Oklahoma. AREDC now seeks to amend its previously approved regional center designation to include an actual project that will be managed by Emerald Falls Hotel and Resort, LLLP.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
Emerald Falls	Hotel, Independent	Economic Analysis	Revised August 2015
Hotel and	and Assisted Living		
Resort	Facilities, Country		
	Club, and		
Geographic	Commercial/Retail		
Location:	Spaces		
Broken Arrow,			
OK (Wagoner	Investment:		
County)	Loan		
·			

USCIS cannot give deference to the applicant's business plan at this time because of numerous inconsistencies and/or errors.\(^1\) The business plan will be reviewed at the I-526 petition filing stage, or with a future I-924 amendment filing.

1 T	These include, but are not limited to the following:
(b)(4)	

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

Limited EB-5 in	quested amendment seeks approval of the Eme d Liability Limited Partnership formed in the expressors will subscribe to the NCE as limited p	State of Wyom:	ing. Approxi	mately	
	utions ofeach for a total of				(b)(4)
	Creation creation methodology presented in the econor	nic imnact ana	lveie and und	larlying	
busines	is plan is found to be reasonable based on the in N economic model:	-			
NAICS	Industry Name	Input (\$Mil)	Multiplier	Jobs	
	Resort/Spa (Phase I)		•		
2361	Nonresidential Building Construction				
5411*	Architectural, Engineering, and Related Services				
7211	Traveler Accommodation				
	Independent Living (Phase I)				
2362	Residential Building Construction				
5411*	Architectural, Engineering, and Related Services			ŀ	
6233	Continuing Care Retirement Communities and Assisted Living Facilities for the Elderly				(b)(4)
			4.4		

dential Building Construction nitectural, Engineering, and Related vices				
rices	1			
tinuing Care Retirement Communities and sted Living Facilities for the Elderly]			
ntry Club Upgrade (Phase II)	j			
residential Building Construction	1			
nitectural, Engineering, and Related				
er Amusement and Recreation Industries	<u></u>			
Commercial and Retail S	pace (Phase II)	Total Jobs		
residential Building Construction				י
ors of Real Estate				
l Job Creation, Phases I and II				J
induced jobs only.		···		_ (b)
	ntry Club Upgrade (Phase II) residential Building Construction hitectural, Engineering, and Related hices re Amusement and Recreation Industries Commercial and Retail S residential Building Construction hors of Real Estate 1 Job Creation, Phases I and II	residential Building Construction hitectural, Engineering, and Related hices or Amusement and Recreation Industries Commercial and Retail Space (Phase II) residential Building Construction hors of Real Estate 1 Job Creation, Phases I and II	residential Building Construction intectural, Engineering, and Related ices or Amusement and Recreation Industries Commercial and Retail Space (Phase II) Total Jobs residential Building Construction ors of Real Estate I Job Creation, Phases I and II	residential Building Construction intectural, Engineering, and Related ices or Amusement and Recreation Industries Commercial and Retail Space (Phase II) Total Jobs residential Building Construction ors of Real Estate I Job Creation, Phases I and II

The approval of this Form I-924 application is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using IMPLAN multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately direct, indirect, and induced jobs from construction and operations associated with the Emerald Falls Hotel and Resort project.

(b)(4)

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with Emerald Falls Hotel and Resort project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a

76

reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions based on the Emerald Falls Hotel and Resort project

Each individual petition, in order to demonstrate that it is affiliated with the Arkansas Regional Economic Development Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

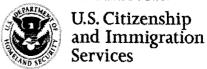
Chief, Immigrant Investor Program

Milels Coloni

cc: Timothy Post

736 S. Center Street Reno, NV 89501

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



October 20, 2015

Stephen Smith South Atlantic Coast Regional Center LLC 9500 Roosevelt Way NE Suite 300 Seattle, WA 98115

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

South Atlantic Coast Regional Center LLC

Re:

Initial Regional Center Designation

South Atlantic Coast Regional Center LLC RCW 1436352266 / RC ID 1436352266

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 29, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate South Atlantic Coast Regional Center LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

www.uscis.gov

South Atlantic Coast Regional Center LLC ID1436352266 RCW1436352266 Page 2

A. Geographic Area

State	Counties/Cities
Florida	Entire state
Georgia	Entire state
North Carolina	Entire state
South Carolina	Entire state

B. Industry Categories¹

NAICS	Industry Name	
2362	Nonresidential Building Construction	
237990	Other Heavy and Civil Engineering Construction	
3345	Navigational, Measuring, Electromedical, and Control Instruments	
	Manufacturing	
484	Truck Transportation	
5311	Lessors of Real Estate	
5413	Architectural, Engineering, and Related Services	
541720	Research and Development in the Social Sciences and Humanities	
562910	Remediation Services	
62331	Continuing Care Retirement Communities and Assisted Living	
	Facilities for the Elderly	
7211	Traveler Accommodation	
722	Food Services and Drinking Places	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

South Atlantic Coast Regional Center LLC ID1436352266 RCW1436352266 Page 3

investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the South Atlantic Coast Regional Center LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to

South Atlantic Coast Regional Center LLC ID1436352266 RCW1436352266 Page 4

promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

South Atlantic Coast Regional Center LLC ID1436352266 RCW1436352266 Page 5

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



October 19, 2015

Min Chan C/O City Connections Regional Center, LLC 71 West 23rd Street, Suite 1001 New York, NY 10174

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): City Connections Regional Center, LLC

Re: Initial Regional Center Designation

City Connections Regional Center, LLC RCW1504452594 / ID1504452594

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on February 13, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate City Connections Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

www.uscis.gov

A. Geographic Area

State		Counties	
Connecticut	Fairfield	Litchfield	New Haven
New Jersey	Bergen	Essex	Hudson
	Hunterdon	Mercer	Middlesex
	Monmouth	Morris	Ocean
	Passaic	Somerset	Sussex
	Union	Warren	
New York	Bronx	Dutchess	Kings
	Nassau	New York	Orange
	Putnam	Queens	Richmond
	Rockland	Suffolk	Ulster
	Westchester		
Pennsylvania	Carbon	Lehigh	Monroe
	Northampton	Pike	

B. Industry Categories¹

NAICS Code	NAICS Description
236	Construction of Buildings
4232	Furniture and Home Furnishing Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers
7211	Traveler Accommodation

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

The hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I·526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the City Connections Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be

submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

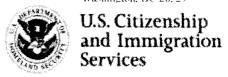
If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Mileles Coloni

Nicholas Colucci Chief, Immigrant Investor Program

cc: David Koplas C/O Koplas and Associates LLC 398 Washburn Lockport, NY 14094



DATE: 10/15/2015

Michael J. Sullivan Ashcroft/Sullivan/Baybridge Mid-Atlantic Economic Development Center, LLC 1950 N. Glebe Road, Suite 530 Arlington, VA 22203

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Ashcroft/Sullivan/Baybridge Mid-Atlantic Economic Development

Center, LLC

Re: Initial Regional Center Designation

Ashcroft/Sullivan/Baybridge Mid-Atlantic Economic Development

Center, LLC

RCW1426251890/ID1426251890

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 09/19/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Ashcroft/Sullivan/Baybridge Mid-Atlantic Economic Development Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities
Maryland	Baltimore, Baltimore City, Anne Arundel, Carroll, Harford, Howard and
	Queen Anne's.

B. Industry Categories¹

NAICS	Industry Name
2361	Residential Building Construction
2362	Nonresidential Building Construction
5311	Lessors of Real Estate

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project.

Project	Type of Project	Organization Documents	Date of Document
Ashcroft/Sullivan/ Baybridge Lenore	Actual project	Business Plan Economic Analysis	September 1, 2014 October 2, 2013
Lender, LLC	project	Leonomie rmarysis	000001 2, 2013
Geographic Location: 114 E. Lexington Street, Baltimore, Maryland			
Focus of Investment: Loan and equity			

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

The proposal identifies the new commercial enterprise ("NCE") of the project as Ashcroft/	
Sullivan/Baybridge Lenore Lender, LLC which was formed in the State of Delaware on	
09/28/2014. The project is located at 114 E. Lexington Street in the City of Baltimore City,	
Maryland. Approximately immigrant investors will subscribe to the NCE as limited	
partners in exchange for capital contributions of each and an aggregate of	
total of EB-5 capital from all investors.	_')(4)
· ·	_
	7

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

Activities	NAICS	Expenditure/Revenue, \$, million 2010 Value	Multiplier	Total jobs	Direct jobs	Indirect jobs	Total Jobs
	2361 &						
Construction	2362						
A&E	5413						
Lessors of							
Real Estate	5311						
Total eligible j	obs						

The approval of this Form I-924 application supported by an economic impact analysis of an (b)(4) actual Project, which is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not

materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on Ashcroft/ Sullivan/ Baybridge Lenore Lender, LLC project

Each individual petition, in order to demonstrate that it is affiliated with the Ashcroft/Sullivan/Baybridge Mid-Atlantic Economic Development Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A

Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Miles Colmi

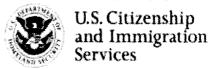
Nicholas Colucci Chief, Immigrant Investor Program

cc:

Debbie Ann Klis, Esq. Ballard Spahr, LLP 4800 Montgomery Lane Bethesda, MD 20854

Ashcroft/Sullivan/Baybridge Mid-Atlantic Economic Development Center, LLC 1950 N. Glebe Road, Suite 530 Arlington, VA 22203

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



Date: 10/15/2015

Reynaldo Ortiz RGV EB-5 Regional Center, LLC 1305 E Nolana Loop, Suite F McAllen, TX 78504

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

RGV EB·5 Regional Center, LLC

Re:

Request to Amend Regional Center Designation

RGV EB-5 Regional Center, LLC RCW1431151967/ID1034250076

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 11/07/2014. The Form I-924 application was filed to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

- A. Effective the date of this notice, USCIS approves the regional center's organization structure discussed in Section III of this notice.
- B. Effective the date of this notice, USCIS approves the regional center's administration discussed in Section III of this notice.

II. Procedural History

On 07/30/2013, USCIS approved the RGV EB-5 Regional Center, LLC for participation in the Immigrant Investor Program as a designated regional center. Based on the initial designation the RGV EB-5 Regional Center, LLC obtained approval for the following geographic area, industry categories,

www.uscis.gov

RGV EB-5 Regional Center, LLC ID1034250076 RCW1431151967 Page 2

Geographic Area		
State	Counties	Approval Date
Texas	Hidalgo, Cameron, Brooks and Starr	07/30/2013

Industry Categories				
NAICS	Industry Name	Approval Date		
236220	Commercial and Institutional Building Construction	07/30/2013		
423850	Service Establishment Equipment and Supplies Merchant Wholesalers			
811192	Car Washes			
52211	Commercial Banking			

III. Amendment Request¹

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following change(s):

USCIS approves the applicant's amendment request to change its organizational structure
The applicant's organizational structure has been revised as follows:

- 1		
.		
•		
•		

(b)(4) Administration Change

USCIS approves the applicant's amendment i	request to change its administration. Th	ıe

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

² Please be advised that as per Form I-924 Instructions the regional center require to "notify USCIS within 30 days of a change of address, contact information, regional center principal(s), contracting agents or similar changes in the operation or administration of the Regional Center."

RGV EB-5 Regional Center, LLC ID1034250076 RCW1431151967 Page 3

IV. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented during initial filing and reviewed in conjunction with the adjudication of this regional center proposal.

The hypothetical project does not have the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the RGV EB-5 Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial

RGV EB-5 Regional Center, LLC ID1034250076 RCW1431151967 Page 4

enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional

RGV EB-5 Regional Center, LLC ID1034250076 RCW1431151967 Page 5

Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Miles Colum

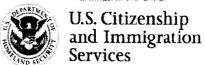
Nicholas Colucci

Chief, Immigrant Investor Program

cc:

RGV EB-5 Regional Center, LLC 1305 E Nolana Loop, Suite F McAllen, TX 78504

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



Date: October 7, 2015

Patrick Francis Hogan CMB North Dakota Regional Center, LLC 7819 42nd Street, West Rock Island, IL 61201

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

CMB North Dakota Regional Center, LLC

Re:

Initial Regional Center Designation CMB North Dakota Regional Center, LLC RCW1500852427/ID1500852427

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on January 08, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was

established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate CMB North Dakota Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

	* . * .	 State	
		Entire State of	
		North Dakota	

www.uscis.gov

CMB North Dakota Regional Center, LLC ID1500852427 RCW1500852427 Page 2

B. Industry Categories¹

NAICS	Industry Name	
000023	Construction	
000022	Utilities	
000032	Chemical Manufacturing	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the CMB North Dakota Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

CMB North Dakota Regional Center, LLC ID1500852427 RCW1500852427 Page 4

Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dls.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Ailela Colmi

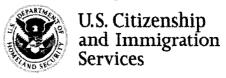
cc: Elsie Hui Arias/ Lincoln Stone, Esq

Stone Grzegorek Gonzalez LLP 800 Wilshire Boulevard, Suite 900

Los Angeles, CA 90017

ende amuşmus berewere ser rasperbendene idibimerely

U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



October 13, 2015

Juan Wu 6525 Morrison Blvd, Ste 402 Charlotte, NC 28211

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

AGC California Regional Center, LLC

Re:

Initial Regional Center Designation AGC California Regional Center, LLC RCW1504952599 / ID1504952599

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on February 18, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate AGC California Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

AGC California Regional Center, LLC ID1504952599 RCW1504952599

Page 2

A. Geographic Area

State		Counties	
California	Alameda	Contra Costa	Los Angeles
	Marin	Monterrey	Napa
	Orange	Riverside	San Benito
	San Bernardino	San Francisco	San Mateo
	San Luis Obispo	Santa Barbara	Santa Clara
	Santa Cruz	Solano	Sonoma
	Ventura		

B. Industry Categories¹

NAICS Code	NAICS Description
236	Construction of Buildings
4232	Furniture and Home Furnishing Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers
7211	Traveler Accommodation

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

The hypothetical projects do not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

AGC California Regional Center, LLC ID1504952599 RCW1504952599 Page 3

evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the AGC California Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

AGC California Regional Center, LLC ID1504952599 RCW1504952599

Page 4

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Mileles Colmi

cc: Marianna Tarantur

C/o Wright Johnson Ltd. 197 S. Federal Hwy, Ste 200

Boca Raton, FL 33432



October 9, 2015

Rocky Lai Lone Star EB5, LLC 3217 Montrose Blvd., Suite 222 Houston, TX 77006

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Lone Star EB5, LLC

Re:

Initial Regional Center Designation

Lone Star EB5, LLC

RCW1501252442 / RC-ID1501252442

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on January 12, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Lone Star EB5, LLC ("LSEB5") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

States			Counties	
	Bastrop	Bell	Bexar	Brazos
	Burleson	Caldwell	Collin	Colorado
	Comal	Coryell	Dallas	Denton
	Ellis	Falls	Fayette	Fort Bend
	Freestone	Galveston	Gonzales	Grimes
Texas	Guadalupe	Harris	Hayes	Hill
	Johnson	Kaufman	Lavaca	Lee
	Leon	Limestone	Madison	McLennan
	Milam	Montgomery	Navarro	Robertson
	Rockwell	Tarrant	Travis	Walker
	Waller	Washington	Williamson	

B. Industry Categories¹

Industry Category	NAICS code
Nonresidential Building Construction	2362
Furniture & Home Furnishing Merchant Wholesalers	4232
Professional & Commercial Equipment & Supplies Merchant Wholesalers	4234
Household Appliances, Electrical & Electronic Goods Wholesalers	4236
Architectural, Engineering & Related Services	541 3
Traveler Accommodation	7211

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with LSEB5, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A

Lone Star EB5, LLC RCW1501252442 / RC-ID1501252442 Page 4

Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

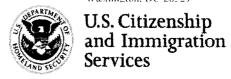
Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

Lone Star EB5, LLC RCW1501252442 / RC-ID1501252442 Page 5

cc: Fei Bao Zhang & Associates, P.C. 9999 Bellaire Blvd., Suite 920 Houston, TX 77036



October 9, 2015

Albert Chang Chang & Cote, LLP 19138 E. Walnut Dr. N., Ste. 100 Rowland Heights, CA 91748

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Global America Regional Center

Re:

Initial Regional Center Designation Global America Regional Center RCW1421251835 / RC-ID1421251835

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 31, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Global America Regional Center ("GARC") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	To combany the second s		Counties	
California	Los Angeles	Orange	Riverside	San Bernardino
Camorma	San Diego		Programma Pophings - Page - Internating programs processed - Smith - Incommittee of Society	andre 1 der 1919ste Province Commission (1998s September 1998) and the commission of

B. Industry Categories¹

Industry Category	NAICS code
Accommodations and Hospitality	7211
Food Services	722
Assisted Living	6233
Professional Offices	5413
Banking & Insurance	52
Retail Trade	44—45 and 81
Health Club	7139
Medical Offices	621
Construction	2362
Wholesale Trade	4232, 4234, 4236

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the GARC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

Global America Regional Center RCW1421251835 / ID1421251835 Page 4

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Melalo Colmi

cc: Antony Chen

Chang & Cote, LLP

19138 E. Walnut Dr. N., Ste. 100 Rowland Heights, CA 91748



October 9, 2015

Gregory Russo Ironstate Regional Center, LLC 50 Washington Street Hoboken, NJ 07030

Application:

Form I-924, Application for Regional Center under the Immigrant Investor

Pilot Program

Applicant(s):

Ironstate Regional Center, LLC

Re:

Initial Regional Center Designation Ironstate Regional Center, LLC RCW1504152590 / ID1504152590

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on February 10, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Ironstate Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
New Jersey	Bergen, Essex, Hudson, Passaic, Sussex, Union, Middlesex, Monmouth,
	Ocean, Somerset, Hunterdon
Pennsylvania	Pike
New York	Kings, Bronx, New York, Richmond, Queens, Westchester, Rockland,
	Putnam, Dutchess, Orange, Ulster, Nassau, Suffolk
Connecticut	Litchfield, New Haven, Fairfield

Ironstate Regional Center, LLC ID1504152590 RCW504152590 Page 2

B. Industry Categories¹

NAICS	Industry Name
2361	Residential Building Construction
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant
5413	Architectural, Engineering, and Related Services
53111	Lessors of Residential Buildings
5312	Office of Real Estate Brokers

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Ironstate Regional Center, LLC ID1504152590 RCW504152590 Page 3

Each individual petition, in order to demonstrate that it is affiliated with the Ironstate Regional Center, LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of</u> Ho. 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924A Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

Ironstate Regional Center, LLC ID1504152590 RCW504152590 Page 4

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

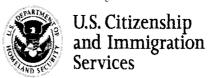
Chief, Immigrant Investor Program

Milalo Colmi

cc: Lillian K. Kalmykov Greenberg Traurig, LLP 200 Park Avenue, Box 677 Florham Park, NJ 07932-0677

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street, NE Washington, DC 20529



October 8, 2015

Tommy Rosenfeld North Country EB-5 Regional Center, LLC c/o CanAm Enterprises, LLC Wall Street Plaza 88 Pine Street, Suite 2010 New York, NY 10005

RE: Reaffirmation of Regional Center Designation RC ID#: ID1031910051

DECISION

This notice is in reference to the regional center designation of North Country EB-5 Regional Center ("the Regional Center"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on May 16, 2011. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395"). Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On June 19, 2015, USCIS notified the Regional Center of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to continue to promote economic growth (including increased export sales, improved regional productivity, job creation, and increased domestic capital investment). The Notice of Intent to Terminate ("NOIT") provided the Regional Center an opportunity to offer evidence in opposition to the grounds stated in the NOIT.

On July 20, 2015, in response to the NOIT, the Regional Center submitted evidence to USCIS of its various efforts to promote economic growth. After considering the evidence, USCIS reaffirms the existing regional center designation for the Regional Center.

Sincerely,

Nicholas Colucci

Julia Colmi

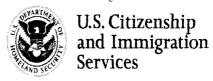
Chief

Immigrant Investor Program Office

1 On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street, NE Washington, DC 20529



October 8, 2015

Brendan Heafey Bay Area Regional Center, LLC 38 Webster Street, Second Floor Oakland, CA 94607

RE: Reaffirmation of Regional Center Designation RC ID#: ID1031910105

DECISION

This notice is in reference to the regional center designation of Bay Area Regional Center ("the Regional Center"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on June 23, 2009. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395"). Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On June 18, 2015, USCIS notified the Regional Center of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to continue to promote economic growth (including increased export sales, improved regional productivity, job creation, and increased domestic capital investment). The Notice of Intent to Terminate ("NOIT") provided the Regional Center an opportunity to offer evidence in opposition to the grounds stated in the NOIT.

On July 15, 2015, in response to the NOIT, the Regional Center submitted evidence to USCIS of its various efforts to promote economic growth. After considering the evidence, USCIS reaffirms the existing regional center designation for the Regional Center.

Sincerely,

Nicholas Colucci

Julis Colmi

Chief

Immigrant Investor Program Office

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102·395. S. 3245 struck the word "pilot" from section 610 of Public Law 102·395 and extended the Immigrant Investor Program until September 30, 2015.

cc: Linda Lau, Esq.
Global Immigration Law Group
350 S. Figueroa Street, Suite 760
Los Angeles, CA 90071

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* 131 M Street, NE. Mailstop 2235 Washington, DC 20529



October 7, 2015

Anita Enriquez E Development Corporation dba EDC GCIC Building, Suite 500H 414 West Soledad Avenue Hagatna, GU 96910

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

E Development Corporation dba EDC

Re:

Request to Amend Regional Center Designation

E Development Corporation ("EDC") RCW1436452285 / RC-ID1223650739

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 30, 2014. Form I-924 application was filed to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

A. Effective the date of this notice, USCIS approves the regional center's organization structure discussed in Section III of this notice.

II. Procedural History

On January 13, 2014, USCIS approved E Development Corporation dba EDC for participation in the Immigrant Investor Program as a designated regional center. Based on the initial designation, EDC obtained approval for the following geographic area and industry categories.

Territory	1	Islands	
Guam		All Islands	

www.uscis.gov

E Development Corporation dba EDC RCW1436452285 / RC-ID1223650739 Page 2

Industry Category	NAICS code
Utilities	22
Construction	23
Wholesale Trade	42
Retail Trade	44-45
Finance & Insurance	52
Real Estate, Rental & Leasing	53
Professional, Scientific & Technical Services	54
Management of Companies & Enterprises	55
Administrative & Support & Waste Management Services	56
Other Services (except Public Administration)	81
Public Administration	92

An amendment request is required if investment opportunities arise that are outside the previously approved geographic area, industry categories. If changes are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the new evidence to ensure compliance with EB-5 program requirements.

III. Amendment Request¹

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following changes:

A. Organizational Structure

USCIS approves the applicant's amendment request to change its organizational structure. The applicant's organizational structure has been revised as follows:

Ms. Vanessa L. Williams is also part-owner and principal of EDC.

B. Administration Change

USCIS approves the applicant's amendment request to change its official address as:

E Development Corporation dba EDC GCIC Building, Suite 500H 414 West Soledad Avenue Hagatna, GU 96910

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

E Development Corporation dba EDC RCW1436452285 / RC-ID1223650739 Page 3

V. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with EDC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

E Development Corporation dba EDC RCW1436452285 / RC-ID1223650739 Page 4

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Vanessa L. Williams

Milels Coloni

GCIC Building Suite 500H 414 West Soledad Avenue Hagatna, Guam 96910

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



June 15, 2015

City of Dallas Regional Center Office of Economic Development 500 Marilla Street, Room 5CS Dallas, TX 75201

Application:

Form I-924, Application for Regional Center Under the Immigrant Investor Pilot

Program

Regional Center:

City of Dallas Regional Center

ID1031910157

Re:

Request to Amend Regional Center Designation

Project: Strand Apartment Project

RCW1418151792

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on June 30, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in Matter of Ho, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Strand Apartment Project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Civitas Strand Fund, LP will be a new commercial enterprise (NCE) and that the Strand Apartment Project is likely to result in the creation of at least jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related

www.uscis.gov

(b)(4)

filings of any Form I-526 filed by an individual investor associated with the Strand Apartment Project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On September 8, 2009, USCIS approved the City of Dallas Regional Center (CDRC) for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the City of Dallas, TX. CDRC now seeks to amend its previously approved regional center designation to include an actual project that will be managed by Civitas Strand Fund, LP, an NCE established on March 13, 2014.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
Strand Apartment Project	Apartment Complex	Business Plan	June 2015
Geographic Location:	Investment: EB-5 Loan, Senior Loan, Developer Equity	Economic Analysis	May 11, 2015
City of Dallas, TX	Developer Equity	Confidential Private Placement Memorandum	March 2014
Exemplar of Form I-526		Limited Partnership Agreement	March 14, 2014

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment identifies the NCE of the proposed project as Civitas Strand Fund, LP which was formed in the State of Texas on March 13, 2014. The Strand Apartment Project, is located within a targeted employment area (TEA) in the City of Dallas, Texas.

(b)(4)	Approximately EB-5 investors will subscribe to the NCE as limited partners in exchange for capital contributions o each and an aggregate of \$

Specifically, the project is predicted to create at least direct and indirect jobs from construction direct and indirect jobs from architectural and engineering services, and direct and indirect jobs from apartment leasing activities.	(b)(4)
IV. Job Creation	

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS 1	Industry Name	Input (\$Millions)	Multiplier	Jobs	
236116	New Multifamily Housing Construction				
5413	Architectural, Engineering, and Related				(b)(4)
J113	Services				(~)(.)
£2111	Lessors of Residential Buildings and				
53111	Dwellings				
Total Jobs:					

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II final demand multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately direct and indirect jobs from the construction and rental activities associated with the Strand Apartment Project.

(b)(4)

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with Strand Apartment Project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions based on the Strand Apartment Project

Each individual petition, in order to demonstrate that it is affiliated with the City of Dallas Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at $8 \text{ CFR } \S 204.6(j)(4)(iii)$ and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Mileles Colmi

cc:

Lincoln Stone

Stone Grzegorek Gonzalez, LLP 800 Wilshire Boulevard, Suite 900

Los Angeles, CA 90017

Daniel J. Healy C/O Civitas Capital Management, LLC 1601 Bryan Street, Suite M-200 Dallas, TX 75201



Date: September 29, 2015

Fuer Yuan Paramount Regional Center, LLC 1020 S. Figueroa Street Los Angeles, CA 90015

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

Paramount Regional Center, LLC

Re:

Initial Regional Center Designation Paramount Regional Center, LLC RCW1432551995 / ID1432551995

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on November 21, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Paramount Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
	Ventura
California	San Bernardino
	Riverside
	Los Angeles
	Orange

www.uscis.gov

Paramount Regional Center, LLC ID1432551995 RCW1432551995 Page 2

B. Industry Categories 1

NAICS	Industry Name	
2362	Nonresidential Building Construction	
4232	Furniture and Home Furnishings Merchant Wholesalers	
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers	
4236	Household Appliances and Electrical and Electric Goods Merchant Wholesalers	
7211	Travelers Accommodation	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Paramount Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Paramount Regional Center, LLC ID1432551995 RCW1432551995 Page 3

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings² (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a

² Please note that, after a cursory review of the organizational documents in the record, it appears that the draft escrow agreement, draft subscription agreement, draft private offering memorandum, and draft operating agreement contain a provision for a "refund" or holdback account that may not be compliant with program eligibility requirements.

Paramount Regional Center, LLC ID1432551995 RCW1432551995 Page 4

Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milels Coloni

cc: Catherine DeBono Holmes

Jeffer Mangels Butler & Mitchell LLP 1900 Avenue of the Stars, 7th Floor Los Angeles, California 90069

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



Date: September 29, 2015

Shuang Yu MW International LLC 17800 Castleton Street, Suite 316 City of Industry, CA 91748

Application: Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s): MW International LLC

Re: Initial Regional Center Designation

MW International LLC

RCW1403751675/ ID1403751675

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on February 06, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate MW International LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities
California Bakersfield-Delando Metropolitian Statistical Area	

www.uscis.gov

MW International LLC ID 1403751675 RCW1403751675 Page 2

B. Industry Categories¹

NAICS	Industry Name	
2362	Non-Residential Building Construction	
4238	Machinery, Equipment, and Supplies Merchant Wholesalers	
1113	Fruit and Tree Nut Farming	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the MW International LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

MW International LLC ID 1403751675 RCW1403751675 Page 3

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

MW International LLC ID 1403751675 RCW1403751675 Page 4

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milels Colum

cc: Mabel Hwang Weiss

c/o Law Offices of Hwang & Weiss P.C.

625 Fair Oaks Ave, Floor 377 South Pasadena CA 91030

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



Date: 09/29/2015

Sam Switzenbaum Liberty EB5 Regional Center 255 South 17th St. 20th Floor Philadelphia, PA 19103

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

Liberty EB5 Regional Center

Re:

Initial Regional Center Designation

Liberty EB5 Regional Center

RCW1430151944 / ID1430151944

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 10/28/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Liberty EB5 Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties	
Pennsylvania	Blair	Centre
	Clearfield	Clinton
	Huntingdon	

Liberty EB5 Regional Center ID1430151944 RCW1430151944 Page 2

B. Industry Categories¹

NAICS	Industry Name	
2362	Nonresidential Building Construction	
4232	Furniture and Home Furnishing Merchant Wholesalers	
7211	Traveler Accommodation	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Liberty EB5 Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Liberty EB5 Regional Center ID1430151944 RCW1430151944 Page 3

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30^{th} of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29^{th} of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and

Liberty EB5 Regional Center ID1430151944 RCW1430151944 Page 4

activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Mileles Colmi

cc:

Nima Kopivaara

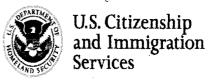
David Hirson & Partners, LLP

8 Cheshire Ct.

Newport Beach, CA 92660

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street, NE Washington, DC 20529



September 28, 2015

Michael Dewey Bauer Arizona Alternative Energy Center, LLC c/o Jin Lee Law Group 895 Dove Street, Suite 300 Newport Beach, CA 92660

RE: Reaffirmation of Regional Center Designation RC ID#: 1113750204

DECISION

This notice is in reference to the regional center designation of Arizona Alternative Energy Center, LLC ("the Regional Center"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on January 23, 2012. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395"). Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On July 7, 2015, USCIS notified the Regional Center of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to continue to promote economic growth (including increased export sales, improved regional productivity, job creation, and increased domestic capital investment). The Notice of Intent to Terminate ("NOIT") provided the Regional Center an opportunity to offer evidence in opposition to the grounds stated in the NOIT.

On August 12, 2015, in response to the NOIT, the Regional Center submitted evidence to USCIS of its various efforts to promote economic growth. After considering the evidence, USCIS reaffirms the existing regional center designation for the Regional Center.

Sincerely,

Nicholas Colucci

Mels Colmi

Chief

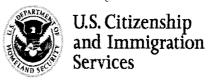
Immigrant Investor Program Office

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

cc: Arizona Alternative Energy Center, LLC 2338 W. Royal Palm Rd., Suite J Phoenix, AZ 85021

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street, NE Washington, DC 20529



September 28, 2015

Tingfu Qiao Crown Point Regional Center 11233 Shadow Creek Parkway, Suite 289 Pearland, TX 77584

RE: Reaffirmation of Regional Center Designation RC ID#: 1031910013

DECISION

This notice is in reference to the regional center designation of Crown Point Regional Center ("the Regional Center"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on May 3, 2011. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395"). Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On June 19, 2015, USCIS notified the Regional Center of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to continue to promote economic growth (including increased export sales, improved regional productivity, job creation, and increased domestic capital investment). The Notice of Intent to Terminate ("NOIT") provided the Regional Center an opportunity to offer evidence in opposition to the grounds stated in the NOIT.

On July 20, 2015, in response to the NOIT, the Regional Center submitted evidence to USCIS of its various efforts to promote economic growth. After considering the evidence, USCIS reaffirms the existing regional center designation for the Regional Center.

Sincerely,

Nicholas Colucci

Julis Colmi

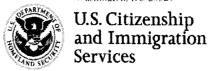
Chief

Immigrant Investor Program Office

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

cc: John William Meyer or Christian Andrew Triantaphyllis Foster LLP 600 Travis Street, 20th Floor Houston, TX 77002

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



August 17, 2015

Paul A. Levinsohn C/O New York City Regional Center 299 Broadway, Suite 1220 New York, NY 10007

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

New York City Regional Center

ID1031910093

Re:

Request to Amend Regional Center Designation

Project: Washington Bridge Bus Station Infrastructure and

Development Fund, Phase II, LLC

RCW1414751766

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on May 27, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Manhattan Chrystie Street Development Fund, LLC project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Washington Bridge Bus Station Infrastructure and Development Fund,

www.uscis.gov

Phase II, LLC will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Washington Bridge Bus Station Infrastructure and Development Fund, Phase II, LLC project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On October 30, 2008, USCIS approved the New York City Regional Center for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the 4 counties in the State of New York: Bronx County, Kings County, Queens County and New York County. New York City Regional Center now seeks to amend its previously approved regional center designation to include an actual project that will be managed by Washington Bridge Bus Station Infrastructure and Development Fund, Phase II, LLC, an NCE established on September 06, 2013.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
George Washington Bridge Bus Station	Construction and redevelopment of	Business Plan	05/2014
Infrastructure and Development Fund,	George Washington	Economic Analysis	04/03/2014
Phase II, LLC	Bridge Bus Station	Confidential Private Placement Memorandum	04/07/2014
Geographic Location: Bronx, Kings, Queens, New York counties	Investment: Loan	Subscription Agreement	04/07/2014
Exemplar of Form I		Operating Agreement	04/07/2014
526		Escrow Agreement	03/27/2014

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS 1	Industry Name	Input (\$Millions)	Multiplier	Jobs	(b)(4)
2300	Construction				ĺ
Total Jobs:					Ì

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately construction jobs associated with the Washington Bridge Bus Station Infrastructure and Development Fund project.

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 fillings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with Washington Bridge Bus Station Infrastructure and Development Fund. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the Manhattan Chrystie Street</u> <u>Development Fund project</u>

Each individual petition, in order to demonstrate that it is affiliated with the New York City Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,
Miles Colum

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Nicolai Hinrichsen

Miller Mayer LLP

202 East State Street, Suite # 700

Ithaca, NY 14850

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



November 6, 2015

Hui Chen Empire Regional Center 136-20 38th Avenue, Suite 9E Flushing, NY 11354

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Empire Regional Center

Re:

Initial Regional Center Designation

Empire Regional Center, LLC RCW1414151760/ID1414151760

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 21, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Empire Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Empire Regional Center, LLC ID1414151760 RCW1414151760 Page 2

A. Geographic Area

State	Counties/Cities	Service of
New York	Kings County, Queens County, New York County, Bronx	
	County, Richmond County, Westchester County, Rockland	
	County, Orange County, Suffolk County, Nassau County,	
	Putnam County, Dutchess County	
New Jersey	Bergen County, Hudson County, Middlesex County,	
	Monmouth County, Ocean County, Passaic County, Essex	
	County, Union County, Somerset County, Sussex County,	
	Morris County, Hunterdon County	

B. Industry Categories¹

Industry Category	NAICS
Construction	230000
Wholesale Trade	420000
Real Estate	531000
Legal Services	541100
Accounting, Tax Preparation, Bookkeeping, and Payroll	541200
Services	
Architectural, Engineering, and Related Services	541300
Specialized Design Services	541400
Management, Scientific, and Technical Consulting	541600
Services	
Advertising, Public Relations, and Related Services	541800
Traveler Accommodation	721100
Food Services and Drinking Places	722000

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the

USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Empire Regional Center, LLC ID1414151760 RCW1414151760 Page 3

Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Empire Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet

Empire Regional Center, LLC ID1414151760 RCW1414151760 Page 4

the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Empire Regional Center, LLC ID1414151760 RCW1414151760 Page 5

Sincerely,
Alls Colum

Nicholas Colucci

Chief, Immigrant Investor Program

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



November 3, 2015

Angela G. Brunner EB5 Capital· Oregon Regional Center 6106 Macarthur Blvd, Suite 104 Bethesda, MD 20816

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

EB5 Capital Oregon Regional Center

Re:

Initial Regional Center Designation EB5 Capital Oregon Regional Center RCW1509252638/ID1509252638

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on April 2, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Capital Oregon Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

www.uscis.gov

EB5 Capital· Oregon Regional Center ID1509252638 RCW1509252638 Page 2

A. Geographic Area

State	Counties/Cities
Oregon	Benton, Clackamas,
	Columbia, Linn,
	Marion, Multnomah,
	Polk, Washington,
	and Yamhill
Washington	Clark, Cowlitz, and
	Skamania

B. Industry Categories¹

Industry Category	NAICS	
Traveler Accommodations	7211	
Nonresidential Building Construction	2362	
Furniture & Home Furniture Merchant	4232	
Wholesale		

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

EB5 Capital Oregon Regional Center ID1509252638 RCW1509252638 Page 3

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Capital-Oregon Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A

EB5 Capital- Oregon Regional Center ID1509252638 RCW1509252638 Page 4

Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci Chief, Immigrant Investor Program

Miles Colmi

EB5 Capital- Oregon Regional Center ID1509252638 RCW1509252638 Page 5

cc: Marianna Tarantur 197 S Federal Hwy Suite 200 Boca Raton, FL 33432

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



November 9, 2015

Jiakun Wang Lifezone Development Regional Center 500 108th Ave NE #1710 Bellevue, WA 98004

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Lifezone Development Regional Center

Re:

Initial Regional Center Designation Lifezone Development Regional Center

RCW1509651742/ID1509651742

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on April 6, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Lifezone Development Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Lifezone Development Regional Center ID1509651742 RCW1509651742 Page 2

A. Geographic Area

State	Counties/Cities
Washington	Snohomish, King,
	Pierce, Thurston,
	Kitsap, Skagit,
	Island, Mason

B. Industry Categories¹

Industry Category	NAICS	
Nonresidential Building Construction	2362	
Ambulatory Health Health Care Services	621	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Lifezone Development Regional Center ID1509651742 RCW1509651742 Page 3

realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Lifezone Development Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

Lifezone Development Regional Center ID1509651742 RCW1509651742 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. <u>Legal Notice</u>

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milels Columi

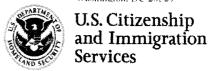
Lifezone Development Regional Center ID1509651742 RCW1509651742 Page 5

Robyn Hou cc:

Zhang & Associates, P.C. 9999 Bellaire Blvd

Suite 920 Houston, TX 77036

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



November 16, 2015

Jialin Niu Golden Sun Development Regional Center 500 108th Ave NE #1170 Bellevue, WA 98004

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Golden Sun Development Regional Center

Re:

Initial Regional Center Designation

Golden Sun Development Regional Center

RCW1509751747/ID1509751747

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on April 7, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Golden Sun Development Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

www.uscis.gov

State
Washington
Snohomish, King,
Pierce, Thurston,
Kitsap, Skagit,
Island, Mason, and
Lewis

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchandising
7211	Traveler Accommodations
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Golden Sun Development Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A

Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Ailela Colmi

Chief, Immigrant Investor Program

cc: Robyn Hou Zhang & Associates, P.C. 9999 Bellaire Blvd Suite 920 Houston, TX 77036

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



November 16, 2015

Bhavesh Patel Sino Indus BK Capital, LLC 485 US Highway 1 Edison, NJ 08817

Application:

Form I-924, Application for Regional Center under the Immigrant Investor

Pilot Program

Applicant(s):

Sino Indus BK Capital, LLC

Re:

Initial Regional Center Designation

Sino Indus BK Capital, LLC RCW1504052588 / ID1504052588

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on February 9, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Sino Indus BK Capital, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
New Jersey	Burlington, Camden, Gloucester, Mercer
Pennsylvania	Philadelphia

www.uscis.gov

Sino Indus BK Capital, LLC ID1504052588 RCW1504052588 Page 2

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
5413	Architectural, Engineering, and Related Services
7225	Restaurants and Other Eating Places

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Sino Indus BK Capital, LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Sino Indus BK Capital, LLC ID1504052588 RCW1504052588 Page 3

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A. Supplement to Form I-924A Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. <u>Legal Notice</u>

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Sino Indus BK Capital, LLC ID1504052588 RCW1504052588 Page 4

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

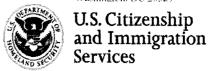
Mileles Columnia

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Martin J. Lawler Lawler & Lawler 1 Post Street, Suite 475 San Francisco, CA 94104

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street NE, Mailstop 2235 Washington, DC 20529



Date: 11/20/2015

John Shen American Lending Center Florida, LLC c/o 1 World Trade Center, Suite 1180 Long Beach, CA 90831

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

American Lending Center Florida, LLC

Re:

Initial Regional Center Designation - Limited Decision

American Lending Center Florida, LLC RCW1432851998 / ID1432851998

This notice of a limited decision is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 11/24/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves, in a limited decision, the Form I-924 request to designate American Lending Center Florida Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation - Limited Decision

The applicant submitted its Form I-924 requesting specific industry categories, geographic regions, and multiple hypothetical projects to be identified for the Regional Center's use.

Upon review of the record, USCIS has determined that not all of the requested geographic regions provided in the Form I-924 represent an appropriate application of a hypothetical project to support the industry categories, and/or geographic regions acceptable for use by the Regional Center.

www.uscis.gov

American Lending Center Florida, LLC ID1432851998 RCW1432851998 Page 2

As such, USCIS has concluded that a limited decision is necessary in this case. Therefore, all requested, approved, and disallowed geographic regions have been identified below along with an opportunity to reopen.

A. Industry Categories and Geographic Regions Requested

The applicant has requested to focus, promote economic growth, and offer capital investment opportunities in the following geographic areas and industry categories:

1. Geographic Areas - Requested

State	Counties				
	Brevard	Broward	Collier	Desoto	Hardee
Florida	Hillsborough	Indian River	Lee	Martin	Miami-Dade
	Monroe	Orange	Osceola	Palm Beach	Pinellas
	Polk	St. Lucie	Seminole	Lake	Volusia
	Marion	Glade	Okeechobee	St. Johns	Duval
	Flagler	Clay	Putnam	Nassau	Alachua
	Pasco	Hernando	Citrus	Sarasota	Sumter
	Charlotte	Manatee	Hendry	Highlands	

2. Industry Categories - Requested

NAICS	Industry Name
623100	Nursing care facilities
721100	Traveler accommodation
624400	Child day care services
623300	Community care facilities
611100	Elementary and secondary schools

B. Approved Industry Categories and/or Geographic Areas

The following industry categories and/or geographic areas have been determined to represent an appropriate application of a hypothetical project to support the industry categories, and geographic regions acceptable for use by the Regional Center.

1. Geographic Areas - Approved

State	Counties		A TO MARKET LIGHT CONTROL OF THE	
	Broward	Collier	Hendry	Lee
Florida	Miami-Dade	Monroe	Palm Beach	

2. Industry Categories - Approved

NAICS	Industry Name
623100	Nursing care facilities
623300	Community care facilities

American Lending Center Florida, LLC ID1432851998 RCW1432851998 Page 3

C. Disallowed Industry Categories and/or Geographic Areas

The following geographic areas have been disallowed because it has been determined that they do not represent an appropriate application of a hypothetical project to support the geographic regions acceptable for use by the Regional Center.

1. Geographic Areas - Disallowed

State	Counties				
500.12	Brevard	Desoto	Hardee	Hillsborough	Indian River
Florida	Martin	Orange	Osceola	Pinellas	Highlands
	Polk	St. Lucie	Seminole	Lake	Volusia
	Marion	Glade	Okeechobee	St. Johns	Duval
	Flagler	Clay	Putnam	Nassau	Alachua
	Pasco	Hernando	Citrus	Sarasota	Sumter
	Charlotte	Manatee			

2. Industry Categories - Disallowed

NAICS	Industry Name
721100	Traveler accommodation
624400	Child day care services
611100	Elementary and secondary schools

(b)(4)

American Lending Center Florida, LLC ID1432851998 RCW1432851998 Page 4

(b)(4)

D. Conclusion - Decision to Disallow

Some aspects of the submitted proposal, as presently constituted, do not meet the regulatory requirements at 8 C.F.R. § 204.6. Therefore the request to grant the specific geographic areas listed above cannot be approved.

The decision to disallow the geographic areas identified above does not preclude the filing of Form I-526 petitions related to a subsequent project using the disallowed industry categories, geographic areas, and/or hypothetical project(s). Any future petitions will be adjudicated on their own merit.

There is no appeal to this decision to disallow the specified industry categories and/or geographic scope explained above. However, pursuant to 8 CFR 103.5, a motion can be filed on Form I-290B. Such motion must be accompanied by the proper fee and filed within 30 days of this notice.

Please note that if the I-924 applicant elects to timely file a motion with USCIS and if said motion is granted the application will be reopened and/or reconsidered and a new decision rendered. If the applicant's proposal submitted in support of its motion meets the regulatory requirements at 8 C.F.R. § 204.6 the applicant will be accorded the geographic areas that meet EB-5 requirements. If no motion is filed within the time allowed this decision is final.

III. Job Creation

USCIS approves the geographic area and industry categories noted below based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal. The approval of this Form I-924 application is based upon the economically and statistically valid assumptions and estimates provided in the business plan for job creation. Please refer to the input and multiplier analysis table above.

A hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998). As such, USCIS's approval of any hypothetical job creation estimates presented in a Form I-924 is not accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

American Lending Center Florida, LLC ID1432851998 RCW1432851998 Page 5

Each individual petition, in order to demonstrate that it is affiliated with the American Lending Center Florida Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational and transactional documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

American Lending Center Florida, LLC ID1432851998 RCW1432851998 Page 6

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <a href="https://doi.org/10.1007/journal.org/10.1007/

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Mileles Colmi

cc: Adrian Toh

Law Office of Adrian Toh Esq

PO Box 80006

San Marino, CA 91118

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



November 13, 2015

Michael John Shin ON Regional Center, LLC 5742 Beach Blvd. Buena Park, CA 90621

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

ON Regional Center, LLC

Re:

Initial Regional Center Designation

ON Regional Center, LLC

RCW1421351837 / ID1421351837

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on August 1, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate ON Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the Franklin Beach, LLC project based on the evidence submitted with the exemplar Form I·526.

www.uscis.gov

ON Regional Center, LLC ID1421351837 RCW1421351837 Page 2

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

	Counties		
California	Los Angeles County	Orange County	
	Riverside County	San Bernardino County	
	San Diego County		

B. Industry Categories¹

NAICS	Industry Name	
2361	Residential Construction	
2362	Nonresidential Construction	
5413	Architectural, Engineering, and Related Services	

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an exemplar Form I-526.

Project	Type of Project	Organization Documents	Date of Document
Franklin Beach, LLC	Exemplar Form	Comprehensive Business Plan	Dated September 2015
Geographic Location: California	I-526 Petition	Economic Analysis* Operating Agreement	Dated August 31, 2015 Dated June 1, 2015
Focus of Investment:	Project	Confidential Private Placement Memorandum	Dated September 2015
Loan		Subscription Agreement	As Submitted September 22, 2015

^{*} Document approval corrects a minor calculation error in the job creation estimate. See below.

¹ USCIS issued a Policy Memorandum (PM·602-0083) on the subject of "EB·5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

ON Regional Center, LLC ID1421351837 RCW1421351837 Page 3

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

The proposal identifies the new commercial enterprise ("NCE") of the project as Frankli	n ·
Beach, LLC, which was formed in the State of California on June 16, 2014. The project	18
located at 5832 Beach Blvd. in the City of Buena Park, Californiammigrant investigations of	stors
will subscribe to the NCE as limited partners in exchange for capital contributions of	(b)(4)
each and an aggregate of	()(.)

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS	Industry Name	Input (\$Mil, 2010\$)	Multiplier	Jobs	
236	Construction of Buildings				1
5413	Architectural, Engineering, and Related Services				(b)(4)
Total Jobs:					

The approval of this Form I-924 application supported by an exemplar Form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially

 $^{^2}$ Jobs estimate for NAICS code 5413 (Architectural, Engineering, and Related Services) adjusted to correct for a minor calculation error.

ON Regional Center, LLC ID1421351837 RCW1421351837 Page 4

unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on Franklin Beach, LLC project

Each individual petition, in order to demonstrate that it is affiliated with the ON Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is

ON Regional Center, LLC ID1421351837 RCW1421351837 Page 5

available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

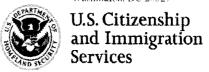
Chief, Immigrant Investor Program

Milels Colmi

ON Regional Center, LLC ID1421351837 RCW1421351837 Page 6

cc: Phuong Le
David Hirson & Partners, LLP
8 Cheshire Court
Newport Beach, CA 92660

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



November 20, 2015

Yong-hee (Julia) Park 489 Fifth Avenue, 12th Floor New York NY 10017

Application: Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center: Advantage America California Regional Center LLC

ID1329751246

Re: Request to Amend Regional Center Designation

Project: Brooklyn Basin Infrastructure Fund – Tranche A LLC

RCW1430951958

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on November 5, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Brooklyn Basin Infrastructure Fund – Tranche A LLC project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Brooklyn Basin Infrastructure Fund – Tranche A LLC will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least jobs. USCIS will give deference to the applicant's estimates of actual job creation

(b)(4)

www.uscis.gov

Advantage America California Regional Center LLC ID1329751246 RCW1430951958 Page 2

and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Brooklyn Basin Infrastructure Fund – Tranche A LLC project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On May 27, 2014, USCIS approved the Advantage America California Regional Center LLC ("AACARC") for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the counties of Alameda, Contra Costa, San Francisco, San Mateo, and Santa Clara in the State of California. AACARC now seeks to amend its previously approved regional center designation to include an actual project that will be managed by Brooklyn Basin Infrastructure Fund – Tranche A LLC, an NCE established on April 28, 2014.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
Brooklyn Basin	Infrastructure	Business Plan	09/2014
Infrastructure	development of 65-acre	Economic Analysis	04/30/2014
Fund –	waterfront property	Confidential Private	06/16/2014
Tranche A LLC		Placement Memorandum	
	Investment:	Subscription Agreement	06/16/2014
Geographic	[Loan, Equity]	Escrow Agreement	06/16/2014
Location: Alameda County		Operating Agreement	06/16/2014
Exemplar of Form I-526			

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment identifies the NCE of the proposed project as Brooklyn Basin Infrastructure Fund – Tranche A LLC, which was formed in the State of Delaware on April

Advantage America California Regional Center LLC ID1329751246 RCW1430951958 Page 3

(b)(4)	28, 2014. The Brooklyn Basin Infrastructure Fund – Tranche A LLC project is located within a targeted employment area (TEA) in Alameda County, California. Approximately EB-5 investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of

IV. Job Creation

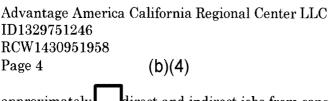
The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the IMPLAN economic model:

NAICS 1	Industry Name	Input (\$Millions) Multiplies	Jobs	
23	Construction			(b)(4)
5413	Architecture, Engineering, and Related Services			
Total Jobs:]

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using IMPLAN multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.



approximately direct and indirect jobs from construction, architecture, engineering, and related services construction, rental, and restaurant activities] associated with the Brooklyn Basin Infrastructure Fund – Tranche A LLC project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with Brooklyn Basin Infrastructure Fund – Tranche A LLC. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I·526. When filing Form I·829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the Brooklyn Basin Infrastructure</u> Fund – Tranche A LLC project

Each individual petition, in order to demonstrate that it is affiliated with the Advantage America California Regional Center LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Advantage America California Regional Center LLC ID1329751246 RCW1430951958 Page 5

5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws

Advantage America California Regional Center LLC ID1329751246 RCW1430951958 Page 6

and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely, Mileles Colmi

Nicholas Colucci

Chief, Immigrant Investor Program

Biyun Cao cc:

Law Offices of Julia Park LLC 489 Fifth Avenue, 12th Floor

New York, NY 10017

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street, NE Washington, DC 20529



November 19, 2015

Stephen D Weststeyn Northern California Regional Center 5745 County Road 65 Willow CA 95988

RE: Reaffirmation of Regional Center Designation RC ID#: 1031910176

DECISION

This notice is in reference to the regional center designation of Northern California Regional Center ("the Regional Center"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on May 5, 2010. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395"). Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On June 18, 2015, USCIS notified the Regional Center of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to continue to promote economic growth (including increased export sales, improved regional productivity, job creation, and increased domestic capital investment). The Notice of Intent to Terminate ("NOIT") provided the Regional Center an opportunity to offer evidence in opposition to the grounds stated in the NOIT.

On June 30, 2015, in response to the NOIT, the Regional Center submitted evidence to USCIS of its various efforts to promote economic growth. After considering the evidence, USCIS reaffirms the existing regional center designation for the Regional Center.

Sincerely,

Nicholas Colucci

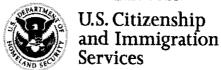
Mels Colmi

Chief

Immigrant Investor Program Office

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



September 16, 2015

James H. Adams BayPointe EB-5 Regional Center, LLC 354 ½ Dauphin Street Mobile, AL 36602

Application:

Form I-924, Application for Regional Center under the Immigrant Investor

Pilot Program

Applicant(s):

BayPointe EB-5 Regional Center, LLC

Re:

Initial Regional Center Designation BayPointe EB-5 Regional Center, LLC RCW1435252136 / ID1435252136

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 18, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate BayPointe EB-5 Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
Alabama	Baldwin, Mobile

BayPointe EB-5 Regional Center, LLC ID1435252136 RCW1435252136 Page 2

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers
7211	Traveler Accommodations

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the BayPointe EB-5 Regional Center, LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

BayPointe EB-5 Regional Center, LLC ID1435252136 RCW1435252136 Page 3

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of</u> Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no

BayPointe EB-5 Regional Center, LLC ID1435252136 RCW1435252136 Page 4

determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

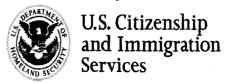
Milalos Colmi

cc: Marianna Tarantur

197 S. Federal Highway, Suite 200

Boca Raton, FL 33432

U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street. NE Washington, DC 20529



September 15, 2015

Chad Bailey c/o American VIP LLC Regional Center (Energize-ECI EB-5 Visa Regional Center) 8555 N. River Road, Suite 220 Indianapolis, IN 46240

RE: Reaffirmation of Regional Center Designation RC ID#: 1114750218

DECISION

This notice is in reference to the regional center designation of Energize-ECl EB-5 Visa Regional Center ("the Regional Center"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on August 30, 2011. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395"). Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On June 19, 2015, USCIS notified the Regional Center of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to continue to promote economic growth (including increased export sales, improved regional productivity, job creation, and increased domestic capital investment). The Notice of Intent to Terminate ("NOIT") provided the Regional Center an opportunity to offer evidence in opposition to the grounds stated in the NOIT.

On July 17, 2015, in response to the NOIT, the Regional Center submitted evidence to USCIS of its various efforts to promote economic growth. After considering the evidence, USCIS reaffirms the existing regional center designation for the Regional Center.

Your draft document, "A Proposal to Amend the American VIP Regional Center", dated June 26, 2015, requests amended geographic scope and North American Industry Classification System categories under which your Regional Center may undertake investment projects. However, this letter only serves to reaffirm your existing regional center designation and does not address or approve your amendment request.

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

Sincerely,

Nicholas Colucci

Chief

Immigrant Investor Program Office

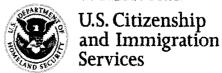
cc: Laura Foote Reiff

Mels Colmi

Greenberg Traurig LLP - TCO 1750 Tysons Boulevard, Suite 1200

McLean, VA 22102

Julia Colmi



September 14, 2015

Shili Fan Mid-America Investment Group, LLC 2144 Madison Ave Memphis, TN 38104

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Mid-America Investment Group, LLC

Re: Initial Regional Center Designation

Mid-America Investment Group, LLC ("MAIG")

RCW1428851919 / ID1428851919

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 15, 2104. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Mid-America Investment Group, LLC ("MAIG") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State			Counties		
Arkansas	Crittenden				
Mississippi	DeSoto	Marshall	Tate	Tunica	
Tennessee	Fayette	Tipton	Shelby		

B. Industry Categories¹

Industry Category	NAICS code
Nonresidential Building Construction	2362
Traveler Accommodations	7211
Furniture and Home Furnishing Merchant Wholesalers	4232
Professional & Commercial Equipment & Supplies Merchant Wholesalers	4234
Household Appliances & Electrical Goods Merchant Wholesalers	4236

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with MAIG, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Mid-America Investment Group, LLC RCW1428851919 / ID1428851919 Page 3

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

Mid-America Investment Group, LLC RCW1428851919 / ID1428851919 Page 4

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

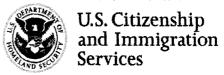
Milalo Colmi

cc:

Marianna Tarantur Wright Johnson, Ltd

197 S. Federal Way, Ste. 200

Boca Raton, FL 33432



September 14, 2015

Macie Wang Amaxi Regional Center, LLC 214 First Avenue Arcadia, CA 91006

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Amaxi Regional Center, LLC

Re:

Initial Regional Center Designation

Amaxi Regional Center, LLC

RCW1431651974 / RC-ID1431651974

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on November 12, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Amaxi Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State		Counties		
California	Los Angeles	Orange	Riverside	
Camornia	San Bernardino	Ventura		

B. Industry Categories¹

Industry Category	NAICS code
Non-residential Building Construction	2362
Furniture and Home Furnishing Merchant Wholesalers	4232
Professional & Commercial Equipment & Supplies Merchant Wholesalers	4234
Household Appliances & Electrical Goods Merchant Wholesalers	4236
Traveler Accommodations	7211

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Amaxi Regional Center, LLC RCW1431651974 / RC-ID1431651974 Page 3

Each individual petition, in order to demonstrate that it is affiliated with the Amaxi Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center

Amaxi Regional Center, LLC RCW1431651974 / RC·ID1431651974 Page 4

in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,
Alle Colum

Nicholas Colucci

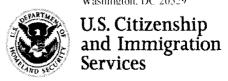
Chief, Immigrant Investor Program

cc: Mark Wietstock

Azarmehr APLC

6633 Telephone Rd, Ste. 120

Ventura, CA 93003



September 8, 2015

Charles B. Shea 12 World's Fair Dr., Suite L Somerset, NJ 08873

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Nature All Co., Inc. EB-5 Regional Center

Re:

Initial Regional Center Designation

NatureAll Co., Inc. EB-5 Regional Center

RCW1402251659/ID1402251659

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on January 22, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate NatureAll Co., Inc. EB-5 Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Cities
State of New	Elizabeth
Jersey	

B. Industry Categories¹

NAICS Code	Industry
311225	Fats & Oil Refining & Blending
561910	Packaging & Labelling Services
625411	Medicinal & Botanical Manufacturing

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the NatureAll Co., Inc. EB-5 Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov. Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center

NaturAll Co Regional Center RCW1402251659/ID1421251834 Page 4

in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

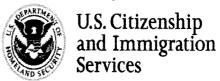
Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street, NE Washington, DC 20529



TO: Jon Freis
Hollywood Regional Center, Inc.
120 El Camino Drive, Suite 204
Beverly Hills, CA 90212

RC ID#: ID1031910034

DATE: September 8, 2015

RE: Reaffirmation of Regional Center Designation

DECISION

This notice is in reference to the regional center designation of Hollywood Regional Center, Inc. ("HRC"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on July 28, 2011. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395"). Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On June 9, 2015 USCIS notified HRC of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to demonstrate the promotion of economic growth in Form I-924A filings for fiscal years 2011, 2012, 2013, and 2014. The Notice of Intent to Terminate ("ITT") provided HRC an opportunity to offer evidence in opposition to the grounds alleged in the ITT, including evidence of the promotion of economic growth for fiscal years 2011, 2012, 2013, and 2014.

On July 21, 2015 in response to the ITT, USCIS received evidence from HRC of the promotion of economic growth for fiscal years 2014 and 2015. After considering the evidence, USCIS reaffirms the existing regional center designation for HRC.

Sincerely,

Nicholas Colucci

Chief

Immigrant Investor Program Office

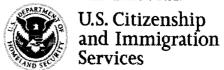
cc: Nima Korpivaara, Esq.

Julies Colmi

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



September 3, 2015

Samuel Silverman EB5 Affiliate Network States of Washington and Oregon Regional Center, LLC 3801 PGA Blvd., Suite 902 Palm Beach Gardens, FL 33410

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

EB5 Affiliate Network States of Washington and Oregon Regional Center, LLC

Re:

Initial Regional Center Designation

EB5 Affiliate Network States of Washington and Oregon Regional Center, LLC

RCW1421751843 / ID1421751843

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on August 5, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Affiliate Network States of Washington and Oregon Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties All counties			
Washington				
Oregon	Benton	Lincoln	Sherman	
	Clackamas	Linn	Tillamook	
	Clatsop	Marion	Wasco	
	Columbia	Multnomah	Washington	
	Hood River	Polk	Yamhill	
	Jefferson			

EB5 Affiliate Network States of Washington and Oregon Regional Center, LLC ID1421751843
RCW1421751843
Page 2

B. Industry Categories¹

NAICS	Industry Name
722511	Full-Service Restaurants
236220	Commercial and Institutional Building Construction

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Affiliate Network States of Washington and Oregon Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

EB5 Affiliate Network States of Washington and Oregon Regional Center, LLC ID1421751843 RCW1421751843 Page 3

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and

EB5 Affiliate Network States of Washington and Oregon Regional Center, LLC ID1421751843
RCW1421751843
Page 4

activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <a href="https://doi.org/10.1007/journal.org/10.1007/

Sincerely,

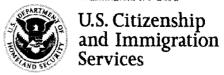
Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

cc: Thomas N. Silverman

3801 PGA Blvd, Suite 902 Palm Beach Gardens, FL 33410



September 3, 2015

Samuel Silverman EB5 Affiliate Network State of Illinois Regional Center, LLC 3801 PGA Blvd., Suite 902 Palm Beach Gardens, FL 33410

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

EB5 Affiliate Network State of Illinois Regional Center, LLC

Re:

Initial Regional Center Designation

EB5 Affiliate Network State of Illinois Regional Center, LLC

RCW1421751842 / ID1421751842

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on August 5, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Affiliate Network State of Illinois Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
Illinois	All counties

EB5 Affiliate Network State of Illinois Regional Center, LLC ID1421751842 RCW1421751842 Page 2

B. Industry Categories¹

NAICS	Industry Name
722511	Full-Service Restaurants
236220	Commercial and Institutional Building Construction

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Affiliate Network State of Illinois Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

EB5 Affiliate Network State of Illinois Regional Center, LLC ID1421751842 RCW1421751842 Page 3

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and

EB5 Affiliate Network State of Illinois Regional Center, LLC ID1421751842 RCW1421751842 Page 4

activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.che.gov</u>.

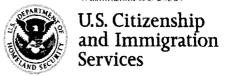
Sincerely,

Nicholas Colucci Chief, Immigrant Investor Program

cc: Thomas N. Silverman 3801 PGA Blvd, Suite 902 Palm Beach Gardens, FL 33410

Milalos Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



Date: November 3, 2015

AnKuo Lin Proficiency Regional Center LLC 2225 S 6th Avenue Arcadia, CA 91006

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Proficiency Regional Center LLC

Re: Initial Regional Center Designation

Proficiency Regional Center LLC RCW1509751749 / ID1509751749

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on April 2, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Proficiency Regional Center LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Proficiency Regional Center LLC ID1509751749 RCW1509751749 Page 2

A. Geographic Area

State	Counties/Cities	Counties/Cities
	Los Angeles County	San Bernardino County
California	Orange County	Ventura County
	Riverside County	

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electric Goods Merchant Wholesalers
5413	Architectural, Engineering, and Related Services
7211	Traveler Accommodation

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Proficiency Regional Center LLC ID1509751749 RCW1509751749 Page 3

realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Proficiency Regional Center LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

Proficiency Regional Center LLC ID1509751749 RCW1509751749 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Mileles Columnia

Nicholas Colucci

Chief, Immigrant Investor Program

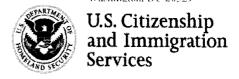
cc: Catherine DeBono Holmes

Jeffer Mangels Butler & Mitchell LLP

1900 Avenue of the Stars #7

Los Angeles, CA 90067

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



October 9, 2015

Linda Lau American Greenland Regional Center 1401 Mission Street, Suite C-1 South Pasadena, CA 91030

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

American Greenland Regional Center (AGRC)

Re:

Request to Amend Regional Center Designation American Greenland Regional Center ("AGRC")

RCW1436352269 / ID1034350088

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 29, 2014. The Form I-924 application was filed to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

- A. Effective the date of this notice, USCIS approves the additional geographic area to include those areas listed in Section III of this notice.
- B. Effective the date of this notice, USCIS approves the additional industry categories listed in Section III of this notice.

II. Procedural History

On June 26, 2013, USCIS approved the American Greenland regional center ("AGRC") for participation in the Immigrant Investor Program as a designated regional center. Based on the initial designation AGRC obtained approval for the following geographic area, industry categories.

American Greenland Regional Center (AGRC) RCW1436352269 / ID 1034350088 Page 2

Geographical Area

State	Counties
California	Imperial, Riverside, San Diego

Industry/NAICS codes

Industry Category	NAICS code
Traveler Accommodation	7211
Restaurants and Other Eating Places	7225
Wineries	31213
Nonresidential Building Construction	2362
Furniture & Home Furnishing Merchant Wholesalers	4232
Professional & Commercial Equipment & Supplies Merchant Wholesalers	4234

An amendment request is required if investment opportunities arise that are outside the previously approved geographic area, industry categories. If changes are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the new evidence to ensure compliance with EB-5 program requirements.

III. Amendment Request¹

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following changes:

A. Geographic Area

USCIS approves the applicant's amendment request to include the following geographic area:

States	Counties
California	Alameda, Contra Costa, Los Angles, Monterey, San Bernardino, San Francisco, San Luis Obispo, San Mateo, Santa Barbara, Santa Clara, Santa Cruz, and Ventura
Nevada	Clark

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Industry Categories

USCIS approves the applicant's amendment request to include the following industry categories:

Industry Name	NAICS code
Residential Building Construction	2361
Plastics Bottle Manufacturing	326160
Real Estate	531
Architectural, Engineering and Related Services	5413

IV. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with AGRC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).

American Greenland Regional Center (AGRC) RCW1436352269 / ID 1034350088 Page 4

4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

American Greenland Regional Center (AGRC) RCW1436352269 / ID 1034350088 Page 5

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci Chief, Immigrant Investor Program

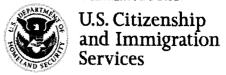
Miles Coloni

cc: Helyn Lau

Global Law Group

909 El Centro Street, Suite 1 South Pasadena, CA 91030

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Immigrant Investor Program
131 M Street, NE. Mailstop 2235
Washington, DC 20529



August 31, 2015

John Young East West Regional Center 521 West 48th Street New York, NY 10036

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

East West Regional Center

Re:

Initial Regional Center Designation

East West Regional Center, LLC ("EWRC")

RCW1431751977 / ID1431751977

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on November 13, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate East West Regional Center, LLC ("EWRC") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

States	Counties			en magazina en 1 april 1 anno en 1	en y en en en ar
Connecticut	Fairfield	Litchfield	New Haven	All and a second of the second	
New Jersey	Bergen	Essex	Hudson	Hunterdon	Mercer
	Middlesex	Monmouth	Morris	Ocean	Passaic
	Somerset	Sussex	Union	professional and a spiritual state of the st	1 - Company of the second of t
New York	Bronx	Dutchess	Kings	Nassau	New York
	Orange	Putnam	Queens	Richmond	Rockland
	Suffolk	Ulster	Westchester		
Pennsylvania	Pike				

B. Industry Categories¹

Industry Category	NAICS code
Residential Building Construction	2361
Nonresidential Building Construction	2362
Furniture & Home Furnishing Merchant Wholesalers	4232
Professional & Commercial Equipment & Supply Wholesalers	4234
Household Appliances & Electrical Merchant Wholesalers	4236
Lessor Of Real Estate	7211
Traveler Accommodations	7211

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

East West Regional Center, LLC RCW1431751977 / ID1431751977 Page 3

deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EWRC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased

East West Regional Center, LLC RCW1431751977 / ID1431751977 Page 4

domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

East West Regional Center, LLC RCW1431751977 / ID1431751977 Page 5

Sincerely,

Miles Columnia

Nicholas Colucci

Chief, Immigrant Investor Program

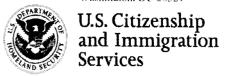
cc:

Troy Nehring

14410 SE Petrovitsky Road, Ste. 201B

Renton, WA 98058

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



Date: October 21, 2015

Stanley Chang Deictic Investment Group LLC 3150 De La Cruz Blvd., Suite 206 Santa Clara, CA 95054

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Deictic Investment Group LLC

Re:

Initial Regional Center Designation Deictic Investment Group LLC RCW1435252133 / ID1435252133

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 18, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Deictic Investment Group LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities	Counties/Cities	
	Alameda County	San Mateo County	
	Contra Costa County Santa Clara County		
California	Marin County	Santa Cruz County	
	Napa County	Solano County	
	San Benito County Sonoma County		
	San Francisco County		

B. Industry Categories¹

NAICS	Industry Name	
2362	Nonresidential Building Construction	
4232	Furniture and Home Furnishing Merchant Wholesalers	
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers	
4236	Household Appliances and Electrical and Electric Goods Merchant Wholesalers	
7211	Traveler Accommodation	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Deictic Investment Group LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is

available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

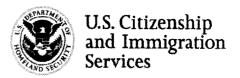
cc:

Troy Nehring
McCarthy Nehring PS
14410 SE Petrovitsky Rd, Ste. 201B

Renton, WA 98058

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



Date: October 13, 2015

Jingzhong Lu Landy Resources Management, LLC 15140 49 T Way, NW Williston, ND 58801

Application: Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s): Landy Resources Management, LLC

Re: Initial Regional Center Designation

Landy Resources Management, LLC RCW1432551993 / ID1432551993

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on November 21, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Landy Resources Management, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Landy Resources Management, LLC ID1432551993 RCW1432551993 Page 2

A. Geographic Area

State	Counties
	Billings
North Dakota	Divide
	Golden Valley
	McLean
	Mountrail
	Ward
	Burke
	Dunn
	McKenzie
	Mercer
	Stark
	Williams

B. Industry Categories¹

NAICS	Industry Name	
Burke	Oil and Gas Extraction	
Dunn	Drilling Oil and Gas Wells	
McKenzie	Machinery, Equipment, and Supplies Merchant Wholesalers	
Mercer	Other Scientific and Technical Consulting Services	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Landy Resources Management, LLC ID1432551993 RCW1432551993 Page 3

I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Landy Resources Management, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings² (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

² Please note that, after a cursory review of the organizational documents in the record, it appears that the draft limited partnership agreement contains a "call option" or redemption agreement that may not be compliant with program eligibility requirements. The limited partnership agreement also contains a provision for the admission of different classes or groups of limited partners that receive preferential or special distributions that may not be compliant with program eligibility requirements.

Landy Resources Management, LLC ID1432551993 RCW1432551993 Page 4

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

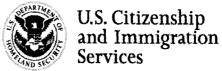
Milalo Colmi

cc: Fei Bao

Zhang & Attorneys, LP 9999 Bellaire Blvd., Suite 920

Houston, TX 77036

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



August 5, 2015

Hee Kyun Cho Rota EB5 Regional Center, LLC C/o SNM Corporation PO Box 1317 Rota, MP 96951

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Rota EB5 Regional Center, LLC

Re:

Initial Regional Center Designation Rota EB5 Regional Center, LLC RCW1323551199 / RC ID1323551199

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on August 23, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Rota EB5 Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the Rota Casino Hotel LLC project based on the evidence submitted with the exemplar Form I-526.

Rota EB5 Regional Center, LLC ID1323551199 RCW1323551199 Page 3

Project	Type of Project	Organization Documents	Date of Document
Rota Casino Hotel,	Exemplar	Comprehensive Business Plan -	Submitted March
LLC	Form	Rota Casino Hotel, LLC	2015
	I-526	Economic Impact Study	Dated 3/16/2015
	Petition	Operating Agreement for Rota	Executed 8/22/2013
Geographic	Project	Casino Hotel, LLC	
Location:		Confidential Private Placement	Submitted 8/23/2013
Rota island, Commonwealth of the Northern		Memorandum – Rota Casino	
		Hotel, LLC	
		Rota Casino Hotel, LLC	Executed 7/25/2013
Mariana Islands		Memorandum of Understanding	
		Subscription Agreement	Submitted 8/23/2013
Focus of		Escrow Agreement	Submitted 8/23/2013
Investment:	(b)(4)	Loan Agreement	Submitted 3/20/2015
Loan to JCE		between Rota Casino Hotel, LLC	
		and Rota Casino Hotel Inc.	

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

The proposal identifies the new commercial enterprise ("NCE") of the project as Rota Casino Hotel LLC, which was formed in the Commonwealth of the Northern Mariana Islands on March 23, 2013. The project is located at on the island of Rota, Commonwealth of the Northern Mariana Islands
of EB-5 capital from all investors.

A. Job Creation

(b)(4)

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the

Rota EB5 Regional Center, LLC ID1323551199 RCW1323551199 Page 5

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United

U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street. NE Washington, DC 20529



August 27, 2015

Dan Nip Global Century Development Corporation Houston Regional Center 11205 Bellaire Blvd., Suite B 33 Houston, TX 77072

RE: Reaffirmation of Regional Center Designation RC ID#: 1031910139

DECISION

This notice is in reference to the regional center designation of Global Century Development Corporation Houston Regional Center ("the Regional Center"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on April 18, 2007. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395"). Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On June 18, 2015, USCIS notified the Regional Center of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to continue to promote economic growth (including increased export sales, improved regional productivity, job creation, and increased domestic capital investment). The Notice of Intent to Terminate ("NOIT") provided the Regional Center an opportunity to offer evidence in opposition to the grounds stated in the NOIT.

On July 22, 2015, in response to the NOIT, the Regional Center submitted evidence to USCIS of its various efforts to promote economic growth. After considering the evidence, USCIS reaffirms the existing regional center designation for the Regional Center.

Sincerely,

Nicholas Colucci

Mels Colmi

Chief

Immigrant Investor Program Office

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

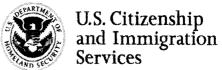
cc: Charles Foster

Foster LLP

600 Travis Street, 20th Floor

Houston, TX 77002

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



August 26, 2015

Alan Wu ARC Atlantic Regional Center 2290 Huntington Drive Suite 100 San Marino, California 91108

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

ARC Atlantic Regional Center

Re:

Initial Regional Center Designation ARC Atlantic Regional Center, LLC RCW1409051723/ID1409051723

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on March 31, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate ARC Atlantic Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the CIU Fund I project based on the evidence submitted with the exemplar Form I-526.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

ARC Atlantic Regional Center ID1409051723 RCW1409051723 Page 3

. Job Creatio	on			
nalysis prese: he job creati	es the geographic area and industry categories no nted and reviewed in conjunction with the adjuc- on methodology presented in the economic imp del and underlying business plan has been adjust	lication of this ca _l act analysis when	oital investmen applying the I	ıt project.
NAICS 2	NAICS Description	Input (\$Millions)	Multiplier	Jobs
2362	Nonresidential Building Construction	(4MILLIOIIS)	L STORY WENT	
5413	Architectural and Engineering Services			
4232	Furniture and Home Furnishing Merchant Wholesalers			
7211	Traveler Accommodation			
7225	Restaurants & Other Eating Places			
4851	Urban Transit Systems	1		
4811	Scheduled Air Transportation			
4521	Department Stores			
8121	Personal Care Services			
7112	Spectator Sports			
*Indirect Jobs	s Only			
Total Jobs:		*		

unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation

When an actual project is specifically named in this notice and the critical inputs remain materially

² These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

ARC Atlantic Regional Center ID1409051723 RCW1409051723 Page 5

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalos Colmi

CC:

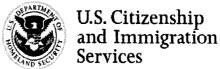
Chung-Hung Liou

Larry C Liou and Associates

150 North Santa Anita Ave. Suite 890

Arcadia, CA 91006

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



August 26, 2015

Daniel Healy Civitas Alabama Regional Center 1601 Bryan Street, Suite M-200 Dallas, TX 75201

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Civitas Alabama Regional Center Regional Center

Re:

Request to Amend Regional Center Designation

Civitas Alabama Regional Center ("CALRC")

RCW1428851926 / ID1428851926

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 15, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Civitas Alabama Regional Center ("CALRC") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

States	Counties	
Alabama	All	

B. Industry Categories¹

Industry Category	NAICS code
Management, Scientific, Technical, and Consulting Services	5416
Construction of Buildings	236
Merchant Wholesalers—Durable Goods	423
Architectural, Engineering, and Related Services	5413
Office of Real Estate Appraisers	531320
Title Abstract and Settlement Services	541191
Legal Services	5411
Advertising, Public Relations, and Related Services	5418
Lessors of Real Estate	5311

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the CALRC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

Civitas Alabama Regional Center RCW1428851926 / ID1428851926 Page 4

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalos Colmi

cc: Lincoln Stone

Stone Grzegorek and Gonzalez 800 Wilshire Blvd., Ste. 900 Los Angeles, CA 90017

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* 131 M Street, NE. Mailstop 2235 Washington, DC 20529



August 25, 2015

David Lai Altura Regional Center, LLC 220 South Linden Avenue South San Francisco, CA 94080

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Altura Regional Center, LLC

Re:

Initial Regional Center Designation

Altura Regional Center, LLC RCW1424551871 / ID1424551871

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on September 2, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Altura Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities
	County of Los Angeles
California	County of Imperial
	County of San Bernardino
	County of Riverside

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
5413	Architectural, Engineering, and Related Services
4237	Hardware, and Plumbing and Heating Equipment and Supplies Merchant
	Wholesalers
4243	Apparel, Piece Goods and Notions Merchant Wholesalers
7139	Other Amusement and Recreation Industries
7211	Traveler Accommodation
7225	Restaurants and Other Eating Places

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Altura Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is

available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

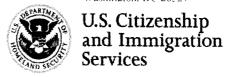
Chief, Immigrant Investor Program

Milalo Colmi

cc: Linda Lau

Global Law Group 909 El Centro St., Ste. 1 South Pasadena, CA 91030

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Immigrant Investor Program
131 M Street. NE. Mailstop 2235
Washington, DC 20529



August 25, 2015

Eric Jacobsen EB5 International II, LLC 560 First Street, Suite 104 Lake Oswego, OR 97034

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

EB5 International II, LLC

Re:

Initial Regional Center Designation

EB5 International II, LLC

RCW1424051867 / ID1424051867

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on August 28, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 International II, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities	Counties/Cities
<u> </u>	Alameda	Contra Costa
California	Marin	Monterey
	Napa	San Benito
	San Francisco	San Joaquin
	San Mateo	Santa Clara
	Santa Cruz	Solano
	Sonoma	

B. Industry Categories¹

NAICS	Industry Name	
2362	Non-Residential Building Construction	
4232	Furniture and Home Furnishings Merchant Wholesalers	
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers	
4236	Household Appliances and Electrical and Electrical Goods Merchant Wholesalers	
6233 Continuing Care Retirement Communities and Assisted Living Facilities the Elderly		

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 International II, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho. 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is

available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

cc:

Troy Nehring McCarthy Nehring PS 14410 SE Petrovitsky Road

Renton, WA 98058

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* 131 M Street. NE. Mailstop 2235 Washington, DC 20529



August 25, 2015

Kevin Stamper Boston Regional Center, Inc. 800 Fifth Ave, Ste. 4120 Seattle. WA 98104

Application:

Form I-924, Application for Regional Center under the

Immigrant Investor Pilot Program

Applicant(s):

Boston Regional Center, Inc.

Re:

Initial Regional Center Designation

Boston Regional Center, Inc.

RCW1427651898 / ID1427651898

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 3, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Boston Regional Center, Inc. ("BRC") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State of	Counties 'Counties 'Counti				
Massachusetts	Essex	Norfolk	Suffolk		
	Middlesex	Plymouth			

B. Industry Categories¹

Industry Category	NAICS code
Construction of Buildings	236
Motion Picture Theaters (except drive ins)	512131
Professional, Scientific and Technical Services	541
Fitness & Recreational Sports Centers	71394
Food Services & Drinking Places	722

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with BRC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as

otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,
Miles Colum

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Bernard Wolfsdorf

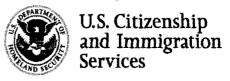
Wolfsdorf Rosenthal LLP

1416 2nd Street

Santa Monica, CA 90401

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program
131 M Street NE. Mailstop 2235
Washington, DC 20529



September 17, 2015

Arthur Halleran QueensFort New York Regional Center, LLC C/O QueensFort Capital Corporation 1000 5th Street, 2nd Floor Miami Beach, FL 33139

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

QueensFort Capital Massachusetts Regional Center, LLC

Re:

Initial Regional Center Designation – Limited Decision QueensFort Capital Massachusetts Regional Center, LLC

RCW1430751952 / RC ID1430751952

This notice of a limited decision is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on November 3, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves, in a limited decision, the Form I-924 request to designate QueensFort Capital Massachusetts Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation - Limited Decision

The applicant submitted its Form I-924 requesting specific industry categories, geographic regions, and multiple hypothetical projects to be identified for the Regional Center's use.

Upon review of the record, USCIS has determined that not all of the requested industry categories provided in the Form I-924 represent an appropriate application of a hypothetical project to support the industry categories, and/or geographic regions acceptable for use by the Regional Center.

As such, USCIS has concluded that a limited decision is necessary in this case. Therefore, all requested, approved, and disallowed industry categories have been identified below.

A. Industry Categories and Geographic Regions Requested

The applicant has requested to focus, promote economic growth, and offer capital investment opportunities in the following geographic areas and industry categories:

1. Geographic Areas - Requested

State	Counties		
Massachusetts	Barnstable	Berkshire	Bristol
	Dukes	Essex	Franklin
	Hampden	Hampshire	Middlesex
	Nantucket	Norfolk	Plymouth
	Suffolk	Worcester	

2. Industry Categories - Requested

NAICS	Industry Name
23	Construction
42	Wholesale Trade
44	Retail Trade
45	Retail Trade
531	Real Estate
5412	Accounting, Tax Preparation, Bookkeeping, and Payroll Services
5413	Architectural, Engineering, and Related Services
5419	Other Professional, Scientific, and Technical Services
721	Accommodation
722	Food Services and Drinking Places

B. Approved Industry Categories and Geographic Areas¹

The following industry categories and/or geographic areas have been determined to represent an appropriate application of a hypothetical project to support the industry categories, and/or geographic regions acceptable for use by the Regional Center.

1. Geographic Areas - Approved

State	Counties		
Massachusetts	Barnstable	Berkshire	Bristol
	Dukes	Essex	Franklin
	Hampden	Hampshire	Middlesex
	Nantucket	Norfolk	Plymouth
	Suffolk	Worcester	

2. Industry Categories - Approved

NAICS	Industry Name
23	Construction
42	Wholesale Trade
5419	Other Professional, Scientific, and Technical Services
722	Food Services and Drinking Places

C. Disallowed Industry Categories

The following industry categories have been disallowed because it has been determined that they do not represent an appropriate application of a hypothetical project to support the industry categories acceptable for use by the Regional Center.

2. Industry Categories - Disallowed

NAICS	Industry Name
44	Retail Trade
45	Retail Trade
531	Real Estate
5412	Accounting, Tax Preparation, Bookkeeping, and Payroll Services
5413	Architectural, Engineering, and Related Services
721	Accommodation

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

(b)(4)

USCIS will not give deference to the business plan and the economic analysis that derived the job creation estimates with any subsequently filed individual immigrant investors' Form I-526s pertaining to the above project. USCIS will review the business plan and/or economic analysis when the Form I-526s are filed to determine if it meets EB-5 requirements.

4. Conclusion - Decision to Disallow

Some aspects of the submitted proposal, as presently constituted, do not meet the regulatory requirements at 8 C.F.R. § 204.6. Therefore the request to grant the specific industry categories listed above cannot be approved.

The decision to disallow the industry categories identified above does not preclude the filing of Form I-526 petitions related to a subsequent project using the disallowed industry categories. Any future petitions will be adjudicated on their own merit.

There is no appeal to this decision to disallow the specified industry categories explained above. However, pursuant to 8 CFR 103.5, a motion can be filed on Form I-290B. Such motion must be accompanied by the proper fee and filed within 30 days of this notice.

Please note that if the I-924 applicant elects to timely file a motion with USCIS and if said motion is granted the application will be reopened and/or reconsidered and a new decision rendered. If the applicant's proposal submitted in support of its motion meets the regulatory requirements at 8 C.F.R. § 204.6 the applicant will be accorded the industry categories that meet EB-5 requirements. If no motion is filed within the time allowed this decision is final.

III. Job Creation

USCIS approves the geographic area and industry categories noted below based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

The approval of this Form I-924 application is based upon the economically and statistically valid assumptions and estimates provided in the business plan for job creation. Please refer to the input and multiplier analysis table above.

A hypothetical project does not have the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998). As such, USCIS's approval of any hypothetical job creation estimates presented in a Form I-924 is not accorded deference and may not be relied upon by an individual investor when

filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the QueensFort Capital Massachusetts Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational and transactional documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet

the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Milels Column

Nicholas Colucci

Chief, Immigrant Investor Program

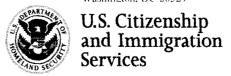
cc: Steve Park

C/O Nelson Mullins Riley & Scarborough LLP

201 17th Street, NW, Suite 1700

Atlanta, GA 30363

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



September 17, 2015

David Townsend EB5 Florida Real Estate Regional Center, LLC 7380 W. Sandlake Road, Suite 500 Orlando, FL 32819

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

EB5 Florida Real Estate Regional Center, LLC

Re:

Initial Regional Center Designation

EB5 Florida Real Estate Regional Center, LLC

RCW1429351932 / ID1429351932

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 20, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Florida Real Estate Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the City Center West Orange, LLC project based on the evidence submitted as an actual project.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties	
Florida	Lake	Orange
	Osceola	Polk

B. Industry Categories¹

NAICS	Industry Name
23611	Residential Building Construction
236115	New Single-Family Housing Construction (except For-Sale Builders)
236116	New Multifamily Housing Construction (except For-Sale Builders)
236117	New Housing For-Sale Builders
236220	Commercial and Institutional Building Construction
53111	Lessors of Residential Buildings and Dwellings
53112	Lessors of Nonresidential Buildings (except Miniwarehouses)
53131	Real Estate Property Managers
531311	Residential Property Managers
53139	Other Activities Related to Real Estate
541	Professional, Scientific, and Technical Services
551114	Corporate, Subsidiary, and Regional Managing Offices
72111	Hotels (except Casino Hotels) and Motels
721199	All Other Traveler Accommodation
722410	Drinking Places (Alcoholic Beverages)
72251	Restaurants and Other Eating Places
722514	Cafeterias, Grill Buffets, and Buffets

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an actual project.

Project	Type of Project	Organization Documents	Date of Document
City Center West Orange, LLC	Actual Project	NCE's City Center West Orange, LLC Private Placement Memorandum	Dated: July 2014
Geographic		City Center Project Plan (Business Plan)	Submitted: 10/20/2014
Location: Orange County, Florida		Economic Impact Analysis	Dated: October 2014
Focus of Investment:			
Equity			1.

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

The proposal identifies the new commercial enterprise ("NCE") of the project as City Center West Orange, LLC, which was formed in the State of Florida on February 4, 2013. The project is located at 251, 352 and 362 Main Street in the City of Orlando, Florida. Up to immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of

A. Job Creation

(b)(4)

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic

impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS	Industry Name	Input (\$Millions)	Multiplier	Jobs	
230000	Hard Construction Costs Phase I				(b)(4)
230000	Hard Construction Costs Phase II				(() ()
230000	Hard Construction Costs Phase III				
541300	Architect, Engineering & Related Phase I				ŀ
541300	Architect, Engineering & Related Phase II				
541300	Architect, Engineering & Related Phase III				
531000	Year 3 Revenues Office Leasing				
531000	Year 3 Revenues Retail Leasing				
531000	Year 3 Residential Leasing				ļ
Total Job	og:]

The approval of this Form I-924 application supported by an actual project is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on City Center West Orange, LLC project

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Florida Real Estate Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Milely Column

Nicholas Colucci

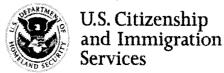
Chief, Immigrant Investor Program

cc: James Lavigne

C/O South Milhausen, P.A. 1000 Legion Place, Suite 1200

Orlando, FL 32801

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street. NE, Mailstop 2235 Washington. DC 20529



August 26, 2015

Daniel Healy Civitas Louisiana Regional Center 1601 Bryan Street, Suite M-200 Dallas, TX 75201

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Civitas Louisiana Regional Center Regional Center

Re:

Request to Amend Regional Center Designation

Civitas Louisiana Regional Center ("CLARC")

RCW1428851924 / ID1428851924

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 15, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Civitas Louisiana Regional Center ("CLARC") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

States	Counties	:
Louisiana	All	

B. Industry Categories¹

Industry Category	NAICS code
Management, Scientific, Technical and Consulting Services	5416
Construction of Buildings	236
Merchant Wholesalers—Durable Goods	423
Architectural, Engineering & Related Services	5413
Office of Real Estate Appraisers	531320
Title Abstract & Settlement Services	541191
Legal Services	5411
Advertising, Public Relations, and Related Services	5418
Lessors of Real Estate	5311

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the CLARC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

Civitas Louisiana Regional Center RCW1428851924 / ID1428851924 Page 4

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

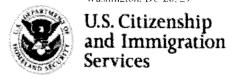
Milals Colmi

cc: Lincoln Stone

Stone Grzegorek and Gonzalez 800 Wilshire Blvd., Ste. 900 Los Angeles, CA 90017 cc: Charles Foster
Foster LLP
600 Travis Street, 20th Floor

Houston, TX 77002

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



Date: 08/27/2015

Jun Xu CA EB-5 Express, LLC 1955 Rose Avenue San Marino, CA 91108

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

CA EB-5 Express, LLC

Re:

Initial Regional Center Designation

CA EB-5 Express, LLC

RCW1405051688/ ID1405051688

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 02/19/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate CA EB-5 Express, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
California	Los Angeles, Orange, Riverside, San Bernardino and Ventura,

CA EB-5 Express LLC ID1405051688 RCW1405051688 Page 2

B. Industry Categories¹

NAICS	Industry Name	
2362	Nonresidential Building Construction	
1112	Vegetable and Melon Farming	
1114	Greenhouse, Nursery, and Floriculture Production	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the CA EB-5 Express, LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

CA EB-5 Express LLC ID1405051688 RCW1405051688 Page 3

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho. 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

CA EB-5 Express LLC ID1405051688 RCW1405051688 Page 4

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Milely Column

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Marianna Tarantur, Esq.

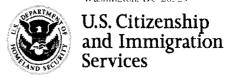
Wright Johnson Ltd

197 S. Federal Hwy, Suite 200

Boca Raton, FL 33432

CA EB-5 Express, LLC 1955 Rose Avenue San Marino, CA 91108

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street. NE. Mailstop 2235 Washington, DC 20529



August 31, 2015

Michael Reschke LaSalle Street Regional Center, LLC 120 N. LaSalle St., Ste. 3200 Chicago, IL 60602

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

LaSalle Street Regional Center, LLC

Re:

Initial Regional Center Designation

LaSalle Street Regional Center, LLC ("LSRC")

RCW1430451950 / ID1430451950

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 31, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate LaSalle Street Regional Center, LLC ("LSRC") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

LaSalle Street Regional Center, LLC ("LSRC") RCW1430451950 / ID1430451950 Page 2

A. Geographic Area

State		C	ounties	
**	Cook	DeKalb	DuPage	Grundy
Illinois	Kane Will	Kendall	Lake	McHenry
Indiana	Jasper	Lake	Newton	Porter
Wisconsin	Kenosha			

B. Industry Categories¹

Industry Category	NAICS code
Nonresidential Building Construction	2362
Architectural, Engineering and Related Services	5413
Traveler Accommodation	7211

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

LaSalle Street Regional Center, LLC ("LSRC") RCW1430451950 / ID1430451950 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the LSRC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

LaSalle Street Regional Center, LLC ("LSRC") RCW1430451950 / ID1430451950 Page 4

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalos Colmi

cc: Ronald Hayden RKJ Legal LTD

1 N. LaSalle St, Ste. 1515

Chicago, IL 60602

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Immigrant Investor Program
131 M Street, NE, Mailstop 2235
Washington, DC 20529



September 14, 2015

David Keller Re: Liberty Kansas Regional Center 17470 N. Pacesetter Way Scottsdale, Arizona 85255

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

Liberty Kansas Regional Center, LLC

Re:

Initial Regional Center Designation Liberty Kansas Regional Center, LLC RCW1327351224 / ID1327351224

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on August 23, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Liberty Kansas Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Liberty Kansas Regional Center, LLC ID1327351224 RCW1327351224 Page 2

A. Geographic Area

State	Counties	4		
Kansas	All			
Missouri	Bates		Caldwell	Cass
	Clay		Clinton	Jackson
	Lafayette		Platte	Ray

B. Industry Categories¹

NAICS Code	NAICS Description
2362	Nonresidential Building Construction (Hotel 2)
7211	Accommodation (Hotel 1)
7221	Restaurants & Other Eating Places
3115	Dairy Product Manufacturing (Crop and Animal Production)

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Liberty Kansas Regional Center, LLC ID1327351224 RCW1327351224 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Liberty Kansas Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A. Supplement to Form I-924A Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

Liberty Kansas Regional Center, LLC ID1327351224 RCW1327351224 Page 4

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

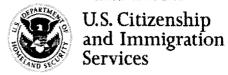
If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colum



September 10, 2015

Ling Woodworth Summit Regional Center, LLC 206 S. Los Robles Ave, Suite #321 Pasadena, CA 91101

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Summit Regional Center, LLC

Re:

Initial Regional Center Designation Summit Regional Center, LLC

RCW1432151982 / RC-ID1432151982

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on November 17, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Summit Regional Center, LLC ("SRC") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

States	Counties				
California	Los Angeles	Orange	Riverside	San Bernardino	

B. Industry Categories¹

Industry Category	NAICS code
Residential Building Construction	230000
Architectural & Engineering Services	5413
Activities Related to Real Estate	5310
Offices of Real Estate Agents & Brokers	5312

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with SRC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Summit Regional Center, LLC RCW1432151982 / RC-ID1432151982 Page 3

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

Summit Regional Center, LLC RCW1432151982 / RC-ID1432151982 Page 4

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

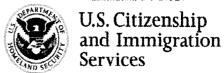
cc: Jason Park

Sapient Law Group PC

5670 Wilshire Blvd., Ste. 2300

Los Angeles, CA 90036

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



August 24, 2015

Daniel J. Healy Civitas Massachusetts Regional Center 1601 Bryan Street, Suite M-200 Dallas, TX 75201

Application:

Form I-924, Application for Regional Center under the Immigrant Investor

Pilot Program

Applicant(s):

Civitas Massachusetts Regional Center

Re:

Initial Regional Center Designation Civitas Massachusetts Regional Center RCW1428851923 / ID1428851923

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 15, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Civitas Massachusetts Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Civitas Massachusetts Regional Center ID1428851923 RCW1428851923 Page 2

A. Geographic Area

State	Counties/Cities
Massachusetts	All Counties/Cities

B. Industry Categories¹

NAICS	Industry Name	
236	Construction of Buildings	
423	Merchant Wholesalers - Durable Goods	
5411	Legal Services	
5413	Architectural, Engineering, and Related Services	
5416	Management, Scientific, and Technical Consulting Services	
5418	Advertising, Public Relations, and Related Services	
5311	Lessors of Real Estate	
531320	Offices of Real Estate Appraisers	
541191	Title Abstract and Settlement Offices	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Civitas Massachusetts Regional Center ID1428851923 RCW1428851923 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Civitas Massachusetts Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

Civitas Massachusetts Regional Center ID1428851923 RCW1428851923 Page 4

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

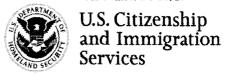
Chief, Immigrant Investor Program

Miles Colmi

cc: Lincoln Stone

Stone Grzegorek & Gonzalez LLP 800 Wilshire Boulevard, Suite 900 Los Angeles, CA 90017

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131M Street NE, MS 2235 Washington, DC 20529



October 6, 2015

Lewis Laskin American National Immigration and Education Center LLC (AMNIEC) 1629 K Street NW, Suite 300 Washington DC 20006

Application: Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s): American National Immigration and Education Center LLC (AMNIEC)

Re: Initial Regional Center Designation

American National Immigration and Education Center LLC (AMNIEC)

RCW1435252134/ID1435252134

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 18, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate American National Immigration and Education Center LLC (AMNIEC) as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

American National Immigration and Education Center LLC (AMNIEC)

ID 1435252134

RCW1435252134

Page 2

A. Geographic Area

State	Counties	Cities
District of		
Columbia		1
Maryland	Ann Arundel; Baltimore; Calvert; Carroll; Charles; Frederick; Harford; Howard; Montgomery; Prince George's; Queen Anne's and St Mary's	Baltimore
Virginia	Arlington; Clarke; Culpeper; Fairfax, Fauquier, Frederick; Loudoun, Stafford, Warren; Prince William and Spotsylvania	Alexandria; Fairfax; Falls Church; Fredericksburg; Manassas; Manassas Park and Winchester
West Virginia	Hampshire and Jefferson	

B. Industry Categories¹

NAICS	Industry Name
2362	Residential Building Construction
4232	Furniture & Home Furnishings Merchant Wholesale
7211	Traveler Accommodations
4234	Professional & Commercial Equipment & Supplies Merchant Wholesaler
4236	Household Appliances & Electrical & Electrical Goods Merchant
	Wholesaler

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

American National Immigration and Education Center LLC (AMNIEC) ID 1435252134 RCW1435252134 Page 3

filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Bluegrass International Fund Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

American National Immigration and Education Center LLC (AMNIEC) ID 1435252134 RCW1435252134 Page 4

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

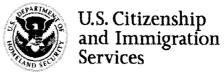
cc: Marianna Tarantur

C/O Wright Johnson Ltd

197 S Federal Highway, Suite 200

Boca Raton, FL 33432

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



October 5 2015

Jody R. Jordahl Invest CNMI, LLC Micro Beach Road, PMB 29 Box 10001 Saipan, MP 96950

Application:

Form I-924, Application for Regional Center under the Immigrant Investor

Pilot Program

Applicant(s):

Invest CNMI, LLC

Re:

Initial Regional Center Designation

Invest CNMI, LLC

RCW1435352159 / ID1435352159

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 19, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Invest CNMI, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
Commonwealth of	Saipan
Northern Mariana	
Islands (MP)	

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant
	Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant
	Wholesalers
5413	Architectural, Engineering, and Related Services
7211	Traveler Accommodations
7225	Restaurants and Other Eating Places

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Invest CNMI, LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

_

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Invest CNMI, LLC ID1435352159 RCW1435352159 Page 3

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of</u> Ho. 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities

Invest CNMI, LLC ID1435352159 RCW1435352159 Page 4

related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

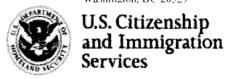
Milely Columnia

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Martin J. Lawler

1 Post Street, Suite 475 San Francisco, CA 94104



Date: 10/06/2015

Juan Wu AGC New York Regional Center, LLC 6525 Morrison Blvd., Suite 402 Charlotte, NC 28211

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

AGC New York Regional Center, LLC

Re:

Initial Regional Center Designation AGC New York Regional Center, LLC RCW1435352156 / ID1435352156

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 12/19/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate AGC New York Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

Name of States	Counties
New York	Bronx, Dutchess, Kings, Nassau, New York, Orange, Putnam,

AGC New York Regional Center, LLC ID1435352156 RCW1435352156 Page 2

	Queens, Richmond, Rockland, Suffolk, Ulster, and Westchester
	Counties.
Connecticut	Fairfield, Litchfield and New Haven Counties.
Pennsylvania	Carbon, Lehigh, Monroe, Northampton and Pike Counties.
New Jersey	Bergen, Essex, Hudson, Hunterdon, Mercer, Middlesex, Monmouth,
	Morris, Ocean, Passaic, Somerset, Sussex, Union and Warren
	Counties.

B. Industry Categories¹

NAICS	Industry Name
236	Construction of Buildings
4232	Furniture and Home Furnishing Merchant Wholesalers
7211	Traveler Accommodation
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the

¹USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

AGC New York Regional Center, LLC ID1435352156 RCW1435352156 Page 3

evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the AGC New York Regional Center, LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho. 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

AGC New York Regional Center, LLC ID1435352156 RCW1435352156 Page 4

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Milele Columnia

Nicholas Colucci

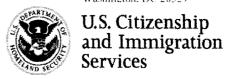
Chief, Immigrant Investor Program

AGC New York Regional Center, LLC ID1435352156 RCW1435352156 Page 5

cc:

Marianna Tarantur, Esq. Wright Johnson, Ltd. 197 S. Federal Hwy, Suite 200 Boca Raton, FL 33432

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



October 2, 2015

Jason Chi-Cheng Cheng American EB-5 Properties Regional Center, LLC 2025 Lincoln Highway Suite 220 Edison, NJ 08817

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

American EB-5 Properties Regional Center, LLC

Re:

Initial Regional Center Designation

American EB-5 Properties Regional Center, LLC

RCW1435652190/ID1435652190

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 22, 2014 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate American EB-5 Properties Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties		
States of New	New York County, Bronx County, Richmond County, Kings County,		
York, Connecticut	Queens County, Westchester County, Rockland County, Putnam		
and New Jersey	County, Dutchess County, Orange County, Ulster County, Nassau		
	County, Suffolk County, Litchfield County, New Haven County,		
	Fairfield County, Bergen County, Essex County, Hudson County,		
	Morris County, Passaic County, Sussex County, Union County		

B. Industry Categories¹

NAICS Code	Industry
2361	Residential Building Construction
2362	Residential Building Construction
5413	Architectural and Engineering
5311	Lessors of Real Estate

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

American EB-5 Properties Regional Center, LLC RCW1435652190/ID1421251834 Page 3

than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the American EB-5 Properties Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

American EB-5 Properties Regional Center, LLC RCW1435652190/ID1421251834 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Milely Columnia

Nicholas Colucci

Chief, Immigrant Investor Program

American EB-5 Properties Regional Center, LLC RCW1435652190/ID1421251834 Page 5

cc:

Mehreen Shah, Esq. Mona Shah and Associates PLLC 299 Broadway, Suite 1005 New York, NY 10007

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* 131 M Street, NE. Mailstop 2235 Washington, DC 20529



October 1, 2015

Angelique Brunner EB 5 Capital-Texas Regional Center 6106 Macarthur Blvd., Suite 104 Bethesda, MD 20816

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

EB 5 Capital-Texas Regional Center

Re:

Initial Regional Center Designation EB 5 Capital Texas Regional Center RCW1435852255/ID1435852255

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 24, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB 5 Capital-Texas Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities		
	Travis, Bastrop, Caldwell, Hays, Williamson, Harris, Fort Bend, Galveston, Montgomery, Colorado, Austin, Brazoria, Chambers		
Texas			
	Liberty, Waller, Fayette, and Wharton		

B. Industry Categories¹

NAICS	Industry Name		
2362	Nonresidential Building Construction		
4232	Furniture and Home Furnishing Merchant Wholesalers		
	Household Appliances, and Electrical, and Electrical Goods Merchant		
4234	Wholesalers		
4236	Professional, and Commercial Equipment, and Supplies Merchant Wholesalers		
7211	Traveler Accommodations		

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB 5 Capital-Texas Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely.

Nicholas Colucci

Chief, Immigrant Investor Program

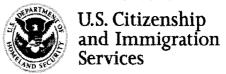
Miles Colmi

cc: Marianna Tarantur, Esq. Wright Johnson Ltd 197 South Federal Highway, Suite 200

Boca Raton, FL 33432

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



08/18/2015

Joseph Walsh North Atlantic Regional Center, LLC 197 S. Federal Hwy, Suite 200 Boca Raton, FL 33432

Application: Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s): North Atlantic Regional Center, LLC

Re: Initial Regional Center Designation

North Atlantic Regional Center, LLC RCW1420251819 / ID1420251819

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 07/21/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate North Atlantic Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the "95 Rockwell Place Investors, LP" project based on the evidence submitted.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities			
New York	Kings	Queens	New York	Bronx
	Richmond	Westchester	Rockland	Suffolk
	Nassau	Putnam		
New Jersey	Bergen	Hudson	Middlesex	Monmouth
	Ocean	Passaic	Essex	Union
	Morris	Somerset	Sussex	Hunterdon
Pennsylvania	Pike			

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers
7211	Traveler Accommodation

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an exemplar Form I-526.

Type of Project	Organization Documents	Date of Document
Exemplar	Business Plan	06/10/2014
Form	Economic Analysis	06/04/2014
Petition Project		
	Project Exemplar Form I-526 Petition	ProjectExemplarBusiness PlanFormEconomic AnalysisI-526Petition

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS	Industry Name	Input Multiplier Jobs
23	Construction	-
42	Wholesale Trade	
7211	Traveler Accommodation	-
Total Jobs	:	

(b)(4)

The approval of this Form I-924 application supported by an exemplar Form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on "95 Rockwell Place Investors, LP" project

Each individual petition, in order to demonstrate that it is affiliated with the North Atlantic Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. <u>Legal Notice</u>

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci Chief, Immigrant Investor Program

Milalos Coloni

cc: David Derrico

197 S. Federal Hwy, Suite 200

Boca Raton, FL 33432

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



August 17, 2015

Jefferson D. Simmons Miami Film Regional Center 318 NW 23rd Street Miami, FL 33127

Application: Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s): Miami Film Regional Center, LLC

Re: Initial Regional Center Designation

Miami Film Regional Center, LLC RCW1335751407/ID1335751407

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 23, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Miami Film Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities
Florida	Miami-Dade
Annual Principles - 1997 (Annual Principles & Company) (Annual Principles & Princip	Broward

Miami Film Regional Center ID1335751407 RCW1335751407 Page 2

B. Industry Categories¹

Industry Category	NAICS
Motion Picture and Video Industries	5121
Television Broadcasting	51512
Cable and Other Subscription Programming	5152
Advertising, Public, and Related Services	5418

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Miami Film Regional Center, LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Miami Film Regional Center ID1335751407 RCW1335751407 Page 3

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New

Miami Film Regional Center ID1335751407 RCW1335751407 Page 4

Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dbs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

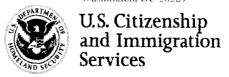
cc: Mr. Michael Harris

HarrisLaw, P.A.

100 Biscayne Blvd. Suite 2301

Miami, FL 33132

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



Date: 08/14/2015

Mel Jiganti Sunpin Massachusetts Regional Center, LLC 1 North La Salle St., Suite 1515 Chicago, IL 60602

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

Sunpin Massachusetts Regional Center, LLC

Re:

Initial Regional Center Designation

Sunpin Massachusetts Regional Center, LLC RCW1422351846 / ID1422351846

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 08/11/14. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Sunpin Massachusetts Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties	
Massachusetts	Berkshire	Franklin
	Hampden	Hampshire
	Worcester	

Sunpin Massachusetts Regional Center, LLC ID1422351846 RCW1422351846 Page 2

B. Industry Categories¹

NAICS	Industry Name
2382	Building Equipment Contractors
2211	Electric Power Generation, Transmission and Distribution
3359	Other Electrical Equipment and Component Manufacturing

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Sunpin Massachusetts Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Sunpin Massachusetts Regional Center, LLC ID1422351846 RCW1422351846 Page 3

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30^{th} of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29^{th} of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and

Sunpin Massachusetts Regional Center, LLC ID1422351846 RCW1422351846 Page 4

activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <a href="https://doi.org/10.1007/journal.org/10.1007/

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Coloni

CC:

Thomas D. Rosenberg

RKJ Legal, LTD.

1 N. La Salle St., Suite 1515

Chicago, IL 60602



August 21, 2015

Douglas Hughes Texas Mining & Resource Regional Center, LLC 5050 Quorum Drive, Suite 700 Dallas, TX 75254

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Texas Mining & Resource Regional Center, LLC

Re:

Initial Regional Center Designation

Texas Mining & Resource Regional Center, LLC

RCW1430151945 / RC-ID1430151945

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 28, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Texas Mining & Resource Regional Center, LLC ("TMRRC") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Texas Mining & Resource Regional Center, LLC RCW1430151945 / RC-ID1430151945 Page 2

A. Geographic Area

		Counties	
State of Texas	Dallas	Kaufman	Wood Rain
	Henderson	VanZandt	

B. Industry Categories¹

Industry Category	NAICS code
Support Activities for Mining	2131
Machinery Equipment & Supplies Merchant Wholesalers	4238
Architectural, Engineering & Related Services	5413
Nonmetallic Mineral Mining and Quarrying	2123

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Texas Mining & Resource Regional Center, LLC RCW1430151945 / RC-ID1430151945 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the TMRRC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

Texas Mining & Resource Regional Center, LLC RCW1430151945 / RC-ID1430151945 Page 4

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

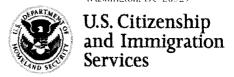
Chief, Immigrant Investor Program

cc: Marianna Tarantur

Milals Colmi

197 S Federal Hwy, Ste. 200

Boca Raton, FL 33432



September 30, 2015

Jason Chi-Cheng Cheng c/o Mehreen Shah, Esq. Mona Shah and Associates PLLC 299 Broadway, Suite 1005 New York, NY 10007

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): American EB-5 Properties Regional Center, LLC

Re: Initial Regional Center Designation

American EB- 5 Properties Regional Center, LLC

RCW1435652190/ID1435652190

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 24, 2014 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate American EB- 5 Properties Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities
States of New York, Connecticut and New Jersey	New York County, Bronx County, Richmond County, Kings County, Queens County, Westchester County, Rockland County, Putnam County, Dutchess County, Orange County, Ulster County, Nassau County, Suffolk County, Litchfield County, New Haven County, Fairfield County, Bergen County, Essex County, Hudson County, Morris County, Passaic County, Sussex County, Union County

B. Industry Categories¹

NAICS Code	Industry
2361	Residential Building Construction
2362	Residential Building Construction
5413	Architectural and Engineering
5311	Lessors of Real Estate

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area TMwill be permissible prior to filing Form I-526 petitions.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the American EB-5 Properties Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is

American EB- 5 Properties Regional Center, LLC RCW1435652190/ID1435652190 Page 4

available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

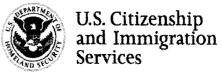
Miles Coloni

cc: Mehreen Shah, Esq.

American EB- 5 Properties Regional Center, LLC RCW1435652190/ID1435652190 Page 5

Mona Shah and Associates PLLC 299 Broadway, Suite 1005 New York, NY 10007

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



September 24, 2015

Angelique G. Brunner EB 5 Capital-Texas Regional Center 6106 Macarthur Blvd., Suite 104 Bethesda, MD 20816

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

EB 5 Capital-Texas Regional Center

Re:

Initial Regional Center Designation EB 5 Capital-Texas Regional Center RCW1435852255/ID1435852255

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 24, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB 5 Capital-Texas Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities
Texas	Travis, Bastrop, Caldwell, Hays, Williamson, Harris, Fort Bend, Galveston, Montgomery, Colorado, Austin, Brazoria, Chambers Liberty, Waller, Fayette, and Wharton

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
	Household Appliances, and Electrical, and Electrical Goods Merchant
4234	Wholesalers
4236	Professional, and Commercial Equipment, and Supplies Merchant Wholesalers
7211	Traveler Accommodations

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB 5 Capital-Texas Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A

Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

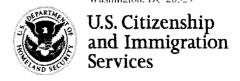
Milalos Colmi

EB 5 Capital-Texas Regional Center ID1435852255 RCW1435852255 Page 5

Marianna Tarantur cc:

Wright Johnson Ltd

197 South Federal Highway, Suite 200 Boca Raton, FL 33432



August 21, 2015

Daniel Healy Civitas Las Vegas Regional Center 1601 Bryan Street, Suite M-200 Dallas, TX 75201

Application: Form I-924, Application for Regional Center under the

Immigrant Investor Pilot Program

Applicant(s): Civitas Las Vegas Regional Center

Re: Request to Amend Regional Center Designation

Civitas Las Vegas Regional Center RCW1428851922 / ID1331251278

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 15, 2014. The Form I-924 application was filed to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the additional geographic area to include those areas listed in Section III of this notice.

II. Procedural History

On May 16, 2014, USCIS approved the Civitas Las Vegas Regional Center ("CLVRC") for participation in the Immigrant Investor Program as a designated regional center. Based on the initial designation CLVRC obtained approval for the following geographic area, industry categories

Geographic Area		
State	Counties	Approval Date
Nevada	Clark County	05/16/2014

Industry Categories		
NAICS	Industry Name	Approval Date
5416	Management Scientific & Technical Consulting Services	05/16/2014
236	Construction Of Buildings	05/16/2014
423	Merchant Wholesalers Durable Goods	05/16/2014
5413	Architectural Engineering & Related Services	05/16/2014
531320	Offices Of Real Estate Appraisers	05/16/2014
541191	Title Abstract & Settlement Offices	05/16/2014
5411	Legal Services	05/16/2014
5418	Advertising Public Relations & Related Services	05/16/2014
5311	Lessors Of Real Estate	05/16/2014

An amendment request is required if investment opportunities arise that are outside the previously approved geographic area, industry categories, and capital investment projects. If changes are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the new evidence to ensure compliance with EB-5 program requirements.

III. Amendment Request¹

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following change(s):

A. Geographic Area

USCIS approves the applicant's amendment request to include the following geographic area:

State	Counties		
Arizona	Coconino County	Mohave County	Pinal County
[Maricopa County	Pima County	Yavapal County

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Civitas Las Vegas Regional Center RCW1428851922 / ID1331251278 Page 3

IV. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with CLVRC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the

Civitas Las Vegas Regional Center RCW1428851922 / ID1331251278 Page 4

requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).

4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

Civitas Las Vegas Regional Center RCW1428851922 / ID1331251278 Page 5

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

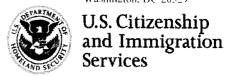
Nicholas Colucci

Chief, Immigrant Investor Program

Milalos Colmi

cc: Lincoln Stone

Stone Grzegorek and Gonzalez 800 Wilshire Blvd., Ste. 900 Los Angeles, CA 90017



August 19, 2015

Thomas Wang
G & CW Regional Center, LLC
C/O: G&CW Realty Development Regional Center, LLC
34-30 Collins Place
Flushing, NY 11354

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

G & CW Regional Center, LLC

Re:

Initial Regional Center Designation G & CW Regional Center, LLC RCW1310651124 / ID1310651124

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on April 15, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate the G & CW Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Countles
New York	Bronx, Kings, New York, Queens, Richmond

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
7211	Traveler Accommodation
7225	Restaurants and Other Eating Places
812199	Other Personal Care Services
4421	Furniture Stores
4422	Home Furnishings Stores
4431	Electronics and Appliance Stores
4451	Grocery Stores
4452	Specialty Food Stores
4461	Health and Personal Care Stores
4481	Clothing Stores
4482	Shoe Stores
4483	Jewelry, Luggage, and Leather Goods Stores
4511	Sporting Goods, Hobby, and Musical Instrument Stores
4512	Book Stores and News Dealers
4529	Other General Merchandise Stores
4531	Florists
4539	Other Miscellaneous Store Retailers
6211	Offices of Physicians
6212	Offices of Dentists
6213	Offices of Other Health Practitioners

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the G & CW Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent

to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

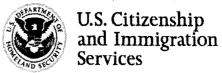
Nicholas Colucci

Chief, Immigrant Investor Program

cc: Anibal Sanchez

Darren Silver & Associates, LLP 3699 Wilshire Blvd., Ste. 600 Los Angeles, CA 90010

G & CW Regional Center, LLC 37-06 Prince Street, 2nd Floor Flushing, NY 11354



August 18, 2015

Junmin Li American United EB-5 Regional Center 805 SW Broadway, Suite 2080 Portland, OR 97205

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

American United EB-5 Regional Center ("AURC")

Re:

Request to Amend Regional Center Designation American United EB-5 Regional Center ("AURC")

RCW1421651839 / RC-ID1031910044

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on August 4, 2014. The Form I-924 application was filed to request approval of an amendment to an approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the additional geographic area to include the areas listed in Section III of this notice.

II. Procedural History

On June 9, 2011, USCIS approved the American United EB-5 Regional Center ("AURC") for participation in the Immigrant Investor Program as a designated regional center. Based on the initial designation and subsequently approved designation amendments, AURC obtained approval for the following geographic area, industry categories.

Geographic Area

State	Counties/Cities	Approval Date
Oregon	All	06/09/2011
Washington	All	09/23/2013

American United EB-5 Regional Center RCW1421651839 / RC-ID1421651839 Page 2

Industry Categories

NAICS	Industry Name	Approval Date
31-33	Manufacturing	06/09/2011
44-45	Retail Trade	06/09/2011
54	Professional, Scientific & Technical Services	06/09/2011
61	Education Services	06/09/2011
62	Health Care & Social Assistance	06/09/2011
72	Accommodation & Food Services	06/09/2011
2361	Residential Building Construction	09/23/2013
2362	Non-residential Building Construction	09/23/2013
2379	Other Heavy & Civil Engineering Construction	09/23/2013
5121	Motion Picture & Video Industries	09/23/2013
5311	Lessors of Real Estate	09/23/2013
5313	Activities Related to Real Estate	09/23/2013
7139	Other Amusement & Recreation Industries	09/23/2013

An amendment request is required if investment opportunities arise that are outside the previously approved geographic area, industry categories, and capital investment projects. If changes are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the new evidence to ensure compliance with EB-5 program requirements.

III. Amendment Request¹

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following change(s):

Geographic Area

USCIS approves the applicant's request to include the following geographic area:

State	Counties/Cities
California	All

IV. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

American United EB-5 Regional Center RCW1421651839 / RC-ID1421651839 Page 3

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with AURC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

American United EB·5 Regional Center RCW1421651839 / RC-ID1421651839 Page 5

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Coloni

cc: Timothy Knowles

TD Knowles & Associates

1200 Old Fairhaven Parkway, Ste. 203

Bellingham, WA 98225

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



August 13, 2015

Mr. Samuel Silverman 3801 PGA Blvd., Suite 902 Palm Beach Gardens, FL 33410

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

EB5 Affiliate Network New York/Tri-State Regional Center

Re:

Initial Regional Center Designation

EB5 Affiliate Network New York/Tri-State Regional Center, LLC

RCW1404251680/ID1404251680

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on January 21, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Affiliate Network New York/Tri-State Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

EB5 Affiliate Network New York/Tri-State Regional Center, LLC ID1404251680 RCW1404251680 Page 2

A. Geographic Area

State	Counties/Cities
New York	Dutchess, Kings, New York, Nassau, Orange,
	Putnam, Queens, Bronx, Richmond, Suffolk, Sullivan, Ulster, Westchester

State	Counties/Cities
New Jersey	Bergen, Essex, Ocean, Mercer, Middlesex, Monmouth, Somerset, Union,
	Hudson, Hunterdon, Morris, Passaic, Sussex, Warren

State	Counties/Cities
Connecticut	New Haven, Fairfield, Litchfield

B. Industry Categories¹

NAICS	Industry Name
722511	Full-Service Restaurants
236116	Multi-Family Housing Construction

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

EB5 Affiliate Network New York/Tri-State Regional Center, LLC ID1404251680 RCW1404251680 Page 3

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Affiliate Network New York/Tri-State Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is

EB5 Affiliate Network New York/Tri-State Regional Center, LLC ID1404251680 RCW1404251680 Page 4

available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

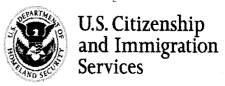
Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street, NE Washington, DC 20529



To: Brian Garcia Regional Center of South Florida 1221 Brickell Ave Suite 1200 Miami, FL 33131 DATE: August 11, 2015

RCID#: **ID**1031910166

RE: Reaffirmation of Regional Center Designation

DECISION

This notice is in reference to the regional center designation of Regional Center of South Florida ("RCSF"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on December 14, 2009. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395").¹ Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On June 15, 2015, USCIS notified RCSF of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to promote economic growth in the geographic area and the industries for which the regional center designation was approved. The Notice of Intent to Terminate ("NOIT") provided RCSF an opportunity to offer evidence in opposition to the grounds alleged in the NOIT.

On July 23, 2015, in response to the NOIT, USCIS received evidence from RCSF of preliminary evidence demonstrating that RCSF has now begun its effort to select and sponsor a hotel project. After considering the evidence, USCIS reaffirms the existing regional center designation for RCSF until it processes the Form I-924 for 2015, when USCIS shall re-evaluate the progress made by RCSF.

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

Sincerely,

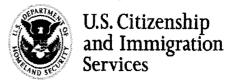
Nicholas Colucci

Melo Colmi

Chief

Immigrant Investor Program Office

U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street, NE Washington, DC 20529



August 11, 2015

Stanley Jackson Anacostia Regional Center 1800 Martin Luther King Ave., SE Washington, DC 20020

RE: Reaffirmation of Regional Center Designation RC ID#: 1031910104

DECISION

This notice is in reference to the regional center designation of Anacostia Regional Center ("the Regional Center"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on June 25, 2009. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395"). Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On June 18, 2015, USCIS notified the Regional Center of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to continue to promote economic growth (including increased export sales, improved regional productivity, job creation, and increased domestic capital investment). The Notice of Intent to Terminate ("NOIT") provided the Regional Center an opportunity to offer evidence in opposition to the grounds stated in the NOIT.

On July 21, 2015, in response to the NOIT, the Regional Center submitted evidence to USCIS of its various efforts to promote economic growth. After considering the evidence, USCIS reaffirms the existing regional center designation for the Regional Center.

Sincerely,

Nicholas Colucci

Mels Colmi

Chief

Immigrant Investor Program Office

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

cc: Larry J. Behar

Behar Law Group

888 Southeast Third Avenue, Suite 400

Fort Lauderdale, FL 33316

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* 131 M Street. NE. Mailstop 2235 Washington, DC 20529



August 11, 2015

Peter F. Riley C/O Howard Hughes New York Regional Center, LLC 1999 Water Street, 31st Floor New York, NY 10038

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Howard Hughes New York Regional Center, LLC

Re: Initial Regional Center Designation

Howard Hughes New York Regional Center, LLC

RCW1420951827 / ID1420951827

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 7, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Howard Hughes New York Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Howard Hughes New York Regional Center, LLC ID1420951827 RCW1420951827 Page 2

A. Geographic Area

State	Counties	
New York	New York	

B. Industry Categories¹

NAICS Codes	NAICS Description	
2361	Residential Building Construction	
2362	Nonresidential Building Construction	
4232	Furniture and Home Furnishing Merchant Wholesalers	
5311	Lessors of Real Estate	
5312	Offices of Real Estate Agents and Brokers	
5413	Architectural, Engineering, and Related Services	
7113	Promoters of Performing Arts, Sports, and Similar Events	
7211	Traveler Accommodation	
7224	Drinking Places (Alcoholic Beverages)	
7225	Restaurants and Other Eating Places	
8139	Business, Professional, Labor, Political, and Similar Organizations	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Howard Hughes New York Regional Center, LLC ID1420951827 RCW1420951827 Page 3

evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Howard Hughes New York Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Howard Hughes New York Regional Center, LLC ID1420951827 RCW1420951827 Page 4

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

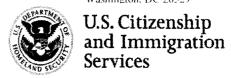
Chief, Immigrant Investor Program

Milels Colmi

cc: Ms. Linda Lau

Howard Hughes New York Regional Center, LLC ID1420951827 RCW1420951827 Page 5

C/O Global Law Group 909 El Centro Street, Ste. 1 South Pasadena, CA 91030



August 5, 2015

John Gordon 11100 Santa Monica Blvd. Suite 850 Los Angeles, CA 90025

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

ADC Colorado RC, LLC

Re:

Initial Regional Center Designation

ADC Colorado RC, LLC

RCW1419651806 / RC-ID1419651806

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 15, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate ADC Colorado RC, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

Counties State of				
Coloredo	Adams	Arapahoe	Boulder	Denver
VVIOLAGY	Douglas	El Paso	Jefferson	Larimer

B. Industry Categories¹

Industry Category	NAICS code
Non-residential Building Construction	236200
Architectural, Engineering &Related Services	541300
Lessors of Real Estate	5311

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the ADC Colorado RC, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho. 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

ADC Colorado RC, LLC RCW1419651806 / RC-ID1419651806 Page 4

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

cc: Steve Qi

388 E. Valley Blvd. Alhambra, CA 91801

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* 131 M Street, NF. MS 2235 Washington, DC 20529



August 5, 2015

Tom Rosenfeld Pennsylvania DCED Regional Center 1500 Market Street, 2600 Centre Square West Philadelphia, PA 19102

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

Pennsylvania DCED Regional Center

ID1031910137

Re:

Request to Amend Regional Center Designation

Project: Pennsylvania Regional Center, LP VIII

RCW1416851781

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on June 17, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Pennsylvania Regional Center, LP VIII project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Pennsylvania Regional Center, LP VIII will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least obs. USCIS will give

(b)(4)

Pennsylvania DCED Regional Center ID1031910137 RCW1416851781 Page 2

deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Pennsylvania Regional Center, LP VIII project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On April 13, 2007, USCIS approved the Pennsylvania Department of Community and Economic Development Regional Center ("PDCED") for participation in the Immigrant Investor Program as a designated regional center. Based on the initial designation and subsequently approved amendments, the PDCED obtained approval for the following geographic areas and industry categories:

State	Counties	Approval Date
	Erie, Crawford, Mercer, Venango,	
	Lawrence, Butler, Clarion, Beaver,	
	Armstrong, Allegheny, Indiana,	
Pennsylvania	Westmoreland, Washington, Greene,	04/13/2007
	Fayette, Somerset, Cambria, Blair,	
	Bedford, Warren, Forest, Jefferson	
	Clearfield	
	Fulton, Franklin, Cumberland, Adams,	
	York, Lancaster, Chester, Delaware,	
	Montgomery, Bucks, Berks, Lehigh,	
Pennsylvania	Northampton, Schuylkill, Carbon,	09/08/2008
	Luzerne, Monroe, Pike, Lackawanna,	
	Wayne	

NAICS	Industry Name	Approval Date	
482000	Agriculture and Food Production	04/13/2007	
524114	Health Services	04/13/2007	
611310	Higher Education	04/13/2007	
321991	Leasehold Improvements of Commercial Office Space	04/13/2007	
Not Applicable	Manufacturing and Trade	04/13/2007	
921110	Technology	04/13/2007	
561591	Tourism and Hospitality 04/13/2007		
926120	Transportation 04/13/2007		
331421	Cooper Manufacturing 07/15/2013		
236210	Industrial Building Construction 07/15/2013		

Pennsylvania DCED Regional Center ID1031910137 RCW1416851781 Page 3

III. Amendment Request¹

USCIS approves the applicant's amendment request to include the following industry categories:

NAICS	Industry Name
236220	Commercial and Institutional Building Construction
721110	Hotels (except Casino Hotels) and Motels
531312	Nonresidential Property Managers

IV. Pennsylvania Regional Center LP, VIII Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
Pennsylvania	Hotel & Office	Comprehensive Business Plan	06/07/2014
Regional Center	Building	Economic Analysis	03/13/2014
LP, VIII		Confidential Information Memorandum	03/13/2014
Geographic Location:	Investment: EB-5, Equity,	Confidential Information Memorandum Supplement	03/13/2014
Lehigh, PA	Loans, Grants	Subscription Agreement	08/14/2014
Exemplar Form I-526 Petition		Escrow Agreement	12/10/2013 (01/29/201 signed)
Project		Limited Partnership Agreement	03/14/2014
		Servicing Agreement	03/12/2014
		Agreement of Sale	10/17/2013
		Loan & Security Agreement	03/14/2014
		Hotel Deed	05/03/2013
		Lease Agreements	04/03/2014
		Consulting Services Agreement	08/21/2013
		Hotel Franchise Agreement	10/25/2013
		Construction Service Agreement	04/01/2014
		Second Facility Modification	01/07/2014
		Agreement	
		Shareholder Agreement	08/30/2012

_

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment identifies the NCE of the proposed project as Pennsylvania Regional Center LP, VIII_which was formed in the State of Pennsylvania on March 26, 2010. Pennsylvania Regional Center LP, VIII_project is located within a targeted employment area (TEA) in the City of Allentown, Pennsylvania. Approximately EB-5 investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of (b)(4)

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the IMPLAN economic model:

NAICS 2	Industry Name	Input (\$Millions)	Direct Employment Multiplier	Total Indirect/ Induced Multiplier
236220	Commercial and Institutional Building			
230220	Construction			
	Hard Costs			
	Soft Costs			
	FF&E			
721110	Hotels, Resort without Casinos			
	Hotel Operations			
	Restaurants			
Total Hotel Jok)g:			

(b)(4)

NAICS 4	Industry Name	Input (\$Millions)	Direct Employment Multiplier	Total Indirect/ Induced Multiplier
236220	Commercial and Institutional Building			
230220	Construction	_		
721110	Hotels, Resort without Casinos			
	Rental Income			
	Retail			
Total Office Jo	bs:			

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using IMPLAN multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately direct, indirect, and induced jobs from construction and hotel operation activities associated with the Pennsylvania Regional Center LP, VIII project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with Pennsylvania Regional Center LP, VIII project. Deference,

(b)(4)

² These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

³ For complete list of multipliers, eligible/non-eligible jobs and individual industry category revenue, see USCIS approved Economic Impact Analysis, dated March 13, 2014.

⁴ Ibid., footnote 2

⁵ Ibid., footnote 3

however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the Pennsylvania Regional Center, LP, VIII project</u>

Each individual petition, in order to demonstrate that it is affiliated with the Pennsylvania DCED Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

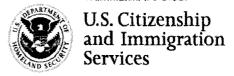
Chief, Immigrant Investor Program

Miles Coloni

cc: Tom Rosenfeld

CanAm Enterprises, LLC 88 Pine Street, Suite 2010 New York, NY 10005

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



August 12, 2015

JOSEPH DIFRANCESCO C/O 3D FUTURE VISION II, INC. 2005 TREE FORK LANE, UNIT 109 LONGWOOD, FL 32750

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): IZON LLC.

Re: Initial Regional Center Designation

Izon LLC.

RCW1410851738 / RC ID1410851738

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on April 18, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Izon LLC. as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the 3D Future Vision II, Inc. project based on the evidence submitted with the exemplar Form I-526.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	County
South Carolina	Marlboro

B. Industry Categories¹

NAICS	Industry Name
33431	Audio and Video Equipment Manufacturing

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an exemplar Form I-526.

Project	Type of Project	Organization Documents	Date of Document
3D Future Vision II, LLC	Exemplar Form	NCE's 3D Future Vision II, LLC Private Placement Memorandum	Dated: January 2015
	I-526	I-526 Petition (Exemplar Form)	Dated: 4/11/2014
Geographic	Petition	3D Future Vision II, Inc.	Submitted: 5/11/2015
Location:	Project	Subscription Agreement	
Marlboro County,		Economic Impact Study	Exhibits 12-37
South Carolina		3D Future Vision II Business Plan	Dated: January 2014
Focus of		1 1011	
Investment:			
Equity			

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

The proposal identifies the new commercial enterprise ("NCE") of the project as 3D Future Vision II, LLC, which was formed in the State of Florida on March 7, 2011. The project is located at 1120 Oakwood Street in the City of Bennetsville, South Carolina. Up to immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of leach and an aggregate of leach and an aggregate of leach and leach	F)

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the [RIMS II] economic model:

NAICS	Industry Name	Direct Jobs	Indirect Jobs	Total Jobs	
33431	Audio and Video Equipment Manufacturing				(b)(4)
Total Jobs:					

The approval of this Form I-924 application supported by an exemplar Form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of

conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on 3D Future Vision II, Inc. project

Each individual petition, in order to demonstrate that it is affiliated with the Izon, LLC., in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

cc: Christopher Fontana

C/O Law Offices of Fontana and Associates P.A.

6590 Swissco Dr., Ste. 2 Orlanda, FL 32822

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

U.S. Citizenship and imingration Service Immigrant Investor Program Mailstop 2235 Washington, DC 20529



Date: 08/12/2015

Stephen Steele USCFID Georgia LLC 1266 W Paces Ferry 142 Atlanta, GA 30327

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

USCFID Georgia LLC

Re:

Initial Regional Center Designation

USCFID Georgia LLC

RCW1414351763 / ID1414351763

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 05/23/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate USCFID Georgia LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
Georgia	Entire State

USCFID Georgia LLC ID1414351763 RCW1414351763 Page 2

B. Industry Categories¹

NAICS	Industry Name
236115	New Single-Family Housing Construction (except For-Sale Builders)
236220	Commercial and Institutional Building Construction
713940	Fitness and Recreational Sports Centers

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the USCFID Georgia LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

USCFID Georgia LLC ID1414351763 RCW1414351763 Page 3

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30^{th} of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29^{th} of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and

USCFID Georgia LLC ID1414351763 RCW1414351763 Page 4

activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <a href="https://doi.org/10.1007/journal.org/10.1007/

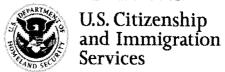
Sincerely,

Milalo Colum

Nicholas Colucci

Chief, Immigrant Investor Program

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* 131 M Street, NF. Mailstop 2235 Washington, DC 20529



August 10, 2015

Paul Zhang WDS Media Regional Center C/O: WDS Media, LLC 55 Vernal Spring Irvine, CA 92603

Application:

Form I-924, Application for Regional Center under the Immigrant Investor

Pilot Program

Applicant(s):

WDS Media Regional Center

Re:

Initial Regional Center Designation

WDS Media Regional Center RCW1414251762 / ID1414251762

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on May 22, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate WDS Media Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities	
California	All Counties/Cities	

WDS Media Regional Center ID1414251762 RCW1414251762 Page 2

B. Industry Categories¹

NAICS	Industry Name	
2362	Nonresidential Building Construction	
5312	Offices of Real Estate Agents and Brokers	
5413	Architectural, Engineering, and Related Services	
52231	Mortgage and Nonmortgage Loan Brokers	
53139	Other Activities Related to Real Estate	
722513	Limited-Service Restaurants	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the WDS Media Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

WDS Media Regional Center ID1414251762 RCW1414251762 Page 3

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no

WDS Media Regional Center ID1414251762 RCW1414251762 Page 4

determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

cc: Nima Korpivaara

Fragomen, Del Rey, Bernsen & Loewy, LLP 18401 Von Karman Avenue, Suite 255 Irvine, CA 92612

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131M Street NE, MS 2235 Washington, DC 20529



September 16, 2015

Tina Tsou C/O: Big Apple Regional Center 401 E 80th Street Apt 28K New York, NY 10075

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

Big Apple Regional Center (BARC)

Re:

Initial Regional Center Designation Big Apple Regional Center (BARC) RCW1408551717/ID1408551717

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on March 26, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Big Apple Regional Center (BARC) as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Big Apple Regional Center (BARC) ID 1408551717 RCW1408551717 Page 2

A. Geographic Area

State	Counties
New York	Bronx, Dutchess, Kings, Nassau, New York, Orange, Putnam, Queens,
New York	Richmond, Rockland, Suffolk, Westchester
NIX	Bergen, Essex, Hudson, Hunterdon, Middlesex, Monmouth, Morris,
NJ	Ocean, Passaic, Somerset, Sussex, Union
PA	Pike

B. Industry Categories¹

b. Industry Categorie	
NAICS	Industry Name
236116	New Multifamily Housing Construction
425120	Wholesale Trade Agents & Brokers
52421	Insurance Agencies & Brokerages
5411	Legal Services
5412	Accounting, Tax Preparation, Bookkeeping & Payroll Services
5413	Architectural, Engineering & Related Services
5418	Advertising, Public Relations & Related Services
5511	Management Companies & Enterprises
531210	Offices of Real Estate Agents
81293	Parking Lots & Garages

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Big Apple Regional Center (BARC) ID 1408551717 RCW1408551717 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Bluegrass International Fund Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

Big Apple Regional Center (BARC) ID 1408551717 RCW1408551717 Page 4

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

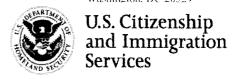
If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalos Colmi



August 18, 2015

Daniel Healy 1601 Bryan Street, Suite M·200 Dallas, Texas 75201

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Civitas Great Plains Regional Center, LLC

Re:

Initial Regional Center Designation

Civitas Great Plains Regional Center, LLC

RCW1428051906 / ID1428051906

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 7, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Civitas Great Plains Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State		Counties	
Kansas	Butler	Chase	Coffey
	Cowley	Douglas	Sedgwick
	Franklin	Johnson	Leavenworth
	Lyon	Osage	Sumner
	Wyandotte		
Missouri	Jackson		
Oklahoma	Canadian	Cleveland	Creek
	Garfield	Grady	Kay
	Kingfisher	Lincoln	Logan
	Major	McClain	Muskogee
	Noble	Oklahoma	Okmulgee
	Osage	Pawnee	Payne
	Pottawatomie	Rogers	Tulsa
	Wagoner	Washington	

B. Industry Categories¹

NAICS Code	NAICS Description
23	Construction
423	Merchant Wholesalers, Durable Goods
5311	Lessors of Real Estate
531320	Offices of Real Estate Appraisers
5411	Legal Services
541191	Title Abstract and Settlement Offices
5413	Architectural, Engineering, and Related Services
5416	Management, Scientific, and Technical Consulting Services
5418	Advertising, Public Relations, and Related Services
5419	Other Professional, Scientific, and Technical Services

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Civitas Great Plains Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

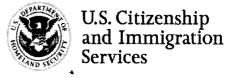
Miles Colmi

cc: Lincoln Stone

Stone Grzegorek and Gonzalez 800 Wilshire Boulevard, Ste. 900

Los Angeles, CA 90017

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Immigrant Investor Program
131 M Street. NE, Mailstop 2235
Washington, DC 20529



Date: August 4, 2015

Jordan Weinreich American Gateway Investments, LLC 45 South Park Place, Suite# 267 Morristown, NJ 07960

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): American Gateway Investments, LLC

Re: Initial Regional Center Designation

American Gateway Investments, LLC RCW1127050319 / RC-ID1127050319

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on September 27, 2011. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate American Gateway Investments, LLC ("AGI") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

States			II de C
New Jersey	Bergen County	Essex County	Hudson County

B. Industry Categories¹

Industry Category	NAICS code
New Multifamily Housing Construction	236116
Lessors of Residential Building	531110

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with AGI, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

American Gateway Investments, LLC RCW1127050319 / RC-ID1127050319 Page 3

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

American Gateway Investments, LLC RCW1127050319 / RC-ID1127050319 Page 4

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

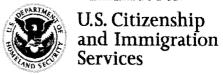
Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



09/14/2015

Patrick Hogan C/O CMB Texas LLC 7819 42nd Street West Rock Island, IL 61201

Application:

Form I-924, Application for Regional Center Under the Immigrant Investor Pilot

Program

Regional Center:

CMB Texas

ID12278850774

Re:

Request to Amend Regional Center Designation

Project: CMB Texas Infrastructure Investment Group 27, LP

RCW1435352172

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on 12/19/2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in Matter of Ho, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the CMB Texas Infrastructure Investment Group 27, LP project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the CMB Texas Infrastructure Investment Group 27, LP will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least lobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor

(b)(4)

CMB Texas, LLC ID12278850774 RCW1435352172 Page 2

associated with the CMB Texas Infrastructure Investment Group 27, LP project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On 08/06/2014, USCIS approved the CMB Texas LLC for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the State of Texas. CMB Texas LLC now seeks to amend its previously approved regional center designation to include an actual project that will be managed by CMB Texas Infrastructure Investment Group 27, LP, an NCE established on 02/05/2014

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
CMB Texas	Horizontal infrastructure	Business Plan	10/31/2014
Infrastructure	construction	Economic Analysis	10/31/2014
Investment Group		Confidential Private	07/14/2014
27, LP	Investment:	Placement Memorandum	
	Equity in partnership that	Subscription Agreement	7/14/2014
Geographic	offers loan	Limited Partnership	7/14/2014
Location:		Agreement	
State of Texas			
		Loan agreement	07/09/2014
Exemplar of Form		Private Placement	08/01/2014
I-526		Memorandum Amendments	
		Private Placement	10/08/2014
		Memorandum and Limited	
		Partnership Agreement	
		Amendments	

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment identifies the NCE of the proposed project as CMB Texas Infrastructure
Investment Group 27, LP, which was formed in the State of Texas on 02/05/2014. The project is located
within a targeted employment area (TEA) in Manvel, Texas. Approximately EB-5 investors will subscribe
to the NCE as limited partners in exchange for capital contributions ofeach and an aggregate of

RCW1435352172 Page 3			

IV. Job Creation

CMB Texas, LLC ID12278850774

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model: (b)(4)

NAICS 1	Industry Name	Input (\$Millions) Multiplier	Jobs
23	Construction		
54	Professional, scientific, and technical services		
Total Jobs:			

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

(b)(4)

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately indirect and induced jobs from hard and soft construction associated with the CMB Texas Infrastructure Investment Group 27, LP project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with CMB Texas Infrastructure Investment Group 27, LP. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

CMB Texas, LLC ID12278850774 RCW1435352172 Page 4

have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the CMB Texas Infrastructure Investment Group 27, LP project</u>

Each individual petition, in order to demonstrate that it is affiliated with the CMB Texas, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

CMB Texas, LLC ID12278850774 RCW1435352172 Page 5

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dlss.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milales Coloni

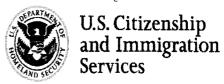
cc:

Elsie Arias Stone Grzegorek Gonzalez LLP 800 Wilshire Blvd Suite 900 Los Angeles, CA 90017

CMB Texas, LLC 7819 42nd Street West Rock Island, IL 61201

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street, NE Washington, DC 20529



DATE: September 11, 2015

RC ID#: 1102650151

TO: Debra B. Wickizer Golden Lamp Regional Center, Inc.

> First National Bank Building 480 East 400 South, Suite 201 Salt Lake City, UT 84111

RE: Reaffirmation of Regional Center Designation

DECISION

This notice is in reference to the regional center designation of Golden Lamp Regional Center, Inc. ("GLRC"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on August 23, 2011. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395").¹ Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On June 19, 2015 USCIS notified GLRC of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to report in its I-924A filings any EB-5 capital investment or job creation for fiscal years 2011, 2012, 2013, or 2014. The Notice of Intent to Terminate ("ITT") provided GLRC an opportunity to offer evidence in opposition to the grounds alleged in the ITT.

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

On July 23, 2015 and August 5, 2015, in response to the ITT, USCIS received evidence from GLRC, and after considering the evidence, USCIS reaffirms the existing regional center designation for GLRC.

Sincerely,

Nicholas Colucci

Julilo Colmi

Chief

Immigrant Investor Program Office

cc: Robert Lubin

American Investor Immigration Law, PLLC

620 Herndon Parkway, Suite 360

Herndon, VA 20170

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



July 28, 2015

Jeffery Campion Texas Urban Triangle Regional Center, LLC 1675 Market Street Suite 203 Weston, FL 33326

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

Texas Urban Triangle Regional Center, LLC

ID1108950188

Re:

Request to Amend Regional Center Designation

Project: Jefferson Madrone Lender, L.P.

RCW1420251821

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on July 21, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Jefferson Madrone Lender, L.P. project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Jefferson Madrone Lender, L.P. will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least jobs. USCIS will give

(b)(4)

deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Jefferson Madrone Lender, L.P. project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On October 14, 2011, USCIS approved the Texas Urban Triangle Regional Center ("TUTRC") for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of 40 counties within the State of Texas. On February 20, 2014, TUTRC's regional center designation was amended to include four more counties and an additional industrial category. The geographical areas and industrial classifications previously approved include the following:

A.	Geograp	hical	Areas
----	---------	-------	-------

	Counties/Cities	Counties/Cities
	Collin	Travis
	Dallas	Williamson
	Denton	Hays
	Tarrant	Bexar
	Johnson	Comal
	Ellis	Guadalupe
	Hill	Gonzales
	Navarro	Lavaca
State of Texas	Freestone	Colorado
(Approved 10/14/2011)	Limestone	Harris
The state of the page of the state of the st	Leon	Montgomery
	McLennan	Fort Bend
	Coryell	Waller
	Bell	Washington
	Falls	Grimes
	Milam	Madison
	Lee	Walker
	Brazos	Bastrop
	Robertson	Caldwell
	Burleson	Fayette

State of Texas (Approved	Counties/Cities	Counties/Cities
2/20/2014)	Galveston	Brazoria
	Chambers	Matagorda

B. Industrial Categories¹

NAICS	Industry Name	Approval Date
722	Food Services & Drinking Places	10/14/2011
721	Accommodations	10/14/2011
44-45	Retail Trade	10/14/2011
623	Assisted Living Facility	10/14/2011
23	Construction	10/14/2011
6244	Child Day Care Services	02/20/2014

TUTRC now seeks to amend its previously approved regional center designation to include an actual project that will be managed by Jefferson Madrone Lender, L.P., an NCE established on May 19, 2014.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
Jefferson Madrone	228 Unit Apartment Complex	Business Plan	07/21/2014 (as filed)
Lender, L.P.	T	Economic Analysis	05/15/2014
Geographic	Investment: Loan	Confidential Private Placement Memorandum	05/28/2014
Location: Bee Cave, TX		Subscription Agreement	07/21/2014 (as filed)
(Travis Co.)		Limited Partnership Agreement	05/19/2014
Exemplar of			
Form I-526			

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment would have the NCE, Jefferson Madrone Lender, L.P., raise from EB-5 alien investors to fund part of a planned 228 unit multifamily development in Bee Cave, Texas. The project will take place in a Targeted Employment Area in Travis County, Texas. The alien investors will subscribe to the NCE as limited partners in exchange for capital contributions of	(b)(4)

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS ²	Industry Name	Input (\$Millions)	Multiplier	Jobs	
5416	Management, Scientific, and Technical Consulting Services ³	And the state of t			
2361	Residential Building Construction				ł
423	Merchant Wholesalers, Durable Goods				/b\/4
5413	Architectural, Engineering, and Related Services				(b)(4)
5411	Legal Services				
5418	Advertising, Public Relations, and Related Services				
53111	Lessors of Residential Buildings and Dwellings				
Total Jobs:					

Note: All multipliers are for indirect jobs only.

² These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

³ These are described differently in the Applicant's economic report, Table 6, May 15, 2014, pg. 11. Here, USCIS utilizes the NAICS codes names as used by the U.S. Census Bureau.

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately indirect jobs from construction and related activities associated with the Jefferson Madrone Lender, L.P. project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with Jefferson Madrone Lender, L.P.. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the Jefferson Madrone Lender, L.P. project</u>

Each individual petition, in order to demonstrate that it is affiliated with the TUTRC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.

(b)(4)

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no

determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Milely Column

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Lillian Katherine Kalmykov

Greenberg Traurig LLP - New Jersey

200 Park Avenue

Florham Park, NJ 07932-0677

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Immigrant Investor Program
131 M Street, NE, Mailstop 2235
Washington, DC 20529



July 27, 2015

Stella Zhang C/O Farm for America, LLC 1 World Trade Center, Suite 1180 Long Beach, CA 90831

* * * * * CORRECTED APPROVAL LETTER * * * * *

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant: Farm for America, LLC

Re: Request to Amend Regional Center Designation

Farm One, LLLP

RCW1336451534 / ID1031910018

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 30, 2013. The Form I-924 application was filed to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

- A. Effective the date of this notice, USCIS approves the additional industry categories listed in Section III of this notice.
- B. Effective the date of this notice, USCIS approves the regional center's organization structure discussed in Section III of this notice.
- C. Effective the date of this notice, USCIS approves the regional center's administration discussed in Section III of this notice.

D. Effective the date of this notice, USCIS approves the Farm One, LLLP project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Farm One, LLLP will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Farm One, LLLP project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On May 2, 2011, USCIS approved the Farm for America, LLC for participation in the Immigrant Investor Program as a designated regional center. Based on the initial designation the Farm for America, LLC obtained approval for the following geographic area, industry categories.

Geographic Are	. 그 이렇지하는 그리즘 그 이 집회의 회사 이 그를 먹는 그 이 하게 되는 그 이라를 하는 때 하셨습니다. 이 가장 없었다는 그 그 이렇게 되었다.	
State	Counties/Cities	Approval Date
Washington	Benton County	May 2, 2011
	Franklin County	May 2, 2011
	Chelan County	May 2, 2011
	Klickitat County	May 2, 2011
	Douglas County	May 2, 2011
	Okanogan County	May 2, 2011
	Grant County	May 2, 2011
	Walla Walla County	May 2, 2011

Industry Categories			
NAICS	Industry Name	Approval Date	
1119	Other Farming	May 2, 2011	
1112	Vegetable Farming	May 2, 2011	

III. Amendment Request¹

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following changes:

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

A. Industry Categories

USCIS approves the applicant's amendment request to include the following industry categories:

NAICS	Industry Name
111332	Grape Vineyards
2362	Nonresidential Building Construction
72111	Hotels (except Casino Hotels) and Motels
5413	Architectural, Engineering, and Related Services
31213	Wineries
7225	Restaurants and Other Eating Places
7224	Drinking Places (Alcoholic Beverages)

B. Organizational Structure

USCIS approves the applicant's amendment request to change its organizational structure to recognize Farm for America, LLC incorporated on November 27, 2012 to carry the designation and conduct business for the regional center.

C. Administration Change

USCIS approves the applicant's amendment request to change its administration. The applicant's administration has changed with Stella Zhang as the new principal for Farms for America, LLC. Tobin Butcher, the previous principal will maintain a passive role in management of the regional center as a consultant.

D. Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
E'ritage, LLC	Vineyard Resort	E'ritage, LLC Business Plan	March 2015
		Economic Analysis	March 2015
Geographic	Investment:	Subscription Agreement for Farm	Submitted 12/30/2013
Location:	Loan	One, LLLP	
State of		Limited Partnership Agreement for	Submitted 12/30/2013
Washington		Farm One, LLLP	
		Loan agreement between Farm	11/15/2013
Exemplar of		One, LLLP and E'ritage, LLC	
Form I-526		E'ritage, LLC Business Plan	Submitted 12/30/2013

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The applicant seeks to use EB-5 capital to purchase, construct and operate a 368 acre vineyard resort in Walla Walla Washington. The vineyard resort will consist of a vineyard, commercial cottages, a restaurant, and a tourism/event center. The requested amendment identifies the NCE of the proposed project as Farm One, LLLP which was formed in the State of Washington on November 12, 2013EB-5 investors are expected to subscribe to the NCE as limited partners in exchange for capital contributions ofeach and an aggregate of	(b)(4)
]

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the IMPLAN economic model:

NAICS 2	Industry Name	Input (\$Millions)/ Direct Jobs	Multiplier	Jobs
11332	Agricultural Activities			
5413	Architecture/Engineering]		
237	Construction	<u> </u>		
2362	Building Construction	1		
5617	Landscaping			
4232, 4238	Equipment & Fixture Expenditures	<u>]</u>		
5411	Legal/accounting			
5511	Administrative	1		
5418	Marketing	1		
5416	Consulting			
447	Fuel			
111332	Vineyard/Winery	1		
7225	Full-service restaurant			
721110	Cottages			

(b)(4)

² These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

(b)(4)

	Event Center
7224	Tasting room
5511	Facility Management
Total Jobs:	
Onlyinding	at and induced inles

^{*} Only indirect and induced jobs.

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and	ł
the calculations using IMPLAN multipliers are verifiable. The applicant has shown by a	/l=\ / 4 \
F - F	(b)(4)
approximately	

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with Farm One, LLLP. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions based on the Farm One, LLLP project

Each individual petition, in order to demonstrate that it is affiliated with the Farm for America, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities,

projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,
Alle Colum

Nicholas Colucci

Chief, Immigrant Investor Program

cc:

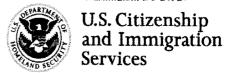
Adrian Toh

Law Office of Adrian J Toh Esq.

PO Box 80006

San Marino, CA 91118

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Immigrant Investor Program
131 M Street. NE. MS 2235
Washington, DC 20529



July 17, 2015

Jeffrey Campion Texas Urban Triangle Regional Center 1675 Market Street, Suite 203 Weston, Florida 33326

Application: Form I-924, Application for Regional Center Under the Immigrant Investor Pilot

Program

Regional Center: Texas Urban Triangle Regional Center

ID1321851187

Re: Request to Amend Regional Center Designation

Project: Jefferson Memorial Lender, L.P.

RCW1428751917

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on October 14, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in Matter of Ho, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Jefferson Memorial Lender, L.P. project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Jefferson Memorial Lender, L.P. will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Jefferson Memorial Lender, L.P. project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

(b)(4)

II. Procedural History

On October 14, 2011, USCIS approved the Texas Urban Triangle Regional Center (TURC) for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the state of Texas. TURC now seeks to amend its previously approved regional center designation to include an actual project that will be managed by Jefferson Memorial Lender, L.P., an NCE established on August 14, 2014.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
Jefferson Memorial	Exemplar	Private Placement Memorandum	October 14, 2014
Lender, L.P.	1	Subscription Agreement	October 14, 2014
Herider, Err		Jefferson Memorial Apartments, LP Corporate Documents	May 15, 2014
Geographic Location:		Jefferson Memorial Business Plan	October 14, 2014
Texas		Economic Impact Analysis	October 2, 2014
I CANO		Recorded Deed	June 11, 2014
Focus of Investment: loan/equity			

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

(b)(4)	The proposal identifies the new commercial enterprise ("NCE") of the project as Jefferson Memorial Lender, L.P., which was formed in the State of Texas on May 19, 2014. The project is located in the City of Houston, Texas. immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of teach and an aggregate of

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS 1	NAICS Description	Input (\$Millions)	Multiplier	Jobs	
5413	Architectural, Engineering, and Related				j
	Services	i			
2361	Residential Construction				
5411	Legal Services				(b)(4)
5241	Insurance Carriers				
423	Merchant Wholesales- Durable Goods			1	
5418	Advertising, Public Relations, and Related]			
	Services				
5311	Lessors of Real Estate				ł
5416	Management, Scientific, and Technical	1			
	Consulting Services	.]			
Total Jobs:					

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

USCIS has approved NAICS code 2361 in the initial application. The additional NAICS codes are approved for this project. The NAICS codes encompassed by this project include:

Industry Code	NAICS Description	
NAICS 2361	Residential Construction	
NAICS 423	Merchant Wholesales- Durable Goods	
NAICS 5241	Insurance Carriers	
NAICS 5311	Lessors of Real Estate	
NAICS 5411	Legal Services	
NAICS 5413	Architectural, Engineering, and Related Services	
NAICS 5416	Management, Scientific, and Technical Consulting	
	Services	
NAICS 5418	Advertising, Public Relations, and Related Services	

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately direct and indirect jobs from construction and rental activities associated with the Jefferson Memorial Lender, L.P. project. (b)(4)

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with Jefferson Memorial Lender, L.P. Deference, however, will not apply if the underlying facts

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions based on the Jefferson Memorial Lender, L.P. project

Each individual petition, in order to demonstrate that it is affiliated with the Texas Urban Triangle Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS.

The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

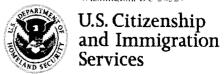
Nicholas Colucci

Chief, Immigrant Investor Program

Mals Colmi

cc: Lillian Katherine Kalmykov Greenberg Traurig LLP- New Jersey 200 Park Avenue P.O. Box 677 Florham Park, New Jersey 07932-0677

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



Date: July 17, 2015

Kevin R. Rogers Renewable Texas Energy Regional Center, LLC 17300 N. Dallas Parkway, Suite 2020 Dallas, TX 75248

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Renewable Texas Energy Regional Center, LLC

Re:

Request to Amend Regional Center Designation - Limited Decision

Renewable Texas Energy Regional Center, LLC

RCW1421351838 / ID1310651125

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on August 1, 2014. The Form I-924 application was filed to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USICS approves, in a limited decision, the Form I-924 requesting specific industry categories, geographic regions, and multiple hypothetical projects to be identified for the Regional Center's use.

II. Procedural History

On June 23, 2014, USCIS approved the Renewable Texas Energy Regional Center, LLC for participation in the Immigrant Investor Program as a designated regional center. Based on the initial designation, the Renewable Texas Energy Regional Center, LLC obtained approval for the following geographic area and industry categories.

Geographic Area			
State	Counties	Approval Date	
Texas	Armstrong, Bailey, Borden, Briscoe, Castro, Crosby, Floyd, Garza, Glasscock, Hale, Howard, Lamb, Lubbock, Midland, Parmer, Randall, Scurry, Swisher	06/23/2014	

Industry	Industry Categories				
NAICS	Industry Name	Approval Date			
2362	Nonresidential Building Construction	06/23/2014			
23713	Power and Communication Line and Related Structures				
_	Construction				
5413	Architectural, Engineering, and Related Services				
2211	Electric Power Generation, Transmission and Distribution				
33241	Power Boiler and Heat Exchanger Manufacturing				
333611	Turbine and Turbine Generator Set Units Manufacturing				
335311	Power, Distribution, and Specialty Transformer Manufacturing				

An amendment request is required if investment opportunities arise that are outside the previously approved geographic area and industry categories. If changes are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the new evidence to ensure compliance with EB-5 program requirements.

III. Regional Center Designation - Limited Decision¹

The applicant submitted its Form I-924 requesting specific industry categories, geographic regions, and multiple hypothetical projects to be identified for the Regional Center's use.

Upon review of the record, USCIS has determined that not all of the requested geographic regions provided in the Form I-924 represent an appropriate application of a hypothetical project(s) to support the industry categories, and/or geographic regions acceptable for use by the Regional Center.

As such, USCIS has concluded that a limited decision is necessary in this case. Therefore, all requested, approved, and disallowed industry categories, geographic regions, and hypothetical projects have been identified below.

USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

A. Industry Categories and Geographic Regions Requested

The applicant has requested to focus, promote economic growth, and offer capital investment opportunities in the following geographic areas and industry categories:

1. Geographic Areas – Requested

State	Counties			*
Texas	The remaining 23	6 counties of the State of	Texas	

2. Industry Categories – Requested

NAICS	Industry Name
2361	Residential Building Construction
423	Merchant Wholesalers, Durable Goods
53111	Lessors of Residential Buildings and Dwellings
5416	Management, Scientific, and Technical Consulting Services
5418	Advertising, Public Relations, and Related Services
7211	Traveler Accommodation

B. Approved Industry Categories and/or Geographic Areas

The following industry categories and/or geographic areas have been determined to represent an appropriate application of a hypothetical project to support the industry categories and geographical regions acceptable for use by the Regional Center.

1. Geographic Areas - Approved

State	Counties
Texas	Callahan, Eastland, Jones, Nolan, Shackelford, Taylor

2. Industry Categories - Approved

NAICS	Industry Name
2361	Residential Building Construction
423	Merchant Wholesalers, Durable Goods
53111	Lessors of Residential Buildings and Dwellings
5416	Management, Scientific, and Technical Consulting Services
5418	Advertising, Public Relations, and Related Services
7211	Traveler Accommodation

(b)(4)

C. Disallowed Industry Categories and/or Geographic Areas

The following industry categories and/or geographic areas have been disallowed because it has been determined that they do not represent an appropriate application of a hypothetical project to support the industry categories and geographical regions acceptable for use by the Regional Center.

State	Counties				
Гexas	All other Texas counties not mentioned above				

² Under "Initial Evidence Requirements" listed in the Form I-924 Instructions, point 2 reads, "The Regional Center must focus on a geographical area. This area must be contiguous and clearly identified in the application by providing a detailed map of the proposed geographic area of the Regional Center."

Page 5			
		······	

3. Hypothetical Projects - Disallowed

Renewable Texas Energy Regional Center, LLC

The applicant requests to include a hotel project and five multi-family projects across the state of Texas, located in the cities of Austin, Corpus Christi, Dallas-Fort Worth, El Paso, Houston, and San Antonio as new hypothetical investments. For the reasons noted above, these hypothetical projects are disallowed. The applicant's own economic impact reports assign and estimate economic benefits only within the relevant localized impact for each project. None of these localized areas are contiguous with the Regional Center's current geographical area (see footnote #2, above).

USCIS will not give deference to the business plan and the economic analysis that derived the job creation estimates with any subsequently filed individual immigrant investors' Form I-526s pertaining to the above project. USCIS will review the business plan and/or economic analysis when the Form I-526s are filed to determine if it meets EB-5 requirements.

4. Conclusion - Decision to Disallow

The decision to disallow the industry categories, geographic areas, and hypothetical projects identified above does not preclude the filing of Form I-526 petitions related to a subsequent project using the disallowed industry categories, geographic areas, and/or hypothetical project(s). Any future petitions will be adjudicated on their own merit.

There is no appeal to this decision to disallow the specified industry categories and/or geographic scope explained above. However, pursuant to 8 CFR 103.5, a motion can be filed on Form I-290B. Such motion must be accompanied by the proper fee and filed within 30 days of this notice. Form I-290B, Notice of Appeal or Motion, is available in the "Forms" section on the USCIS website at www.uscis.gov.

Please note that if the I-924 applicant elects to timely file a motion with USCIS and if said motion is granted the application will be reopened and/or reconsidered and a new decision rendered. If the applicant's proposal submitted in support of its motion meets the regulatory requirements at 8 C.F.R. § 204.6 the geographic areas, industry categories, and hypothetical projects that meet EB-5 requirements will be included in a corrected approval notice. If no motion is filed within the time allowed this decision is final.

V. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Renewable Texas Energy Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A

Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

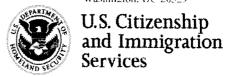
Nicholas Colucci

Chief, Immigrant Investor Program

Milals Coloni

cc: Brian Graham
Strasburger and Price LLP
720 Brazos Street
Suite 700
Austin, TX 78701

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



CORRECTED

July 15, 2015

John C. Kratzer JMIR Texas Mega Metro Regional Center, LLC c/o JMI Realty, LLC 111 Congress Avenue, Ste. 2600 Austin, TX 78701

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

JMIR Texas Mega Metro Regional Center, LLC

Re:

Initial Regional Center Designation

JMIR Texas Mega Metro Regional Center, LLC

RCW1406651700 / ID1406651700

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on March 07, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate JMIR Texas Mega Metro Regional Center, LLC ("TMMRC") as a qualifying participant in the Immigrant Investor Program.

JMIR Texas Mega Metro Regional Center, LLC ID1406651700 RCW1406651700 Page 2

1. Effective the date of this notice, USCIS approves the JMIR Austin TX Hotel Fund, LP project based on the evidence submitted with the exemplar Form I-526.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties				
Texas	Bastrop, Dallas, Bell, Denton, Blanco, Ellis, Burnet, Johnson, Caldwell,				
	Kaufman, Hays, Rockwall, Lee, Tarrant, Llano, Austin, Mason, Brazoria, Milam,				
İ	Colorado, Travis, Fayette, Williamson, Fort Bend, Collin, Galveston, Harris,				
	Madison, Montgomery, Robertson, Walker, Washington, Waller, Coryell, Bexar,				
	Falls, Comal, Freestone, Gonzales, Hill, Guadalupe, Limestone, Lavaca,				
	McLennan, Brazos, Navarro, Burleson, Grimes, Leon				

B. Industry Categories¹

NAICS	Industry Name
2632	Nonresidential Building Construction
7211	Traveler Accommodations
5413	Architectural, Engineering and Related Services
337127	Institutional Furniture Manufacturing
54181	Advertising Agencies

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

JMIR Texas Mega Metro Regional Center, LLC ID1406651700 RCW1406651700 Page 3

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an exemplar Form I-526.

Project	Type of Project	Organization Documents	Date of Document
JMIR Austin TX	Exemplar	JMIR Texas Mega Metro	Dated: 12/08/2014
Hotel Fund, LP	Form	Regional Center, LLC	
	I-526	Certificate of Formation	
Geographic	Petition	JMIR Austin TX Hotel Fund,	Dated: 02/25/2014
Location:	Project	LP Certificate of Filing	
Austin, Travis		JMIR-Austin Hotel, LP	Dated 03/22/2006
County, TX		Certificate of Limited	
		Partnership	
Focus of		JMIR-Austin Hotel, LP	Dated 04/06/2006
Investment:		Certificate of Filing (Foreign	
Equity		Filing, TX)	
		Comprehensive Business Plan	Dated: 09/05/2014
		Economic Impact Analysis	Dated: 06/2014
		Subscription Agreement -	Dated: 07/18/2014
		JMIR Austin TX Hotel Fund,	
		LP	
		Limited Partnership	Dated: 07/17/2014, as
		Agreement	amended on 09/16/2014
			and on 04/27/ 2015
		Confidential Offering	Dated: 07/17/2014
		Memorandum	
		Supplement No. 2 to	Dated: 12/01/2014
		Confidential Offering	
		Memorandum	
		Escrow Agreement	Dated: 11/24/2014

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

The proposal identifies the new commercial enterprise ("NCE") of the project as JMIR Austin TX Hotel Fund, LP, which was formed in the State of Texas on February 25,2014. The NCE is located at 111 Congress Ave., Ste. 2600, Austin, TX 78701. immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of	(b)(4)

JMIR Texas Mega Metro Regional Center, LLC ID1406651700 RCW1406651700 Page 4

(b)(4)

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS Industry Name	NAICS	Input (\$Millions)	Multiplier	Jobs	
Nonresidential Building Construction	2362				1
Traveler Accommodations	7211				(b)(4)
Architectural, Engineering and Related Services	5413				
Institutional Furniture Manufacturing	337127				
Advertising Agencies	54181				
Total Jobs:	<u>,</u>				J

The approval of this Form I-924 application supported by an exemplar Form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

JMIR Texas Mega Metro Regional Center, LLC ID1406651700 RCW1406651700 Page 5

IV. Guidelines for Filing Form I-526 Petitions Based on JMIR Austin TX Hotel Fund, LP project

Each individual petition, in order to demonstrate that it is affiliated with the TMMRC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program

JMIR Texas Mega Metro Regional Center, LLC ID1406651700 RCW1406651700 Page 6

will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

cc: Lincoln Stone, Esq.

Stone, Grzegorek & Gonzalez, LLP

800 Wilshire Blvd., Ste 900 Los Angeles, CA 90017 PIDC Regional Center ID1031910154 RCW1334551332 Page 6

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Milels Column

Nicholas Colucci

Chief, Immigrant Investor Program

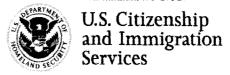
cc: Ron Klasko

Klasko, Rulon, Stock & Seltzer, LLP

1800 John F. Kennedy Boulevard, 17th Floor

Philadelphia, PA 19103

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131M Street NE, MS 2235 Washington, DC 20529



August 18, 2015

Yong-hee Park C/O Advantage America Nevada Regional Center LLC P.O. Box 489 5th Avenue, 12th Floor New York, NY 10017

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

Advantage America Nevada Regional Center LLC

Re:

Initial Regional Center Designation

Advantage America Nevada Regional Center LLC Name RC

RCW1419551804/ID1419551804

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 11, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Advantage America Nevada Regional Center LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

Advantage America Nevada Regional Center LLC ID 1419551804 RCW1419551804 Page 2

A. Geographic Area

State	Into the second
Nevada	

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
5413	Architectural, Engineering and Related Services
4232	Furniture and Home Furnishings Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electrical good Merchant
	Wholesalers
5311	Lessors of Real Estate
6231	Nursing Care Facilities (Skilled Nursing Facilities)

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Bluegrass International Fund Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Advantage America Nevada Regional Center LLC ID 1419551804 RCW1419551804 Page 3

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any

Advantage America Nevada Regional Center LLC ID 1419551804 RCW1419551804 Page 4

instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci Chief, Immigrant Investor Program

Milalo Colmi

cc: Julia Yong-hee Park

Law Offices of Julia Park LLC 489 5th Avenue, Floor 12 New York, NY 10017

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* 131 M Street, NF. Mailstop 2235 Washington, DC 20529



August 4, 2015

Ernest S. Munzen Good Life EB5 Georgia Regional Center, LLC C/O: Good Life EB5 Advisors, LLC 15251 Amberly Drive Tampa, FL 33647

Application:

Form I-924, Application for Regional Center under the Immigrant Investor

Pilot Program

Applicant(s):

Good Life EB5 Georgia Regional Center, LLC

Re:

Initial Regional Center Designation

Good Life EB5 Georgia Regional Center, LLC

RCW1409951725/ ID1409951725

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on April 9, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Good Life EB5 Georgia Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the Good Life Funding-Acworth, LLC as an actual project based on the evidence submitted.

II. Regional Center Designation

Good Life EB5 Georgia Regional Center, LLC ID1409951725 RCW1409951725 Page 2

A.	Geor	grap	hic	Area

State	Counties/Cities
	Fulton, Gwinnett, DeKalb, Cobb, Clayton, Cherokee, Henry, Forsyth,
	Paulding, Douglas, Coweta, Carroll, Fayette, Newton, Bartow, Rockdale,
Georgia	Walton, Barrow, Spalding, Pickens, Haralson, Butts, Meriwether,
•	Dawson, Pike, Lamar, Jasper, Heard

B. Industry Categories¹

NAICS	Industry Name		
23	Construction		
42	Wholesale Trade		
541	Professional, Scientific, and Technical Services		
623	Nursing and Residential Facilities		

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project.

Project	Type of Project	[11 : 15 : 18 : 18 : 18 : 18 : 18 : 18 :	Date of Document
() - 1 T : C T T - 1:	A	D.	
Good Life Funding	Actual Project	Business Plan	04/2014
Acworth, LLC		Economic Analysis	04/2014
Geographic Location: Cobb County, GA			
Focus of Investment: EB-5 Loan, Equity,			

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

The proposal identifies the new commercial enterprise ("NCE") of the project as <u>Good Life EB5</u>
Funding-Acworth, LLC which was formed in the State of Florida on January 29, 2014. The project is
located at 3378 Cobb Parkway NW in the City of Acworth, Georgia. mmigrant investors will
subscribe to the NCE as limited partners in exchange for capital contributions of each and
an aggregate of (b)(4)

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Good Life EB5 Georgia Regional Center, LLC ID1409951725 RCW1409951725

Page 3	(b)(4)

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the

Industry Name	NAICS	Input (\$Millions)	Multiplier	Total New Jobs	
Construction	23				1
Professional, Scientific, and Technical Services	541				(b)(4
Wholesale Trade	42				
Nursing and Residential Facilities	623				
Total New Jobs:					

The approval of this Form I-924 application supported by an exemplar form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

Good Life EB5 Georgia Regional Center, LLC ID1409951725 RCW1409951725 Page 4

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on Good Life Funding-Acworth, LLC project

Each individual petition, in order to demonstrate that it is affiliated with the Good Life EB5 Georgia Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of</u> Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

Good Life EB5 Georgia Regional Center, LLC ID1409951725 RCW1409951725 Page 5

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

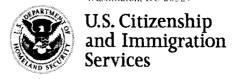
Miles Coloni

cc: Kathryn A. Kofler, Esq.

UniSource Inc. 718 Siesta Key Circle

718 Siesta Key Circle Sarasota, FL 34242

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



July 30, 2015

Thomas Irons C/o Dallas Regional Center, LLC 17950 Preston Road, Ste. 650 Dallas, TX 75252

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Dallas Regional Center, LLC

Re:

Initial Regional Center Designation

Dallas Regional Center, LLC

RCW1425951884 / ID1425951884

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on September 16, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Dallas Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

A. Geographic Area

State	Counties			
Texas	Collin	Dallas	Delta	
	Denton	Ellis	Hunt	
	Johnson	Kaufman	Parker	
	Rockwall	Tarrant	Wise	

B. Industry Categories¹

NAICS Code	NAICS Description
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers
7211	Traveler Accommodation

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Dallas Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

cc:

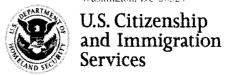
Troy Nehring

Miles Coluin

C/o McCarthy Nehring PS

 $14410~\mathrm{SE}$ Petrovitsky Road, Ste. 201B Renton, WA 98058

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131M Street NE, MS 2235 Washington, DC 20529



September 14, 2015

Reece Runyan C/O: KCI Capital, Ltd. 1 South Nevada Avenue, Suite 260 Colorado Springs, CO 80903

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

FP Advisors LLC

Re:

Initial Regional Center Designation

FP Advisors LLC

RCW1307251105/ID1307251105

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on March 13, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate FP Advisors LLC (FP) as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

FP Advisors LLC ID 1307251105 RCW1307251105 Page 2

A. Geographic Area

State		A COMPANY SERVE A Surgaya	
Colorado			

B. Industry Categories¹

NAICS	Industry Name
2361	Residential Building Construction
2371	Utility System Construction
2372	Land Subdivision
2373	Highway, Street, Bridge Construction
236117	New Housing For-Sale Builders

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Bluegrass International Fund Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

FP Advisors LLC ID 1307251105 RCW1307251105 Page 3

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. <u>Legal Notice</u>

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for

FP Advisors LLC ID 1307251105 RCW1307251105 Page 4

designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci Chief, Immigrant Investor Program

Miles Colmi

cc: Mark T. Thatcher

Simmons Assoc., Ltd 56 Pine Street, 7th Floor Providence, RI 02903

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Immigrant Investor Program
131 M Street, NE. Mailstop 2235
Washington, DC 20529



July 30, 2015

Tong Gao Harmonia Regional Center, LLC 1 Sugar Creek Center Blvd., Suite 1010 Sugar Land, TX 77478

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

Harmonia Regional Center, LLC

Re:

Initial Regional Center Designation Harmonia Regional Center, LLC RCW1418451798 / ID1418451798

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 3, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Harmonia Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the Harmonia Energy Investor Program, LP (HEIP) project based on the evidence submitted with the exemplar Form I-526.

II. Regional Center Designation

A. Geographic Area

State	Counties			ing terminang dan 1991 dan Bilanggan
Texas	Borden County	Ector County	Martin County	Midland County
	Glasscock County	Howard County	Mitchell County	Sterling County

B. Industry Categories¹

NAICS	Industry Name
2111	Oil and Gas Extraction
213111	Drilling Oil and Gas Wells
333132	Oil and Gas Field Machinery and Equipment Manufacturing

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an exemplar Form I-526.

Project	Type of Project	Organization Documents	Date of Document
Harmonia Energy	Exemplar	Business Plan	Revision Dated
Investor Program, LP	Form		03/25/2015
(HEIP)	I-526	Economic Analysis	Revision Dated
	Petition		03/24/2015
Geographic Location:	Project	Confidential Private Placement	Dated 06/30/2014
Howard County and		Memorandum	
Borden County, TX		Subscription Agreement	Submitted 07/03/2014
		Limited Partnership Agreement	Revision Submitted
Focus of Investment:			03/31/2015
EB-5 Loan, Developer		Escrow Agreement	Submitted 07/03/2014
Equity		Joint Participation Agreement	Dated 06/01/2014
		between HPC and HPO	
		Addendum to the Joint Participation	Dated 6/18/2015
		Agreement between HPC and HPO	
		Final Sale and Restated Purchase	Dated 05/10/2013
	i	Agreement for Mineral Leases	
		Promissory Note between HPO and	Dated 06/26/2014
		HPC	
		Promissory Note between HPO and	Submitted 07/03/2014
		HEIP	
		Equity Funding Commitment Letter	Dated 06/30/2014
		from HPC to HPO	

_

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

The proposal identifies the new commercial enterprise ("NCE") of the project as Harmonia Energy Investor Program, LP, which was formed in the State of Texas on May 20, 2014. The project is located in Howard County and Borden County, TX. immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of all investors.	(b)(4)

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS	Industry Name	Input (\$Millions)	Multiplier	Jobs	
213111	Drilling Oil and Gas Wells				(b)(4)
222122	Oil and Gas Field Machinery and Equipment				
333132	Manufacturing				
2111	Oil and Gas Extraction				
Total Jobs:]

The approval of this Form I-924 application supported by an exemplar Form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. <u>Guidelines for Filing Form I-526 Petitions Based on Harmonia Energy Investor Program, LP (HEIP)</u> <u>Project</u>

Each individual petition, in order to demonstrate that it is affiliated with the Harmonia Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.</u>

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milala Colmi

cc: Fei Bao

Zhang & Associates, P.C. 9999 Bellaire Blvd., Suite 920

Houston, TX 77036

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



Date: July 29, 2015

Samuel Brookner Silverman EB5 Affiliate Network Washington, D.C. Regional Center, LLC 3801 PGA Blvd., Suite 902 Palm Beach Gardens, FL 33410

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

EB5 Affiliate Network Washington, D.C. Regional Center, LLC

Re:

Initial Regional Center Designation

EB5 Affiliate Network Washington, D.C. Regional Center, LLC

RCW1421751841 / ID1421751841

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on August 5, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Affiliate Network Washington, D.C. Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

A. Geographic Area

State	Counties
	All counties
Maryland	

State	City
	Washington, DC
Washington, DC	

State	Counties
	Berkeley, Grant, Hampshire, Hardy, Jefferson, Mineral, and Morgan.
West Virginia	

State	Cities/Counties
	Cities: Alexandria, Falls Church, Fairfax, Manassas, Manassas Park,
Virginia	Winchester, and Fredericksburg.
	Counties: Arlington, Clarke, Culpeper, Fairfax, Loudoun, Prince
	William, Rappahannock, Shenandoah, Stafford, Spotsylvania,
	Frederick, King George, Loudoun, Madison, Orange, Page, Warren,
	Westmoreland, and Fauquier.

B. Industry Categories¹

NAICS	Industry Name
236115	Residential Construction
236220	Commercial Construction
722511	Full-service Restaurants
713940	Fitness and Recreational Sports Centers

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

These hypothetical projects do not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Affiliate Network Washington, D.C. Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The projects reviewed with this Form I-924 application are hypothetical projects. Organizational and transactional documents associated with the new commercial

enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional

Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

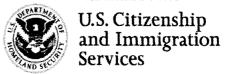
Chief, Immigrant Investor Program

Miles Coloni

cc: Thomas Silverman

Thomas N Silverman PA 3801 PGA Blvd., Suite 902 Palm Beach Gardens, FL 33410

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



July 21, 2015

Daniel Healy Civitas Illinois Regional Center 1601 Bryan Street, Suite M-200 Dallas, TX 75201

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Civitas Illinois Regional Center

Re:

Initial Regional Center Designation Civitas Illinois Regional Center

RCW 1428851921 / RC ID 1428851921

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 15, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Civitas Illinois Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

A. Geographic Area

State	Counties/Cities
	Entire State
Illinois	

B. Industry Categories¹

NAICS	Industry Name		
236	Construction of Buildings		
423	Merchant Wholesalers, Durable Goods		
5311	Lessors of Real Estate		
531320	Offices of Real Estate Appraisers		
5411	Legal Services		
541191	Title Abstract and Settlement Offices		
5413	Architectural, Engineering, and Related Services		
5416	Management, Scientific, and Technical Consulting Services		
5418	Advertising, Public Relations, and Related Services		

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Civitas Illinois Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is

available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Mulls Column

Nicholas Colucci

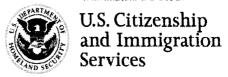
Chief, Immigrant Investor Program

cc: Lincoln Stone

Stone Grzegorek and Gonzalez 800 Wilshire Boulevard Ste. 900

Los Angeles, CA 90017

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street. NE, Mailstop 2235 Washington, DC 20529



July 16, 2015

Daniel Healy Civitas Northern Florida regional Center 1601 Bryan Street, Suite M·200 Dallas, TX 75201

Application:

Form I-924, Application for Regional Center under the

Immigrant Investor Pilot Program

Applicant(s):

Civitas Northern Florida regional Center

Re:

Initial Regional Center Designation

Civitas Northern Florida regional Center

RCW1428851925 / ID1428851925

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 15, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Civitas Northern Florida regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

A. Geographic Area

The state of the s	Counties				
State of Florida	Alachua	Gadsen	Lake	Santa Rosa	
	Bay	Gilchrist	Leon	Sumter	
	Calhoun	Gulf	Levy	Suwannee	
	Citrus	Hamilton	Liberty	Taylor	
	Columbia	Holmes	Madison	Wakulla	
	Dixie	Jackson	Marion	Walton	
	Escambia	Jefferson	Okaloosa	Washington	
	Franklin	Lafayette	Orange		

B. Industry Categories¹

Industry Category	NAICS	
Management, Scientific & Technical Consulting Svcs	code 5416	
Construction of Buildings	236	
Merchant Wholesalers – Durable Goods	423	
Architectural, Engineering & Related Services	5413	
Offices of Real Estate Appraisers	531320	
Title Abstract & Settlement Offices	541191	
Legal Services	5411	
Advertising, Public Relations & Related Services	9418	
Lessors of Real Estate	5311	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Civitas Northern Florida regional Center RCW1428851925 / ID1428851925 Page 3

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Civitas Northern Florida regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Civitas Northern Florida regional Center RCW1428851925 / ID1428851925 Page 4

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval

Civitas Northern Florida regional Center RCW1428851925 / ID1428851925 Page 5

and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

cc: Lincoln Stone

Stone Grzegorek and Gonzalez 800 Wilshire Blvd, Suite 900 Los Angeles, CA 90017

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131M Street NE, MS 2235 Washington, DC 20529



August 21,2015

Marcel El Fadi C/O: Royal White Cement EB-5 Regional Center LLC 8316 East Freeway Houston TX 77029

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

Royal White Cement EB-5 Regional Center LLC

Re:

Initial Regional Center Designation

Royal White Cement EB-5 Regional Center LLC

RCW1513152687/ID1513152687

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on May 11, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Royal White Cement EB-5 Regional Center LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Royal White Cement EB-5 Regional Center LLC ID 1513152687 RCW1513152687 Page 2

A. Geographic Area

State	Counties
Texas	McCulloch

B. Industry Categories¹

NAICS	Industry Name
236210	Industrial Building Construction
327310	Cement Manufacturing

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Bluegrass International Fund Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Royal White Cement EB-5 Regional Center LLC ID 1513152687 RCW1513152687 Page 3

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Royal White Cement EB-5 Regional Center LLC ID 1513152687 RCW1513152687 Page 4

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalos Colmi

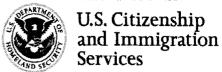
ce: Christian Triantaphyllis

Foster LLP

600 Travis Street, 20th Floor

Houston TX 77002

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street NE, Mailstop 2235 Washington, DC 20529



Date: July 15, 2015

Seung-Ming Kang Massachusetts Wealth and Happiness Regional Center, Inc. 400 Tradecenter, Suite 5881 Woburn, MA 01801

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Massachusetts Wealth and Happiness Regional Center, Inc.

Re:

Initial Regional Center Designation – Limited Decision

Massachusetts Wealth and Happiness Regional Center, Inc.

RCW1326651217 / ID1326651217

This notice of a limited decision is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on September 23, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves, in a limited decision, the Form I-924 request to designate Massachusetts Wealth and Happiness Regional Center, Inc. as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation – Limited Decision

The applicant submitted its Form I-924 requesting specific industry categories, geographic regions, and hypothetical project to be identified for the Regional Center's use.

Upon review of the record, USCIS has determined that not all of the requested industry categories, and geographic regions provided in the Form I-924 represent an appropriate application of a hypothetical project to support the industry categories, and/or geographic regions acceptable for use by the Regional Center.

As such, USCIS has concluded that a limited decision is necessary in this case. Therefore, all requested, approved, and disallowed industry categories, and geographic regions have been identified below.

A. Industry Categories and Geographic Regions Requested

The applicant has requested to focus, promote economic growth, and offer capital investment opportunities in the following geographic areas and industry categories:

1. Geographic Areas - Requested

State	Counties			
	Barnstable	Berkshire	Bristol	Dukes
MASSACHUSETTS	Essex	Franklin	Hampden	Hampshire
	Middlesex	Nantucket	Norfolk	Plymouth
	Suffolk	Worcester		

2. Industry Categories - Requested

NAICS	Industry Name
23	Construction
42	Wholesale Trade
44*	Retail Trade
5 3	Real Estate*
541	Professional and Technical Services*
561	Administrative and Support Services
61-62*	Educational and Healthcare Services*
71*	Arts and Recreation
72	Accommodation and Food Services

^{*}Note: Industry Name and/or NAICS code incorrectly identified by applicant.

B. Approved Industry Categories and/or Geographic Areas

The following industry categories and/or geographic areas have been determined to represent an appropriate application of a hypothetical project to support the industry categories, and geographic regions acceptable for use by the Regional Center.

1. Geographic Areas - Approved

State	Counties			
	Essex	Middlesex	Norfolk	Plymouth
MASSACHUSETTS	Suffolk			
NEW HAMPSHIRE	Rockingham	Strafford		

2. Industry Categories - Approved

NAICS	Industry Name
23	Construction
42	Wholesale Trade
541	Professional, Scientific, and Technical Services
623	Nursing and Residential Care Facilities
713940	Fitness and Recreational Sports Centers

C. Disallowed Industry Categories and/or Geographic Areas

The following industry categories and geographic areas have been disallowed because it has been determined that they do not represent an appropriate application of a hypothetical project to support the industry categories, and geographic regions acceptable for use by the Regional Center.

1. Geographic Areas - Disallowed

State	Counties			
	Barnstable	Berkshire	Bristol	Dukes
MASSACHUSETTS	Franklin	Hampden	Hampshire	Nantucket
	Worcester			

(b)(4)			
ı			

2. Industry Categories - Disallowed

NAICS	Industry Name
44*	Retail Trade
53	Real Estate*
561	Administrative and Support Services
61-62*	Educational and Healthcare Services*
71*	Arts and Recreation
72	Accommodation and Food Services

*Note: Industry Name and/or NAICS code incorrectly identified by applicant.

(b)(4)			

3. Conclusion - Decision to Disallow

Some aspects of the submitted proposal, as presently constituted, do not meet the regulatory requirements at 8 C.F.R. § 204.6. Therefore the request to grant the specific geographic areas, and industry categories listed above cannot be approved.

The decision to disallow the industry categories, and geographic areas identified above does not preclude the filing of Form I-526 petitions related to a subsequent project using the disallowed industry categories, geographic areas, and/or hypothetical project(s). Any future petitions will be adjudicated on their own merit.

There is no appeal to this decision to disallow the specified industry categories and/or geographic scope explained above. However, pursuant to 8 CFR 103.5, a motion can be filed on Form I-290B. Such motion must be accompanied by the proper fee and filed within 30 days of this notice.

Please note that if the I-924 applicant elects to timely file a motion with USCIS and if said motion is granted the application will be reopened and/or reconsidered and a new decision rendered. If the applicant's proposal submitted in support of its motion meets the regulatory requirements at 8 C.F.R. § 204.6 the applicant will be accorded the geographic areas, and industry categories that meet EB-5 requirements. If no motion is filed within the time allowed this decision is final.

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of

this regional center proposal. The approval of this Form I-924 application is based upon the economically and statistically valid assumptions and estimates provided in the business plan for job creation.

A hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998). As such, USCIS's approval of any hypothetical job creation estimates presented in a Form I-924 is not accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Massachusetts Wealth and Happiness Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational and transactional documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial

enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,
Miles Column

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Kiju Sung

Law Office of Kiju Joseph Sung 929 Massachusetts Avenue Cambridge, MA 02139

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



August 14, 2015

Derek M. Watson EB-5 Bonds New York, LLC 673 Woodland Square Loop, Suite 320 Lacey, WA 98503

Application: Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s): EB-5 Bonds New York, LLC

Re: Initial Regional Center Designation

EB-5 Bonds New York, LLC

RCW1427451895 / RC-ID1427451895

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 1, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves, in a limited decision, the Form I-924 request to designate EB-5 Bonds New York, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation - Limited Decision

The applicant submitted its Form I-924 requesting specific industry categories, geographic regions, and a hypothetical project to be identified for the Regional Center's use.

Upon review of the record, USCIS has determined that not all of the requested geographic regions provided in the Form I-924 represent an appropriate application of a hypothetical project to support the industry categories, and/or geographic regions acceptable for use by the Regional Center.

As such, USCIS has concluded that a limited decision is necessary in this case. Therefore, all requested and approved geographic regions have been identified below followed by a decision to disallow any

EB-5 Bonds New York, LLC RCW1427451895 / RC-ID1427451895Page 2

remaining industry categories, geographic region, and/or actual projects that do not meet EB-5 requirements.

A. Industry Categories and Geographic Regions Requested

The applicant has requested to focus, promote economic growth, and offer capital investment opportunities in the following geographic areas and industry categories:

Geographic Areas - Requested

State	Counties
Connecticut	All counties
New Jersey	All counties
New York	All counties
Massachusetts	All counties
Pennsylvania	All counties
Rhode Island	All counties

Industry Categories - Requested

NAICS	Industry Name
237310	Highway, Bridge, Street Construction
237990	Other Heavy & Civil Engineering Construction
331200	Steel Products Manufacturing from Purchased Steel
238910	Site Preparation Contractors
333995	Fluid Power Cylinder & Actuator Manufacturing
327390	Other Concrete Product Manufacturing
332323	Ornamental & Architectural Metal Manufacturing
541300	Architectural, Engineering & Related Services

B. Approved Industry Categories and/or Geographic Areas

The following industry categories and/or geographic areas have been determined to represent an appropriate application of a hypothetical project to support the industry categories and geographic regions acceptable for use by the Regional Center.

Geographic Areas - Approved

State	Counties
Connecticut	All counties
New York	All counties

Geographic Areas - Disallowed

State	Counties
New Jersey	All counties
Massachusetts	All counties
Pennsylvania	All counties
Rhode Island	All counties

(b)(4)						
(10)(14)						
		 -	 			

USCIS will not give deference to the business plan and the economic analysis that derived the job creation estimates with any subsequently filed individual immigrant investors' Form I-526s pertaining to the above project. USCIS will review the business plan and/or economic analysis when the Form I-526s are filed to determine if it meets EB-5 requirements.

Conclusion - Decision to Disallow

Some aspects of the submitted proposal, as presently constituted, do not meet the regulatory requirements at 8 C.F.R. § 204.6. Therefore the request to grant the counties in the four disallowed listed above cannot be approved.

The decision to disallow the geographic areas identified above does not preclude the filing of Form I-526 petitions related to a subsequent project using the disallowed industry categories, geographic areas, and/or hypothetical project(s). Any future petitions will be adjudicated on their own merit.

There is no appeal to this decision to disallow the specified industry categories and/or geographic scope explained above. However, pursuant to 8 CFR 103.5, a motion can be filed on Form I-290B. Such motion must be accompanied by the proper fee and filed within 30 days of this notice.

Please note that if the I-924 applicant elects to timely file a motion with USCIS and if said motion is granted the application will be reopened and/or reconsidered and a new decision rendered. If the applicant's proposal submitted in support of its motion meets the regulatory requirements at 8 C.F.R. § 204.6 the applicant will be accorded the geographic areas that meet EB-5 requirements. If no motion is filed within the time allowed this decision is final.

III. Job Creation

USCIS approves the geographic area and industry categories noted below based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal. The approval of this Form I-924 application is based upon the economically and statistically valid assumptions and estimates provided in the business plan for job creation. Please refer to the input and multiplier analysis table above.

A hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998). As such, USCIS's approval of any hypothetical job creation estimates presented in a Form I-924 is not accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and

EB-5 Bonds New York, LLC RCW1427451895 / RC-ID1427451895Page 4

job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB-5 Bonds New York, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational and transactional documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

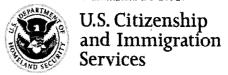
Milalos Colmi

cc: Robert C. Divine

Baker Donelson Bearman Caldwell & Berkowitz

633 Chestnut Street 1800 Republic Center Chattanooga, TN 37450

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* 131 M Street, NE, Mailstop 2235 Washington, DC 20529



July 10, 2015

Donald Huster Ocean Pacific Regional Center, LLC 630 NW Hickory St, Suite 120 Albany, OR 97321

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Ocean Pacific Regional Center, LLC

Re:

Initial Regional Center Designation Ocean Pacific Regional Center RCW1336451536/ ID 1336451536

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 12/30/2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Ocean Pacific Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the Miramar Lifestyles, LLC project based on the evidence submitted with the exemplar Form I-526.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Citie	S		
Oregon	Benton	Douglas	Lincoln	Polk
	Clackamas	Josephine	Linn	Tillamook
	Clatsop	Jackson	Marion	Washington
	Columbia	Lane	Multnomah	Yamhill
	Coos			

B. Industry Categories¹

NAICS	Industry Name
236116	New Multifamily Housing Construction
623310	Continuing Care Retirement Communities and Assisted Living Facilities for the Elderly

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an exemplar Form I-526.

Project	Type of Project	Organization Documents	Date of Document
Miramar Lifestyles,	Exemplar	Miramar Lifestyles, LLC	Dated 5/12/2015
LLC	Form	Business Plan	
	I-526	Miramar Lifestyles LLC Private	Dated 7/7/2015
Geographic	Petition	Placement Memorandum	
Location:	Project	Miramar Lifestyles LLC	Submitted 6/1/2015
Newport, OR		Subscription Agreement	
		Miramar Lifestyles, LLC	Dated 8/9/2013
Focus of		Operating Agreement	
Investment:		Escrow Agreement	Submitted 6/1/2015
Equity			

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

Lifestyles, LLC, which was formed in the State of Oregon on 8/9/2013. The project is located in Newport, Oregon. immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of aggregate of	(b)(4)

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the IMPLAN economic model:

Category	Eligible Spending (\$M)	IMPLAN Multiplier	Direct jobs	Indirect Jobs	Total Jobs	
Construction (NAICS 236116)	14.91					(b)(4)
Operations (NAICS 623310)						
Total						

The approval of this Form I-924 application supported by an exemplar Form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and

the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on Miramar Lifestyles, LLC project

Each individual petition, in order to demonstrate that it is affiliated with the Ocean Pacific Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to

promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

cc:

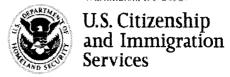
Robert Donaldson Black Helterline LLP

805 SW Broadway, suite 1900

Portland, OR 97205

Ocean Pacific Regional Center, LLC 630 NW Hickory Street, Suite 120 Albany OR 97321

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



August 4, 2015

James Speyer C/O USA ODI Regional Center, LLC 1828 L Street, NW, Suite 703 Washington, DC 20036

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

USA ODI Regional Center, LLC

Re:

Initial Regional Center Designation USA ODI Regional Center, LLC

RCW1418851801 / ID1418851801

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 7, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate USA ODI Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Cities	Counties			
District of	Washington				
Columbia					
Maryland	Baltimore	Anne Arundel	Baltimore	Calvert	
		Carroll	Charles	Frederick	
		Harford	Howard	Montgomery	
		Prince	Queen	St. Mary's	
		George's	Anne's		
Virginia	Alexandria	Arlington	Clarke	Culpeper	
	Fairfax City	Fauquier	Loudoun	Stafford	
	Falls Church	Warren	Fairfax	Frederick	
	Manassas	Prince	Spotsylvania		
		William			
	Manassas				
	Park				
	Fredericksburg				
	Winchester				
West Virginia		Hampshire	Jefferson		

B. Industry Categories¹

NAICS Code	NAICS Description
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers
7211	Traveler Accommodation

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the USA ODI Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Nima Korpivaara

C/O David Hirson & Partners LLP

8 Cheshire Court

Miles Colmi

Newport Beach, CA 92660

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



Ms. Nima Korpivaara C/O David Hirson & Partners LLP 8 Cheshire Court Newport Beach, CA 92660

* This page is intentionally left blank. *

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



August 4, 2015

James Speyer C/O USA ODI Regional Center, LLC 1828 L Street, NW, Suite 703 Washington, DC 20036

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

USA ODI Regional Center, LLC

Re:

Initial Regional Center Designation USA ODI Regional Center, LLC RCW1418851801 / ID1418851801

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 7, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate USA ODI Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Cities		Counties	
District of	Washington			
Columbia				
Maryland	Baltimore	Anne Arundel	Baltimore	Calvert
		Carroll	Charles	Frederick
		Harford	Howard	Montgomery
		Prince	Queen	St. Mary's
		George's	Anne's	
Virginia	Alexandria	Arlington	Clarke	Culpeper
	Fairfax City	Fauquier	Loudoun	Stafford
	Falls Church	Warren	Fairfax	Frederick
	Manassas	Prince	Spotsylvania	
		William		
	Manassas			
۸.	Park			
	Fredericksburg			
	Winchester			
West Virginia		Hampshire	Jefferson	

B. Industry Categories¹

NAICS Code	NAICS Description
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers
7211	Traveler Accommodation

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the USA ODI Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

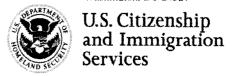
cc: Nima Korpivaara

C/O David Hirson & Partners LLP

8 Cheshire Court

Newport Beach, CA 92660

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



Date: August 4, 2015

Hao Rong Saipan Regional Investment Center, LLC P.O. Box 500209 Saipan, MP 96950

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Saipan Regional Investment Center, LLC

Re:

Initial Regional Center Designation

Saipan Regional Investment Center, LLC

RCW1418451797 / ID1418451797

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 3, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Saipan Regional Investment Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Saipan Regional Investment Center ID1418451797 RCW1418451797 Page 2

A. Geographic Area

Protectorate		
Commonwealth of the	Northern Mariana Islands	

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
5413	Architectural, Engineering & Related Services
4232	Furniture and Home Furnishings Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers
7211	Traveler Accommodation
7225	Restaurants and Other Eating Places

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Saipan Regional Investment Center ID1418451797 RCW1418451797 Page 3

business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Saipan Regional Investment Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

Saipan Regional Investment Center ID1418451797 RCW1418451797 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

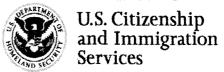
Nicholas Colucci

Chief, Immigrant Investor Program

cc: Martin J. Lawler, Esq.
Lawler and Lawler
1 Post Street
San Francisco, CA 94101

Miles Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



August 13, 2015

Ahmad Farrokhi Washington Foreign Investment Management Group, LLC 10101 SE 3rd Street Unit #108 Bellevue, WA 98004

Application: Form I-290B, Notice of Appeal or Motion, of decision for

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Washington Foreign Investment Management Group, LLC

Re: Initial Regional Center Designation—Updated/Reconsidered

Washington Foreign Investment Management Group, LLC

WAC1590442281/ID1334751341

This notice is in reference to the Form I-290B, Notice of Appeal or Motion that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on June 29, 2015. This motion was filed to reopen and reconsider the limited decision USCIS issued on May 21, 2015 to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with USCIS on December 13, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS has reconsidered its May 21, 2015 decision and updates its designation of the Washington Foreign Investment Management Group, LLC as a qualifying participant in the Immigrant Investor Program.

- 1. Effective the date of this notice, USCIS approves the Sultan Foreign Investment Group, LLC project based on the evidence submitted with the exemplar Form I-526.
- 2. Effective the date of this notice, USCIS approves the updated Private Placement Memorandum submitted as supporting material to the I-290B motion. (See section III, below.)

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

Washington	Snohomish	Sultan	
State of		City	

B. Industry Categories¹

NAICS	Industry Name
3312	Steel Product Manufacturing from Purchased Steel
332114	Custom Roll Forming
33231	Plate Work and Fabricated Structural Product Manufacturing

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an exemplar Form I-526.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Project	Type of Project	Organization Documents	Date of Document
Sultan Foreign	Exemplar	Business Plan (Revised)	As received 03/06/2015
Investment	Form	Economic Analysis (Revised)	02/27/2015
Group, LLC	I-526	Operating Agreement	As submitted 12/13/2013
	Petition	Confidential Private	As revised June 2015
Geographic	Project	Placement Memorandum	
Location:		(Revised)	
Snohomish		Subscription Agreement	As submitted 12/13/2013
County,		Investor Holding Account	As received 03/06/2015
Washington.		Agreement (revised)	
Focus of			
Investment:			
Loan			

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

(b)(4)	The proposal identifies the new commercial enterprise ("NCE") of the project as Sultan Foreign Investment Group, LLC, which was formed in the State of Washington on 09/06/2013. The project is located in the City of Sultan, Snohomish County, Washington State. Approximately immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS	Industry Name	Input (\$,Millions, 2010)	Multiplier	Total Jobs
33351	Metalworking Machinery Manufacturing			
33231	Plate Work and Fabricated Structural Product Manufacturing			

(b)(4)

The approval of this Form I-924 application supported by an exemplar Form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on Sultan Foreign Investment Group. LLC project

Each individual petition, in order to demonstrate that it is affiliated with the Washington Foreign Investment Management Group, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. <u>Legal Notice</u>

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not

reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Anthony B. Ravani, Esq. Lotus Law Group, PLLC

Miles Colui

300 Spectrum Center Drive, Suite 400

Irvine, CA 92618

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131M Street NE, MS 2235 Washington, DC 20529



August 3, 2015

George Ekins C/O American Dream Fund Hawaii Regional Center, LLC 880 Apollo Street, Suite 218 El Segundo CA 90245

Application: Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s): American Dream Fund Hawaii Regional Center LLC

Re: Initial Regional Center Designation

American Dream Fund Hawaii Regional Center LLC

RCW1420251820/ID1420251820

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 21, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate American Dream Fund Hawaii Regional Center LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

American Dream Fund Hawaii Regional Center LLC ID 1420251820 RCW1420251820 Page 2

A. Geographic Area

State	AND THE DESCRIPTION OF THE PROPERTY OF THE PRO	And the second s	n (an the form of the first of	
Hawaii				

B. Industrial Categories¹

NAICS	Industry Name
2362	Non-residential Building Construction
5413	Architectural, Engineering and Related Services
4232	Furniture and Home Furnishings Merchant Wholesalers
4234	Professional & Commercial Equipment & Supply Merchant Wholesalers
4236	Household Appliances & Electrical & Electrical Goods Merchant Wholesalers
6233	Continuing Care Retirement Communities & Assisted Living Facilities for the Elderly
6231	Nursing Care Facilities

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Bluegrass International Fund Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

American Dream Fund Hawaii Regional Center LLC ID 1420251820 RCW1420251820 Page 3

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc, Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any

American Dream Fund Hawaii Regional Center LLC ID 1420251820 RCW1420251820 Page 4

instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

cc:

Troy Nehring

McCarthy Nehring PS

14410 SE Petrovitsky Road, Ste 201B

Renton WA 98058

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



July 24, 2015

Frank M.K. Liu C/O Lovett Homes dba 5177 Builders, Ltd. 1520 Oliver Street Houston, Texas 77007

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

Texas Regional Fortune Center, LLC

ID1213750656

Re:

Request to Amend Regional Center Designation

Project: Urban DFW Fund 1, LLC

RCW1429351931

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on October 20, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Urban DFW Fund 1, LLC project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Urban DFW Fund 1, LLC project will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least _______jobs. USCIS will give deference to the

(b)(4)

Texas Regional Fortune Center, LLC ID1213750656 RCW1429351931 Page 2

applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Urban DFW Fund 1, LLC project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On March 20, 2013, USCIS approved the Texas Regional Fortune Center, LLC ("TXRFC") for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the 27 contiguous counties within Texas. TXRFC now seeks to amend its previously approved regional center designation to include an actual project that will be managed by Urban DFW Fund 1, LLC, an NCE established on July 25, 2014.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document	Exhibit
Urban DFW Fund 1, LLC Geographic		Business Plan Revision Economic Analysis Confidential Private Placement Memorandum	07/07/2015 08/08/2014 10/06/2014	C 8 6
Location: Dallas/Fort Worth metropolitan area	Investment: Loan and Equity	Subscription Agreement Operating Agreement Escrow Agreement	10/06/2014 10/06/2014 10/15/2014	15 16 17
Exemplar of Form I-526				

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment identifies the NCE of the proposed project as Urban DFW Fund 1, LLC, which was formed in the State of Texas on July 25, 2014. The Urban DFW Fund 1, LLC project is located within a targeted employment area (TEA) in the Dallas/Fort Worth

	Page 3	area in Texas. Approximately EF	R-5 investors will s	subscribe to th	ie NCE as	2
!)	limited partn	ners in exchange for capital contribution	ons of ea	ach and an ag	gregate of	f
						\neg
	IV. <u>Job Crea</u>	tion				
	17. 000 0100					
			momic impact ana	lysis and unde	erlving	
	The job creat	tion methodology presented in the eco	nomic impact ana	llysis and unde	erlying	
	The job creat	tion methodology presented in the eco n is found to be reasonable based on t	nomic impact ana he following input	llysis and unde ts, when apply	erlying ving the	
	The job creat	tion methodology presented in the eco n is found to be reasonable based on t	he following input	llysis and understs, when apply	erlying ving the	7 /1
	The job creat	tion methodology presented in the eco n is found to be reasonable based on t	nomic impact ana he following input Input/Revenue (\$Millions)	ts, when apply	erlying ving the] (k
	The job creat business plan RIMS II ecor	tion methodology presented in the eco n is found to be reasonable based on t nomic model:	he following input Input/Revenue	ts, when apply	ring the	(
	The job creat business plan RIMS II econ	tion methodology presented in the econ is found to be reasonable based on the model: Industry Name	he following input Input/Revenue	ts, when apply	ring the)
	The job creat business plan RIMS II econ NAICS 1 2300	tion methodology presented in the economic found to be reasonable based on the model: Industry Name Construction Architectural, Engineering, and	he following input Input/Revenue	ts, when apply	ring the	(1
	The job creat business plan RIMS II econ NAICS 1 2300 5413 5310 Total Jobs:	tion methodology presented in the economic found to be reasonable based on the nomic model: Industry Name Construction Architectural, Engineering, and Related services Real Estate*	Input/Revenue (\$Millions)	ts, when apply	ring the]
	The job creat business plan RIMS II econ NAICS 1 2300 5413 5310 Total Jobs:	tion methodology presented in the economic found to be reasonable based on the nomic model: Industry Name Construction Architectural, Engineering, and Related services Real Estate*	Input/Revenue (\$Millions)	ts, when apply	ring the	(l
	The job creat business plan RIMS II econ NAICS 1 2300 5413 5310 Total Jobs:	ion methodology presented in the economic found to be reasonable based on the nomic model: Industry Name Construction Architectural, Engineering, and Related services Real Estate* aced jobs only All figures calculated from	Input/Revenue (\$Millions)	ts, when apply	Jobs	(l
	The job creat business plan RIMS II econ NAICS 1 2300 5413 5310 Total Jobs: *Indirect/indu	ion methodology presented in the economic found to be reasonable based on the nomic model: Industry Name Construction Architectural, Engineering, and Related services Real Estate* Iced jobs only All figures calculated from 1 of this Form I-924 application, supp	Input/Revenue (\$Millions) n rounded numbers orted by the exem	Multiplier plar Form I-5	Jobs 26	
	The job creat business plan RIMS II econ NAICS 1 2300 5413 5310 Total Jobs: *Indirect/indu	ion methodology presented in the economic found to be reasonable based on the nomic model: Industry Name Construction Architectural, Engineering, and Related services Real Estate* Industry Name Construction Architectural, Engineering, and Related services Real Estate* Industry Name Industry Name Construction Architectural, Engineering, and Related services Real Estate*	Input/Revenue (\$Millions) a rounded numbers orted by the exemulates used as input	Multiplier plar Form I-5 ts in the busin	Jobs 26	
	The job creat business plan RIMS II ecor NAICS 1 2300 5413 5310 Total Jobs: *Indirect/indu* The approva petition, is b for job creati	ion methodology presented in the economic struction is found to be reasonable based on the nomic model: Industry Name Construction Architectural, Engineering, and Related services Real Estate* Iced jobs only All figures calculated from the second upon the assumptions and estiments. Please refer to the input and multiple second to the second to the second to the second upon the assumptions and estiments.	Input/Revenue (\$Millions) orted by the exemulates used as inputational inputations.	plar Form I-5 ts in the busir ble above.	Jobs 26 ness plan	
	The job creat business plan RIMS II econ NAICS 1 2300 5413 5310 Total Jobs: *Indirect/indu.* The approva petition, is b for job creati The economi	ion methodology presented in the economic found to be reasonable based on the nomic model: Industry Name Construction Architectural, Engineering, and Related services Real Estate* Iced jobs only All figures calculated from the seconomic supplementation and estimated on. Please refer to the input and must canalysis accurately portrays the asset in the seconomic supplementation and estimate the seconomic supplementation and must be a seconomic supplementation.	Input/Revenue (\$Millions) orted by the exemutates used as inputitiplier analysis talksumptions stated in	plar Form I-5 ts in the business in the busine	Jobs 26 ness plan s plan, an	
	The job creat business plan RIMS II econ NAICS 1 2300 5413 5310 Total Jobs: *Indirect/indu The approva petition, is b for job creati The economithe calculation	Industry Name Construction Architectural, Engineering, and Related services Real Estate* Iced jobs only All figures calculated from the services are dupon the assumptions and estimated on. Please refer to the input and multipliers are verification and RIMS II multipliers are verification.	Input/Revenue (\$Millions) orted by the exemutates used as inputiplier analysis tassumptions stated in rifiable. The applications	plar Form I-5 ts in the business to the busine	Jobs 26 ness plan s plan, an	
	The job creat business plan RIMS II econ NAICS 1 2300 5413 5310 Total Jobs: *Indirect/indu* The approva petition, is b for job creati The economithe calculation preponder and the calculation of the calcu	Industry Name Construction Architectural, Engineering, and Related services Real Estate* Iced jobs only All figures calculated from the second upon the assumptions and estimate on. Please refer to the input and multipliers are ventore of the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease of the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease on the second to the evidence that the project is ease of the evidence that the project is ease on the second to the evidence that the project is ease of the evidence that the p	Input/Revenue (\$Millions) orted by the exemulates used as inputiplier analysis talking the expected to result	plar Form I-5 ts in the business to the business in the creation	Jobs 26 ness plan s plan, an vn by a n of	
1)	The job creat business plan RIMS II econ NAICS 1 2300 5413 5310 Total Jobs: *Indirect/indu* The approva petition, is b for job creati The economithe calculation preponder approximate approximate.	Industry Name Construction Architectural, Engineering, and Related services Real Estate* Iced jobs only All figures calculated from the services are dupon the assumptions and estimated on. Please refer to the input and multipliers are verification and RIMS II multipliers are verification.	Input/Revenue (\$Millions) orted by the exemulates used as inputiplier analysis talking the expected to result jobs from constructions.	plar Form I-5: ts in the business icant has show in the creation; architection; architection;	Jobs 26 ness plan s plan, an vn by a n of ctural,	d

Texas Regional Fortune Center, LLC

ID1213750656

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

Texas Regional Fortune Center, LLC ID1213750656 RCW1429351931 Page 4

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with the Urban DFW Fund 1, LLC project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions based on the Dallas/Fort Worth project

Each individual petition, in order to demonstrate that it is affiliated with the Texas Regional Fortune Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

Texas Regional Fortune Center, LLC ID1213750656 RCW1429351931 Page 5

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Texas Regional Fortune Center, LLC ID1213750656 RCW1429351931 Page 6

Sincerely,

Milels Column

Nicholas Colucci

Chief, Immigrant Investor Program

cc: John William Meyer/Houston R. Harris

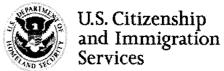
FosterQuan, LLP

600 Travis Street, Suite 2000

Houston, Texas 77002

Texas Regional Fortune Center, LLC 1520 Oliver Street Houston, Texas 77007

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



Date: May 12, 2015

Samuel Silverman EB5 Affiliate Network State of Michigan Regional Center, LLC 3801 PGA Blvd., Suite 902 Palm Beach Gardens, FL 33410

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): EB5 Affiliate Network State of Michigan Regional Center, LLC

Re: Initial Regional Center Designation

EB5 Affiliate Network State of Michigan Regional Center, LLC

RCW 1427951904 / RC ID 1427951904

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 6, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Affiliate Network State of Michigan Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

EB5 Affiliate Network State of Michigan Regional Center, LLC ID1427951904 RCW1427951904 Page 2

A. Geographic Area

State	Counties/Cities
	Entire State
Michigan	

B. Industry Categories¹

NAICS	Industry Name
236115	New Single-Family Housing Construction
236116	New Multifamily Housing Construction
236220	Commercial and Institutional Building Construction
713940	Fitness and Recreational Sports Centers
722511	Full-Service Restaurants

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

EB5 Affiliate Network State of Michigan Regional Center, LLC ID1427951904 RCW1427951904 Page 3

business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Affiliate Network State of Michigan Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

EB5 Affiliate Network State of Michigan Regional Center, LLC ID1427951904 RCW1427951904 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milala Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NF. Mailstop 2235 Washington, DC 20529



Date: May 12, 2015

Samuel Silverman EB5 Affiliate Network State of Colorado Regional Center, LLC 3801 PGA Blvd., Suite 902 Palm Beach Gardens, FL 33410

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): EB5 Affiliate Network State of Colorado Regional Center, LLC

Re: Initial Regional Center Designation

EB5 Affiliate Network State of Colorado Regional Center, LLC

RCW 1427951903 / RC ID 1427951903

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 6, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Affiliate Network State of Colorado Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

EB5 Affiliate Network State of Colorado Regional Center, LLC ID1427951903 RCW1427951903 Page 2

A. Geographic Area

State	Counties/Cities
	Entire State
Colorado	

B. Industry Categories¹

NAICS	Industry Name
236115	New Single-Family Housing Construction
236116	New Multifamily Housing Construction
236220	Commercial and Institutional Building Construction
713940	Fitness and Recreational Sports Centers
722511	Full-Service Restaurants

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

EB5 Affiliate Network State of Colorado Regional Center, LLC ID1427951903 RCW1427951903 Page 3

business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Affiliate Network State of Colorado Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

EB5 Affiliate Network State of Colorado Regional Center, LLC ID1427951903 RCW1427951903 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Mileles Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street. NE. Mailstop 2235 Washington. DC 20529



Date: May 12, 2015

Samuel Silverman EB5 Affiliate Network State of Texas Regional Center, LLC 3801 PGA Blvd., Suite 902 Palm Beach Gardens, FL 33410

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): EB5 Affiliate Network State of Texas Regional Center, LLC

Re: Initial Regional Center Designation

EB5 Affiliate Network State of Texas Regional Center, LLC

RCW 1427951902 / RC ID 1427951902

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 6, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Affiliate Network State of Texas Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

EB5 Affiliate Network State of Texas Regional Center, LLC ID1427951902 RCW1427951902 Page 2

A. Geographic Area

State	Counties/Cities
	Entire State
Texas	

B. Industry Categories¹

NAICS	Industry Name
236115	New Single-Family Housing Construction
236116	New Multifamily Housing Construction
236220	Commercial and Institutional Building Construction
713940	Fitness and Recreational Sports Centers
722511	Full-Service Restaurants

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

EB5 Affiliate Network State of Texas Regional Center, LLC ID1427951902 RCW1427951902 Page 3

business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Affiliate Network State of Texas Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho. 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

EB5 Affiliate Network State of Texas Regional Center, LLC ID1427951902 RCW1427951902 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

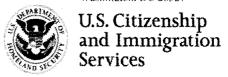
Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Mileles Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



Date: May 12, 2015

Samuel Silverman EB5 Affiliate Network State of Arizona Regional Center, LLC 3801 PGA Blvd., Suite 902 Palm Beach Gardens, FL 33410

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

EB5 Affiliate Network State of Arizona Regional Center, LLC

Re:

Initial Regional Center Designation

EB5 Affiliate Network State of Arizona Regional Center, LLC

RCW 1427951901 / RC ID 1427951901

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 6, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Affiliate Network State of Arizona Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

EB5 Affiliate Network State of Arizona Regional Center, LLC ID1427951901 RCW1427951901 Page 2

A. Geographic Area

State	Counties/Cities
	Entire State
Arizona	

B. Industry Categories¹

NAICS	Industry Name
236115	New Single-Family Housing Construction
236116	New Multifamily Housing Construction
236220	Commercial and Institutional Building Construction
713940	Fitness and Recreational Sports Centers
722511	Full-Service Restaurants

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

EB5 Affiliate Network State of Arizona Regional Center, LLC ID1427951901 RCW1427951901 Page 3

business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Affiliate Network State of Arizona Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

EB5 Affiliate Network State of Arizona Regional Center, LLC ID1427951901 RCW1427951901 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

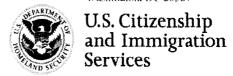
Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



May 6, 2015

Ms. Jillian Fortuna EB-5 Jobs for Massachusetts, Inc. Regional Center 170 Milk Street, 4th Floor Boston, MA 02109

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

EB-5 Jobs for Massachusetts, Inc. Regional Center

ID1031910110

Re:

Request to Amend Regional Center Designation

Project: The Point RCW1431051962

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on November 4, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Point project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Birch Boston Fund I, LP will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least obs. USCIS will give deference to the applicant's estimates of actual job

(b)(4)

EB-5 Jobs for Massachusetts, Inc. Regional Center ID1031910110 RCW1431051962 Page 2

creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Point project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On September 22, 2011, USCIS approved the EB-5 Jobs for Massachusetts Regional Center ("EB5MA") for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the entire State of Massachusetts. EB5MA now seeks to amend its previously approved regional center designation to include an actual project that will be managed by Birch Boston Fund I, LP, an NCE established on May 13, 2014.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
The Point	Mixed-Use Development	Business Plan	10/30/2014
		Economic Analysis	10/01/2014
	Investment:	Private Offering Memorandum	09/02/2014
Geographic	EB-5, Bank Loan,	Private Offering Memorandum	10/14/2014
Location:	Equity	- Addendum	
Suffolk		Subscription Agreement	09/02/2014
County, MA		Limited Partnership	09/02/2014
		Agreement	
Exemplar of			
Form I-526		Escrow Agreement	06/05/2014
		Business Affiliation Agreement	02/03/2014
		Construction Loan Agreement	06/30/2014

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment identifies the NCE of the proposed project as Birch Boston Fund I, LP which was formed in the State of Massachusetts on May 13, 2014. The Birch Boston Fund I, LP project is located within a targeted employment area (TEA) in the City of Boston, Massachusetts. Approximately EB-5 investors will subscribe to the NCE as

EB-5 Jobs for Massachusetts, Inc. Regional Center ID1031910110 RCW1431051962 Page 3

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS 1	Industry Name	Input (\$Mill	ions)	Multiplier	Jobs	
2362	Nonresidential Building Construction					
5413	Architecture, Engineering, and Related Services					(b)(4)
5311	Lessors of Real Estate					
Total Jobs:]

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

EB-5 Jobs for Massachusetts, Inc. Regional Center ID1031910110 RCW1431051962 Page 4

(b)(4) preponderance of the evidence that the project is expected to result in the creation of approximately direct indirect jobs, and induced jobs from construction, rental, and service activities associated with the Point project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with the Point project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the Birch Boston Fund I, LP the Point project</u>

Each individual petition, in order to demonstrate that it is affiliated with the EB-5 Jobs for Massachusetts, Inc. Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

EB-5 Jobs for Massachusetts, Inc. Regional Center ID1031910110 RCW1431051962 Page 5

5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws

EB-5 Jobs for Massachusetts, Inc. Regional Center ID1031910110 RCW1431051962 Page 6

and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

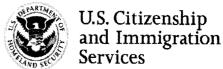
Milalos Colmi

cc: Carolyn Lee

Miller Mayer, LLP P.O. Box 6435

Ithaca, NY 14851-6435

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



May 6, 2015

Rashid A. Khatib Vistar's EB·5 Business Alliance of Texas LLC C/O: Intram Investments Inc. 5555 S. Kirkman Road, Suite 201 Orland, FL 32819

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Vistar's EB-5 Business Alliance of Texas LLC

Re:

Initial Regional Center Designation

Vistar's EB-5 Business Alliance of Texas LLC

RCW1416451780 / ID1416451780

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on June 13, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant is also seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Vistar's EB-5 Business Alliance of Texas LLC as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves Vistar Restaurant Fund IV, LLC as an actual project.

Vistar's EB-5 Business Alliance of Texas LLC ID1416451780 RCW1416451780 Page 2

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Cities/Counties
Texas	All Cities/Counties

B. Industry Categories¹

NAICS	Industry Name
23	Construction
42	Wholesale Trade
541	Professional, Scientific, and Technical Services
722	Food Services and Drinking Places

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project.

Project	Type of Project	Organization Documents	Date of Document
Vistar Restaurant Fund	Actual	Business Plan	06/13/2014 (As Submitted)
IV, LLC Geographic Location: Multiple Counties, TX	Project	Economic Analysis	06/13/2014 (As Submitted)
Focus of Investment: EB-5, Equity			

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

The proposal identifies the new commercial enterprise ("NCE") of the project as Vistar Restaurant Fund IV, LLC, which was formed in the State of Texas on November 12, 2013. The projects are in various counties within the following metropolitan statistical areas: (a) San-Antonio-New Braunfels, (b) Austin-Round Rock-San Marcos, (c) Dallas-Fort Worth-Arlington, and (d) Houston-Sugar Land-Baytown. The units will be at selected major urban

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Vistar's EB·5 Business Alliance of Texas LLC ID1416451780 RCW1416451780 Page 3

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

Economic Impact Summary - 1st Phase Expansion of 30 units								
Metropolitan Statistical Area	Target	# Jobs Per Unit	Total Jobs Created	Increased Industrial Output Per Unit	Total Increased Industrial Output Per Unit	Increased Household Earnings Per Unit	Total Increased Household Earnings	
San Antonio-New Braunfels	# 0J Unus	rei onu	Creuieu	Output Let Onti	Output 1 et Onti	: 101 Unu	Household Larrings	
Austin-Round Rock-San Marcos								(b)(4)
Dallas-Fort Worth-Arlington								
Houston-Sugar Land-Baytown								
Total Economic Impact								

The approval of this Form I-924 application is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of

Vistar's EB-5 Business Alliance of Texas LLC ID1416451780 RCW1416451780 Page 4

conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions based on Vistar Restaurant Fund IV, LLC project

Each individual petition, in order to demonstrate that it is affiliated with the Vistar's EB-5 Business Alliance of Texas LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is

Vistar's EB·5 Business Alliance of Texas LLC ID1416451780 RCW1416451780 Page 5

available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center. The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

ilels Colmi

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Immigrant Investor Program
131 M Street NE, Mailstop 2235
Washington, DC 20529



May 6, 2015

Patrick Barber Encore Midwest Regional Center, LLC 5005 LBJ Freeway, Ste. 1200 Dallas, TX 75244

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Encore Midwest Regional Center, LLC

Re:

Initial Regional Center Designation - Limited Decision

Encore Midwest Regional Center, LLC RCW1334651334 / RC-ID1334651334

This notice of a limited decision is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 12, 2103. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves, in a limited decision, the Form I-924 request to designate Encore Midwest Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation - Limited Decision

The applicant submitted its Form I-924 requesting specific industry categories, geographic regions, and multiple hypothetical projects to be identified for the Regional Center's use. Upon review of the record, USCIS has determined that not all of the requested geographic regions requested on Form I-924 represent an appropriate application of a hypothetical project to support the industry categories, and/or geographic regions acceptable for use by the Regional Center.

The general proposals and predictions provided in the specified hypothetical projects' business plans and economic analyses are insufficient to determine that the proposed regional center will more likely than not promote economic growth, improved regional productivity, job creation, and increased domestic capital investment.

As such, USCIS has concluded that a limited decision is necessary in this case. All requested and approved counties have been identified below.

A. Industry Categories and Geographic Regions Requested

The applicant has requested to focus, promote economic growth, and offer capital investment opportunities in the following geographic areas and industry categories:

1. Geographic Areas - Requested

State		Counties	
Missouri	All counties		
Arkansas	All counties		
	Allen County	Anderson County	Bourbon County
	Butler County	Chautauqua County	Cherokee County
	Coffey County	Cowley County	Crawford County
	Douglas County	Elk County	Franklin County
Kansas	Greenwood County	Harvey County	Jefferson County
	Johnson County	Labette County	Leavenworth County
	Linn County	Miami County	Montgomery County
	Neosho County	Osage County	Sedgwick County
	Shawnee County	Sumner County	Wilson County
	Woodson County	Wyandotte County	
	Adair County	Canadian County	Cherokee County
	Cleveland County	Craig County	Creek County
	Delaware County	Grady County	Le Flore County
	Lincoln County	Logan County	Mayes County
Oklahoma	McClain County	Muskogee County	Nowata County
	Oklahoma County	Okmulgee County	Osage County
	Ottawa County	Pawnee County	Payne County
	Pottawatomie County	Rogers County	Sequoyah County
	Tulsa County	Wagoner County	Washington County
Tennessee	Fayette County	Hardeman County	Haywood County
	Lauderdale County	Shelby County	Tipton County

2. Industry Categories - Requested

Industry Category	NAICS code
Residential Building Construction	2361
Non-Residential Building Construction	2362
Lessors of Real Estate	5311
Traveler Accommodation	7211
Full Service Restaurants	722511

B. Approved Industry Categories and/or Geographic Areas

The following geographic areas have been determined to represent an appropriate application of a hypothetical project to support the industry categories and geographic regions acceptable for use by the Regional Center.

1. Geographic Areas - Approved

State Counties/Cities						
M:	Franklin County	Jefferson County	Lincoln County	St. Charles County		
Missouri	St. Louis County	Warren County		City of St. Louis		
Illinois	Madison County	Monroe County	St. Clair County			

2. Industry Categories - Approved

Industry Category	NAICS code
Residential Building Construction	2361
Non-Residential Building Construction	2362
Lessors of Real Estate	5311
Traveler Accommodation	7211
Full Service Restaurants	722511

Some aspects of the submitted proposal, as presently constituted, do not meet the regulatory requirements at 8 C.F.R. § 204.6. Therefore the request to grant the entire geographic area requested, above, cannot be approved.

The decision to disallow the geographic areas identified above does not preclude the filing of Form I-526 petitions related to a subsequent project using the disallowed industry categories, geographic areas, and/or hypothetical project(s). Any future petitions will be adjudicated on their own merit.

III. Job Creation

USCIS approves the geographic area and industry categories noted below based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

The approval of this Form I-924 application is based upon the economically and statistically valid assumptions and estimates provided in the business plan for job creation. Please refer to the input and multiplier analysis table above.

A hypothetical project does not have the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998). As such, USCIS's approval of any hypothetical job creation estimates presented in a Form I-924 is not accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with Encore Midwest Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational and transactional documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine

compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws

and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalos Colmi

cc: Julianne Johnson Maerschel

Administrative Director

Encore Equities Management, LLC

Encore Enterprises, Inc.

5005 LBJ Freeway, Suite 1200

Dallas, TX 75244

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Washington, DC 20529



May 14, 2015 George Xu Century New York City Regional Center 35.06 Leavitt Street, Unit CFA Flushing, New York 11354

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Century New York City Regional Center Re: Initial Regional Center Designation

Century New York City Regional Center

RCW1420251818/ID1420251818

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 21, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Century New York City Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities
	Queens, New York, Bronx County, Richmond County, Westchester
New York	County, and Nassau County

Note: Pursuant to the Policy Memorandum on EB-5 Adjudications Policy (PM-602-0083), an amendment request is not required if investment opportunities arise outside the geographic area referenced above. USCIS will evaluate eligibility upon the filing of an initial Form I-526 related to that new investment opportunity.

B. Industry Categories

Industry Category	NAICS code
Nonresidential Building Construction	2362
Furniture and Home Furnishing Merchant Wholesalers	4232
Hotel and Motel (including Casino)	72251
Restaurants and Other Eating Places	72251
Lessors of Nonresidential Buildings (Except Miniwarehouses)	53112
Architectural, Engineering and Related Services	5413
Insurance Carriers	5241
Accounting Tax Preparation, Bookkeeping Services	5412
Legal Services	5411
Monetary Authorities and Depository Credit Intermediation	5222
Other miscellaneous professional and technical services	5419

Note: Pursuant to the Policy Memorandum on EB-5 Adjudications Policy (PM-602-0083), an amendment request is not required if investment opportunities arise outside the industry categories referenced above. USCIS will evaluate eligibility upon the filing of an initial Form I-526 related to that new investment opportunity.

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Century New York City Regional Center in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

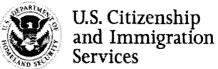
Chief, Immigrant Investor Program

Milalos Colmi

cc:

Mehreen Shah, Esq. 299 Broadway, Suite 1005 New York, NY 10007

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



April 6, 2015

Robert Lubin Southeast Foreign Investment Center LLC PO Box 9300 Reston, VA 20190

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Southeast Foreign Investment Center LLC

Re:

Request to Amend Regional Center Designation

Southeast Foreign Investment Center LLC

RCW1415051768 / RC ID 103450103

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on May 30, 2014. The Form I-924 application was filed to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

- A. Effective the date of this notice, USCIS approves the additional geographic area to include those areas listed in Section III of this notice.
- B. Effective the date of this notice, USCIS approves the additional industry categories listed in Section III of this notice.
- C. Effective the date of this notice, USCIS approves the regional center's organization structure discussed in Section III of this notice.
- D. Effective the date of this notice, USCIS approves the changes in the economic analysis and underlying business plan used to estimate job creation for previously

approved investment opportunities and industrial as described in Section III of this notice.

II. Procedural History

On May 21, 2013, USCIS approved the Southeast Foreign Investment Center LLC for participation in the Immigrant Investor Program as a designated regional center. Based on the initial designation the Southeast Foreign Investment Center LLC obtained approval for the following geographic area and industry categories:

Geographic A	rea	
State	Counties	Approval Date
Georgia	Clayton	05/21/2013
	Cobb	05/21/2013
	DeKalb	05/21/2013
	Fulton	05/21/2013
	Gwinnett	05/21/2013

Industry Cate	egories	
NAICS	Industry Name	Approval Date
236	Construction of Buildings	05/21/2013
531	Real Estate	05/21/2013

An amendment request is required if investment opportunities arise that are outside the previously approved geographic area and industry categories. If changes are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the new evidence to ensure compliance with EB-5 program requirements.

III. Amendment Request 1

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following changes:

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

A. Geographic Area

USCIS approves the applicant's amendment request to include the following geographic area:

State	Counties/Cities
Florida	All Counties
Georgia	All Counties not previously approved

B. Industry Categories

USCIS approves the applicant's amendment request to include the following industry categories:

NAICS	Industry Name
623	Nursing and Residential Care Facilities
721	Accommodation
722	Food Service and Drinking Places

C. Administration Change

USCIS approves the applicant's amendment request to change its administration. The applicant's administration has changed as follows:

The regional center provided evidence to update USCIS of the addition of a fourth managing member, Mr. Robert Lubin. Mr Lubin joined Misters Michael Nuzum, Joe Valeri and Rodney Burns. The four managing members will have equal ownership of the regional center.

D. Economic Analysis and underlying Business Plan Change

USCIS approves the applicant's amendment request to incorporate the following changes in its economic analysis and underlying business plan used to estimate job creation for previously approved investment opportunities and industry categories. The applicant's economic analysis and underlying business plan have changed as follows:

The applicant requested the ability to use the IMPLAN model to conduct economic analyses since the Bureau of Economic Analysis recently stated that the RIMS II model and data would be discontinued in response to fiscal year 2013 budget impacts. The applicant has provided sufficient evidence to use the IMPLAN model to forecast economic impacts and job creation. Additionally, the applicant can always use an appropriate economic impact model as outlined in the May 30, 2013 Policy Memorandum without the need for a formal amendment.

IV. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Southeast Foreign Investment Center LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial

enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional

Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

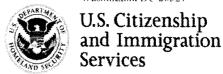
Sincerely,

Milels Columnia

Nicholas Colucci

Chief, Immigrant Investor Program

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



Date: May 4, 2015

Xiao Ping Christina Chang American Regional Center Opportunity Fund, LLC 39-01 Main Street, Suite 501 Flushing, NY 11354

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

American Regional Center Opportunity Fund, LLC

Re:

Initial Regional Center Designation

American Regional Center Opportunity Fund, LLC

RCW1421151833 / RCW1421151833

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 30, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate American Regional Center Opportunity Fund, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

American Regional Center Opportunity Fund, LLC ID1421151833 RCW1421151833 Page 2

A. Geographic Area

State	Counties			
New Jersey	Bergen County	Essex County	Hudson County	Hunterdon County
	Middlesex County	Monmouth County	Morris County	Ocean County
	Passaic County	Somerset County	Sussex County	Union County
New York	Kings County	Queens County	Suffolk County	Bronx County
	Nassau County	Westchester County	Richmond County	Rockland County
	Putnam County	New York County	Dutchess County	Orange County
Pennsylvania	Pike County			

B. Industry Categories¹

NAICS	Industry Name		
2361	Residential Building Construction		
2362	Non-Residential Building Construction		
4232	Furniture and Home Furnishing Merchant Wholesalers		
4234	Professional and commercial Equipment and Supplies Merchant		
	Wholesalers		
4236	Household Appliances and Electrical and Electrical Goods Merchant		
	Wholesalers		
5413	Architectural, Engineering, and Related Services		

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

American Regional Center Opportunity Fund, LLC ID1421151833 RCW1421151833 Page 3

investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the American Regional Center Opportunity Fund, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to

American Regional Center Opportunity Fund, LLC ID1421151833 RCW1421151833 Page 4

promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

American Regional Center Opportunity Fund, LLC ID1421151833 RCW1421151833 Page 5

Sincerely,

Milels Column

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Daniel B. Lundy

Klasko Rulon Stock and Seltzer 1601 Market St., Suite 2600 Philadelphia, PA 19103

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



May 4, 2015

Yanjun Chen Golden State Economic Development Fund, LLC 475 El Camino Real, Suite 218 Millbrae, CA 94030

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Golden State Economic Development Fund, LLC

Re:

Initial Regional Center Designation

Golden State Economic Development Fund, LLC

RCW1317151167 / RC-ID1317151167

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on June 20, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Golden State Economic Development Fund, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

, par marine en e	Counties			
State of California	Alameda County	San Benito County	Santa Cruz County	
	Contra Costa County	San Francisco County	Solano County	
	Marin County	San Mateo County	Sonoma County	
	Napa County	Santa Clara County	en e	

B. Industry Categories¹

Industry Category	NAICS code	
Residential Building Construction	2361	
Architectural, Engineering and Related Services	5413	
Furniture and Furnishing Wholesalers	4232	
Professional & Commercial Equipment Supplies Wholesalers	4234	
Household Appliances & Electrical Goods Wholesalers	4236	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be

¹ USCIS issued a Policy Memorandum (PM·602·0083) on the subject of "EB·5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I·924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Golden State Economic Development Fund, LLC RCW1317151167 / RC-ID1317151167 Page 3

realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Golden State Economic Development Fund, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

Golden State Economic Development Fund, LLC RCW1317151167 / RC-ID1317151167 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Mileles Columnia

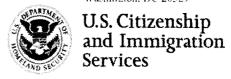
Nicholas Colucci

Chief, Immigrant Investor Program

cc: Je

Jean Chen Law Offices of Jean Chen 2107 North First Street San Jose, CA 95131

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



Date: April 30, 2015

David Charles Keller Liberty Minnesota Regional Center 23150 N Pima Road, Suite 2-B Scottsdale, AZ 85255

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Liberty Minnesota Regional Center

Re: Initial Regional Center Designation

Liberty Minnesota Regional Center RCW1319651177 / ID1319651177

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 15, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Liberty Minnesota Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Liberty Minnesota Regional Center ID1319651177 RCW1319651177 Page 2

A. Geographic Area

State	Counties	Counties
	Anoka	Chisago
Minnesota	Carver	Dakota
	Hennepin	Isanti
	Le Seur	McLeod
	Ramsey	Scott
	Sherburne	Sibley
	Washington	Wright
Wisconsin	Pierce	St. Croix

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
2389	Other Specialty Trade Contractors
2372	Land Subdivision
2371	Utility System Construction
5413	Architectural, Engineering and Related Services
5416	Management, Scientific and Technical Consulting Services

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Liberty Minnesota Regional Center ID1319651177 RCW1319651177 Page 3

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Liberty Minnesota Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is

Liberty Minnesota Regional Center ID1319651177 RCW1319651177 Page 4

available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

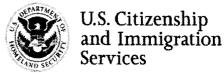
Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



April 27, 2015

Arun K Agarwal White Lotus Group Regional Center 105 North 31st Avenue, 2nd Floor Omaha NE 68131

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

White Lotus Group Regional Center

Re:

Initial Regional Center Designation White Lotus Group Regional Center RCW1413351755 / ID1413351755

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on May 13, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate White Lotus Group Regional Center as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the 30 Metropolitan Place project based on the evidence submitted with the exemplar Form I-526.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
Nebraska	Douglas, Sarpy, Lancaster and Cass
Iowa	Pottawattamie, Mills

B. Industry Categories¹

2362	Nonresidential Buildings Construction
2361	Residential Buildings Construction
7211	Accommodations
53112	Lessors of Nonresidential Building (except mini-warehouses)
53111	Lessors of Residential Building

III. The Project

(b)(4)

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an exemplar Form I-526.

Project	Type of Project	Organization Documents	Date of Document
30 Metropolitan	Actual	Certificate of Organization	Dated 04/15/2014
Place	Form	Operating Agreement	Submitted 05/13/2014
	I-526	Subscription Agreement/ Investor	
Geographic Location:	Petition	Questionnaire	Submitted 05/13/2014
Omaha NE	Project	Escrow Agreement	Submitted 05/13/2014
		PPM	Submitted 05/13/2014
Focus of Investment:		Business Plan	Submitted 05/13/2014
loan, equity		Economic Analysis by:	
		Impact Econometrics LLC	Dated 04/21/2014

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

The proposal identifies the new commercial enterprise ("NCE") of the project as TBD, which was formed in the State of Nebraska on TBD. The project is located at 5319 North 30 th Street in the City of, Omaha, Nebraska. Immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

(b)(4)

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS (b)(4) Industry Name		Direct Jobs	Indirect & Induced Jobs	Jobs
Hard construction		And to		
A&E fees		NO ANNA AN ANA		
Office space	MCC			
Office space	Deeb Realty			
Restaurant	Little King Sub			
Restaurant	Egg & I	Market Francisco		
Restaurant	Dunkin Donuts			
Health Care	Charles Drew Health Center			
Child Daycare	Purposely Created Child Care			
	Total Job	s		

(b)(4)

The approval of this Form I-924 application supported by an exemplar Form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on the NCE project

Each individual petition, in order to demonstrate that it is affiliated with the White Lotus Group Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci Chief, Immigrant Investor Program

Milalo Colmi

cc: Neeraj Agarwal

White Lotus Group

105 North 31st Avenue, 2nd Floor

Omaha, NE 68131

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



April 27, 2015

Neeraj Agarwal White Lotus Group 105 North 31st Avenue, 2nd Floor Omaha, NE 68131

Application: Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s): White Lotus Group Regional Center

Re: Initial Regional Center Designation

White Lotus Group Regional Center RCW1413351755 / ID1413351755

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on May 13, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate White Lotus Group Regional Center as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the 30 Metropolitan Place project based on the evidence submitted with the exemplar Form I-526.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
Nebraska	Douglas, Sarpy, Lancaster and Cass
Iowa	Pottawattamie, Mills

B. Industry Categories¹

2362	Nonresidential Buildings Construction
2361	Residential Buildings Construction
7211	Accommodations
53112	Lessors of Nonresidential Building (except mini-warehouses)
53111	Lessors of Residential Building

III. The Project

(b)(4)

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an exemplar Form 1-526.

Project	Type of Project	Organization Documents	Date of Document
30 Metropolitan	Actual	Certificate of Organization	Dated 04/15/2014
Place	Form	Operating Agreement	Submitted 05/13/2014
	I-526	Subscription Agreement/ Investor	
Geographic Location:	Petition	Questionnaire	Submitted 05/13/2014
Omaha NE	Project	Escrow Agreement	Submitted 05/13/2014
		PPM	Submitted 05/13/2014
Focus of Investment:		Business Plan	Submitted 05/13/2014
loan, equity		Economic Analysis by:	
		Impact Econometrics LLC	Dated 04/21/2014

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

The proposal identifies the new commercial enterprise ("NCE") of the project as TBD, which was formed in the State of Nebraska on TBD. The project is located at 5319 North 30 th Street in the City of, Omaha, Nebraska. immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

(b)(4)

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS Industry Name	(b)(4)	Direct Jobs	Indirect & Induced Jobs	Jobs
Hard construction				
A&E fees				
Office space	MCC			
Office space	Deeb Realty			
Restaurant	Little King Sub			
Restaurant	Egg & I			
Restaurant	Dunkin Donuts			
Health Care	Charles Drew Health Center			
Child Daycare	Purposely Created Child Care			
	Total Job	os		

The approval of this Form I-924 application supported by an exemplar Form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

(b)(4)

IV. Guidelines for Filing Form I-526 Petitions Based on the NCE project

Each individual petition, in order to demonstrate that it is affiliated with the White Lotus Group Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Milels Columnia

Nicholas Colucci

Chief, Immigrant Investor Program

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



April 27, 2015

Nicolai Hinrichsen Miller Mayer LLP 202 East State Street, Suite # 700 Ithaca, NY 14850

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

New York City Regional Center

ID1031910093

Re:

Request to Amend Regional Center Designation

Project: Manhattan Chrystie Street Development Fund, LLC

RCW1323451197

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on August 22, 2013. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Manhattan Chrystie Street Development Fund, LLC project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Manhattan Chrystie Street Development Fund, LLC will be a new

(b)(4) commercial enterprise (NCE) and that the project is likely to result in the creation of at least jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Manhattan Chrystie Street Development Fund, LLC project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On October 30, 2008, USCIS approved the New York City Regional Center for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the 4 counties in the State of New York: Bronx County, Kings County, Queens County and New York County. New York City Regional Center now seeks to amend its previously approved regional center designation to include an actual project that will be managed by Manhattan Chrystie Street Development Fund, LLC, an NCE established on March 29, 2013.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
Manhattan Chrystie Street Development	Hotel & Apartment	Business Plan	08/2013
Fund, LLC		Economic Analysis	07/09/2013
Geographic Location: Bronx, Kings,	Investment: Loan	Confidential Private Placement Memorandum	06/14/2013
Queens, New York counties		Subscription Agreement	06/14/2013
Exemplar of Form I-		Operating Agreement	06/14/2013
526		Escrow Agreement	06/14/2013

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove

Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

(b)(4)	
(/ (/	

IV. Job Creation

(b)(4)

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

Total Jobs:				
2300	Construction			
NAICS 1	Industry Name	Input (\$Millions) Multiplier	Jobs	(b)(4)

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately construction jobs associated with the Manhattan Chrystie Street Development Fund project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with Manhattan Chrystie Street Development Fund. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the Manhattan Chrystie Street</u> <u>Development Fund project</u>

Each individual petition, in order to demonstrate that it is affiliated with the New York City Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to

promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely.

Miles Colmi

Nicholas Colucci

Chief, Immigrant Investor Program

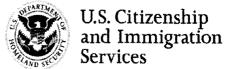
Paul A. Levinsohn cc:

C/O New York City Regional Center

299 Broadway, Suite 1220 New York, NY 10007

632

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



April 27, 2015

Paul A. Levinsohn C/O New York City Regional Center 299 Broadway, Suite 1220 New York, NY 10007

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

New York City Regional Center

ID1031910093

Re:

Request to Amend Regional Center Designation

Project: Manhattan Chrystie Street Development Fund, LLC

RCW1323451197

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on August 22, 2013. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Manhattan Chrystie Street Development Fund, LLC project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Manhattan Chrystie Street Development Fund, LLC will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at

(b)(4)

least jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Manhattan Chrystie Street Development Fund, LLC project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On October 30, 2008, USCIS approved the New York City Regional Center for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the 4 counties in the State of New York: Bronx County, Kings County, Queens County and New York County. New York City Regional Center now seeks to amend its previously approved regional center designation to include an actual project that will be managed by Manhattan Chrystie Street Development Fund, LLC, an NCE established on March 29, 2013.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
Manhattan Chrystie Street Development	Hotel & Apartment	Business Plan	08/2013
Fund, LLC		Economic Analysis	07/09/2013
Geographic Location: Bronx, Kings,	Investment: Loan	Confidential Private Placement Memorandum	06/14/2013
Queens, New York counties		Subscription Agreement	06/14/2013
Exemplar of Form I-		Operating Agreement	06/14/2013
526		Escrow Agreement	06/14/2013

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove

Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.	
	(b)(4)

IV. Job Creation

(b)(4)

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS 1	Industry Name	Input Multiplier Jobs	
2300	Construction		(b)(4)
Total Jobs:			

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately construction jobs associated with the Manhattan Chrystie Street Development Fund project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with Manhattan Chrystie Street Development Fund. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the Manhattan Chrystie Street</u> <u>Development Fund project</u>

Each individual petition, in order to demonstrate that it is affiliated with the New York City Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to

promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Miles Coloni

Nicholas Colucci

Chief, Immigrant Investor Program

cc:

Nicolai Hinrichsen Miller Mayer LLP

202 East State Street, Suite # 700

Ithaca, NY 14850

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street. NE, MS 2235 Washington, DC 20529



April 27, 2015

Nicolai Hinrichsen Miller Mayer LLP 202 East State Street, Suite # 700 Ithaca, NY 14850

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

New York City Regional Center

ID1031910093

Re:

Request to Amend Regional Center Designation

Project: Upper Manhattan Medical Development Fund, LLC

RCW1317651168

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on June 25, 2013. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Upper Manhattan Medical Development Fund, LLC project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Upper Manhattan Medical Development Fund, LLC will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at

(b)(4)

least obs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Upper Manhattan Medical Development Fund, LLC project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On October 30, 2008, USCIS approved the New York City Regional Center for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the 4 counties in the State of New York: Bronx County, Kings County, Queens County and New York County. New York City Regional Center now seeks to amend its previously approved regional center designation to include an actual project that will be managed by Upper Manhattan Medical Development Fund, LLC, an NCE established on January 18, 2013.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
Upper Manhattan Medical Development	Hotel & Medical Offices	Business Plan	06/2013
Fund, LLC		Economic Analysis	05/30/2013
Geographic Location: Bronx, Kings, Queens, New York counties	Investment: Loan	Confidential Private Placement Memorandum	06/10/2013
Exemplar of Form I- 526		Subscription Agreement	03/12/2013
320		Loan Agreement	03/12/2013
		Escrow Agreement	03/12/2013

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove

Conditions, USCIS compliance with EB	will review the suppor -5 program requireme	eting documents once ments.	ore to ensure continued	
	•			(b)(4)

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

Total Jobs:			
2300	Construction	(b)	(4)
NAICS 1	Industry Name	Input (\$Millions) Multiplier Jobs	(A)

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately construction jobs associated with the Upper Manhattan Medical Development Fund, LLC project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with Upper Manhattan Medical Development Fund, LLC. Deference,

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the Upper Manhattan Medical Development Fund, LLC project</u>

Each individual petition, in order to demonstrate that it is affiliated with the New York City Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide

USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Mileles Coloni

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Paul A. Levinsohn

C/O New York City Regional Center

299 Broadway, Suite 1220 New York, NY 10007

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street. NE. MS 2235 Washington, DC 20529



April 27, 2015

Paul A. Levinsohn C/O New York City Regional Center 299 Broadway, Suite 1220 New York, NY 10007

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

New York City Regional Center

ID1031910093

Re:

Request to Amend Regional Center Designation

Project: Upper Manhattan Medical Development Fund, LLC

RCW1317651168

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on June 25, 2013. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Upper Manhattan Medical Development Fund, LLC project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Upper Manhattan Medical Development Fund, LLC will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at

(b)(4)

least jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Upper Manhattan Medical Development Fund, LLC project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On October 30, 2008, USCIS approved the New York City Regional Center for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the 4 counties in the State of New York: Bronx County, Kings County, Queens County and New York County. New York City Regional Center now seeks to amend its previously approved regional center designation to include an actual project that will be managed by Upper Manhattan Medical Development Fund, LLC, an NCE established on January 18, 2013.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
Upper Manhattan Medical Development	Hotel & Medical Offices	Business Plan	06/2013
Fund, LLC		Economic Analysis	05/30/2013
Geographic Location: Bronx, Kings, Queens, New York counties	Investment: Loan	Confidential Private Placement Memorandum	06/10/2013
Exemplar of Form I-		Subscription Agreement	03/12/2013
		Loan Agreement	03/12/2013
		Escrow Agreement	03/12/2013

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove

Conditions, U compliance wi	SCIS will review t ith EB-5 program	he supporting do requirements.	ocuments once 1	more to ensure	continued

IV. Job Creation

(b)(4)

The job creation methodology presented in the economic impact analysis and underlying (b)(4) business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS 1	Industry Name	Input (\$Millions)	Multiplier	Jobs
2300	Construction			7
Total Jobs	3:			

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately construction jobs associated with the Upper Manhattan Medical Development Fund, LLC project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with Upper Manhattan Medical Development Fund, LLC. Deference,

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the Upper Manhattan Medical</u> Development Fund, LLC project

Each individual petition, in order to demonstrate that it is affiliated with the New York City Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide

New York City Regional Center ID1031910093 RCW1317651168 Page 5

USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at <a href="https://doi.org/10.1007/journal-number-10.1007/j

Sincerely,

New York City Regional Center ID1031910093 RCW1317651168 Page 6

Miles Colmi

Nicholas Colucci

Chief, Immigrant Investor Program

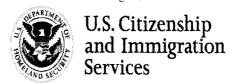
cc:

Nicolai Hinrichsen Miller Mayer LLP

202 East State Street, Suite # 700

Ithaca, NY 14850

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street, NE Washington, DC 20529



TO: Greg Hart Ohio Development Regional Center 534 Hathaway Road Dayton, OH 45419

RC ID#: 1105950168

DATE: April 28, 2015

RE: Reaffirmation of Regional Center Designation

DECISION

This notice is in reference to the regional center designation of Ohio Development Regional Center ("ODRC"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on August 23, 2011. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395"). Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On March 17, 2015, USCIS notified ODRC of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for not promoting economic growth in the region. The Notice of Intent to Terminate ("NOIT") provided ODRC an opportunity to offer evidence in opposition to the grounds alleged in the NOIT, including evidence of a Form I-924A filing for fiscal year 2013.

On April 20, 2015, in response to the NOIT, USCIS received evidence from ODRC of a Form I-924A filing for fiscal year 2013. After considering the evidence, USCIS reaffirms the existing regional center designation for ODRC.

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

Sincerely,

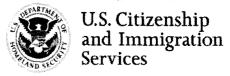
Nicholas Colucci

Mels Colmi

Chief

Immigrant Investor Program Office

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



April 22, 2015

Hong-Jin Guan Pan-Pacific Center 100 Century Center Ct. Suite 415 San Jose, CA 95112

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Pan-Pacific Regional Center

Re:

Initial Regional Center Designation Pan-Pacific Regional Center, LLC RCW1418251795/ID1418251795

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 1, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Pan-Pacific Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

Pan-Pacific Regional Center ID1418251795 RCW1418251795 Page 2

State	Counties/Cities
California	Alameda County, Contra Costa County, Marin County, Santa Clara
	County, San Francisco County, San Mateo County, and Sonoma County

B. Industry Categories¹

NAICS	Industry Name
236000	Construction of Buildings
236220	Commercial & Institutional Building Construction
623312	Assisted Living Facilities

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Pan-Pacific Regional Center ID1418251795 RCW1418251795 Page 3

Each individual petition, in order to demonstrate that it is affiliated with the Pan-Pacific Regional Center, LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center

Pan-Pacific Regional Center ID1418251795 RCW1418251795 Page 4

in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Milely Column

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Hong-Jin Guan

Pacific Law Group LLP

100 Century Center Court Suite 415

San Jose, CA 95112

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



April 22, 2015

Ms. Catherine Holmes Jeffer Mangles Butler & Mitchell, LLP 1900 Avenue of the Stars Floor 7 Los Angeles, CA 90067

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Hana Financial Regional Center

Re:

Initial Regional Center Designation Hana Financial Regional Center, LLC RCW1418151791/ID1418151791

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on June 30, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Hana Financial Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities
California	Ventura, Los Angeles, San Bernardino, Orange, Riverside

B. Industry Categories¹

NAICS	Industry Name		
2362	Nonresidential Building Construction		
4232	Furniture and Home Furnishings Merchant Wholesalers		
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers		
4236	Household Appliances and Electrical and Electric Goods Merchant Wholesalers		
7211	Traveler Accommodation		

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Hana Financial Regional Center, LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,
Miles Colum

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Sunnie S. Kim

Hana Financial Regional Center 1000 Wilshire Blvd. 20th Floor

Los Angeles, CA 90017

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



April 22, 2015

Sunnie S. Kim Hana Financial Regional Center 1000 Wilshire Blvd. 20th Floor Los Angeles, CA 90017

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Hana Financial Regional Center

Re: Initial Regional Center Designation

Hana Financial Regional Center, LLC

RCW1418151791/ID1418151791

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on June 30, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Hana Financial Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities
California	Ventura, Los Angeles, San Bernardino, Orange, Riverside

B. Industry Categories¹

NAICS	Industry Name	
2362	Nonresidential Building Construction	
4232	Furniture and Home Furnishings Merchant Wholesalers	
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers	
4236	Household Appliances and Electrical and Electric Goods Merchant Wholesalers	
7211	Traveler Accommodation	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

_

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Hana Financial Regional Center, LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Milels Columnia

Nicholas Colucci

Chief, Immigrant Investor Program

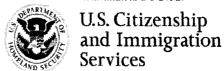
cc: Ms. Catherine Holmes

Jeffer Mangles Butler & Mitchell, LLP

1900 Avenue of the Stars Floor 7

Los Angeles, CA 90067

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



April 22, 2015

Daniel J. Healy Civitas Michigan Regional Center 1601 Bryan Street, Suite M-200 Dallas, TX 75201

Application:

Form I-924, Application for Regional Center under the Immigrant Investor

Pilot Program

Applicant(s):

Civitas Michigan Regional Center

Re:

Initial Regional Center Designation Civitas Michigan Regional Center RCW1428051907 / ID1428051907

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 7, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Civitas Michigan Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities
Michigan	All Counties/Cities

B. Industry Categories¹

NAICS	Industry Name
236	Construction of Buildings
423	Merchant Wholesalers – Durable Goods
5411	Legal Services
5413	Architectural, Engineering, and Related Services
5416	Management, Scientific, and Technical Consulting Services
5418	Advertising, Public Relations, and Related Services
5311	Lessors of Real Estate
531320	Offices of Real Estate Appraisers
541191	Title Abstract and Settlement Offices

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Civitas Michigan Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 1&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,
Alls blui

Nicholas Colucci

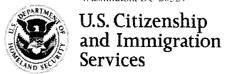
Chief, Immigrant Investor Program

cc: Lincoln Stone

Stone Grzegorek & Gonzalez LLP 800 Wilshire Boulevard, Suite 900

Los Angeles, CA

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



April 22, 2015

Lincoln Stone Stone Grzegorek & Gonzalez LLP 800 Wilshire Boulevard, Suite 900 Los Angeles, CA 90017

Application: Form I-924, Application for Regional Center under the Immigrant Investor

Pilot Program

Applicant(s): Civitas Michigan Regional Center

Re: Initial Regional Center Designation

Civitas Michigan Regional Center RCW1428051907 / ID1428051907

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 7, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Civitas Michigan Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities
Michigan	All Counties/Cities

B. Industry Categories¹

NAICS	Industry Name
236	Construction of Buildings
423	Merchant Wholesalers – Durable Goods
5411	Legal Services
5413	Architectural, Engineering, and Related Services
5416	Management, Scientific, and Technical Consulting Services
5418	Advertising, Public Relations, and Related Services
5311	Lessors of Real Estate
531320	Offices of Real Estate Appraisers
541191	Title Abstract and Settlement Offices

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Civitas Michigan Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities

related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

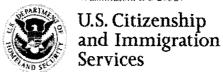
Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

cc: Civitas Michigan Regional Center 1601 Bryan Street, Suite M-200 Dallas, TX 75201

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street. NE. Mailstop 2235 Washington, DC 20529



Date: April 17, 2015

Jeffrey Campion Jeffrey E Campion PA 1675 Market Street, Ste. 211 Weston, FL 33326

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

West Coast Regional Center, Inc.

Re:

Initial Regional Center Designation West Coast Regional Center, Inc. RCW1400251560 / RC ID 1400251560

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on January 2, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate West Coast Regional Center, Inc. as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

West Coast Regional Center, Inc. ID1400251560 RCW1400251560 Page 2

State	Counties/Cities
California	Entire state
Nevada	Entire state

B. Industry Categories¹

NAICS	Industry Name
236	Construction of Buildings
423	Merchant Wholesalers, Durable Goods
5311	Lessors of Real Estate
5413	Architectural, Engineering, and Related Services
7211	Traveler Accommodation
722	Food Services and Drinking Places
8129	Other Personal Services

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

West Coast Regional Center, Inc. ID1400251560 RCW1400251560 Page 3

realized, then it will be the responsibility of the EB·5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the West Coast Regional Center, Inc., in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

West Coast Regional Center, Inc. ID1400251560 RCW1400251560 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

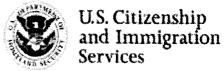
Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

cc: Jeffrey Campion West Coast Regional Center, Inc. 1675 Market St., 211 Weston, FL 33326

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



Date: 04/17/2015

Metin Negrin Lexin New York Regional Center 654 Madison Avenue, Suite 2205 New York, NY 10065

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Lexin New York Regional Center, LLC

Re:

Initial Regional Center Designation Lexin New York Regional Center, LLC RCW1418151793 / ID1418151793

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 06/30/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Lexin New York Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

Name of State (s)	Counties/Cities
Connecticut	Fairfield, Litchfield, and New Heaven
New Jersey	Bergen, Essex, Hudson, Hunterdon, Mercer,

Lexin New York Regional Center, LLC RCW1418151793 / ID1418151793

Page 2

	Middlesex, Monmouth, Morris, Ocean, Passaic, Somerset, Sussex and Union.
New York	Bronx, Dutchess, Kings, Nassau, New York, Orange, Putnam, Queens, Richmond, Rockland, Suffolk, Ulster and Westchester.
Pennsylvania	Pike

B. Industry Categories¹

NAICS	Industry Name	
2362	Nonresidential Building Construction	
5413	Architectural, Engineering, and Related Services	
7211	Traveler Accommodation	
4232	Furniture and Home Furnishing Merchant Wholesalers	
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers	
4236	Household Appliances and Electrical and Electronic Goods Merchant	
	Wholesalers	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Lexin New York Regional Center, LLC RCW1418151793 / ID1418151793

Page 3

realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Lexin New York Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho. 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

Lexin New York Regional Center, LLC RCW1418151793 / ID1418151793

Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

cc: Marianna Tarantur, Esq.

Wright Johnson Ltd.

197 S. Federal Highway, Suite 200

Boca Raton, FL 33432



April 15, 2015

Marianna Tarantur 197 S Federal Highway, Suite 200 Boca Raton, FL 33432

USCIS Motion to Reopen

Form I-924, Application for Regional Center under the Immigrant Investor Program

On March 31, 2015, U.S. Citizenship and Immigration Services (USCIS) approved Coming to America LLC for participation in the Immigrant Investor Program as a designated regional center under the authority of § 610 of the Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriations Act of 1993, Pub. L. No 102-395, 106 Stat. 1828, 1874 (Oct. 6, 1992). The purpose of this notice is to inform Coming to America LLC of USCIS' decision to reopen the decision.

USCIS is reopening the decision because the required review of the Form I-924 application has not been completed.

Sincerely,

Nicholas Colucci

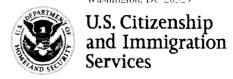
Chief, Immigrant Investor Program

Cc: Annabelle Rodriguez

Milels Colum

Coming to America LLC 3515 Plazas Del Lago Edinburg, TX 78539

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street. NE. Mailstop 2235 Washington, DC 20529



March 31, 2015

Marianna Tarantur 197 S Federal Highway, Suite 200 Boca Raton, FL 33432

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Coming to America LLC

Re:

Initial Regional Center Designation

Coming to America LLC

RCW1406951701 / ID1406951701

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 3/7/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Coming to America LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Coming to America LLC ID1406951701 RCW1406951701 Page 2

C. Geographic Area

State	Counties/Cities
	Hidalgo
State of Texas	

B. Industry Categories³

NAICS Code	Industry
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers
5413	Architectural, Engineering, and Related Services
6115	Technical and Trade Schools

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the

³ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area TMwill be permissible prior to filing Form I-526 petitions.

Coming to America LLC ID1406951701 RCW1406951701 Page 3

Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Coming to America LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 9. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 10. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 11. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 12. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide

Coming to America LLC ID1406951701 RCW1406951701 Page 4

USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Coming to America LLC ID1406951701 RCW1406951701 Page 5

Sincerely,
Allelo Colum

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Annabelle Rodriguez Coming to America LLC 3515 Plazas Del Lago Edinburg, TX 78539

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



April 13, 2015

Robert Frost Great Southern Regional Center, LLC 1212 Guadalupe St., Suite 1002 Austin, TX 78701

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Great Southern Regional Center, LLC

Re:

Initial Regional Center Designation Great Southern Regional Center, LLC RCW1235550908 / RC-ID1235550908

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 20, 2012. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Great Southern Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

States	Counties		
Georgia	Franklin County	Hart County	Stephens County
South Carolina	Anderson County		

B. Industry Categories¹

Industry Category	NAICS code
Hotels, Motels & Hotel Management Services	721110

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Great Southern Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Great Southern Regional Center, LLC RCW1235550908/RC·ID1235550908 Page 3

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

Great Southern Regional Center, LLC RCW1235550908/RC-ID1235550908 Page 4

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

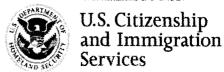
Chief, Immigrant Investor Program

Milalo Colmi

cc: James Halter

17055 Windward Lane Addison, TX 75001

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



Han Jun Li C/o Law offices of Li and Assc 136-18 39th Ave Flushing, NY 11354

Re: April 6, 2015

Tom Rosenfeld 88 Pine Street, Suite 2010 New York, NY 10005

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

PIDC Regional Center

ID1031910154

Re:

Request to Amend Regional Center Designation

Project: PIDC Regional Center, LP XXXII

RCW1428751913

This notice of a limited decision is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on October 14, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

A. Effective the date of this notice, USCIS approves a limited decision for the included project, PIDC Regional Center, LP XXXII as explained in Sections III, IV, and V of this notice.

Effective the date of this notice, USCIS approves the PIDC Regional Center, LP XXXII project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the PIDC Regional Center, LP XXXII will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least piobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the PIDC Regional Center, LP XXXII project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On February 28, 2003, USCIS approved the PIDC Regional Center ("PIDCRC") for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the following five counties in the State of Pennsylvania: Bucks, Chester, Delaware, Montgomery and Philadelphia. PIDCRC now seeks to amend its previously approved regional center designation to include an actual project that will be managed by PIDC Regional Center, LP XXXII, an NCE established on April 7, 2014.

An amendment request may be filed for capital investment projects for a decision regarding deference. If changes are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the new evidence to ensure compliance with EB-5 program requirements.

III. Amendment Request1

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following actual capital investment project supported by an exemplar Form I-526:

_

(b)(4)

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Project Type of Project Organization Documents		Date of Document	
PIDC Regional	Industrial Metals	Exemplar Form I-526	Submitted
Center, LP	Manufacturing	Petition with Sample NCE	10/14/2014
XXXII		Ownership List	
	Investment:	Confidential Information	Final 7/9/2014
Geographic	Loan	Memorandum ("CIM") and	
Location:		Supplement CIM dated the	
1900 Kitty		same	
Hawk Avenue,		PIDC Regional Center, L.P.	Sample 7/9/2014
Philadelphia,		XXXII Subscription	
PA		Agreement 2014-08-29	
		PIDC Regional Center, LP	Executed 7/1/2014
Exemplar of		XXXII (NCE) Limited	
Form I-526		Partnership Agreement	
		Escrow Agreement and	Executed 8/20/2013
		related documents	
		Servicing Agreement	Executed 7/1/2014
		Business Plan for EB-5	Submitted
		Investment in PIDC	10/14/2014
		Regional Center, LP XXXII	
		(NCE)	
		Economic Impact by	Final 10/9/2014
		Econsult Solutions, Daniel	
		M. Miles	
		Loan Commitment Letter	Executed Letter 7/31/2014
		Draft Loan and Security	Sidley Draft
		Agreement	10/8/2014

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

(b)(4)	The requested amendment identifies the NCE of the proposed project as PIDC Regional Center, LP XXXII which was formed in the State of Pennsylvania on April 7, 2014. The PIDC Regional Center, LP project is located within a targeted employment area (TEA) in the City of Philadelphia, Pennsylvania. Up to EB-5 investors will subscribe to the NCE as equity owners in exchange for capital contributions of each and an aggregate investment amount of

(b)(4)			

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

IMPLAN Industry Code ²	IMPLAN Industry Category	Input (\$Millions)	Multiplier	Jobs	USCIS Jobs	(b)(4)
34	Construction of new non-residential commercial structures (Stage 1)					
369	Architectural, engineering, and related services (Stage 1)					
319	Wholesale Trade Business (Stage 1)					
228	Material Handling Equipment Manufacturing (Stage 1)					
189	Metal tank (heavy gauge) manufacturing (Stage 1)					
189	Metal tank (heavy gauge) manufacturing (Stage 2)					
189	Metal tank (heavy gauge) manufacturing (Stage 3)					
Total Jobs:						

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a

² These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

PIDC Regional Center ID1031910154
RCW1428751913
Page 5

preponderance of the evidence that the project is expected to result in the creation of approximately jobs.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with PIDC Regional Center, LP XXXII. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is

(b)(4)

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

determined to be legally deficient (involved an objective mistake of fact or law).

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Decision to Disallow Certain Requested Job Creation

a) Economic Impact Analysis - Insufficient to show job creation

Project: PIDC Regional Center, LP XXXII

The applicant requests to include NYUS Group A, LLC as a new actual capital investment project(s). The actual project is described as follows:

The development, construction and operation of a mixed use project comprised of an office building and a residential building.

(b)(4)		

VI. <u>Guidelines for Filing Form I-526 Petitions based on the PIDC Regional Center, LP XXXII project</u>

Each individual petition, in order to demonstrate that it is affiliated with the PIDC Regional Center, LP XXXII, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VII. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant

Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VIII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Han Jun Li

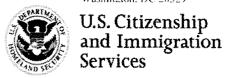
C/o Law offices of Li and Assc

136-18 39th Ave

Miles Colmi

Flushing, NY 11354

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



Date: April 1, 2015

Samuel Silverman EB5 Affiliate Network State of California Regional Center, LLC 3801 PGA Blvd., Suite 902 Palm Beach Gardens, FL 33410

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

EB5 Affiliate Network State of California Regional Center, LLC

Re:

Initial Regional Center Designation

EB5 Affiliate Network State of California Regional Center, LLC

RCW 1403151667 / RC ID 1403151667

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on January 31, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Affiliate Network State of California Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

EB5 Affiliate Network State of California Regional Center, LLC ID1403151667 RCW1403151667 Page 2

A. Geographic Area

State	Counties/Cities	
	Entire State	
California		

B. Industry Categories¹

NAICS	Industry Name
236115	New Single-Family Housing Construction
236116	New Multifamily Housing Construction
236220	Commercial and Institutional Building Construction
713940	Fitness and Recreational Sports Centers
722511	Full-Service Restaurants

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

EB5 Affiliate Network State of California Regional Center, LLC ID1403151667 RCW1403151667 Page 3

business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Affiliate Network State of California Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

EB5 Affiliate Network State of California Regional Center, LLC ID1403151667 RCW1403151667 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

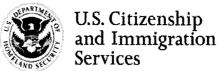
Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalos Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program*Mailstop 2235
Washington, DC 20529



Date: March 3, 2015

Ms. Marianna Tarantur Wright Johnson, LLC 197 S Federal Hwy Ste. 200 Boca Raton, FL 33432

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

EB5 Florida Hotels & Investments Regional Center, LLC

Re:

Initial Regional Center Designation

EB5 Florida Hotels & Investments Regional Center, LLC

RCW1435752249/1435752249

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 23, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Florida Hotels & Investments Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

EB5 Florida Hotels & Investments Regional Center, LLC ID1435752249 RCW1435752249 Page 2

A. Geographic Area

State	Counties/Cities
	Miami-Dade
Florida	Broward
	Palm Beach

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
7211	Traveler Accommodation

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

EB5 Florida Hotels & Investments Regional Center, LLC ID1435752249 RCW1435752249 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Florida Hotels & Investments Regional Center, LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

EB5 Florida Hotels & Investments Regional Center, LLC ID1435752249 RCW1435752249 Page 4

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

cc: Luis Prado

EB5 Florida Hotels & Investments Regional Center, LLC c/o American Strategic Investments Consulting Group, LLC

801 Brickwell Ave. Suite 220

Miami, FL 33131

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



March 27, 2015

David E. Dobbs US EB5 Association C/O: Dobbs & Tittle, PC 3311 Woods Boulevard Tyler, TX 75707

Application:

Form I-924, Application for Regional Center under the Immigrant Investor

Pilot Program

Applicant(s):

US EB5 Association

Re:

Initial Regional Center Designation

US EB5 Association

RCW1422351845 / ID1422351845

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on August 11, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate US EB5 Association as a qualifying participant in the Immigrant Investor Program.

US EB5 Association ID1422351845 RCW1422351845 Page 2

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities	
Texas	All Counties/Cities	

B. Industry Categories¹

NAICS	Industry Name
236116	New Multifamily Housing Construction (except For-Sale Builders)
236220	Commercial and Industrial Building Construction
531110	Lessors of Residential Buildings and Dwellings
622110	General Medical and Surgical Hospitals
21111	Oil & Gas Extraction
213111	Drilling Oil & Gas Wells
213112	Supportive Activities for Oil & Gas Operations

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

US EB5 Association ID1422351845 RCW1422351845 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the US EB5 Association, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

US EB5 Association ID1422351845 RCW1422351845 Page 4

VI. <u>Legal Notice</u>

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

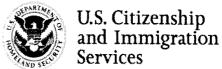
Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milala Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



Michael Brown Clark Hill PLC 150 N. Michigan Ave, Suite 2700 Chicago, IL 60601

Re: March 26, 2015

Phillip Dean Greystone Capital Investments Regional Center, LLC 1272 Willowick Lane Rockford, IL 61108

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Greystone Capital Investments Regional Center, LLC

Re:

Initial Regional Center Designation

Greystone Capital Investments Regional Center, LLC

RCW1231050798 / ID1231050798

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on November 5, 2012. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Greystone Capital Investments Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the Greystone Specialty Care I, L.P. project based on the evidence submitted with the exemplar Form I-526.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Citie	8	
Illinois	Boone	Cook	Dekalb
	DuPage	Kane	Lake
	McHenry	Ogle	Stephenson
	Winnebago		

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
5413	Architectural, Engineering, and Related Services
623	Nursing and Residential Care Facilities
6233	Continuing Care Retirement Communities and Assisted Living Facilities for the Elderly

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an exemplar Form I-526.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Project	Type of Project	Organization Documents	Date of Document
Greystone Speciality Care I, L.P.	Exempl ar Form I-526	Confidential Private Placement Memorandum target ("CPPM")	Submitted 01/22/2015 (b)(4)
Geographic	Petition Project	Business Plan – Greystone Specialty Care I, L.P. (Attachment A to CPPM)	Dated October 2012; Revised December 2014
Location: Rockford, IL		Economic Analysis Operating Agreement (Doc ID 8378686.3 09999/09998-1278)	Dated 11/26/2013 Submitted 01/22/2015
Focus of Investment:		Subscription Agreement (Doc ID 8488076.2 09999/09998-1278)	Submitted 01/22/2015
Loan		Escrow Agreement: Principal Investment (Doc ID 8487168.2 09999/09998-1278)	Submitted 01/22/2015
		Escrow Agreement: Administrative Expense (Doc ID 8355008.2 09999/09998-1278)	Submitted 01/22/2015

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

The proposal identifies the new commercial enterprise ("NCE") of the project as Greystone

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II input output economic model:

NAICS Industry Name		Input (\$Millions)	Multiplier	Jobs	
2362	Nonresidential Building Construction]
5413	Architectural, Engineering, and				(6)(4)
	Related Services				(b)(4)
623	Nursing and Residential Care				
	Facilities				
Total Jobs:					

The approval of this Form I-924 application supported by an exemplar Form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on Greystone Specialty Care I, L.P. project

Each individual petition, in order to demonstrate that it is affiliated with the Greystone Capital Investments Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual

immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center.

Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Michael Brown

Clark Hill PLC

Miles Colmi

150 N. Michigan Ave, Suite 2700

Chicago, IL 60601

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



March 23, 2015 Stanley Lan Ohio International Investment Center LP LLC 4449 Easton Way, 2nd Floor Columbus, OH 43219

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Ohio International Investment Center LC

Re: Initial Regional Center Designation

Ohio International Investment Center LC

RCW1421251834 / ID1421251834

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 31, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Ohio International Investment Center LC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation - Limited Decision

The applicant submitted its Form I-924 requesting specific industry categories, geographic regions, and multiple hypothetical projects to be identified for the Regional Center's use.

Upon review of the record, USCIS has determined that not all of the requested geographic regions provided in the Form I-924 represent an appropriate application of a hypothetical project to support the industry categories, and/or geographic regions acceptable for use by the Regional Center.

As such, USCIS has concluded that a limited decision is necessary in this case. Therefore, all requested, approved, and disallowed geographic regions.

Ohio International Investment Center LC ID1421251834 RCW1421251834 Page 2

A. Industry Categories and Geographic Regions Requested

The applicant has requested to focus, promote economic growth, and offer capital investment opportunities in the following geographic areas and industry categories:

1. Geographic Areas - Requested

State	Counties		
	All Counties		
Ohio			

B. Approved Industry Categories and/or Geographic Areas

The following industry categories and/or geographic areas have been determined to represent an appropriate application of a hypothetical project to support the geographic regions acceptable for use by the Regional Center.

1. Geographic Areas - Approved

Counties/Cities
City of Columbus
Counties of Delaware, Fairfield, Franklin, Hocking, Licking, Madison, Morrow, Perry, Pickaway, and Union

C. Disallowed Industry Categories and/or Geographic Areas

The following geographic areas have been disallowed because it has been determined that they do not represent an appropriate application of a hypothetical project to support the geographic regions acceptable for use by the Regional Center.

1. Geographic Areas - Disallowed

State	Counties
	Adams, Allen, Ashland, Ashtabula, Athens, Auglaize, Belmont,
Ohio	Brown, Butler, Carroll, Champaign, Clark, Clermont, Clinton,
	Columbiana, Coshocton, Crawford, Cuyahoga, Darke, Defiance,
	Erie, Fayette, Fulton, Gallia, Geauga, Greene, Guernsey, Hamilton,
	Hancock, Hardin, Harrison, Henry, Highland, Holmes, Huron,

Ohio International Investment Center LC ID1421251834 RCW1421251834 Page 3

Jackson, Jefferson, Knox, Lake, Lawrence, Logan, Lorain, Lucas,
Mahoning, Marion, Medina, Meigs, Mercer, Miami, Monroe,
Montgomery, Morgan, Muskingum, Noble, Ottawa, Paulding, Pike
Portage, Preble, Putnam, Richland, Ross, Sandusky, Scioto, Seneca,
Shelby, Stark, Summit, Trumbull, Tuscarawas, Van Wert, Vinton,
Warren, Washington, Wayne, Williams, Wood, and Wyandot

The allowed counties were cited in the Economic Impact Study and shown to be affected by the Regional Center's activities. There was no such evidence of impact in the disallowed counties.

B. Industry Categories¹

NAICS Code	Industry
721110	Hotels (except Casino Hotels) and Motels
6233	Continuing Care Retirement Communities and Assisted Living Facilities for the Elderly
236200	Nonresidential Building Construction
236110	Residential Building Construction

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area ™will be permissible prior to filing Form I-526 petitions.

Ohio International Investment Center LC ID1421251834 RCW1421251834 Page 4

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Ohio International Investment Center LC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A

Ohio International Investment Center LC ID1421251834 RCW1421251834 Page 5

Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

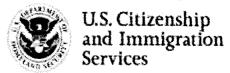
Chief, Immigrant Investor Program

Miles Colmi

Ohio International Investment Center LC ID1421251834 RCW1421251834 Page 6

cc: Haifeng Hong Porter Wright Morris & Arthur LLP 1900 K Street NW, Suite 1110 Washington DC 20006

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



Date: 03/23/2015

Richard L. Mostyn BA Regional Center, LLC C/O Bozzuto & Associates, Inc. 17850 Walker Drive, Suite 400 Greenbelt, MD 20770

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): BA Regional Center, LLC

Re: Initial Regional Center Designation

BA Regional Center, LLC

RCW1421151832 / ID1421151832

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 07/30/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate BA Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

BA Regional Center, LLC ID1421151832 RCW1421151832

Page 2

A. Geographic Area Name of State Counties District of Columbia Maryland Calvert, Charles, Frederick, Montgomery, and Prince George's Counties Virginia Alexandria City, Arlington Arlington, Clarke, City, Fairfax City, Falls Fairfax, Fauguier, Church City, Manassas Park Loudon, Stafford, City, Manassas City, Spotsylvania, Prince Fredericksburg City Williams, and Warren Counties. West Virginia Jefferson County

B. Industry Categories¹

Industry Category	NAICS
Nonresidential Building Construction	2362
Furniture and Home Furnishing Merchant Wholesalers	4232
Professional and Commercial Equipment and Supplies Merchant Wholesalers	4234
Household Appliances and Electrical and Electronic Goods Merchant Wholesalers	4236
Architectural, Engineering, and Related Services	5413
Lessors of Real Estate	5311
Offices of Real Estate Agents and Brokers	5312

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

BA Regional Center, LLC ID1421151832 RCW1421151832

Page 3

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the BA Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

BA Regional Center, LLC ID1421151832 RCW1421151832

Page 4

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

BA Regional Center, LLC ID1421151832 RCW1421151832

Page 5

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,
Miles Columnia

Nicholas Colucci

Chief, Immigrant Investor Program

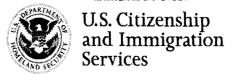
cc: Debbie Ann Klis, Esq.

Ballard Spahr LLP

4800 Montgomery Lane, Floor 7

Bethesda, MD 20854

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Immigrant Investor Program
131 M Street, NE, MS 2235
Washington, DC 20529



DATE

Daniel Miller 1519 Connecticut Avenue, NW, Suite 200 Washington, DC 20036

Application: Form I-924, Application for Regional Center Under the Immigrant Investor Pilot

Program

Regional Center: WestMill Mid-Atlantic Regional Center, LLC

ID1033650029

Re: Request to Amend Regional Center Designation

Project: DCEP Lender I LLC

RCW1410751736

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on April 16, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the DCEP Lender I LLC project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the DCEP Lender I LLC will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least ____jobs. USCIS will give (b)(4) deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the DCEP Lender I LLC project.

Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On June 29, 2011, USCIS approved the WestMill Mid-Atlantic Regional Center, LLC ("WestMill") for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the Washington, DC-Baltimore-Northern Virginia Combined Statistical Area (CSA) and Richmond, VA Metropolitan Statistical Area (MSA). WestMill now seeks to amend its previously approved regional center designation to include an actual project that will be managed by DCEP Lender I LLC, an NCE established on February 28, 2014.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
DCEP Lender I	Apartment Building and	Business Plan	2/10/2014
LLC	Retail Space	Economic Analysis	1/27/2014
Caagraphia	lavantmonte	Confidential Private	3/21/2014
Geographic Location:	Investment: Loans and Equity	Placement Memorandum Subscription Booklet	Filed 4/16/2014
Washington, DC Exemplar of Form 1-526		Second Amended and Restated Limited Liability Company Agreement	3/21/2014
10/11/1/525		Amended and Restated Escrow Agreement	3/21/2014
		Valbridge Property Advisors Market Assessment	12/23/2013
		Gill Group Appraisal of 1031 4th St., NW	1/23/2014
		USCIS RC Approval Letter	6/29/2011
		Cassidy Turley Opinion of Value (of the property)	12/30/2013
		EB-5 Loan Term Sheet	1/26/2014
		NCE Certificate of Formation	2/28/2014

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS !	Industry Name	Input (\$Millions in Multiplier Jobs 2010 \$)
2362	Construction	
5413	Architecture & Engineering Services	
4200	Wholesale Trade	
5310	Real Estate	
Total Jobs		

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to (b)(4) the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately obs from the

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

construction, architecture & engineering services, wholesale trade, and real estate activities associated with the DCEP Lender I LLC project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with the DCEP Lender I LLC project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions based on the DCEP Lender I LLC Project

Each individual petition, in order to demonstrate that it is affiliated with the WestMill Mid-Atlantic Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. <u>Legal Notice</u>

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

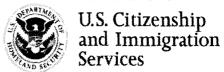
If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.lmmigrantlnvestorProgram@uscis.dhs.gov.

Sincerely,

Milala Colmi

Nicholas Colucci Chief, Immigrant Investor Program

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



Lincoln Stone Stone Grzegorek Gonzalez LLP 800 Wilshire, Ste. 900 Los Angeles, CA 90017

Re: March 17, 2015

Daniel Healy C/O Civitas El Paso Regional Center 1601 Bryan Street, Suite M-200 Dallas, Texas 75201

Application: Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center: Civitas El Paso Regional Center

ID1232050814

Re: Request to Amend Regional Center Designation

Project: Civitas Permian Basin Hotels, LP

RCW1428351911

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on October 10, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

- A. Effective the date of this notice, USCIS approves the additional geographic area to include those areas listed in Section III of this notice.
- B. Effective the date of this notice, USCIS approves the Civitas Permian Basin Hotels, LP capital investment project as described in Section IV of this notice. The decision is based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Civitas Permian Basin Hotels, LP will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least 215 jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Civitas Permian Basin Hotels, LP project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On February 12, 2014, USCIS approved the Civitas El Paso Regional Center, ("CEPRC") for participation in the Immigrant Investor Program as a designated regional center. Based on the initial designation, the Civitas El Paso Regional Center obtained approval for the following geographic area and industry categories.

Geographic Area		
State	Counties	Approval Date
New Mexico	Dona Ana	02/12/2014
Texas	El Paso	02/12/2014

Industry Categories		
NAICS	Industry Name	Approval Date
2361	Residential Building Construction	02/12/2014
2362	Nonresidential Building Construction	02/12/2014
5311	Lessors of Real Estate	02/12/2014
54 13	Architectural, Engineering, and Related Services	02/12/2014
6113	Colleges, Universities, and Professional Schools	02/12/2014
621512	Diagnostic Imaging Centers	02/12/2014
6221	General Medical and Surgical Hospitals	02/12/2014
6233	Continuing Care Retirement Communities and	02/12/2014
	Assisted Living Facilities for the Elderly	
711211	Sports Teams and Clubs	02/12/2014
72111	Hotels Except Casino Hotels and Motels	02/12/2014

	-	
01000	Deulein au I atau and I Camana	00/10/0014
81293	Parking Lots and Garages	02/12/2014

CEPRC now seeks to amend its previously approved regional center designation to expand its geographic area and to include an actual project that will be managed by Civitas Permian Basin Hotels, LP, an NCE established on May 15, 2014.

III. Amendment Request1

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following change:

A. Geographic Area

USCIS approves the applicant's amendment request to include the following geographic area:

State		Counties	
Texas	Borden	Hudspeth	Pecos
	Crane	Jeff Davis	Reeves
	Culbertson	Loving	Scurry
	Ector	Martin	Upton
	Glasscock	Midland	Ward
	Howard	Mitchell	Winkler

IV. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Project	Type of Project	Organization Documents	Date of Document
0: :1	Two limited service	Civitas Permian Basin	August 2014
Civitas		Hotels, LP	
Permian Basin	hotels	Comprehensive I-526	
Hotels, LP		Business Plan	
	Investment:		06/07/2014
Geographic	Loan	Economic Analysis	
Location:		Private Offering	July 2014
College		Memorandum	,
Avenue,		Limited Partnership	05/15/2014
Snyder Texas;		Agreement (Executed)	7.7
and Northeast		Loan Commitment	07/14/2014
corner of		Letter (Executed)	
		Subscription Documents	Undated
Teague Drive		(Document ID	
and Interstate		205342244 v1)	
20, Pecos,			04/29/2013
Texas		Loan Documents	04/23/2013
Exemplar of			
Form I-526			

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment requests the expansion of the geographic are to include 18 counties of the Permian Basin region in Texas and approval of a capital investment project. The applicant identifies the NCE of the proposed capital investment project as Civitas Permian Basin Hotels, LP which was formed in the State of Texas on May 15, 2014.

(b)(4)	The Civitas Permian Basin Hotels, LP project is located within a targeted employment area (TEA) in the rural areas of Pecos and Snyder, Texas. Up to EB-5 investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of the REB.

V. Job Creation

(b)(4)

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II Input-Output economic model:

NAICS 2	Industry Name	Input (\$Millions) Multiplier Jobs
2362	Nonresidential Building Construction	
4232	Furniture and Home Furnishings	
	Merchant Wholesalers Architectural, Engineering, and	
5413	Related Services	
7211	Traveler Accomodation	
Total Jobs:		

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately direct and indirect jobs from construction activities and hotel operations associated with the Civitas Permian Basin Hotels, LP project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with Civitas Permian Basin Hotels, LP. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation

² These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

VI. Guidelines for Filing Form I-526 Petitions based on the Civitas Permian Basin Hotels, LP project

Each individual petition, in order to demonstrate that it is affiliated with the Civitas El Paso Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VII. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that

year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VIII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely.

Nicholas Colucci

Chief, Immigrant Investor Program

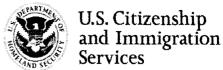
Miles Colmi

cc: Lincoln Stone

Stone Grzegorek Gonzalez LLP

800 Wilshire, Ste. 900 Los Angeles, CA 90017

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



March 17, 2015

Debbie A. Klis Ballard Spahr, LLP 4800 Montgomery Lane, 7th Floor Bethesda, MD 20814-3401

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Alexico New York Regional Center, LLC

Re:

Initial Regional Center Designation

Alexico New York Regional Center, LLC

RCW1413551757 / ID1413551757

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on May 15, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Alexico New York Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Alexico New York Regional Center, LLC ID1413551757 RCW1413551757 Page 2

A. Geographic Area

State	Counties/Cities	
Connecticut	Fairfield, Litchfield, New Haven,	
New Jersey	Bergen, Essex, Hudson, Morris, Passaic, Sussex, Union	
New York	New York, Bronx, Richmond, Kings, Queens, Westchester, Rockland, Putnam, Dutchess, Orange, Ulster, Nassau, Suffolk	

B. Industry Categories¹

NAICS	Industry Name
2361	Residential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
4234	Office of Real Estate Agents and Brokers
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers
5312	Office of Real Estate Agents and Brokers
5413	Architectural, Engineering, and Related Services

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Alexico New York Regional Center, LLC ID1413551757 RCW1413551757 Page 3

business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Alexico New York Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho. 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

Alexico New York Regional Center, LLC ID1413551757 RCW1413551757 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS. Immigrant Investor Program@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

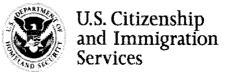
Miles Coloni

cc: Alexico New York Regional Center, LLC

150 East 58th Street, 33rd Floor

New York, NY 10155

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. MS 2235 Washington, DC 20529



Han Jun Li C/o Law offices of Li and Assc 136-18 39th Ave Flushing, NY 11354

Re: March 17, 2015

Shen Zhiwen 39-15 Main Street, Suite 301 Flushing, NY 11354]

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

NYUS Regional Center, Inc

ID1202750581

Re:

Request to Amend Regional Center Designation

Project: NYUS Group A, LLC

RCW1428751915

This notice of a limited decision is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on October 14, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

- A. Effective the date of this notice, USCIS approves the additional geographic area to include those areas listed in Section III of this notice.
- B. Effective the date of this notice, USCIS approves the additional industry categories listed in Section III of this notice.
- C. Effective the date of this notice, USCIS approves a limited decision for the included project, NYUS Group A, LLC as explained in Sections IV, V, and VI of this notice.

Effective the date of this notice, USCIS approves the NYUS Group A, LLC project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the NYUS Group A, LLC will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least ____jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the NYUS Group A, LLC project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

(b)(4)

On July 10, 2013, USCIS approved the NYUS Regional Center ("NYUSRC") for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the following six counties in the State of New York: Bronx, Kings, Nassau, New York Queens, and Westchester. NYUSRC now seeks to amend its previously approved regional center designation to expand the geographic area, to include additional industry categories, and to include an actual project that will be managed by NYUS Group A, LLC, an NCE established on November 10, 2011.

On July 10, 2013, USCIS approved the NYUS Regional Center ("NYUSRC") for participation in the Immigrant Investor Program as a designated regional center. Based on the initial designation, the NYUS Regional Center obtained approval for the following geographic area and industry categories.

Geographic Area		
State	Counties	Approval Date
New York	Bronx	07/10/2013
	Kings	07/10/2013
	Nassau	07/10/2013
	New York	07/10/2013
	Queens	07/10/2013
	Westchester	07/10/2013

Industry Categories				
NAICS	Industry Name	Approval Date		
2361	Residential Building Construction	07/10/2013		
2362	Nonresidential Building Construction	07/10/2013		
531311	Residential Property Managers	07/10/2013		
81293	Parking Lots and Garages	07/10/2013		

An amendment request is required if investment opportunities arise that are outside the previously approved geographic area, industry categories, and capital investment projects. If changes are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the new evidence to ensure compliance with EB-5 program requirements.

III. Amendment Request1

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following changes:

A. Geographic Area

USCIS approves the applicant's amendment request to include the following geographic area:

Geographic Area			
State		Counties	
Connecticut	Fairfield	Litchfield	New Haven
New Jersey	Bergen	Essex	Hudson
•	Morris	Passaic	Sussex
	Union		
New York	Dutchess	Orange	Putnam
	Richmond	Rockland	Suffolk
	Ulster		

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

B. Industry Categories

USCIS approves the applicant's amendment request to include the following industry categories:

Industry Cate	gories
NAICS	Industry Name
5311	Lessors of Real Estate
5413	Architectural, Engineering, and Related Services

IV. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
NYUS Group A, LLC	Mixed Use: Office, Retail and Residential	Business Plan for EB-5 Investment in NYUS Group A, LLC	08/2014
Geographic Location:	Investment: Loan	Economic Analysis Confidential Private Offering Memorandum	08/21/2014 08/29/2014
190 and 191 Edgewater Street, Staten		Subscription Agreement Escrow Agreement and Acknowledgement	08/29/2014 09/10/2014
Island, NY Exemplar of Form I-526		Operating Agreement Loan Commitment Letter	08/29/2014 09/08/2014

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

(b)(4)	The requested amendment identifies the NCE of the proposed project as NYUS Group A, LLC which was formed in the State of New York on November 10, 2011. The NYUS Group A, LLC project is located within a targeted employment area (TEA) in the City of State Island, New York. Approximately EB-5 investors will subscribe to the NCE as equity owners in exchange for capital contributions of each and an aggregate of

(b)(4)			

Note: It appears that the targeted employment area letters reference the wrong census tract for the building to be constructed at 191 Edgewater Street, State Island, NY 10305. This is not material at this time because no deference is given for targeted employment areas at the project approval stage.

V. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS 2	Industry Name	Input (\$Millions)	Multiplier	Jobs	USCIS Jobs
2361	Residential Building Construction				
2222	Nonresidential Building				
2362	Construction				
	Architectural, Engineering, and				
5413	Related Services				
	Sales Commissions]			
5311	Lessors of Real Estate				
Total Jobs:					

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable, except for the Sales Commissions. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately jobs. (b)(4)

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with NYUS Group A, LLC. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation

(b)(4)

² These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

VI. <u>Decision to Disallow Certain Requested Job Creation</u>

a) Economic Impact Analysis - Insufficient to show job creation

Project: NYUS Group A, LLC

The applicant requests to include NYUS Group A, LLC as a new actual capital investment project(s). The actual project is described as follows:

The development, construction and operation of a mixed use project comprised of an office building and a residential building.

The direct jobs estimated for the Architectural, Engineering and Related Services were disallowed because they were deemed to be intermittent over the course of the project and not full-time. All of the estimated job creation related to the industry category Sales Commissions were disallowed because no NAICS code was provided. You may file additional information to have these jobs created with Form I-526 petitions. The project is estimated to create jobs per EB-5 investor.

VII. Guidelines for Filing Form I-526 Petitions based on the NYUS Group A, LLC project

Each individual petition, in order to demonstrate that it is affiliated with the NYUS Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VIII. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

IX. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional

Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

cc:

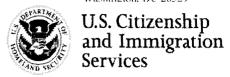
Han Jun Li

Miles Colmi

C/o Law offices of Li and Assc

136-18 39th Ave Flushing, NY 11354

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



March 16, 2015 Robert Papiri Washington EB-5 Regional Center, LLC 1928 Rose St NE Olympia, WA 98506

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Washington EB-5 Regional Center, LLC

Re:

Initial Regional Center Designation

Washington EB-5 Regional Center, LLC

RCW1427951905 / ID1427951905

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 6, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Washington EB-5 Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Washington EB-5 Regional Center, LLC ID1427951905 RCW1427951905 Page 2

A. Geographic Area

State	Counties/Cities
	Adams, Douglas and Grant Counties
State of	
Washington	

B. Industry Categories¹

NAICS Code	Industry	
2362	Non-Residential Building Construction	
3115	Dairy Product Manufacturing	
1121	Cattle Ranching and Farming	
4238	Furniture, Fixtures, and Equipment Purchases	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area ™will be permissible prior to filing Form I-526 petitions.

Washington EB-5 Regional Center, LLC ID1427951905 RCW1427951905 Page 3

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Washington EB-5 Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is

Washington EB-5 Regional Center, LLC ID1427951905 RCW1427951905 Page 4

available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

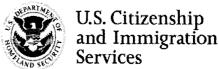
Chief, Immigrant Investor Program

Milalos Colmi

Washington EB-5 Regional Center, LLC ID1427951905 RCW1427951905 Page 5

cc: Marianna Tarantur Wright Johnson Ltd 197 S Federal Hwy, Suite 200 Boca Raton, FL 33432

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



August 25, 2014

Bartolo N Sanchez South Texas EB-5 Regional Center, LLC 5415 Clover Drive San Antonio, TX 78228

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

South Texas EB-5 Regional Center, LLC

Re:

Initial Regional Center Designation

South Texas EB-5 Regional Center, LLC

RCW1335051351 / 1335051351

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 16, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate South Texas EB-5 Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

South Texas EB-5 Regional Center, LLC ID1335051351 RCW1335051351 Page 2

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties			
Texas	Bexar	Comal	Guadalupe	Wilson
	Atascosa	McMullen	Frio	Medina
	Uvalde	Bandera	Kerr	and Kendall

B. Industry Categories¹

NAICS	Industry Name		
230000	Construction		
531000	Real Estate		

III. The Project

Actual projects on which the Form I-526 petitions will be based will receive de novo review during the subsequent filing (e.g., an amended Form I-924 application including the actual project details or the first Form I-526 petition filed by an investor under the regional center project).

Project	Type of Project	Organization Documents	Date of Document
South Texas EB-5	Actual	Business Plan	Submitted 12/16/2013
San Antonio I LP	Petition	Economic Analysis	Revised 11/30/2013
	Project	Certificate of Formation STERC	Dated 06/20/2013
		Operating Agreement	Submitted 12/16/2013
Geographic		Confidential Private Placement	Submitted 12/16/2013
Location:		Memorandum	
San Antonio, TX		Subscription Agreement	Submitted 12/16/2013
		Limited Partnership Agreement	Submitted 12/16/2013
Focus of		Escrow Agreement	Submitted 12/16/2013
Investment:		Escrow Instructions	
loan, equity		Investor Eligibility	Submitted 12/16/2013
		Questionnaire	

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

South Texas EB-5 Regional Center, LLC ID1335051351 RCW1335051351 Page 3

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

(b)(4)	The proposal identifies the new commercial enterprise ("NCE") of the project as South Texas EB-5 San Antonio I LP, which was formed in the State of TBD on TBD. The project is located on the west side of S New Braunfels Avenue, south of Military Drive in the City of San Antonio, Texas

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the IMPLAN economic model:

Total		
531	Real Estate	- (
23	Construction	
NAICS	Industry Name Induce //Indirection Jobs	

(b)(4)

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not

South Texas EB-5 Regional Center, LLC ID1335051351 RCW1335051351 Page 4

materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on Brooks City-Base Phase II Apartments project

Each individual petition, in order to demonstrate that it is affiliated with the South Texas EB-5 Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

South Texas EB-5 Regional Center, LLC ID1335051351 RCW1335051351 Page 5

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS. Immigrant Investor Program@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

South Texas EB-5 Regional Center, LLC ID1335051351 RCW1335051351 Page 6

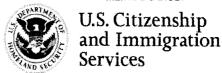
cc: Samuel Medrano

Samuel Medrano Attorney at Law

5415 Clover Drive San Antonio, TX 78228

South Texas EB-5 Regional Center, LLC 5415 Clover Drive San Antonio, TX, 78228

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



March 12, 2015

John W. Meyer/ Christian A. Triantaphyllis FosterQuan, LLP 600 Travis Street, Suite 2000 Houston, TX 77002

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Las Vegas Economic Impact Regional Center, LLC

Re:

Request to Amend Regional Center Designation

Las Vegas Economic Impact Regional Center, LLC

RCW1412251746 / ID1126250313

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on May 2, 2014. The Form I-924 application was filed to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

- A. Effective the date of this notice, USCIS approves the additional geographic area to include those areas listed in Section III of this notice.
- B. Effective the date of this notice, USCIS approves the additional industry categories listed in Section III of this notice.
- C. Effective the date of this notice, USCIS approves the changes in the economic analysis and underlying business plan used to estimate job creation for previously approved investment opportunities and industrial as described in Section III of this notice.

II. Procedural History

On July 5, 2012, USCIS approved the Las Vegas Economic Impact Regional Center, LLC for participation in the Immigrant Investor Program as a designated regional center. Based on the initial designation the Las Vegas Economic Impact Regional Center, LLC obtained approval for the following geographic area, industry categories, and capital investment projects for the Lucky Dragon LP (a luxury Asian-themed casino hotel offering a unique gambling experience along with top notch retail, restaurant and spa amenities).

Geographic A	tea .	
State	Counties	Approval Date
Nevada	County of Clark	07/05/2012

Industry Categories			
NAICS	Industry Name	Approval Date	
721120	Casino Hotels	07/05/2012	
236220	Construction	07/05/2012	
722000	Restaurants (Food Services and Drinking Places)	07/05/2012	
713940	Fitness and Recreational Sports Centers	07/05/2012	
451212	Retail – News Dealers and Newsstands	07/05/2012	
453220	Retail – Gift, Novelty, and Souvenir	07/05/2012	
446199	Retail – All Other Health and Personal Care	07/05/2012	
	Services		
451120	Retail – Hobby, Toy, and Games Stores	07/05/2012	

Capital Investment Projects			
Project	Type of Project	Organization Documents	Date of Document
Lucky Dragon, LP	Actual	Business Plan	06/2012
	Petition	Economic Analysis	05/31/2012
Approved on:	Project	Operating Agreement	08/30/2011
07/05/2012		Confidential Private Placement Memorandum	06/05/2012
Geographic		Subscription Agreement	03/10/2012
Location:		Limited Partnership Agreement	03/10/2012
Clark County, NV		Escrow Agreement	03/10/2012
Focus of			
Investment:			
EB-5, developer			
equity,			
construction loans			

An amendment request is required if investment opportunities arise that are outside the previously approved geographic area, industry categories, and capital investment projects. If changes are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the new evidence to ensure compliance with EB-5 program requirements.

III. Amendment Request¹

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following change(s):

A. Geographic Area

USCIS approves the applicant's amendment request to include the following geographic area:

State	Counties
	Count of Imperial
	County of Los Angeles
California	County of Orange
	County of Riverside
	County San Bernardino
	County San Diego

B. Industry Categories

USCIS approves the applicant's amendment request to include the following industry categories:

NAICS	Industry Name
721110	Hotels (except Casino Hotels) and Motels

C. Economic Analysis and underlying Business Plan Change

USCIS approves the applicant's amendment request to incorporate the following changes in its business plan used to estimate job creation for previously approved investment opportunities and industry categories. The applicant's business plan has changed as follows:

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

This project is enclosed as a sample project, and is not being submitted as an Exemplar I-526 at this time. The project involves the development and operation of a new upscale Asian-themed hotel, to be located in downtown Los Angeles called the Red Dragon Hotel. The 200 hotel will consist of an 189,070 total square feet, consisting of administrative and common areas, restaurant and food services, retail, and fitness center. In addition, the regional center decided to remove the NAICS code 623311 – Continuing Care Retirement Communities, from the entire project. Therefore, the previous project associated with that particular NAICS code and economic analysis (multiplier, expenditures, and jobs created) have been removed from the updated comprehensive business plan and corresponding economic analysis. The newly submitted economic analysis has multipliers and aggregate job totals, that are consistent with revised business plan project of the new commercial enterprise.

IV. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Las Vegas Economic Impact Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

cc:

Nicholas Colucci

Chief, Immigrant Investor Program

Milala Colmi

Las Vegas Economic Impact Regional Center

C/O: Las Vegas Economic Impact Regional Center, LLC

3575 West Post Road Suite #1 Las Vegas, Nevada 89118

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street. NE. MS 2235 Washington, DC 20529



March 12, 2015

Tom Rosenfeld PIDC Regional Center 88 Pine Street, Suite 2010 New York, NY 10005

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

PIDC Regional Center

ID1031910154

Re:

Request to Amend Regional Center Designation

Project: PIDC Regional Center, LP XXXI (Aker II Project)

RCW1334551332

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on December 11, 2013. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Aker II Project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the PIDC Regional Center, LP XXXI will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum,

(b)(4)

and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the PIDC Regional Center, LP XXXI project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On February 28, 2003, USCIS approved the PIDC Regional Center for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of:

Selected Geog	graphic Area for Promotion of Economic Growth
State	Counties
Pennsylvania	Bucks County, Chester County, Delaware County,
	Montgomery County, Philadelphia County

PIDC Regional Center now seeks to amend its previously approved regional center designation to include an actual project that will be managed by PIDC Regional Center, LP XXXI, an NCE established on September 24, 2012.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
Akers II Project	Construction of 4 tankers	Business Plan	12/11/2013
, and the second	(ships) in Philadelphia's	Economic Analysis	12/11/2013
Geographic	Old Navy Shipyard	Confidential Information	10/18/2013
Location:		Memorandum (CIM) and	
Philadelphia	Investment:	CIM Supplement	
County, PA	Combination Loan &	Subscription Agreement	10/18/2013
·	Equity	Limited Partnership	9/24/2012
Exemplar of		Agreement	
Form I-526		Servicing/Operating	10/18/2013
		Agreement	

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment identifies the NCE of the proposed project as PIDC Regional Center, LP XXXI which was formed in the State of Pennsylvania on September 24, 2012. The PIDC Regional Center, LP XXXI project is located within a targeted employment area (TEA) in Philadelphia County, Pennsylvania (Census Tract 50). Approximately EB-5 investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of	(b)(4)
IV. Job Creation The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:	

NAICS ¹	I done Nicos	T. 4 (CN C:11:	N. 4. 12. 12	Jo	obs	
NAICS	industry Name	Input (\$Millions)	Multiplier	Direct	Indirect	(b)(4)
336611	Shipbuilding					(b)(4)
Total Jobs						

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the
calculations using RIMS II multipliers are verifiable. The applicant has shown by a
preponderance of the evidence that the project is expected to result in the creation of
approximately indirect jobs associated with the PIDC Regional Center, LP XXXI project.

record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

(b)(4)

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with PIDC Regional Center, LP XXXI project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the PIDC Regional Center, LP XXXI project</u>

Each individual petition, in order to demonstrate that it is affiliated with the PIDC Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

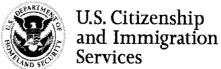
Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



March 11, 2015

Tom Rosenfeld PIDC Regional Center 88 Pine Street, Suite 2010 New York, NY 10005

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

PIDC Regional Center

ID1031910154

Re:

Request to Amend Regional Center Designation

Project: PIDC Regional Center, LP XXXI (Aker II Project)

RCW1334551332

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on December 11, 2013. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Aker II Project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the PIDC Regional Center, LP XXXI will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum,

(b)(4)

and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the PIDC Regional Center, LP XXXI project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On February 28, 2003, USCIS approved the PIDC Regional Center for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of:

Selected Geog	graphic Area for Promotion of Economic Growth
State	Counties
Pennsylvania	Bucks County, Chester County, Delaware County,
	Montgomery County, Philadelphia County

PIDC Regional Center now seeks to amend its previously approved regional center designation to include an actual project that will be managed by PIDC Regional Center, LP XXXI, an NCE established on September 24, 2012.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
Akers II Project	Construction of 4 tankers	Business Plan	12/11/2013
	(ships) in Philadelphia's	Economic Analysis	12/11/2013
Geographic	Old Navy Shipyard	Confidential Information	10/18/2013
Location:		Memorandum (CIM) and	
Philadelphia	Investment:	CIM Supplement	
County, PA	Combination Loan &	Subscription Agreement	10/18/2013
	Equity	Limited Partnership	9/24/2012
Exemplar of		Agreement	
Form I-526		Servicing/Operating	10/18/2013
		Agreement	

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment identifies the NCE of the proposed project as PIDC Regional Center, LP XXXI which was formed in the State of Pennsylvania on September 24, 2012. The PIDC Regional Center, LP XXXI project is located within a targeted employment area (TEA) in Philadelphia County, Pennsylvania (Census Tract 50). Approximately EB-5 investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of	(b)(4)
IV Joh Creation	J

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS ¹	T. J. S. N.	Land (CACHELLA) Made also	Jobs	
NAICS	industry Name	Input (\$Millions) Multiplier	Direct Indirect	(b)(4)
336611	Shipbuilding			(b)(4)
Total Jobs				

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately indirect jobs associated with the PIDC Regional Center, LP XXXI project.

(b)(4)

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with PIDC Regional Center, LP XXXI project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the PIDC Regional Center, LP XXXI project</u>

Each individual petition, in order to demonstrate that it is affiliated with the PIDC Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. <u>Legal Notice</u>

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalos Colmi

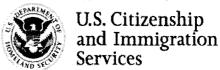
cc: Ron Klasko

Klasko, Rulon, Stock & Seltzer, LLP

1800 John F. Kennedy Boulevard, 17th Floor

Philadelphia, PA 19103

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131M Street NE, MS 2235 Washington, DC 20529



March 10, 2015

Randy Trask Rio Grande Regional Investment Center, LLC 8820 Horizon Blvd Albuquerque NM 87113

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Fllot

Program

Applicant(s):

Rio Grande Regional Investment Center, LLC

Re:

Initial Regional Center Designation

Rio Grande Regional Investment Center, LLC

RCW133351307/ ID133351307

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Flot Program that was filed by the applicant with the U.S Citizenship and Immigration Services ("USCIS") on November 23, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Rub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

1. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Rio Grande Regional Investment Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Rio Grande Regional Investment Center, LLC ID133351307 RCW133351307 Page 2

A. Geographic Area

State	Counties
∣New Mexico	Sandoval

B. Industry Categories

NAICS	Industry Name
236116	New Multifamily Housing Construction (except for Sales Builders)
5413	Architectural, Engineering/Related Services
423210	Furniture Merchant Wholesaler
	Continuing Care Retirement Communities & Assisted Living Facilities
62331	for the Elderly

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCISs approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCISwhen an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCISwill give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form 1-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Bluegræs International Fund Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

¹ USCISissued a Policy Memorandum (FM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Rio Grande Regional Investment Center, LLC ID133351307 RCW133351307 Page 3

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Rio Grande Regional Investment Center, LLC ID133351307 RCW133351307 Page 4

Each Regional Center designated by USCISmust monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCISby email at USCISImmigrantInvestorProgram@uscis.dhs.gov.

Snoerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Coloni

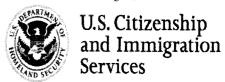
oc: Shahzad Qadri

Wong Reming 2410 19th Street SE

Rio Rancho NM 87124

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Office

131 M Street, NE Washington, DC 20529



TO: Brendan Heafey Bay Area Regional Center, LLC 38 Webster Street Second Floor Oakland, CA 94607

DATE: March 9, 2015

RC ID#: ID1031910105

RE: Reaffirmation of Regional Center Designation

DECISION

This notice is in reference to the regional center designation of Bay Area Regional Center] ("Bay Area RC"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on June 23, 2009. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395"). Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On January 22, 2015, USCIS notified Bay Area RC of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to demonstrate that the regional center is continuing to promote economic growth, improved regional productivity, job creation, or increased domestic capital investment in the approved geographic area in their submitted Form I-924A. The Notice of Intent to Terminate ("ITT") provided Bay Area RC an opportunity to offer evidence in opposition to the grounds alleged in the ITT.

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

On February 24, 2015, in response to the ITT, USCIS received evidence from Bay Area RC demonstrating that the regional center is continuing to promote economic growth, improved regional productivity, job creation, or increased domestic capital investment in the approved geographic area in their submitted Form I-924A. After considering the evidence, USCIS reaffirms the existing regional center designation for Bay Area RC.

Sincerely,

Nicholas Colucci

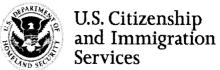
Melo Colmi

Chief

Immigrant Investor Program Office

www.dhs.gov

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



MARCH 10, 2015

Lillian Katherine Kalmykov Greenberg Traurig LLP – New Jersey 200 Park Avenue, P.O. Box 677 Florham Park, NJ 07932-0677

Application: Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center: Silverstein Properties Regional Center LLC

ID1314351143

Re: Request to Amend Regional Center Designation

Project: 30 Park Place EB-5 Project

RCW1412251745

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on May 2, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves Silverstein Properties Regional Center LLC's request for an amended regional center designation that reflects its new corporate name. Additionally, USCIS approves the 30 Park Place EB-5 Project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the 30 Park Place EB-5 Project will be a

Silverstein Properties Regional Center LLC ID1314351143 RCW1412251745 Page 2

new commercial enterprise (NCE) and that the project is likely to result in the creation of at least obs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the 30 Park Place EB-5 Project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On April 2, 2014, USCIS approved Gotham City Regional Center LLC for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of various counties in Connecticut, New Jersey, New York, and Pennsylvania. On April 17, 2014, Silverstein Properties Regional Center LLC ("SPRC") filed a certificate of amendment with the Secretary of State for the State of Delaware to amend its corporate name from "Gotham City Regional Center LLC" to "Silverstein Properties Regional Center LLC." SPRC wishes to amend its regional center designation to reflect its new corporate name and to include an actual project that will be managed by 30 Park Place EB-5 Lenders LLC, an NCE established on March 19, 2013.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
30 Park Place	Hotel and residential	Business Plan	04/17/2014
EB-5 Project	tower	Economic Analysis	04/17/2014
·		Confidential Private	04/22/2014
Geographic	Investment:	Placement Memorandum	
Location:	Loan and equity	Subscription Agreement	Submitted
New York			05/02/2014
		Operating Agreement	04/08/2014
Exemplar of			
Form I-526			

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

Silverstein Properties Regional Center LLC ID1314351143 RCW1412251745 Page 3

The requested amendment identifies the NCE of the proposed project as 30 Park Place EB-5 Lenders LLC, which was formed in the State of Delaware on March 19, 2013. The 30 Park Place EB-5 Project is located within a targeted employment area (TEA) in New York, New York. Approximately EB-5 investors will subscribe to the NCE as LLC members in exchange for capital contributions of Each and an aggregate of \$\)	(b)(4) -

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the REDYN economic model:

NAICS 1	Industry Name/Project Component	Year 3 Input (\$Millions)	Multiplier (Implied)	Jobs	
2361	Residential Building Construction				1
2362	Nonresidential Building Construction				
2362	Nonresidential Building Construction				
4232	Furniture and Home Furnishing				
4202	Merchant Wholesalers]			
5411	Legal Services				i
5412	Accounting, Tax Preparation,				(b)(4)
3412	Bookkeeping, and Payroll Services				
E 419	Architectural, Engineering, and	Ì			
5413	Related Services				
5414	Specialized Design Services				
T 410	Advertising, Public Relations, and				Ī
5418	Related Services				
Total Jobs					J

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

Silverstein Properties Regional Center LLC ID1314351143 RCW1412251745 Page 4

(b)(4)

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using implied REDYN multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately construction and development jobs associated with the 30 Park Place EB-5 Project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with the 30 Park Place EB-5 Project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions based on the 30 Park Place EB-5 Project

Each individual petition, in order to demonstrate that it is affiliated with the Silverstein Properties Regional Center LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.

792

Silverstein Properties Regional Center LLC ID1314351143 RCW1412251745 Page 5

- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Silverstein Properties Regional Center LLC ID1314351143 RCW1412251745 Page 6

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS. Immigrant Investor Program@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milala Colmi

cc: Martin S. Burger

C/O Silverstein Properties Regional Center LLC

250 Greenwich Street, 38th Floor

New York, NY 10007

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street. NE, MS 2235 Washington, DC 20529



MARCH 10, 2015

Martin S. Burger C/O Silverstein Properties Regional Center LLC 250 Greenwich Street, 38th Floor New York, NY 10007

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

Silverstein Properties Regional Center LLC

ID1314351143

Re:

Request to Amend Regional Center Designation

Project: 30 Park Place EB-5 Project

RCW1412251745

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on May 2, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves Silverstein Properties Regional Center LLC's request for an amended regional center designation that reflects its new corporate name. Additionally, USCIS approves the 30 Park Place EB-5 Project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the 30 Park Place EB-5 Project will be a

Silverstein Properties Regional Center LLC ID1314351143 RCW1412251745 Page 2

(b)(4)

new commercial enterprise (NCE) and that the project is likely to result in the creation of at least obs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the 30 Park Place EB-5 Project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On April 2, 2014, USCIS approved Gotham City Regional Center LLC for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of various counties in Connecticut, New Jersey, New York, and Pennsylvania. On April 17, 2014, Silverstein Properties Regional Center LLC ("SPRC") filed a certificate of amendment with the Secretary of State for the State of Delaware to amend its corporate name from "Gotham City Regional Center LLC" to "Silverstein Properties Regional Center LLC." SPRC wishes to amend its regional center designation to reflect its new corporate name and to include an actual project that will be managed by 30 Park Place EB-5 Lenders LLC, an NCE established on March 19, 2013.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
	guingalia ar a sa s		
30 Park Place	Hotel and residential	Business Plan	04/17/2014
EB-5 Project	tower	Economic Analysis	04/17/2014
		Confidential Private	04/22/2014
Geographic	Investment:	Placement Memorandum	
Location:	Loan and equity	Subscription Agreement	Submitted
New York			05/02/2014
		Operating Agreement	04/08/2014
Exemplar of			
Form I-526			

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

Silverstein Properties Regional Center LLC ID1314351143 RCW1412251745 Page 3

The requested amendment identifies the NCE of the proposed project as 30 Park Place EB-5 Lenders LLC, which was formed in the State of Delaware on March 19, 2013. The 30 Park Place EB-5 Project is located within a targeted employment area (TEA) in New York, New York. Approximately EB-5 investors will subscribe to the NCE as LLC members in exchange for capital contributions of each and an aggregate of	(b)(4)

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the REDYN economic model:

NAICS 1	Industry Name/Project Component	Year 3 Input (\$Millions)	Multiplier (Implied)	Jobs	
2361	Residential Building Construction				
2362	Nonresidential Building Construction				
2362	Nonresidential Building Construction				(b)(4)
4232	Furniture and Home Furnishing				
4202	Merchant Wholesalers				
5411	Legal Services				
5412	Accounting, Tax Preparation,				
0414	Bookkeeping, and Payroll Services				
5413	Architectural, Engineering, and				
9419	Related Services				
5414	Specialized Design Services				
F 4 1 0	Advertising, Public Relations, and				
5418	Related Services				
Total Jobs	•				

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

797

Silverstein Properties Regional Center LLC ID1314351143 RCW1412251745 Page 4

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using implied REDYN multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately construction and development jobs associated with the 30 Park Place EB-5 Project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with the 30 Park Place EB-5 Project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions based on the 30 Park Place EB-5 Project

Each individual petition, in order to demonstrate that it is affiliated with the Silverstein Properties Regional Center LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.

Silverstein Properties Regional Center LLC ID1314351143 RCW1412251745 Page 5

- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Silverstein Properties Regional Center LLC ID1314351143 RCW1412251745 Page 6

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

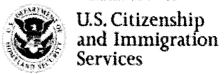
Milala Colmi

cc: Lillian Katherine Kalmykov

Greenberg Traurig LLP – New Jersey

200 Park Avenue, P.O. Box 677 Florham Park, NJ 07932-0677

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



Date: 03/04/2015

Michael L. Mattox EB-5 Bonds California, LLC 673 Woodland Square Loop, Suite 320 Lacey, WA 98503

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): EB-5 Bonds California, LLC

Re: Initial Regional Center Designation

EB-5 Bonds California, LLC

RCW1423751857 / RC ID1423751857

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 08/25/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB-5 Bonds California, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Page 2

A. Geographic Area

State	
Entire State of California	

B. Industry Categories¹

Industry Category	NAICS
Architectural, Engineering, and Related Services	5413
Highway, Street, and Bridge Construction	237310
Remediation Services	562910
Other Heavy and Civil Engineering Construction	237990
Management, Scientific, and Technical Consulting	5416
Services	
Iron and Steel Mills and Ferroalloy Manufacturing	33111
Construction Sand and Gravel Mining	212321
Other Communications Equipment Manufacturing	334290
Motor and Generator Manufacturing	335312
Railroad Rolling Stock Manufacturing	336510

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Page 3

deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB-5 Bonds California, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased

Page 4

domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Page 5

Sincerely,
Milely Columnia

Nicholas Colucci Chief, Immigrant Investor Program

cc: Robert C. Divine, Esq.

Baker Donelson Bearman Caldwell & Berkowitz, P.C.

633 Chestnut Street 1800 Republic Centre Chattanooga, TN 37450

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program 134 M Street, NE. Mailstop 2235 Washington, DC 20529



July 1, 2015

Samuel Silverman EB5 Affiliate Network State of Hawaii Regional Center, LLC 3801 PGA Blvd., Suite 902 Palm Beach Gardens, FL 33410

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

EB5 Affiliate Network State of Hawaii Regional Center, LLC

Re:

Initial Regional Center Designation

EB5 Affiliate Network State of Hawaii Regional Center, LLC

RCW1421751840 / ID1421751840

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on August 5, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Affiliate Network State of Hawaii Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties		
Hawaii	All counties		

EB5 Affiliate Network State of Hawaii Regional Center, LLC ID1421751840 RCW1421751840 Page 2

B. Industry Categories¹

NAICS	Industry Name
722511	Full-Service Restaurants
713940	Fitness and Recreational Sports Centers
236220	Commercial and Institutional Building Construction
236115	New Single-Family Housing Construction
236116	New Multifamily Housing Construction

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Affiliate Network State of Hawaii Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

EB5 Affiliate Network State of Hawaii Regional Center, LLC ID1421751840 RCW1421751840 Page 3

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924A Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30^{th} of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29^{th} of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and

EB5 Affiliate Network State of Hawaii Regional Center, LLC ID1421751840 RCW1421751840 Page 4

activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

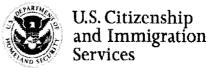
Alles Colmi

cc: Thomas N. Silverman

3801 PGA Blvd, Suite 902 Palm Beach Gardens, FL 33410

U.S. Department of Homeland Security

U.S. Cifizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



July 1, 2015

Paul Pong American NW Regional Center, LLC 11010 NE 8th Street, Suite 465 Bellevue, WA 98004

Application:

Form I-924, Application for Regional Center Under the Immigrant Investor Pilot

Program

Regional Center:

American NW Regional Center

RCW1415351770

Re:

Request to Amend Regional Center Designation

Project: American NW Fund-1, LLC

RCW1415351770

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on 06/02/2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in Møtter of Ho, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the U-District Marriott project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the American NW Fund-1, LLC will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least ______jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with American NW Fund-1, LLC project.

www.uscis.gov

(b)(4)

Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On March 5, 2014, USCIS approved the American NW Regional Center for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the Snohomish, Pierce, and King Counties in Washington. American NW Regional Center now seeks to amend its previously approved regional center designation to include an actual project that will be managed by American NW Fund-1, LLC, an NCE established on February 6, 2013.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
American NW Fund-	Exemplar	American NW Fund-1, LLC Business Plan	May 16, 2014
1, LLC		Economic Impact Report	May 30, 2014
1, 1220		Term Sheet	May 22, 2014
Geographic Location:		American NW Fund-1, LLC - Subscription	May 22, 2014
Washington		Agreement	
G		American NW Fund-1, LLC- Escrow	May 22, 2014
Focus of Investment:		Agreement	
Loan/EB investment		Operating Agreement of American NW Fund- 1, LLC	May 22, 2014
		Private Placement Memorandum	May 22, 2014

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment identifies the NCE of the proposed project as American NW Fund-1, LLC which was formed in the State of Washington on February 6, 2013. The U-District Marriott project is located within a targeted employment area (TEA) in Seattle, Washington. Approximately EB-5 investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of	(b)(4)

IV. <u>Job Creation</u> (b)(4)

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS	INDUSTRY NAME	INPUT (\$MILLIONS)	MULTIPLIER	TOTAL JOBS
2362	Nonresidential			
	Building Construction			
5413	Architectural,			
	Engineering, and			
	Related Services			
4232	Furniture, Fixtures,			
	and Equipment (FFE)			
8129	Other Personal Services			
	(Parking)			
7225	Restaurants and Other			
	Places			
7221	Traveler			
	Accommodation			
Total Jobs				
*Indirect and	l Induced jobs only			
All figures ca	dculated from unrounded nun	nbers		

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by preponderance of the evidence that the project is expected to result in the creation of approximately jobs from construction and hotel operation activities associated with the American NW Fund-1, LLC project. (b)(4)

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with American NW Fund-1, LLC. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the

burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions based on 1541 Wilcox LP project

Each individual petition, in order to demonstrate that it is affiliated with the American NW Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation m thodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at <u>USCIS.ImmigrantInvestorF.ogram@uscis.dhs.gov</u>.

Sincerely.

Nicholas Colucci

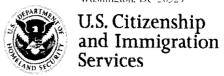
Chief, Immigrant Investor Program

Miles Colmi

cc: Daniel Lundy

Klasko Rulon Stock Seltzer 1601 Market Street Philadelphia, PA 19103

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



Date: 06/30/2015

Ming Duan American Coast Regional Center 9085 Alcosta Blvd. Suite 388 San Ramon, CA 94583

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

American Coast Regional Center

Re:

Initial Regional Center Designation American Coast Regional Center RCW1416951782 / ID1416951782

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 06/18/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate American Coast Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities		
	Alameda	Contra Costa	Marin
California	Napa	San Benito	San Francisco
	San Mateo	Santa Clara	Santa Cruz
	Solano	Sonoma	

American Coast Regional Center ID1416951782 RCW1416951782 Page 2

B. Industry Categories¹

NAICS	Industry Name
2361	Residential Building Construction
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the American Coast Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

American Coast Regional Center ID1416951782 RCW1416951782 Page 3

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A. Supplement to Form I-924A Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. <u>Legal Notice</u>

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a

American Coast Regional Center ID1416951782 RCW1416951782 Page 4

Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <a href="https://doi.org/10.1007/journal.org/10.1007/

Sincerely,

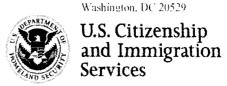
Nicholas Colucci

Chief, Immigrant Investor Program

Milala Colum

cc: Justin Fok

Law Offices of Jean D Chen APC 465 California St. Suite 410 San Francisco, CA 94104



June 29, 2015

Samuel Silverman EB5 Affiliate Network State of North Carolina Regional Center, LLC 3801 PGA Blvd., Suite 902 Palm Beach Gardens, FL 33410

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

EB5 Affiliate Network State of North Carolina Regional Center, LLC

Re:

Initial Regional Center Designation

EB5 Affiliate Network State of North Carolina Regional Center, LLC

RCW1403151664 / ID1403151664

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on January 31, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Affiliate Network State of North Carolina Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties	
North Carolina	All counties	

EB5 Affiliate Network State of North Carolina Regional Center, LLC ID1403151664
RCW1403151664
Page 2

B. Industry Categories¹

NAICS	Industry Name
722511	Full-Service Restaurants
236220	Commercial and Institutional Building Construction

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Affiliate Network State of North Carolina Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

EB5 Affiliate Network State of North Carolina Regional Center, LLC ID1403151664
RCW1403151664
Page 3

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and

EB5 Affiliate Network State of North Carolina Regional Center, LLC ID1403151664
RCW1403151664
Page 4

activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

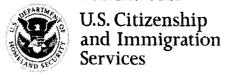
Milala Colmi

CC:

Thomas N. Silverman 3801 PGA Blvd, Suite 902 Palm Beach Gardens, FL 33410

EB5 Affiliate Network State of North Carolina Regional Center, LLC 3801 PGA Blvd., Suite 902 Palm Beach Gardens, FL 33410

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



June 25, 2015

Adam Greene Live in America California Regional Center 711 Westchester Ave Ste. 203 White Plains, NY 10604

Application: Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center: Live in America California Regional Center

RCID1314851146

Re: Request to Amend Regional Center Designation

Project: Kingswood by Landsea Homes capitalized through

LS-SF Jordan Ranch EB-5, LLC

RCW1428351910

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on October 10, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Kingswood by Landsea Homes (b)(4) Project capitalized through LS-SF Jordan Ranch EB-5, LLC will be a new commercial enterprise (NCE) and that the Project is likely to result in the creation of at least body. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and

Live in America California Regional Center ID1314851146 / RCW1428351910 Page 2

investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Kingswood by Landsea Homes Project. Deference, however, will not apply if the underlying facts change materially, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On January 16, 2014, USCIS approved Live in America California Regional Center ("LIACA") for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the State of California. LIA-CA now seeks to amend its previously approved regional center designation to include an actual project that will be managed by Landsea Holdings Corp. and by LS-SF Jordan Ranch EB-5, LLC an NCE established on September 17, 2014.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project Type of Project		Organization Documents	Document Date	
NCE: LS-SF Jordan 109 new		Business Plan	09/24/2014	
Ranch EB-5, LLC Townhomes		Economic Analysis	08/07/2014	
Project: Kingswood		Confidential Private	10/10/2014	
by Landsea Homes		Placement Memorandum		
capitalized through		Sample (Draft)	10/10/2014	
		Subscription Agreement		
Location: Dublin, CA		Limited Partnership	10/10/2014	
		Agreement		
Exemplar Form I-526		Operating Agreement	10/10/2014	

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

LS-SF Jordan Ranch LLC is a single purpose, CA-based LLC, located in Dublin, CA (Bay Area, near SF). The Project Sponsor (Landsea) wishes to build a 109 new town homes community on a 6.3 acre land parcel, which is within the 189 acre Jordan Ranch Master Planned Development. Landsea Holdings is a wholly owned subsidiary of the Landsea Group Co, Ltd.

(b)(4)

Live in America California Regional Center ID1314851146 / RCW1428351910 Page 3

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

Category	NAICS code	Eligible Spending (\$M)	Multi plier	Total Jobs	Direct Jobs	Indirect Jobs	
Hard Construction Costs	2362						(b)(4)
Architecture & Engrg Svcs	5413						(b)(4)
Sales & Marketing Costs	5312						
Totals	n/a						

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of (b)(4) approximately direct and indirect jobs from construction and sales of new town homes associated with the Kingswood by Landsea Homes Project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with [Insert Name of Project]. Deference, however, will not apply if the underlying facts change materially, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions based on the [Insert Name of Project] project

Each individual petition, in order to demonstrate that it is affiliated with the [insert name of regional center], in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

Live in America California Regional Center ID1314851146 / RCW1428351910 Page 5

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

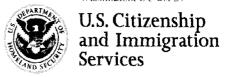
Milales Coloni

cc: Carolyn Lee

Miller Mayer, LLP

PO BOX 6435Ithaca, NY 14851

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



June 25, 2015

Mr. Eric Jacobsen c/o EB5 International LLC 560 First Street, Suite 104 Lake Oswego, OR 97034

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

EB5 International Regional Center

Re:

Initial Regional Center Designation

EB5 International, LLC

RCW1424051866/ID1424051866

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 08/28/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 International, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities
California	Los Angeles; Orange; Riverside; San Bernardino; San Diego; San Luis Obispo; Santa
	Barbara; Ventura

EB5 International ID1424051866 RCW1424051866 Page 2

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishings Merchant Wholesalers
4234	Professional and Commercial Equipment and supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electric Goods Merchant Wholesalers
6233	Continuing Care Retirement Communities and Assisted Living Facilities for the Elderly

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 International, LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

EB5 International ID1424051866 RCW1424051866 Page 3

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A. Supplement to Form I-924A Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30^{th} of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29^{th} of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. <u>Legal Notice</u>

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a

EB5 International ID1424051866 RCW1424051866 Page 4

Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

EB5 International ID1424051866 RCW1424051866 Page 5

Sincerely,
Alle Colour

Nicholas Colucci

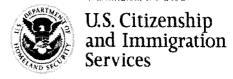
Chief, Immigrant Investor Program

cc:

Mr. Troy Nehring

14410 E Petrovitsky Road Suite 201B

Renton, WA 98058



June 24, 2015

Rodrigo Azpurua 201 S Biscayne Blvd, Suite 905 Miami, FL 33131

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

EB5 Financing Management Company, LLC

Re:

Initial Regional Center Designation

EB5 Financing Management Company, LLC

RCW1415451772 / ID1415451772

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on June 3, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Financing Management Company, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State		Counties	
Florida	Broward	Miami ⁻ Dade	Palm Beach

EB5 Financing Management Company, LLC ID1415451772 RCW1415451772 Page 2

B. Industry Categories¹

NAICS Code	NAICS Description
2362	Nonresidential Building Construction
6233	Continuing Care Retirement Communities and Assisted Living Facilities for the
	Elderly

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Financing Management Company, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

EB5 Financing Management Company, LLC ID1415451772 RCW1415451772 Page 3

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

EB5 Financing Management Company, LLC ID1415451772 RCW1415451772 Page 4

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely.

Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

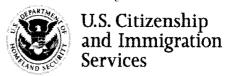
cc: Marianna Tarantur

C/o Wright Johnson Ltd 197 S Federal Hwy, Ste 200

Boca Raton, FL 33432

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



June 22, 2015

Richard Xia C/O Federal New York Metropolitan Regional Center, LLC 136-20 38th Ave, 10th Floor Flushing, NY 11354

Application: Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center: Federal New York Metropolitan Regional Center, LLC

ID1031910196

Re: Request to Amend Regional Center Designation

Project: EEGH, L.P. RCW1335851440

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on December 24, 2013. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the EEGH, L.P. project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the EEGH, L.P. will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least jobs. USCIS will give deference to the applicant's estimates of actual job

(b)(4)

creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the EEGH, L.P. project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On October 7, 2010, USCIS approved the Federal New York Metropolitan Regional Center ("FNYMRC") for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the four New York counties of the Bronx, Kings, Queens and New York. FNYMRC now seeks to amend its previously approved regional center designation to include an actual project that will be managed by EEGH, L.P., an NCE established on December 6, 2013.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
EEGH, L.P.	Mixed-use project	Exemplar Form I-526	12/24/2013
	anchored by a hotel and	Updated Comprehensive	Updated
Geographic	convention center	Business Plan	November 2014
Location:		Economic Analysis	December 2013
112-21	Investment:	Confidential Private	December 2013
Northern	Loan to JCE	Placement Memorandum	
Boulevard,		Subscription Agreement	December 2013
Corona, NY		Limited Partnership	December 2013
11369		Agreement	
Exemplar of		Escrow Agreement	December 2013
Form I-526		Sample Promissory Note	November 2014
		Sample Deed of Trust	November 2014

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment identifies the NCE of the proposed project as EEGH, LP which was formed in the State of New York on December 6, 2013. The EEGH, LP project is

Approximately EB-5 investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate investment of	- (b)(4)
	(b)(4)

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS 1	Industry Name	Input (\$Millions)	Multiplier	Jobs	
2362	Nonresidential Construction				
5413	Architectural, Engineering, and Related Services				(b)(4)
4232/4234/4 236	Furniture and Home Furnishing Merchant Wholesalers/Professional and Commercial Equipment and				
	Supplies Merchant Wholesalers/Household Appliances and Electrical and Electronic Goods Merchant Wholesalers				
7211	Traveler Accommodations				
722511	Full Service Restaurants				

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

F0111	Lessors of Residential Buildings and	(b)(
53111	Dwellings	
EC100	Convention and Trade Show	
56192	Organizers	
Total Jobs:		

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately direct and indirect jobs from construction phase expenditures, leasing and convention revenues, employees per hotel room, and square footage per employee for the restaurant space associated with the EEGH, L.P. project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with EEGH, L.P. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions based on the EEGH, L.P. project

Each individual petition, in order to demonstrate that it is affiliated with the Federal New York Metropolitan Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

840

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional

Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

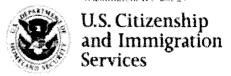
Miles Colmi

cc: Linda Lau

Global Law Group 909 El Centro Street

South Pasadena, CA 91030

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



DATE: 05/18/2015

Daniel Joseph Healy C/O Civitas Capital Management, LLC 1601 Bryan Street, Suite M·200 Dallas, TX 75201

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Regional Center:

Civitas Texas Regional Center

ID1125250305

Re:

Request to Amend Regional Center Designation

Project: Civitas TCR Mezzanine Fund I, LP

RCW1428951928/ ID1125250305

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on 10/16/2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Civitas TCR Mezzanine Fund I, LP project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Civitas TCR Mezzanine Fund I, LP will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Civitas TCR Mezzanine Fund I, LP project. Deference, however, will not apply if the

underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On February 13, 2013, USCIS approved the Civitas Texas Regional Center (CTRC) for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the Dallas, Collin, Denton, Tarrant, Johnson, Ellis, Rockwall, Kaufman, Hill, Navarro, Leon, Limestone, Freestone, McLennan, Coryell, Bell, Falls, Milam, Lee, Brazos, Robertson, Burleson, Travis, Williamson, Burleson, Bexar, Comal, Guadalupe (San Antonio), Gonzales, Lavaca, Colorado, Harris, Montgomery, Fort Bend, Waller, Galveston, Bastrop, Caldwell, Fayette, Washington, Grimes, Madison and Walker Counties, in the State of Texas. CTRC now seeks to amend its previously approved regional center designation to include an actual project that will be managed by Civitas TCR Mezzanine Fund I, LP, an NCE established on 06/04/2014.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
Civitas TCR Mezzanine Fund I, LP Geographic Location: 1410 Texas Street, Houston, TX 77002.	Real Estate Development Investment: Loan and Equity	Business Plan Economic Analysis Confidential Private Placement Memorandum Subscription Agreement Limited Partnership Agreement	September 2014 June 4, 2014 June 2014 June 2014 June 12, 2014
Exemplar of Form I-526			

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment identifies the NCE of the proposed project as Civitas TCR Mezzanine Fund I, LP, which was formed in the State of Texas on 06/04/2014. The Civitas

(b)(4)	TCR Mezzanine Fund I, LP project is located within a targeted employment area (TEA) in the City of Houston, Texas. Approximately EB-5 investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS 1	Industry Name	Input (\$, Millions)	Multiplier	Jobs	_
23	Construction				
5413	A&E				
531	Rental income				(b)(4
531	Sales and marketing				
991	Sales and marketing				

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately total Job Creation.

(b)(4)

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with Civitas TCR Mezzanine Fund I, LP. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the Civitas TCR Mezzanine Fund I,</u> LP project

Each individual petition, in order to demonstrate that it is affiliated with the Civitas TCR Mezzanine Fund I, LP, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Miles Column

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Stone Lincoln

Stone Grzegorek Gonzalez LLP 800 Wilshire Boulevard, Suite 900

Los Angeles, CA 90017

Civitas Texas Regional Center 1601 Bryan Street, Suite M-200 Dallas, TX 75201

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street NE, Mailstop 2235 Washington, DC 20529



May 20, 2015

Stephen H. Smith Western Pacific Regional Center, LLC 9500 Roosevelt Way, NE, Suite 300 Seattle, WA 98115

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

Western Pacific Regional Center, LLC

Re:

Initial Regional Center Designation - Limited Decision

Western Pacific Regional Center, LLC RCW1418251794 / ID1418251794

This notice of a limited decision is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 1, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves, in a limited decision, the Form I-924 request to designate Western Pacific Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation - Limited Decision

The applicant submitted its Form I-924 requesting specific industry categories and geographic regions to be identified for the Regional Center's use.

Upon review of the record, USCIS has determined that not all of the requested geographic regions provided in the Form I-924 represent an appropriate application of a hypothetical project to support the industry categories and/or geographic regions acceptable for use by the Regional Center.

As such, USCIS has concluded that a limited decision is necessary in this case. Therefore, all requested, approved, and disallowed industry categories and geographic regions have been identified below.

A. Industry Categories and Geographic Regions Requested

The applicant has requested to focus, promote economic growth, and offer capital investment opportunities in the following geographic areas and industry categories:

1. Geographic Areas - Requested

State	Counties/Cities
California	Entire State, all Counties and Cities
Oregon	Entire State, all Counties and Cities
Washington	Entire State, all Counties and Cities

2. Industry Categories - Requested

NAICS	Industry Name	
5416	Management, Scientific, and Technical Consulting Services	
562910	Remediation Services	
237310	Highway, Street, and Bridge Construction	
5413	Architectural, Engineering, and Related Services	
336510	Railroad Rolling Stock Manufacturing	
333318	Other Commercial and Service Industry Machinery Manufacturing	
23	Construction	
5311	Lessors of Real Estate	
722	Food Services and Drinking Places	
7211	Traveler Accommodation	
62331	Continuing Care Retirement Communities and Assisted Living Facilities for the Elderly	
541720	Research and Development in the Social Sciences and Humanities	

B. Approved Industry Categories and/or Geographic Areas

The following industry categories and/or geographic areas have been determined to represent an appropriate application of a hypothetical project to support the industry categories and geographic regions acceptable for use by the Regional Center.

1. Geographic Areas - Approved

State	Counties/Cities					
Oregon	Entire State, all Counties and Cities					
Washington	Entire State, all Counties and Cities					

2. Industry Categories - Approved

NAICS	Industry Name				
5416	Management, Scientific, and Technical Consulting Services				
562910	Remediation Services				
237310	Highway, Street, and Bridge Construction				
5413	Architectural, Engineering, and Related Services				
336510	Railroad Rolling Stock Manufacturing				
333318	Other Commercial and Service Industry Machinery Manufacturing				
23	Construction				
5311	Lessors of Real Estate				
722	Food Services and Drinking Places				
7211	Traveler Accommodation				
62331	Continuing Care Retirement Communities and Assisted Living Facilities for the Elderly				
541720	Research and Development in the Social Sciences and Humanities				

C. Disallowed Industry Categories and/or Geographic Areas

Counties/Cities

The following geographic areas have been disallowed because it has been determined that they do not represent an appropriate application of a hypothetical project to support the geographic regions acceptable for use by the Regional Center.

1. Geographic Areas - Disallowed

State

California	Entire State, all Counties and Cities				

4. Conclusion - Decision to Disallow

Some aspects of the submitted proposal, as presently constituted, do not meet the regulatory requirements at 8 C.F.R. § 204.6. Therefore the request to grant the specific geographic areas listed above cannot be approved.

(b)(4)

The decision to disallow the geographic areas identified above does not preclude the filing of Form I-526 petitions related to a subsequent project using the disallowed industry categories, geographic areas, and/or hypothetical project(s). Any future petitions will be adjudicated on their own merit.

There is no appeal to this decision to disallow the specified industry categories and/or geographic scope explained above. However, pursuant to 8 CFR 103.5, a motion can be filed on Form I-290B. Such motion must be accompanied by the proper fee and filed within 30 days of this notice.

Please note that if the I-924 applicant elects to timely file a motion with USCIS and if said motion is granted the application will be reopened and/or reconsidered and a new decision rendered. If the applicant's proposal submitted in support of its motion meets the regulatory requirements at 8 C.F.R. § 204.6 the applicant will be accorded the geographic areas that meet EB-5 requirements. If no motion is filed within the time allowed this decision is final.

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

A hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998). As such, USCIS's approval of any hypothetical job creation estimates presented in a Form I-924 is not accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Western Pacific Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational and transactional documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dbs.gov</u>.

Sincerely,

Milalo Colum

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Robert C. Divine

Baker Donelson Bearman Caldwell and Berkowitz, P.C.

633 Chestnut Street, 1800 Republic Center

Chattanooga, TN 37450

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



Date: June 18, 2015

Henry Szu Anchor Solutions Regional Center, LLC 1055 W. 7 Street, 33FL Los Angeles, CA 90017

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Anchor Solutions Regional Center, LLC

Re:

Initial Regional Center Designation Anchor Solutions Regional Center, L^T,C RCW 1424151870/ ID 1424151870

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 08/29/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Anchor Solutions Regional Center, LLC ("ASRC") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

Anchor Solutions Regional Center, LLC ID 1424151870 RCW 1424151870 Page 2

State of California

Counties/Cities

Riverside County San Bernardino County Los Angeles County

B. Industry Categories¹

Industry Category	NAICS
Construction of Buildings	236
Traveler Accommodations	7211
Food Services and Drinking Places	722

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Anchor Solutions Regional Center, LLC ID 1424151870 RCW 1424151870 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with Anchor Solutions Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

Anchor Solutions Regional Center, LLC ID 1424151870 RCW 1424151870 Page 4

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely.

Nicholas Colucci

Chief, Immigrant Investor Program

Milalos Colmi

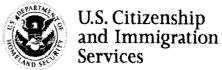
cc: Molly Wessel

Chen Lin and Wessel LLP

790 East Colorado Blvd, Suite 908E

Pasadena CA, 91101

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131M Street NF, MS 2235 Washington, DC 20529



May 4, 2015

Samuel Jinkyoo Kang Future Resources, Inc. 3325 Wilshire Blvd, Ste 905 Los Angeles, CA 90010

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

Future Resources, Inc.

Re:

Initial Regional Center Designation

Future Resources Inc.

RCW1418351796/ID1418351796

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 2, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Future Resources Inc. as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Future Resources Inc. ID 1418351796 RCW1418351796 Page 2

A. Geographic Area

State				
California				

B. Industry Categories¹

NAICS	Industry Name
56292	Materials recovery facilities

^{*}Please be advised that USCIS requires the creation of 10 jobs per investor

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Bluegrass International Fund Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Future Resources Inc. ID 1418351796 RCW1418351796 Page 3

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Future Resources Inc. ID 1418351796 RCW1418351796 Page 4

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Miles Columnia

Nicholas Colucci

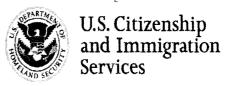
Chief, Immigrant Investor Program

cc: Peter Hwang

Law Office of David Y Kim 3550 Wilshire Blvd, Ste 640 Los Angeles CA 90010

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Office 131 M Street, NE Washington, DC 20529



TO: Michael M. Matesic 4551 Forbes Avenue Suite 200 Pittsburgh, PA 15213 DATE: June 17, 2015

RC ID#: 1034250077

RE: Reaffirmation of Regional Center Designation

DECISION

This notice is in reference to the regional center designation of Pittsburgh Investment Regional Center, LLC ("PRIC"), which was initially issued by U.S. Citizenship and Immigration Services ("USCIS") on July 11, 2011. Upon designation, USCIS authorized the regional center's participation in the Immigrant Investor Program (the "Program") pursuant to section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended ("Public Law 102-395"). Pursuant to 8 C.F.R. § 204.6(m)(6), regional centers must demonstrate continued eligibility for regional center designation and are required to file Form I-924A, Supplement to Form I-924 ("Form I-924A") on an annual basis.

On May 11, 2015, USCIS notified PRIC of its intent, pursuant to 8 C.F.R. § 204.6(m)(6), to terminate its participation as a regional center in the Program for failure to report in its I-924A filings any EB-5 capital investment or job creation for fiscal years 2011, 2012, or 2013. The Notice of Intent to Terminate ("ITT") provided PRIC an opportunity to offer evidence in opposition to the grounds alleged in the ITT.

¹ On September 28, 2012, President Obama signed into law Senate bill S. 3245, which amended section 610 of Public Law 102-395. S. 3245 struck the word "pilot" from section 610 of Public Law 102-395 and extended the Immigrant Investor Program until September 30, 2015.

On June 10, 2015, in response to the ITT, USCIS received evidence from PRIC its intent and purpose of promoting economic growth. After considering the evidence, USCIS reaffirms the existing regional center designation for PRIC.

Sincerely,

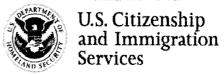
Nicholas Colucci

Males Coloni

Chief

Immigrant Investor Program Office

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131M Street NE, MS 2235 Washington, DC 20529



February 21, 2015

Carlo Barbieri Shrimp House US Regional Center, LLC 4800 N Federal Highway Building D Suite 101D Boca Rotan FL 33431

Application: Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s): Shrimp House US Regional Center, LLC

Re: Initial Regional Center Designation

Shrimp House US Regional Center, LLC

RCW1423851860/ID1423851860

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on August 26, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Shrimp House US Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Shrimp House US Regional Center, LLC RCW1423851860 ID1423851860 Page 2

A. Geographic Area

State	Counties			
Florida	Brevard, Broward, Charlotte, Citrus, Collier, DeSoto, Glades, Hardee,			
	Hendry, Hernando, Highlands, Hillsborough, Indian River, Lake, Lee,			
	Levy, Manatee, Marion, Martin, Miami-Dade, Monroe, Okeechobee,			
	Orange, Osecola, Palm Beach, Pasco, Pinellas, Polk, Sarasota, Seminole			
	and St Lucie			

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Buildings Construction
4232	Furniture & Home Furnishings Merchant Wholesalers
4234	Professional & Commercial Equipment & Supplies Merchant Wholesalers
4236	Household Appliances, Electrical & Electrical Goods Merchant Wholesaler
5413	Architectural, Engineering & Related Services
7225	Restaurants & Other Eating Places

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Shrimp House US Regional Center, LLC RCW1423851860 ID1423851860 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Bluegrass International Fund Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

Shrimp House US Regional Center, LLC RCW1423851860 ID1423851860 Page 4

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

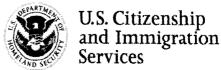
Milales Colmi

cc: Marianna Tarantur

197 S Federal Hwy Suite 200 Boca Rotan FL 33432

868

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



February 12, 2015

Jeffrey Campion Gulf States Regional Center 1675 Market Street, Suite 211 Westin FL 33326

Application: Form I-924, Application for Regional Center Under the Immigrant Investor Pilot

Program

Regional Center: Gulf States Regional Center

ID1201750575

Re: Request to Amend Regional Center Designation

Project: The Jung LLC RCW1412051774

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on 04/30/2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the The Jung LLC project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the 1500 Canal Street will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least obs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related

(b)(4)

filings of any Form I-526 filed by an individual investor associated with the The Jung LLC project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On March 28, 2013, USCIS approved the Gulf States Regional Center (GSRC) for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of

State	Counties
Florida	Escambia, Santa Rosa, Okaloosa, and Walton
Alabama	Mobile and Baldwin
Mississippi	Jackson, Harrison and Hancock
Louisiana	Orleans, St Bernard, Plaquemine, Jefferson, LaFourche, Terrebonne, Vermillion, Iberia, St Mary, Lafayette, Cameron, Calcasieu, St Tammany, Atasoosa, Austin Bastrop, Bell, Bexar, Jackson, Johnson, Kaufman, Lavaca, and Lee
Texas	Orange, Jefferson, Chambers, Galveston, Brazoria, Matagorda, Nueces, Calhoun, Refugio, Aransas, San Patricio, Kleberg, Kenedy, Willacy, Cameron, Brazos, Burleson, Burnet, Caldwell, Collin, Colorado, Comal, Dallas, Denton, Ellis, Falls, Fayette, Fort Bend, Freestone, Gonzales, Grimes, Guadalupe, Harris, Hays, Henderson, Hill, Hood, Hunt, Leon, Liberty, Limestone, Madison, McLennan, Medina, Milam, Montgomery Navarro, Parker, Robertson, Rockwall, Tarrant, Travis, Van Zandt, Walker, Waller, Washington, Wharton, Williamson, Wilson and Wise

GSRC now seeks to amend its previously approved regional center designation to include an actual project that will be managed by 1500 Canal Street, an NCE established on October 16, 2007.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
The Jung LLC	Exemplar	Business Plan	Dated 04/2014
	Form	Economic Analysis	Dated 04/2014
Geographic Location:	I-526	Operating Agreement	Dated 04/21/2014
New Orleans, LA	Petition	Confidential Private Placement	
·	Project	Memorandum	Submitted 04/30/2014
Focus of Investment:		Subscription Agreement	Submitted 04/30/2014
loan, equity		Limited Partnership Agreement	Submitted 04/30/2014
		Escrow Agreement	Submitted 04/30/2014
		Title to fee simple estate or land	Dated 01/06/2014

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The Gulf States Regional Center (GSRC) was established on 03/28/2013. On 04/28/2014 the Regional Center requested an addendum to include NAIC code 5311, Lessor of Real Estate and asked for approval of an actual exemplar I-526 for the new commercial enterprise – 1500 Canal Street LLC.

History of The Jung began in 1925, as a 10-story, 323-room hotel and was considered the "largest and most magnificent hotel in the South." In 1982 The Jung was placed on the National Register of Historic Places. The Jung has gone through many expansions, reaching a room total of 759 and operated as Radisson Hotel New Orleans until hurricane Katrina closed the hotel doors in 2005. The hotel remains vacant today.

The proposed mixed-use Jung Hotel redevelopment is planned for a seventeen-story building comprising 145 lodging units, and 175 multifamily units. The property also proposes two restaurants and bars, meeting space, a spa/fitness center; possible grocery store, gift shop and parking facilities for 484 spaces and a 7 story parking garage. The Jung is located near the BioDistrict, where revitalization is currently underway with the construction of a 200 bed Veteran Affairs Hospital (VA) and the 424 bed LSU University Medical Center (UMC).

(b)(4)	

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS 1	Industry Name	Input (\$Millions)	Multiplier	Jobs
23	Construction			
	Architectural, Engineering and Related]		
5413	Services			
44-45	FF&E purchases			
5411	Legal Services			
721	Hotel operations			
5311	Retail & residential leasing	J		
3311	Ketan & residential leasing			

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

(b)(4)

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately direct and indirect jobs from construction, rental, and hotel activities associated with the The Jung LLC project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with The Jung LLC. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions based on the The Jung LLC project

Each individual petition, in order to demonstrate that it is affiliated with the Gulf States Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milala Colmi

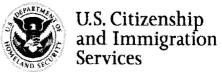
Michele Franchett Buchanan cc:

Stone Grzegorek Gonzalez LLP

800 Wilshire Boulevard, Suite 900

Los Angeles, CA 90017

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* 131 M Street, NE, Mailstop 2235 Washington, DC 20529



June 17, 2015

Jeffrey E. Campion Sun Corridor Regional Center, Inc. 1675 Market Street, Ste. 203 Weston, FL 33326

Application:

Form I-924, Application for Regional Center under the Immigrant Investor

Pilot Program

Applicant(s):

Sun Corridor Regional Center, Inc.

Re:

Initial Regional Center Designation Sun Corridor Regional Center, Inc. RCW1410151729 / ID1410151729

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on April 11, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Sun Corridor Regional Center, Inc. as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities
Arizona	Entire State

Sun Corridor Regional Center, Inc. ID1410151729 RCW1410151729 Page 2

B. Industry Categories¹

NAICS	Industry Name
23	Construction
722	Food Services and Drinking Places
423	Merchant Wholesalers, Durable Goods
44	Retail Trade
5413	Architectural, Engineering, and Related Services
721	Accommodation
7211	Traveler Accommodation
8129	Other Personal Services
531	Real Estate

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Sun Corridor Regional Center, Inc., in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Sun Corridor Regional Center, Inc. ID1410151729 RCW1410151729 Page 3

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of</u> Ho. 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities

Sun Corridor Regional Center, Inc. ID1410151729 RCW1410151729 Page 4

related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

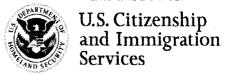
Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

cc: Jeffrey E. Campion, P.A. 1675 Market Street, Ste. 203 Western, FL 33326

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



June 16, 2015

David Liu Inland Gateway Regional Center, Inc. 488 E. Santa Clara Street, Suite 304 Arcadia, CA 91006

Application:

Form I-924, Application for Regional Center under the Immigrant Investor

Pilot Program

Applicant(s):

Inland Gateway Regional Center, Inc.

Re:

Initial Regional Center Designation Inland Gateway Regional Center, Inc. RCW1433052003 / ID1433052003

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on November 26, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Inland Gateway Regional Center, Inc. as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities			:	
California	Los Angeles, Orange,	Riverside, Sa	n Bernardi	no	

Inland Gateway Regional Center, Inc. ID1433052003 RCW1433052003 Page 2

B. Industry Categories¹

NAICS	Industry Name
236	Construction of Buildings
722	Food Services and Drinking Places
5413	Architectural, Engineering, and Related Services
7211	Traveler Accommodation
721110	Hotels (except Casino Hotels) and Motels
531	Real Estate

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Inland Gateway Regional Center, Inc., in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Inland Gateway Regional Center, Inc. ID1433052003 RCW1433052003 Page 3

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no

Inland Gateway Regional Center, Inc. ID1433052003 RCW1433052003 Page 4

determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Miles Columnia

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Molly Wessel

Chen Lin & Wessel LLP 790 East Colorado Blvd., Ste. 908E

Pasadena, CA 91101

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



August 25, 2014

Patrick J Barber Encore Georgia Regional Center LLC 5005 LBJ Freeway, Suite 1200 Dallas, TX 75244

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Encore Georgia Regional Center LLC

Re: Initial Regional Center Designation

Encore Georgia Regional Center LLC RCW1327351225 / ID1327351225

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on September 30, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Encore Georgia Regional Center LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Encore Georgia Regional Center LLC ID1327351225 RCW1327351225 Page 2

A. Geographic Area

State

Georgia

B. Industry Categories¹

Industry	NAICS Codes
Construction of Buildings	236
Construction of Non-Residential Buildings	2362
Wholesale trade	42
Merchant Wholesalers, Durable goods	423
Insurance Carriers	5241
Real Estate	531
Lessor of Real Estate	5311
Legal Services	5411
Title Abstract and Settlement Office	541191
Architectural, Engineering and related services	5413
Management, Scientific and Technical Consulting Services	5416
Advertising, Public Relations and Related Services	5418
Traveler Accommodations	7211
Full Service Restaurant	722511

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Encore Georgia Regional Center LLC ID1327351225 RCW1327351225 Page 3

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Encore Georgia Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A. Form I-924A, Supplement to Form I-924 Application is

Encore Georgia Regional Center LLC ID1327351225 RCW1327351225 Page 4

available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. <u>Legal Notice</u>

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

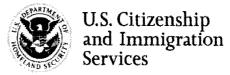
Encore Georgia Regional Center LLC ID1327351225 RCW1327351225Page 5

cc:

M Ford ESQ Law Office of M Ford 8004 Ashby Court Plano, TX 75025

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



May 21, 2015

Corrected

Mr. Richard W. Heyman C/O Hollywood International Regional Center, LLC 1605 Cahuenga Boulevard Hollywood, CA 90028

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

Hollywood International Regional Center

Re:

Request to Amend Regional Center Designation

Project: 6421 Dream 2 LP

RCW1426051886 / RC ID1031910084

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on September 17, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

A. Effective the date of this notice, USCIS approves the additional industry categories listed in Section III of this notice.

B. Effective the date of this notice, USCIS approves the 6421 Dream 2 LP project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526 as detailed in Sections IV and V. The applicant has shown by a preponderance of the evidence that 6421 Dream 2 LP will be a new commercial enterprise (NCE) and that the project is

likely to result in the creation of at least ____jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the 6421 Dream 2 LP project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On August 23, 2011 USCIS approved the Hollywood International Regional Center ("HIRC") for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of five which includes the five counties of Los Angeles, Orange, Riverside, San Bernardino and Ventura of the State of California. HIRC now seeks to amend its previously approved regional center designation to include additional industries and an actual project that will be managed by 6421 Dream 2 LP, an NCE established on March 17, 2014.

Based on the initial designation the Hollywood International Regional Center obtained approval for the following industry categories:

Industry Categories		
NAICS	Industry Name	Approval Date
7210	Accommodation	8/23/2011
7220	Food Services and Drinking Places	8/23/2011

An amendment request is required if investment opportunities arise that are outside the previously approved geographic area, industry categories, and capital investment projects. If changes are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the new evidence to ensure compliance with EB-5 program requirements.

III. Amendment Request1

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following change:

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

A. Industry Categories

USCIS approves the applicant's amendment request to include the following industry categories:

NAICS	Industry Name
2362	Nonresidential Building Construction
4234	Professional and Commercial Equipment and Supplies Merchant
	Wholesalers
5222	Nondepository Credit Intermediation
5242	Agencies, Brokerages, and Other Insurance Related Activities
5312	Offices of Real Estate Agents and Brokers
5411	Legal Services
5412	Accounting, Tax Preparation, Bookkeeping, and Payroll Services
5413	Architectural, Engineering, and Related Services
5416	Management, Scientific, and Technical Consulting Services
5418	Advertising, Public Relations, and Related Services
5511	Management of Companies and Enterprises
7225	Restaurants and Other Eating Places

IV. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document	
			**	
6421 Dream 2,	Acquire, develop, and	Business Plan	August 20, 2014	
LP	construct a hotel and	Economic Analysis	August 1, 2014	
	restaurant	Confidential Private	August 20, 2014	
Geographic		Offering Memorandum		
Location:	Investment:	Subscription Agreement	August 20, 2014	
6415 Selma	Equity	Limited Partnership	August 20, 2014	
Avenue, 6417		Agreement		
Selma Avenue,				
and 1615		Master Escrow	May 29, 2014	
Cahuenga		Agreement		
Boulevard, Los		Joinder in Master	May 21, 2014	
Angeles,		Escrow Agreement		
California		(Investor		
		Acknowledgement)		
Exemplar of				
Form I-526				

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

Hollywood International Regional Center ("HIRC") has filed an I-924 Amendment supported by an exemplar Form-526 for a new project in Hollywood, California. The project involves pooling the immigrant investor's capital into a new commercial enterprise ("NCE" known as 6421 Dream 2 LP. 6421 Dream 2 LP was formed in the State of Delaware on March 17, 2014. The project involves raising up to from up to investors	ct ')
since the project is located within a Targeted Employment Area ("TEA") based upon high unemployment in Hollywood, California ² .	(b)(4)

² In order to qualify as a targeted employment area ("TEA"), a petitioner must demonstrate the area "meets the statutory and regulatory criteria through the submission of (1) evidence that the area is outside of a metropolitan statistical area and outside of a city or town having a population of 20,000 or more; (2) unemployment data for the relevant metropolitan statistical area or county; or (3) a letter from the state government designating a geographic or political subdivision located outside a rural area but within its own boundaries as a high unemployment area. 8 C.F.R. § 204.6(j)(6)" as stated in the May 2013 Policy Memorandum.

V. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the IMPLAN economic model:

IMPLAN Code ³	IMPLAN Industry	Input (\$Millions)	Multiplier	Jobs
Construction Phase				
34	Construction of new nonresidential commercial and health care structures			
319	Wholesale trade businesses			
358	Insurance agencies, brokerages, and related activities			
367	Legal Services			
368	Accounting, tax preparation, bookkeeping, and payroll services			
369	Architectural, engineering, and related services			
381	Management of companies and enterprises			
377	Advertising and related services]		
374	Management, scientific, and technical consulting services			
360	Real estate establishments			
355	Nondepository credit intermediation and related Activities			
Operations Phase				
411	Hotels and motels, including casino hotels			
413	Food services and drinking places			
360	Real estate establishments			
Total Jobs:				

(b)(4)

⁻⁻⁻

³ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using IMPLAN multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately indirect and induced jobs from the construction (hard and soft expenditures) and direct, indirect and induced jobs from the operations phase of the hotel and restaurant associated with the 6421 Dream 2 LP project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with 6421 Dream 2 LP. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

VI. Guidelines for Filing Form 1-526 Petitions based on the 6421 Dream 2 LP project

Each individual petition, in order to demonstrate that it is affiliated with the Hollywood International Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VII. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VIII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional

Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

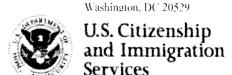
Milalos Colmi

cc: Robert C. Divine

C/O Baker Donnelson Bearman Caldwell & Berkowitz, P.C.

633 Chestnut Street Chattanooga, TN 37450

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235



DATE: 06/08/2015

Anne Doyle Veria Regional Center, Inc. 250 West 34 Street # 3501 New York, NY 10119

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Veria Regional Center, Inc.

Re:

Initial Regional Center Designation

Veria Regional Center, Inc.

RCW 1407051702 / ID 1407051702

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 03/11/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of</u> Ho, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Veria Regional Center, Inc. as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the Veria Lifestyle Capital, LLC project based on the evidence submitted with the exemplar Form I-526.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

Name of State

New York

New York, Richmond, Westchester, Bronx, Queens, Kings, Nassau, Rockland, Orange and Sullivan.

B. Industry Categories¹

NAICS	Industry Name
23	Construction
541	Professional, Scientific, and Technical Services
721	Amusement, Gambling, and Recreation Industries
713	Accommodation
722	Food Services and Drinking Places

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an exemplar Form I-526.

Project	Type of Project	Organization Documents	Date of Document
Veria Lifestyle	Exemplar	Business Plan	February 2014
Capital, LLC	Form	Economic Analysis	February 2014
	I-526	Confidential Private Placement	May 2015
Geographic	Petition	Memorandum	
Location:	Project	Subscription Agreement	May 2015
1 Kutsher Road,		Limited Liability Company	May 2015
Monticello, New		Agreement	
York 12701.			
Focus of			

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Equity and loan. Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements. The proposal identifies the new commercial enterprise ("NCE") of the project as Veria Lifestyle Capital, LLC, which was formed in the State of New York on December 30, 2013. The project is located at 1 Kutsher Road in the City of Monticello, New York. Approximately immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of \$ 5 capital from all investors.	Investment:					
Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements. The proposal identifies the new commercial enterprise ("NCE") of the project as Veria Lifestyle Capital, LLC, which was formed in the State of New York on December 30, 2013. The project is located at 1 Kutsher Road in the City of Monticello, New York. Approximately immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of \$	Equity and					
I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements. The proposal identifies the new commercial enterprise ("NCE") of the project as Veria Lifestyle Capital, LLC, which was formed in the State of New York on December 30, 2013. The project is located at 1 Kutsher Road in the City of Monticello, New York. Approximately immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of \$	loan.					
The proposal identifies the new commercial enterprise ("NCE") of the project as Veria Lifestyle Capital, LLC, which was formed in the State of New York on December 30, 2013. The project is located at 1 Kutsher Road in the City of Monticello, New York. Approximately immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of \$	Note: If changes to	this project a	nd its supporti	ng documents are	found in subseque	nt Form
The proposal identifies the new commercial enterprise ("NCE") of the project as Veria Lifestyle Capital, LLC, which was formed in the State of New York on December 30, 2013. The project is located at 1 Kutsher Road in the City of Monticello, New York. Approximately immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of \$	I-526 or Form I-82	9 petitions, US	SCIS will revie	w the supporting	documents once mo	ore to
Lifestyle Capital, LLC, which was formed in the State of New York on December 30, 2013. The project is located at 1 Kutsher Road in the City of Monticello, New York. Approximately immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of \$ of EB-	ensure compliance	with EB-5 pro	ogram require	nents.		
	Lifestyle Capital, I The project is locat Approximately exchange for capital	LC, which wa ed at 1 Kutsha immigrant in al contribution	as formed in the er Road in the avestors will su	e State of New Yo City of Monticello abscribe to the NC	ork on December 30 o, New York. E as limi <u>ted partne</u>	, 2013. ers in

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

Activities	NAICS	Expenditure/ Revenue, \$, Million, 2010 Value	Multiplier	Total Jobs	(b)(4)
Construction	23	,			(5)(4)
Professional services	5419 A0				
Hotel Accommodation	7211 A0				
Fitness and Recreation	713940				
Food & drinking	722				
Miscellaneous Hotel revenue	7211				
Total					

The approval of this Form I-924 application supported by an exemplar Form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on Veria Lifestyle Capital, LLC Project

Each individual petition, in order to demonstrate that it is affiliated with the Veria Regional Center, Inc., in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws

Veria Regional Center, Inc. ID1407051702 RCW1407051702 Page 6

and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

cc:

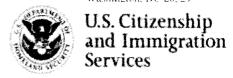
David Hart, Esq. David J. Hart, P.A.

Miles Colmi

21 South East First Avenue, 10th Floor

Miami, FL 33131

Veria Regional Center, Inc. 250 West 34 Street # 3501 New York, NY 10119



Date: 06/04/2015

Reece Runyan KCI Capital, Ltd. 1 South Nevada Avenue, Suite 260 Colorado Spring, CO 80903

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

KCI Capital, Ltd.

Re:

Initial Regional Center Designation

KCI Capital, Ltd.

RCW 1316951165 / ID 1316951165

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 06/18/2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate KCI Capital, Ltd. as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Island
State of Hawaii	Big Island of Hawaii, Hawaiian Islands

B. Industry Categories¹

NAICS	Industry Name	
236115	New Single-Family Housing Construction (except For-Sale Builders)	
23622	Commercial and Institutional Building Construction	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the KCI Capital, Ltd. in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

KCI Capital, Ltd. ID1316951165 RCW1316951165 Page 3

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

KCI Capital, Ltd. ID1316951165 RCW1316951165 Page 4

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

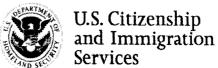
Chief, Immigrant Investor Program

Milalo Colmi

cc:

Mark T. Thatcher, Esq. Simmons Associates, Ltd. 56 Pine Street, 7th Floor Providence, RI 02903

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* 131 M Street, NF, MS 2235 Washington, DC 20529



June 4, 2015

Joseph McCarthy 880 Apollo St. Suite 218 El Segundo, CA 90245

Application: Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center: American Dream Fund d/b/a Portland Regional Center

ID1031910047

Re: Request to Amend Regional Center Designation

EB5 RiverPlace Hotel Investment LP

RCW1402151656

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on January 21, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the EB5 RiverPlace Hotel Investment LP project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the EB5 RiverPlace Hotel Investment LP will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least ____jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the

(b)(4)

business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the EB5 RiverPlace Hotel Investment LP project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On July 11, 2011, USCIS approved the American Dream Fund d/b/a Portland Regional Center (PDX) for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the six contiguous counties in Oregon, Clackamas, Multnomah, Washington, Yamhill, Columbia, and Marion. PDX now seeks to amend its previously approved regional center designation to include an actual project that will be managed by EB5 RiverPlace Hotel Investment LP, an NCE established on November 15, 2012.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
EB5	Portland Hyatt House	Business Plan	October 29, 2013
RiverPlace	Project	Economic Analysis	August 30, 2013
Hotel		Confidential Private	October 29, 2013
Investment LP	Investment:	Placement Memorandum	
	Equity		
Geographic		Subscription Agreement	October 29, 2013
Location:		Limited Partnership	October 29, 2013
Multnomah	<u> </u>	Agreement	
County,			
Oregon		Operating Agreement	October 29, 2013
		Supplement to	May 19, 2015
Exemplar of		Confidential Private	-
Form I-526		Placement Memorandum	

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

(b)(4)	The requested amendment identifies EB5 RiverPlace Hotel Investment LP, an NCE established on November 15, 2012. EB5 RiverPlace Hotel Investment LP is located within a targeted employment area (TEA) in the County of Multnomah, Oregon. The project may have as many as EB-5 investors subscribe to the NCE as limited partners in exchange for capital contributions of each.

IV. Job Creation

(b)(4)

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the IMPLAN economic model:

NAICS 1	Industry Name	Input (\$Millions)	Jobs	(b)(4
23	Construction			(,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
721110	Hotel Operations			
	Visitor Spending			
Total Jobs:				J

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using IMPLAN multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately direct and indirect jobs from construction, hotel operations, and visitor spending associated with the EB5 RiverPlace Hotel Investment, LP project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with EB5 RiverPlace Hotel Investment, LPO. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the EB5 RiverPlace Hotel</u> Investment, LP project

Each individual petition, in order to demonstrate that it is affiliated with the American Dream Fund d/b/a Portland Regional Center (PDX), in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to

promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,
Miles Colour

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Rob

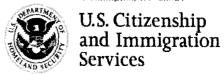
Robert C. Divine

Baker Donelson Bearman, Caldewell and Berkowitz

633 Chestnut St.

Chattanooga, TN 37450

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



June 2, 2015

Patrick Hogan CMB Southeast Regional Center, LLC 7819 42nd Street West Rock Island, IL 61201

Application:

Form I-924, Application for Regional Center Under the Immigrant

Investor Pilot Program

Regional Center:

CMB Southeast Regional Center, LLC

ID1231250800

Re:

Request to Amend Regional Center Designation

Project: CMB Florida Infrastructure Investment Group 26, LP

RCW1424051865

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on August 28, 2014. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the CMB Florida Infrastructure Investment Group 26, LP project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the CMB Florida Infrastructure Investment Group 26, LP will be a new commercial enterprise (NCE) and that the project is likely to result in the

CMB Southeast Regional Center, LLC ID1231250800 RCW1424051865 Page 2 (b)(4)

creation of at least jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the CMB Florida Infrastructure Investment Group 26, LP project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On September 16, 2013, USCIS approved the CMB Southeast Regional Center, LLC for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope of the entire states of Florida and Georgia. CMB Southeast Regional Center, LLC now seeks to amend its previously approved regional center designation to include an actual project that will be managed by CMB Florida Infrastructure Investment Group 26, LP, an NCE established on January 15, 2014.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
CMB Florida Infrastructure	Development and construction of	Comprehensive Business Plan	08/05/2014
Investment	distribution facility at	Economic Impact Report	07/15/2014
Group 26, LP	Cecil Commerce Center	Confidential Private	03/24/2014
	Parcel A	Placement Memorandum	
Geographic		Limited Partnership	03/04/2014
Location:	Investment:	Agreement	
Jacksonville,	Loan	Subscription Agreement	03/27/2014
FL	·	Escrow Agreement	03/24/2014
		Loan Agreement	01/30/2014
Exemplar of		<u> </u>	
Form I-526			

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

CMB Southeast Regional Center, LLC ID1231250800 RCW1424051865 Page 3

The requested amendment identifies the NCE of the proposed project as CMB Florida Infrastructure Investment Group 26, LP, which was formed in the State of Delaware on January 15, 2014. The CMB Florida Infrastructure Investment Group 26, LP project is located within a targeted employment area (TEA) in the City of Jacksonville, Florida. A total of EB-5 investors will subscribe to the NCE as limited partners in exchange for each, for an aggregate of capital contributions of

IV. Job Creation

(b)(4)

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS 1	Industry Name	Input (\$Millions)	Multiplier	Jobs	(1.)(4)
23	Construction				(b)(4)
54	Professional, Scientific, and Technical Services				
Total Jobs:					

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

² Excludes 174 direct jobs

³ Excludes 13 direct jobs

CMB Southeast Regional Center, LLC ID1231250800 RCW1424051865 Page 4 (b)(4)

preponderance of the evidence that the project is expected to result in the creation of approximately ndirect and induced jobs from construction activities associated with the CMB Florida Infrastructure Investment Group 26, LP project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with CMB Florida Infrastructure Investment Group 26, LP. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. <u>Guidelines for Filing Form I-526 Petitions based on the CMB Florida Infrastructure</u> Investment Group 26, LP project

Each individual petition, in order to demonstrate that it is affiliated with the CMB Southeast Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

CMB Southeast Regional Center, LLC ID1231250800 RCW1424051865 Page 5

5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws

CMB Southeast Regional Center, LLC ID1231250800 RCW1424051865 Page 6

and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Milels Column

Nicholas Colucci

Chief, Immigrant Investor Program

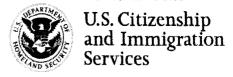
cc: Michele Franchett / Lincoln Stone

Stone Grzegorek Gonzalez LLP 800 Wilshire Boulevard, Ste. 900

Los Angeles, CA 90017

CMB Southeast Regional Center, LLC 7819 42^{nd} Street West Rock Island, IL 61201

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street. NE. Mailstop 2235 Washington, DC 20529



June 1, 2015

Adam Greene Live in America – Missouri/Kansas Regional Center LLC One Penn Plaza, Suite 4015 New York, NY 10119

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Live in America – Missouri/Kansas Regional Center LLC

Re: Initial Regional Center Designation

Live in America - Missouri/Kansas Regional Center LLC

RCW1411951743 / RC-ID1411951743

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on April 29, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Missouri/Kansas Regional Center LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Missouri/Kansas Regional Center LLC RCW1411951743 / RC-ID1411951743 Page 2

A. Geographic Area

	States	Counties	
W 11	Missouri	All counties	
	Kansas	All counties	

B. Industry Categories¹

Industry Category	NAICS code
Nonresidential Building Construction	236200
Architectural, Engineering & Related Services	541300

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Live in America – Missouri/Kansas Regional Center LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

Missouri/Kansas Regional Center LLC RCW1411951743 / RC-ID1411951743 Page 4

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NF, Mailstop 2235 Washington, DC 20529



June 1, 2015

Adam Greene Live in America – Carolinas Regional Center LLC One Penn Plaza, Suite 4015 New York, NY 10119

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Live in America – Carolinas Regional Center LLC

Re:

Initial Regional Center Designation

Live in America – Carolinas Regional Center LLC

RCW1411951742 / RC-ID1411951742

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on April 29, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Live in America – Carolinas Regional Center LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

	States	Counties	
:	North Carolina	All counties	
	South Carolina	All counties	

B. Industry Categories¹

Industry Category	NAICS code	
Nonresidential Building Construction	236200	
Architectural, Engineering & Related Services	541300	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Live in America – Carolinas Regional Center LLC RCW1411951742 / RC-ID1411951742 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Live in America – Carolinas Regional Center LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho. 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

Live in America – Carolinas Regional Center LLC RCW1411951742 / RC-ID1411951742 Page 4

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milala Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



Date: May 29, 2015

Greg Ferguson Land of Sky Regional Center, LLC 60 N Market Street, Suite C200 Asheville NC, 28801

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Land of Sky Regional Center, LLC

Re: Initial Regional Center Designation

Land of Sky Regional Center, LLC RCW1405751692 / ID 1405751692

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 2/26/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Land of Sky Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities	Counties/Cities
	Cocke County	Greene County
State of	Hamblen County	Hawkins County
Tennessee	Knox County	Sevier County
	Sullivan County	Washington County
State of North	Buncombe County	Madison County
Carolina		-

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
5413	Architecture, Engineering, and Related Services
6233	Continuing Care for the Elderly
4232	Furniture Home Furnishing Wholesaler
4236	Household Appliances Merchant Wholesaler

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Land of Sky Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A

Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

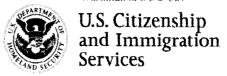
Nicholas Colucci

Chief, Immigrant Investor Program

Alle Colmi

cc: William G Hicks William G Hicks PA 7380 Sand lake Road Orlando FL 32819

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* 131 M Street, NE. Mailstop 2235 Washington, DC 20529



Date: May 28, 2015

Ms. Julia Young-hee Park Advantage America Hawaii Regional Center, LLC 489 5th Ave, 12th Floor New York, NY 10017

Application: Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s): Advantage America Hawaii Regional Center, LLC

Re: Initial Regional Center Designation

Advantage America Hawaii Regional Center, LLC

RCW1502352568 / ID1502352568

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 1/23/2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Advantage America Hawaii Regional Center, LLC ("AAHIRC") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Advantage America Hawaii Regional Center, LLC ID 1502352568 RCW 1502352568 Page 2

A. Geographic Area

State	Counties/Cities
	Hawaii County
Hawaii	City and County of Honolulu
	Maui County
	Kalawao County
	Kaua'i County

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesaler
4234	Professional and Commercial Equipment and Supplies Merchant Wholesaler
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesaler
7211	Traveler Accommodations

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "B-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Advantage America Hawaii Regional Center, LLC ID 1502352568 RCW 1502352568 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Advantage America Hawaii Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

Advantage America Hawaii Regional Center, LLC ID 1502352568 RCW 1502352568 Page 4

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

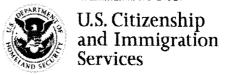
Chief, Immigrant Investor Program

Milalos Colmi

cc: Xinyue Li

Law Offices of Julia Park LLC 489 5th Ave, 12th Floor New York, NY 10017

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washineton, DC 20529



Date: May 26, 2015

Scott W. Barnhart USEGF Florida Regional Center 3875 Sunset Lane Riviera Beach, FL 33404

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

USEGF Florida Regional Center

Re:

Initial Regional Center Designation - Limited Decision

USEGF Florida Regional Center RCW1502052556 / ID1502052556

This notice of a limited decision is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 01/20/2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves, in a limited decision, the Form I-924 request to designate USEGF Florida Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation - Limited Decision

The applicant submitted its Form I-924 requesting specific industry categories, geographic regions, and multiple hypothetical projects to be identified for the Regional Center's use.

USEGF Florida Regional Center ID1502052556 RCW1502052556 Page 2

Upon review of the record, USCIS has determined that not all of the requested geographic regions provided in the Form I-924 represent an appropriate application of a hypothetical project to support the industry categories, and/or geographic regions acceptable for use by the Regional Center.

As such, USCIS has concluded that a limited decision is necessary in this case. Therefore, all requested, approved, and disallowed industry categories, geographic regions, and hypothetical projects have been identified below.

A. Industry Categories and Geographic Regions Requested

The applicant has requested to focus, promote economic growth, and offer capital investment opportunities in the following geographic areas and industry categories:

1. Geographic Areas - Requested

State	Counties, Organized by Metropolitan Areas	
	Tampa-St. Petersburg-Clearwater, FL	
Florida	Hernando County	
	Hillsborough County	
	Pasco County	
	Pinellas County	
	Miami-Fort Lauderdale-West Palm Beach, FL	
	Miami-Dade County	
	Broward County	
	Palm Beach County	
	Orlando-Kissimmee-Sanford, FL	
	Lake County	
	Orange County	
	Osceola County	
	Seminole County	
	Jacksonville, FL	
	Baker County	
	Clay County	
	Duval County	
	Nassau County	
	St. Johns County	
	Other counties outside of these four metro areas:	
	Bradford County	
	Brevard County	

	Charletta County
•	Charlotte County
•	Collier County
•	Columbia County
•	De Soto County
•	Flagler County
•	Glades County
•	Hardee County
•	Hendry County
•	Highlands County
•	Indian River County
•	Lee County
•	Manatee County
•	Marion County
•	Martin County
•	Monroe County
•	Okeechobee County
•	Polk County
•	Putnam County
•	Sarasota County
•	St Lucie County
•	Sumter County
•	Union County
•	Volusia County

2. Industry Categories - Requested

NAICS	Industry Name
2361	Residential Building Construction
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
5311	Lessors of Real Estate
5411	Legal Services
5413	Architectural, Engineering, and Related Services
5418	Advertising Agencies
5511	Management of Companies and Enterprises
6231	Nursing Care Facilities
6243	Services for Elderly and Persons with Disabilities
7211	Traveler Accommodation
7225	Restaurants and Other Eating Places

B. Approved Industry Categories and/or Geographic Areas

The following industry categories and/or geographic areas have been determined to represent an appropriate application of a hypothetical project to support the industry categories, and geographic regions acceptable for use by the Regional Center.

1. Geographic Areas - Approved

State	Counties/Cities
	Tampa-St. Petersburg-Clearwater, FL
Florida	Hernando County
	Hillsborough County
	Pasco County
	Pinellas County

2. Industry Categories - Approved

NAICS	Industry Name	
2361	Residential Building Construction	
2362	Nonresidential Building Construction	
4232	Furniture and Home Furnishing Merchant Wholesalers	
5311	Lessors of Real Estate	
5411	Legal Services	
5413	Architectural, Engineering, and Related Services	
5418	Advertising Agencies	
5511	Management of Companies and Enterprises	
6231	Nursing Care Facilities	
6243	Services for Elderly and Persons with Disabilities	

C. Disallowed Industry Categories and/or Geographic Areas

The following industry categories and/or geographic areas have been disallowed because it has been determined that they do not represent an appropriate application of a hypothetical project to support the industry categories, and/or geographic regions acceptable for use by the Regional Center.

1. Geographic Areas - Disallowed

State	Counties/Cities
	Miami-Fort Lauderdale-West Palm Beach, FL
Florida	Miami-Dade County
	Broward County
	Palm Beach County
	Orlando-Kissimmee-Sanford, FL

O		
	Lake County	
	Orange County	
	Osceola County	
	Seminole County	
	Jacksonville, FL	
	Baker County	
	Clay County	
	Duval County	
	Nassau County	
	St. Johns County	
	Other counties outside of these four metro areas:	
	Bradford County	
	Brevard County	
	Charlotte County	
	Collier County	
	Columbia County	
	De Soto County	
	Flagler County	
1	Glades County	
	Hardee County	
	Hendry County	
	Highlands County	
	Indian River County	
	• Lee County	
	Manatee County	
	Marion County	
	Martin County	
	Monroe County	
	Okeechobee County	
	Polk County	
	Putnam County	
	Sarasota County	
	St Lucie County	
	Sumter County	

Union CountyVolusia County

(b)(4)

RCW1502052556 Page 6 (b)(4)

USEGF Florida Regional Center ID1502052556

2. Industry Categories - Disallowed

7211	Traveler Accommodation
7225	Restaurants and Other Eating Places

3. Hypothetical Project(s) - Dis	allowed		
		······	

USCIS will not give deference to the business plan and the economic analysis that derived the job creation estimates with any subsequently filed individual immigrant investors' Form I-526s pertaining to the above project. USCIS will review the business plan and/or economic analysis when the Form I-526s are filed to determine if it meets EB-5 requirements.

4. Conclusion - Decision to Disallow

Some aspects of the submitted proposal, as presently constituted, do not meet the regulatory requirements at 8 C.F.R. § 204.6. Therefore the request to grant the specific geographic areas, industry categories and hypothetical projects listed above cannot be approved.

The decision to disallow the industry categories, geographic areas, and hypothetical projects identified above does not preclude the filing of Form I-526 petitions related to a subsequent project using the disallowed industry categories, geographic areas, and/or hypothetical project(s). Any future petitions will be adjudicated on their own merit.

There is no appeal to this decision to disallow the specified industry categories and/or geographic scope explained above. However, pursuant to 8 CFR 103.5, a motion can be filed on Form I-290B. Such motion must be accompanied by the proper fee and filed within 30 days of this notice.

Please note that if the I-924 applicant elects to timely file a motion with USCIS and if said motion is granted the application will be reopened and/or reconsidered and a new decision rendered. If the applicant's proposal submitted in support of its motion meets the regulatory requirements at 8 C.F.R. § 204.6 the applicant will be accorded the geographic areas, industry categories and/or hypothetical projects that meet EB-5 requirements. If no motion is filed within the time allowed this decision is final.

III. Job Creation

USCIS approves the geographic area and industry categories noted below based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

The approval of this Form I-924 application is based upon the economically and statistically valid assumptions and estimates provided in the business plan for job creation.

A hypothetical project does not have the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998). As such, USCIS's approval of any hypothetical job creation estimates presented in a Form I-924 is not accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the USEGF Florida Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual

immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational and transactional documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. <u>Legal Notice</u>

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

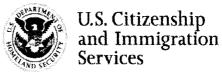
Sincerely,

Miles Columnia

Nicholas Colucci

Chief, Immigrant Investor Program

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



Date: May 26, 2015

Robert Rife Economic Development & Investment Group LLLP 4366 Auburn Blvd. Sacramento, CA 95841

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Economic Development & Investment Group LLLP

Re: Initial Regional Center Designation

Economic Development & Investment Group LLLP

RCW1502352569 / ID1502352569

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on January 23, 2015. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Economic Development & Investment Group LLLP as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Economic Development & Investment Group LLLP ID1502352569 RCW1502352569 Page 2

A. Geographic Area

State	Counties/Cities
	Alameda County
California	Contra Costa County
	Marin County
	Napa County
	Sacramento County
	San Francisco County
	San Joaquin County
	San Mateo County
	Santa Clara County
	Solano County
	Sonoma County
	Stanislaus County

B. Industry Categories¹

NAICS	Industry Name
621493	Freestanding Ambulatory Surgical and Emergency Centers
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
42345	Medical, Dental, and Hospital Equipment and Supplies Merchant Wholesalers
5413	Architectural, Engineering, and Related Services

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998),

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Economic Development & Investment Group LLLP ID1502352569 RCW1502352569 Page 3

and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Economic Development & Investment Group LLLP, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

Economic Development & Investment Group LLLP ID1502352569 RCW1502352569 Page 4

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

Economic Development & Investment Group LLLP ID1502352569 RCW1502352569 Page 5

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

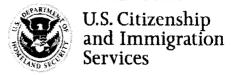
Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalos Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NF, Mailstop 2235 Washington, DC 20529



Date: May 27, 2015

Longsheng Lei American Regional Center-Las Vegas, LLC 2000 S. Eastern Ave. Las Vegas, NV 89104

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): American Regional Center-Las Vegas, LLC

Re: Initial Regional Center Designation

American Regional Center-Las Vegas, LLC

RCW1318651173/ID 1318651173

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 5, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate American Regional Center-Las Vegas, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

American Regional Center-Las Vegas, LLC ID1318651173 RCW1318651173 Page 2

A. Geographic Area

State	Counties		.:
	Clark		
Nevada			

B. Industry Categories¹

NAICS	Industry Name
236220	Commercial & Institutional Building Construction
623312	Assisted Living Facilities for the Elderly

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

American Regional Center-Las Vegas, LLC ID1318651173 RCW1318651173 Page 3

Each individual petition, in order to demonstrate that it is affiliated with the American Regional Center-Las Vegas, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program

American Regional Center-Las Vegas, LLC ID1318651173 RCW1318651173 Page 4

will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Miles Columnia

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Hsiao-wei Jennifer Tsai

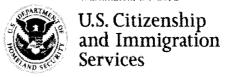
JT Law Group

1810 E. Sahara Ave., Suite 116

Las Vegas, NV 89104

U.S. Department of Homeland Security

U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



May 27, 2015

John C. Kratzer JMIR Texas Mega Metro Regional Center, LLC c/o JMI Realty, LLC 111 Congress Avenue, Ste. 2600 Austin, TX 78701

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): JMIR Texas Mega Metro Regional Center, LLC

Re: Initial Regional Center Designation

JMIR Texas Mega Metro Regional Center, LLC

RCW1406651700 / ID1406651700

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on March 07, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of</u> Ho, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate JMIR Texas Mega Metro Regional Center, LLC ("TMMRC") as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the JMIR Austin TX Hotel Fund, LP project based on the evidence submitted with the exemplar Form I-526.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
Texas	Bastrop, Dallas, Harris, Madison, Bell, Denton, Montgomery, Robertson, Blanco,
	Ellis, Walker, Washington, Burnet, Johnson, Waller, Coryell, Caldwell, Kaufman,
	Bexar, Falls, Hays, Rockwall, Comal, Freestone, Lee, Tarrant, Gonzales, Hill,
	Llano, Austin, Mason, Brazoria, Lavaca, McLennan, Milam, Colorado, Brazos,
	Navarro, Travis, Fayette, Buleson, Williamson, Fort Bend, Grimes, Collin,
	Galveston, Leon

B. Industry Categories¹

NAICS	Industry Name
2632	Nonresidential Building Construction
7211	Traveler Accommodations
541 3	Architectural, Engineering and Related Services
337127	Institutional Furniture Manufacturing
54181	Advertising Agencies

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an exemplar Form I-526.

Project	Type of Project	Organization Documents	Date of Document
JMIR Austin TX Exemplar		JMIR Texas Mega Metro Regional Center, LLC Certificate of Formation	Dated: 12/08/2014
Geographic Location:	Petition Project	JMIR Austin TX Hotel Fund, LP Certificate of Filing	Dated: 02/25/2014
Austin, Travis County, TX	Troject	JMIR-Austin Hotel, LP Certificate of Limited Partnership	Dated 03/22/2006
Focus of Investment: Equity		JMIR-Austin Hotel, LP Certificate of Filing (Foreign Filing, TX)	Dated 04/06/2006
Iquity		Comprehensive Business Plan Economic Impact Analysis	Dated: 09/05/2014 Dated: 06/2014
		Subscription Agreement – JMIR Austin TX Hotel Fund, LP	Dated: 07/18/2014
		Limited Partnership Agreement	Dated: 07/17/2014, as amended on 09/16/2014 and on 04/27/ 2014
		Confidential Offering Memorandum	Dated: 07/17/2014
		Supplement No. 2 to Confidential Offering Memorandum	Dated: 12/01/2014
		Escrow Agreement	Dated: 11/24/2014

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

The proposal identifies the new commercial enterprise ("NCE") of the project as a Austin TX Hotel Fund, LP, which was formed in the State of Texas on February The NCE is located at 111 Congress Ave., Ste. 2600, Austin, TX 78701. immig investors will subscribe to the NCE as limited partners in exchange for capital	25,2014.
contributions ofeach and an aggregate of	(b)(4)

(b)(4)

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS Industry Name	NAICS	Input (\$Millions)	Multiplier	Jobs
Nonresidential Building Construction	2362			
Traveler Accommodations	7211			
Architectural, Engineering and Related Services	5413			
Institutional Furniture Manufacturing	337127			
Advertising Agencies	54181			
Total Jobs:				

(b)(4)

The approval of this Form I-924 application supported by an exemplar Form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on JMIR Austin TX Hotel Fund, LP project

Each individual petition, in order to demonstrate that it is affiliated with the TMMRC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program

will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

cc: Lincoln Stone, Esq.

Stone, Grzegorek & Gonzalez, LLP

800 Wilshire Blvd., Ste 900

Los Angeles, CA 90017

U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235



May 27, 2015

Lincoln Stone, Esq. Stone, Grzegorek & Gonzalez, LLP 800 Wilshire Blvd., Ste 900 Los Angeles, CA 90017

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

JMIR Texas Mega Metro Regional Center, LLC

Re:

Initial Regional Center Designation

JMIR Texas Mega Metro Regional Center, LLC

RCW1406651700 / ID1406651700

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on March 07, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate JMIR Texas Mega Metro Regional Center, LLC ("TMMRC") as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the JMIR Austin TX Hotel Fund, LP project based on the evidence submitted with the exemplar Form I-526.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
Texas	Bastrop, Dallas, Harris, Madison, Bell, Denton, Montgomery, Robertson, Blanco,
	Ellis, Walker, Washington, Burnet, Johnson, Waller, Coryell, Caldwell, Kaufman,
	Bexar, Falls, Hays, Rockwall, Comal, Freestone, Lee, Tarrant, Gonzales, Hill,
	Llano, Austin, Mason, Brazoria, Lavaca, McLennan, Milam, Colorado, Brazos,
	Navarro, Travis, Fayette, Buleson, Williamson, Fort Bend, Grimes, Collin,
}	Galveston, Leon

B. Industry Categories¹

NAICS	Industry Name
2632	Nonresidential Building Construction
7211	Traveler Accommodations
5413	Architectural, Engineering and Related Services
337127	Institutional Furniture Manufacturing
54181	Advertising Agencies

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an exemplar Form I-526.

Project	Type of	Organization Documents	Date of Document
	Project		
JMIR Austin TX	Exemplar	JMIR Texas Mega Metro	Dated: 12/08/2014
Hotel Fund, LP	Form	Regional Center, LLC	
,	I-526	Certificate of Formation	
Geographic	Petition	JMIR Austin TX Hotel Fund,	Dated: 02/25/2014
Location:	Project	LP Certificate of Filing	
Austin, Travis		JMIR-Austin Hotel, LP	Dated 03/22/2006
County, TX		Certificate of Limited	
- · ,		Partnership	
Focus of		JMIR-Austin Hotel, LP	Dated 04/06/2006
Investment:		Certificate of Filing (Foreign	
Equity		Filing, TX)	
		Comprehensive Business Plan	Dated: 09/05/2014
		Economic Impact Analysis	Dated: 06/2014
		Subscription Agreement -	Dated: 07/18/2014
		JMIR Austin TX Hotel Fund,	
		LP	
		Limited Partnership	Dated: 07/17/2014, as
		Agreement	amended on 09/16/2014
			and on 04/27/ 2014
		Confidential Offering	Dated: 07/17/2014
		Memorandum	
		Supplement No. 2 to	Dated: 12/01/2014
		Confidential Offering	
		Memorandum	
		Escrow Agreement	Dated: 11/24/2014

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

The proposal identifies the new commercial enterprise ("NCE") of the project as JMIR Austin TX Hotel Fund, LP, which was formed in the State of Texas on February 25,2014. The NCE is located at 111 Congress Ave., Ste. 2600, Austin, TX 78701immigrant	
investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of (b)(4))

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS Industry Name	NAICS	Input (\$Millions)	Multiplier	Jobs
Nonresidential Building Construction	2362			
Traveler Accommodations	7211			
Architectural, Engineering and Related Services	5413			
Institutional Furniture Manufacturing	337127			
Advertising Agencies	54181			
Total Jobs:				

The approval of this Form I-924 application supported by an exemplar Form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB·5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on JMIR Austin TX Hotel Fund, LP project

Each individual petition, in order to demonstrate that it is affiliated with the TMMRC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program

will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

cc:

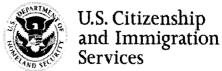
John C. Kratzer JMIR Texas Mega Metro Regional Center, LLC

c/o JMI Realty, LLC

111 Congress Avenue, Ste. 2600

Austin, TX 78701

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE. Mailstop 2235 Washington, DC 20529



Date: May 28, 2015

Michelle Hu California Investment Regional Center, LLC 9911 Valley Blvd. El Monte, CA 91731

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

California Investment Regional Center, LLC

Re:

Initial Regional Center Designation

California Investment Regional Center, LLC

RCW1312651131 / ID1312651131

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on May 3, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate California Investment Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

California Investment Regional Center, LLC ID1312651131 RCW1312651131 Page 2

A. Geographic Area

State	Counties	Counties
California	Los Angeles County	Orange County

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers
7211	Traveler Accommodation

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

California Investment Regional Center, LLC ID1312651131 RCW1312651131 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the California Investment Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

California Investment Regional Center, LLC ID1312651131 RCW1312651131 Page 4

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Marianna Tarantur

Milalo Colmi

Wright Johnson Ltd.

197 S. Federal Hwy., Suite 200

Boca Raton, FL 33432

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



May 28, 2015

Garrett Kenny Central Florida EB5 Regional Center 116 Polo Park East Boulevard Davenport, FL 33897

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Central Florida EB5 Regional Center, LLC

Re:

Initial Regional Center Designation

Central Florida EB5 Regional Center, LLC

RCW1330451257 / ID1330451257

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 31, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Central Florida EB5 Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Central Florida EB5 Regional Center ID1330451257 RCW1330451257 Page 2

A. Geographic Area

State	Counties	
FLORIDA	Brevard, Hillsborough, Lake, Orange, Osceola, Pasco, Pinellas, Polk	ζ,
	and Seminole	

B. Industry Categories¹

NAICS	Industry Name
2362	Non-Residential Building Construction
5413	Architectural, Engineering, and Related Services
7211	Traveler Accommodation

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Central Florida EB5 Regional Center ID1330451257 RCW1330451257 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Central Florida EB5 Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

Central Florida EB5 Regional Center ID1330451257 RCW1330451257 Page 4

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

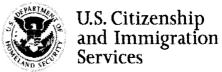
Milalos Colmi

cc:

William G. Hicks, PA 7380 Sand Lake Road Suite 500

Orlando, FL 32819

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



May 20, 2015

Aili Li California Blue Sky Regional Center, LLC 3502 Babson Dr Elk Grove, CA 95758

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): California Blue Sky Regional Center. LLC

Re: Initial Regional Center Designation

California Blue Sky Regional Center, LLC

RCW 1315751158 / ID 1315751158

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on June 06, 2013. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate California Blue Sky Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

California Blue Sky Regional Center, LLC ID1315751158 RCW1315751158 Page 2

A. Geographic Area

State	Counties/Cities
California	East Palo Alto

B. Industry Categories¹

NAICS	Industry Name	
2362	Nonresidential Building Construction	
42	Wholesale Trade	
3332	Industrial Machinery Manufacturing	
3363	Motor Vehicle Parts Machinery	
5417	Scientific Research and Development Services	
5611	Office Administrative Services	
4543	Direct Selling Establishments	

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

California Blue Sky Regional Center, LLC ID1315751158 RCW1315751158 Page 3

realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the California Blue Sky Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital in estment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

California Blue Sky Regional Center, LLC ID1315751158 RCW1315751158 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services *Immigrant Investor Program* 131 M Street, NE, Mailstop 2235 Washington, DC 20529



May 20, 2015

Stella Zhang C/O Farm for America, LLC 1 World Trade Center, Suite 1180 Long Beach, CA 90831

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant: Farm for America, LLC

Re: Request to Amend Regional Center Designation

Farm One, LLLP

RCW1336451534 / ID1031910018

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 30, 2013. The Form I-924 application was filed to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

- A. Effective the date of this notice, USCIS approves the additional industry categories listed in Section III of this notice.
- B. Effective the date of this notice, USCIS approves the regional center's organization structure discussed in Section III of this notice.
- C. Effective the date of this notice, USCIS approves the regional center's administration discussed in Section III of this notice.
- D. Effective the date of this notice, USCIS approves the Farm One, LLLP project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the Farm One, LLLP will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least ______obs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan,

(b)(4)

and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the Farm One, LLLP project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On May 2, 2011, USCIS approved the Farm for America, LLC for participation in the Immigrant Investor Program as a designated regional center. Based on the initial designation the Farm for America, LLC obtained approval for the following geographic area, industry categories.

Geographic Area			
State	Counties/Cities	Approval Date	
Washington	Benton County	May 2, 2011	
	Franklin County	May 2, 2011	
	Chelan County	May 2, 2011	
	Klickitat County	May 2, 2011	
	Douglas County	May 2, 2011	
	Okanogan County	May 2, 2011	
	Grant County	May 2, 2011	
	Walla Walla County	May 2, 2011	

Industry Categori	ies	
NAICS	Industry Name	Approval Date
1119	Other Farming	May 2, 2011
1112	Vegetable Farming	May 2, 2011

III. Amendment Request¹

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following changes:

A. Industry Categories

USCIS approves the applicant's amendment request to include the following industry categories:

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

NAICS	Industry Name	
111332	Grape Vineyards	
2362	Nonresidential Building Construction	
72111	Hotels (except Casino Hotels) and Motels	
5413	Architectural, Engineering, and Related Services	
31213	Wineries	
7225	Restaurants and Other Eating Places	
7224	Drinking Places (Alcoholic Beverages)	

B. Organizational Structure

USCIS approves the applicant's amendment request to change its organizational structure to recognize Farms for America, LLC incorporated on November 27, 2012 to carry the designation and conduct business for the regional center.

C. Administration Change

USCIS approves the applicant's amendment request to change its administration. The applicant's administration has changed with Stella Zhang as the new principal for Farms for America, LLC. Tobin Butcher, the previous principal will maintain a passive role in management of the regional center as a consultant.

D. Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document
III C	X7: 1.D		N. 1. 0015
E'ritage, LLC	Vineyard Resort	E'ritage, LLC Business Plan	March 2015
		Economic Analysis	March 2015
Geographic	Investment:	Subscription Agreement for Farm	Submitted 12/30/2013
Location:	Loan	One, LLLP	
State of		Limited Partnership Agreement for	Submitted 12/30/2013
Washington		Farm One, LLLP	
		Loan agreement between Farm	11/15/2013
Exemplar of		One, LLLP and E'ritage, LLC	
Form I-526		E'ritage, LLC Business Plan	Submitted 12/30/2013

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The applicant seeks to use EB-5 capital to purchase, construct and operate a 368 acre vineyard resort in Walla Washington. The vineyard resort will consist of a vineyard, commercial cottages, a restaurant, and a tourism/event center. The requested amendment identifies the NCE of the proposed project as Farm One, LLLP which was formed in the

State of Washington on November 12, 2013. EB-5 investors are expected to subscribe to the NCE as limited partners in exchange for capital contributions of each and an	(b)(4)
aggregate of	1
	1

IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the IMPLAN economic model:

NAICS ²	Industry Name	Input (\$Millions)/ Direct Jobs	Multiplier	Jobs	
11332	Agricultural Activities				1
5413	Architecture/Engineering				
237	Construction				
2362	Building Construction				
5617	Landscaping				(b)(4)
4232, 4238	Equipment & Fixture Expenditures				(5)(4)
5411	Legal/accounting				
5511	Administrative				
5418	Marketing				
5416	Consulting				
447	Fuel				
111332	Vineyard/Winery				
7225	Full-service restaurant				
721110	Cottages				
	Event Center				
7224	Tasting room				
5511	Facility Management				
Total Jobs:					J

^{*} Only indirect and induced jobs.

² These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

(b)(4)

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and
the calculations using IMPLAN multipliers are verifiable. The applicant has shown by a
preponderance of the evidence that the project is expected to result in the creation of
approximately jobs including jobs created from expenditure in construction
activities and direct, indirect and induced jobs created from operation of the Vineyard
resort associated with the Farm One, LLLP project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with Farm One, LLLP. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions based on the Farm One, LLLP project

Each individual petition, in order to demonstrate that it is affiliated with the Farm for America, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.

- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for

designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milalo Colmi

cc: Adrian Toh

Law Office of Adrian J Toh Esq

PO Box 80006

San Marino, CA 91118



May 21, 2015

Scott D. Greenberg GO USA EB-5 Regional Center, LLC 250 Parkway Drive, Suite 120 Lincolnshire, IL 60069

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

GO USA EB-5 Regional Center, LLC

Re:

Initial Regional Center Designation GO USA EB-5 Regional Center, LLC RCW1423151851/ ID1423151851

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on August 19, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate GO USA EB-5 Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
Illinois	Cook, DuPage, Lake, Will

GO USA EB-5 Regional Center, LLC ID1423151851 RCW1423151851 Page 2

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Building Construction
4232	Furniture and Home Furnishing Merchant Wholesalers
2389	Other Specialty Trade Contractors

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with GO USA EB-5 Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

GO USA EB-5 Regional Center, LLC ID1423151851 RCW1423151851 Page 3

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

GO USA EB-5 Regional Center, LLC ID1423151851 RCW1423151851 Page 4

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milala Colmi

cc:

Laura Reiff

Greenberg Taurig, LLP

1750 Tysons Boulevard, Suite 1200

McLean, VA 22102



May 19, 2015

Yongjian Fu Ohio Lakeside Regional Investment Center 26943 Westwood Road, Suite C Westlake, OH 44145

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Ohio Lakeside Regional Investment Center

Re:

Initial Regional Center Designation

Ohio Lakeside Regional Investment Center

RCW1413251753 / RC-ID1413251753

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on May 12, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Ohio Lakeside Regional Investment Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

anner i see an anner	Counties/Cities	Counties/Cities
State of OHIO	Cuyahoga County	Lake County
· Parameter and Construction of the Construction	Erie County	Lorain County

B. Industry Categories¹

Industry Category	NAICS code
Hotel & Motels	721110
Full-service Restaurant	722511
Supermarkets & Grocery Stores	445110
Commercial & Institutional Building Construction	236220
Alternative Energy Structure Construction	237130
Research & Development in Biotechnology	541711
Computer System Design Services	541512
Other Commercial & Services Industry Machinery Manufacturing	333318
Real Estate Credit	522292

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Ohio Lakeside Regional Investment Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital in estment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations A.t., a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

Ohio Lakeside Regional Investment Center RCW1413251753/RC- ID1413251753 Page 4

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Miles Column

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Lei Jiang

26943 Westwood Road, Suite A

Westlake, OH 44145

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street NF, Mailstop 2235 Washington, DC 20529



Date: May 21, 2015

Yuan Li and Thomas Alcorn U.S. Investment Regional Center, LLC 801 East Walnut Street, Suite 1323 Pasadena, CA 91101

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): U.S. Investment Regional Center, LLC

Re: Initial Regional Center Designation – Limited Decision

U.S. Investment Regional Center, LLC RCW1422351848 / ID1422351848

This notice of a limited decision is in reference to the Forn. I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on August 11, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves, in a limited decision, the Form I-924 request to designate U.S. Investment Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation - Limited Decision

The applicant submitted its Form I-924 requesting specific industry categories, geographic regions, and multiple hypothetical projects to be identified for the Regional Center's use.

Upon review of the record, USCIS has determined that not all of the requested industry categories, and geographic regions provided in the Form I-924 represent an appropriate application of a hypothetical project to support the industry categories, and/or geographic regions acceptable for use by the Regional Center.

As such, USCIS has concluded that a limited decision is necessary in this case. Therefore, all requested, approved, and disallowed industry categories, geographic regions, and hypothetical projects have been identified below.

A. Industry Categories and Geographic Regions Requested

The applicant has requested to focus, promote economic growth, and offer capital investment opportunities in the following geographic areas and industry categories:

1. Geographic Areas - Requested

State	Counties		
ARIZONA	entire state		
CALIFORNIA	entire state		
NEVADA	entire state		
OREGON	entire state		
WASHINGTON	entire state		, , , , , , , , , , , , , , , , , , ,

2. Industry Categories - Requested

NAICS	Industry Name
22	Utilities
23	Construction
31-33	Manufacturing
42	Wholesale Trade
44-45	Retail Trade
48-49	Transportation and Warehousing
53	Real Estate and Rental and Leasing
54	Professional, Scientific, and Technical Services
62	Health Care and Social Assistance
72	Accommodation and Food Services

B. Approved Industry Categories and/or Geographic Areas

The following industry categories and/or geographic areas have been determined to represent an appropriate application of a hypothetical project to support the industry categories, and geographic regions acceptable for use by the Regional Center.

1. Geographic Areas - Approved

State	Counties	eren i	±	-
ARIZONA	Maricopa			

2. Industry Categories - Approved

NAICS	Industry Name
23	Construction
42	Wholesale Trade
44-45	Retail Trade
531*	Real Estate
5413*	Architectural, Engineering, and Related Services
722*	Food Services and Drinking Places

^{*}NOTE: these applicant requested NAICS represent a greater level of business classification detail than originally requested in the business plans, but remain within their respective two digit economic sectors.

C. Disallowed Industry Categories and/or Geographic Areas

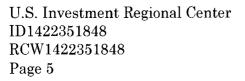
The following industry categories and geographic areas have been disallowed because it has been determined that they do not represent an appropriate application of a hypothetical project to support the industry categories, and geographic regions acceptable for use by the Regional Center.

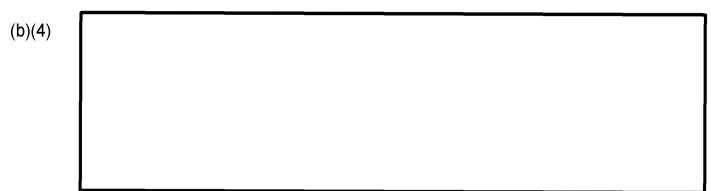
1. Geographic Areas - Disallowed

State	Counties		
ARIZONA	All counties other than Maricopa		
CALIFORNIA	entire state		
NEVADA	entire state		
OREGON	entire state		
WASHINGTON	entire state		

(b)(4)		

Industry Name Utilities Manufacturing
Transportation and Warehousing
Health Care and Social Assistance
l Project(s) - Disallowed





USCIS will not give deference to the business plan and the economic analysis that derived the job creation estimates with any subsequently filed individual immigrant investors' Form I-526s pertaining to the above project. USCIS will review the business plan and/or economic analysis when the Form I-526s are filed to determine if it meets EB-5 requirements.

4. Conclusion - Decision to Disallow

Some aspects of the submitted proposal, as presently constituted, do not meet the regulatory requirements at 8 C.F.R. § 204.6. Therefore the request to grant the specific geographic areas, industry categories and hypothetical projects listed above cannot be approved.

The decision to disallow the industry categories, geographic areas, and hypothetical projects identified above does not preclude the filing of Form I-526 petitions related to a subsequent project using the disallowed industry categories, geographic areas, and/or hypothetical project(s). Any future petitions will be adjudicated on their own merit.

There is no appeal to this decision to disallow the specified industry categories and/or geographic scope explained above. However, pursuant to 8 CFR 103.5, a motion can be filed on Form I-290B. Such motion must be accompanied by the proper fee and filed within 30 days of this notice.

Please note that if the I-924 applicant elects to timely file a motion with USCIS and if said motion is granted the application will be reopened and/or reconsidered and a new decision rendered. If the applicant's proposal submitted in support of its motion meets the regulatory requirements at 8 C.F.R. § 204.6 the applicant will be accorded the geographic areas, industry categories and hypothetical projects that meet EB-5 requirements. If no motion is filed within the time allowed this decision is final.

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal. The approval of this Form I-924 application is based upon the

economically and statistically valid assumptions and estimates provided in the business plan for job creation.

A hypothetical project does not have the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998). As such, USCIS's approval of any hypothetical job creation estimates presented in a Form I-924 is not accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the U.S. Investment Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational and transactional documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review

in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws

and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

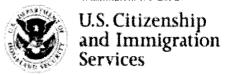
If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Mulls Column

Nicholas Colucci

Chief, Immigrant Investor Program



Date: 05/18/2015

Joseph Jung Gateway California Regional Center 235 Main Street, # 222 Venice, CA 90291

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Gateway California Regional Center, LLC

Re: Initial Regional Center Designation

Gateway California Regional Center, LLC

RCW 1414351764 / ID 1414351764

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 05/23/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Gateway California Regional Center (GCRC), LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
California	Los Angeles, Orange, Riverside, and San Bernardino.

Gateway California Regional Center, LLC ID1414351764 RCW 1414351764 Page 2

B. Industry Categories¹

NAICS	Industry Name
72111	Hotels (except Casino Hotels) and Motels
7225	Restaurants and Other Eating Places
531120	Lessors of Nonresidential Buildings (except Mini - warehouses)
23622	Commercial and Institutional Building Construction
236116	New Multifamily Housing Construction (except For-Sale Builders)

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Gateway California Regional Center, LLC ID1414351764 RCW 1414351764 Page 3

Each individual petition, in order to demonstrate that it is affiliated with the GCRC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center

Gateway California Regional Center, LLC ID1414351764 RCW 1414351764 Page 4

in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

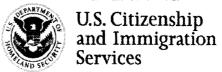
Milalos Colmi

cc: Meixuan Zhang, Esq.

Reeves, Miller, Zhang and Diza 2 North Lake Avenue, 9th Floor

Pasadena, CA 91101

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



Date: May 14, 2015

Viviane Khounlavong-Vallance The Lawrence Economic Development Corporation 216 Collins Avenue South Point, OH 45680

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): The Lawrence Economic Development Corporation

Re: Initial Regional Center Designation

The Lawrence Economic Development Corporation

RCW1410051727 / ID1410051727

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on April 10, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate The Lawrence Economic Development Corporation as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

The Lawrence Economic Development Center ID1410051727 RCW1410051727 Page 2

A. Geographic Area

State	Counties/Cities			Silver .
Ohio	Gallia	Lawrence	Jackson	Scioto

B. Industry Categories¹

NAICS	Industry Name
4931	Warehousing and Storage
541614	Logistics management services

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

_

USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

The Lawrence Economic Development Center ID1410051727 RCW1410051727 Page 3

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the The Lawrence Economic Development Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The Lawrence Economic Development Center ID1410051727 RCW1410051727 Page 4

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Ailala Colmi

cc: Haifeng Hong, Esq.

Porter, Wright, Morris and Arthur

1900 K St, NW, Ste. 1110 Washington, DC 20006

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



Date: May 15, 2015

Izak Senbahar Alexico Los Angeles Regional Center, LLC 150 East 58th Street, 33rd Floor New York, NY 10155

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

Alexico Los Angeles Regional Center, LLC

Re:

Initial Regional Center Designation

Alexico Los Angeles Regional Center, LLC RCW1425151879 / ID1425151879

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on September 8, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Alexico Los Angeles Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
	Los Angeles and Orange
California	

Alexico Los Angeles Regional Center, LLC ID1425151879 RCW1425151879 Page 2

B. Industry Categories¹

NAICS	Industry Name
2362	Nonresidential Construction
4232	Furniture and Home Furnishing Merchant *\forall holesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
4236	Household Appliances and Electrical and Electronic Goods Merchant Wholesalers
5413	Architectural, Engineering, and Related Services
7211	Traveler Accommodations

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of 'he evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Alexico Los Angeles Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Alexico Los Angeles Regional Center, LLC ID1425151879 RCW1425151879 Page 3

- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.²

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

.

² After a cursory review of the organizational documents in the record, it appears that §3.1(b) of your draft Operating Agreement contains a contingency reserves provision that is not compliant with program eligibility requirements. As it reads, not all of the EB-5 capital would necessarily be "at risk" and available for job creation purposes. Similarly, Sections 2(b) and (c) of your Escrow Agreement discuss a holdback provision that may not be compliant with program eligibility requirements. (This is also referenced in §3.1(a) of your draft Operating Agreement and Sections 2.1 and 7.2(a) of your draft Pledge Agreement.) Future submissions of I-924 Amendments and/or I-526 petitions should clarify how 100% of the EB-5 capital will be "at risk" as per 8 CFR § 204.6 (e).

Alexico Los Angeles Regional Center, LLC ID1425151879 RCW1425151879 Page 4

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at <a href="https://doi.org/10.1007/JUSCIS.1007/

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

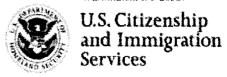
Miles Colmi

cc: Debbie Ann Klis

Ballard Spahr LLP

4800 Montgomery Lane Bethesda, MD 20854

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



Date: 05/13/2015

Samuel Brookner Silverman EB5 Affiliate Network Commonwealth of Massachusetts Regional Center, LLC 3801 PGA Blvd., Suite 902 Palm Beach Gardens, FL 33410

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

EB5 Affiliate Network Commonwealth of Massachusetts Regional

Center, LLC

Re:

Initial Regional Center Designation

EB5 Affiliate Network Commonwealth of Massachusetts Regional

Center, LLC

RCW1404551684 /ID1404551684

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 04/14/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB5 Affiliate Network Commonwealth of Massachusetts Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

EB5 Affiliate Network Commonwealth of Massachusetts Regional Center, LLC ID1404551684 RCW1404551684 Page 2

43,824,839			State		1 (1 (1 (1 (1 (1 (1 (1 (1 (1 (1 (1 (1 (1
]	Entire State	of Massach	usetts	

B. Industry Categories¹

NAICS	Industry Name
722511	Full-Service Restaurants
713940	Fitness and Recreational Sports Centers
236115	New Single-Family Housing Construction (except For-Sale Builders)

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

EB5 Affiliate Network Commonwealth of Massachusetts Regional Center, LLC ID1404551684 RCW1404551684 Page 3

Each individual petition, in order to demonstrate that it is affiliated with the EB5 Affiliate Network Commonwealth of Massachusetts Regional Center, LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program

EB5 Affiliate Network Commonwealth of Massachusetts Regional Center, LLC ID1404551684 RCW1404551684 Page 4

will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

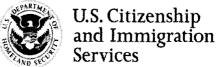
Milalos Colmi

cc: Thomas Nelson Samuel, Esq.
Thomas N. Silverman PA

3801 PGA Boulevard, Suite 902

Palm Beach Gardens, FL 33410





May 13, 2015

Jianhua Jin Western Fortune Regional Center, LLC 18555 Fieldbrook Street Rowland Heights, CA 91748

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): Western Fortune Regional Center, LLC

Re: Initial Regional Center Designation

Western Fortune Regional Center, LLC RCW1425151878 / ID1425151878

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on September 8, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant is also seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Western Fortune Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the La Moda EB5 Investment, LP, as an actual project.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
California	Los Angeles, Orange, Riverside, San Bernardino

B. Industry Categories¹

NAICS	Industry Name	
7224	Drinking Places (Alcoholic Beverages)	
722511	Full-Service Restaurants	
722513	Limited-Service Restaurants	
722514	Cafeterias, Grill Buffets, and Buffets	
446120	Cosmetics, Beauty Supplies, and Perfume Stores	
453220	Gift, Novelty, and Souvenir Stores	
8121	Personal Care Services	
53112	Lessors of Nonresidential Building (except Miniwarehouses)	
531312	Nonresidential Property Managers	

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project.

Project	Type of Project	Organization Documents	Date of Document
La Moda EB5	Actual	Business Plan	May 2014
Investment, LP	Project	Economic Analysis	May 16, 2014
Geographic Location: L.A. County			
Focus of			
Investment:			
EB-5, Bank Loan,			;
Equity			

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

The proposal identifies the new commercial enterprise ("NCE") of the project as La Moda EB5 Investment, LP, which was formed in the State of California on September 9, 2013. The project is located at 17961 Gale Avenue in the City of Industry, California. immigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of each and an aggregate of EB-5 capital from all investors.	(b)(4)

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

(b)(4)

The approval of this Form I-924 application is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on La Moda EB5 Investment, LP project

Each individual petition, in order to demonstrate that it is affiliated with the Western Fortune Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. <u>Designee's Responsibilities in the Operations of the Regional Center</u>

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws

and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

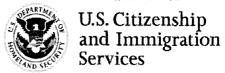
Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milala Columi

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



May 13, 2015

Gonzalo Lopez-Jordan ARCG Florida Regional Center, LLC 1200 Brickell Ave. Suite 1950 Miami, Florida 33131

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

ARCG Florida Regional Center, LLC

Re:

Initial Regional Center Designation ARCG Florida Regional Center, LLC RCW1421251836/ID1421251836

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on 07/31/2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate ARCG Florida Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

ARCG Florida Regional Center, LLC ID1421251836 RCW1421251836 Page 2

State	Counties/Cities
	Miami-Dade
Florida	Collier
	Lee
	Broward
	Palm Beach

B. Industry Categories¹

NAICS	Industry Name
2361	Residential Building Construction
2362	Nonresidential Building Construction
7211	Traveler Accommodation
7225	Food Services and Drinking Places

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be

1

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

ARCG Florida Regional Center, LLC ID1421251836 RCW1421251836 Page 3

realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the ACRG Florida Regional Center, LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

ARCG Florida Regional Center, LLC ID1421251836 RCW1421251836 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

ARCG Florida Regional Center, LLC ID1421251836 RCW1421251836 Page 5

Sincerely,
Milels Colum

Nicholas Colucci

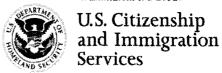
Chief, Immigrant Investor Program

cc: Mr. Lincoln Stone

Stone Grzegorek Gonzalez LLP

800 Wilshire Boulevard Los Angeles, CA 90017

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



May 12, 2015

Patrick F. Hogan CMB Colorado Regional Center, LLC 7819 42nd Street West Rock Island, IL 61201

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

CMB Colorado Regional Center

Re:

Initial Regional Center Designation CMB Colorado Regional Center, LLC RCW1423251852/ID1423251852

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on August 20, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate CMB Colorado Regional Center, LLC as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties/Cities
G 1 1	
Colorado	Entire State

B. Industry Categories¹

NAICS	Industry Name
230000	Construction

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Each individual petition, in order to demonstrate that it is affiliated with the CMB Colorado Regional Center, LLC in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program

will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Milels Columnia

Nicholas Colucci

Chief, Immigrant Investor Program

cc: Lincoln Stone

Stone Grzegorek Gonzales LLP 800 Wilshire Boulevard Suite 900

Los Angeles, CA 90017

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, Mailstop 2235 Washington, DC 20529



May 7, 2015

Ming Duan Western Capital Regional Center 465 California Street, Suite 410 San Francisco, CA 94104

Application:

Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s):

Western Capital Regional Center

Re:

Initial Regional Center Designation Western Capital Regional Center RCW1336551549 / RC-ID1336551549

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 31, 2103. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Western Capital Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

Western Capital Regional Center, LLC RCW1336551549 / RC-ID1336551549 Page 2

A. Geographic Area

		Counties		
State of California	Alameda County	San Benito County	Santa Cruz County	
	Contra Costa County	San Francisco County	Solano County	
	Marin County	San Mateo County	Sonoma County	
	Napa County	Santa Clara County		

B. Industry Categories¹

Industry Category	NAICS code
Construction	2300
Professional, Scientific, & Technical Services	5411—5419
Hotels & Motels, including Casino Hotels	7211
Food Services & Drinking Places	7220
Other Transportation & Support Activities	48 & 49
Performing Arts, Spectator Sports, Museums, Zoos, & Parks	7111—7120
Amusement, Gambling & Recreation	713
Retail Trade	4445

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic areawill be permissible prior to filing Form I-526 petitions.

Western Capital Regional Center, LLC RCW1336551549 / RC-ID1336551549 Page 3

business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the Western Capital Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A

Western Capital Regional Center, LLC RCW1336551549 / RC-ID1336551549 Page 4

Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS. Immigrant Investor Program@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colmi

cc: Jean Chen

Law Offices of Jean Chen 2107 North First Street San Jose, CA 95131

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street NE. Mailstop 2235 Washington, DC 20529



November 25, 2015

Suresh Rajan LCR Atlantic Gulf Regional Center 8 Wright Street Suite 107 Westport, CT 06880

Application: Form I-924, Application for Regional Center under the Immigrant

Investor Pilot Program

Applicant(s): LCR Atlantic Gulf Regional Center

Re: Initial Regional Center Designation – Limited Decision

LCR Atlantic Gulf Regional Center RCW1434252047 / ID1434252047

This notice of a limited decision is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on December 8, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves, in a limited decision, the Form I-924 request to designate LCR Atlantic Gulf Regional Center as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation - Limited Decision

The applicant submitted its Form I-924 requesting specific industry categories, geographic regions, and multiple hypothetical projects to be identified for the Regional Center's use.

Upon review of the record, USCIS has determined that not all of the requested geographic regions provided in the Form I-924 represent an appropriate application of hypothetical projects to support the industry categories, and/or geographic regions acceptable for use by the Regional Center.

As such, USCIS has concluded that a limited decision is necessary in this case. Therefore, all requested, approved, and disallowed industry categories, geographic regions, have been identified below.

A. Industry Categories and Geographic Regions Requested

The applicant has requested to focus, promote economic growth, and offer capital investment opportunities in the following geographic areas and industry categories:

1. Geographic Areas - Requested

State	Counties
Alabama	All Counties
Florida	All Counties
Georgia	All Counties
Louisiana	All Counties
Mississippi	All Counties
North Carolina	All Counties
South Carolina	All Counties
Tennessee	All Counties

2. Industry Categories - Requested

NAICS	Industry Name	
722511	Full-Service Restaurants	
722513	Limited Service Restaurants	
722515	Snack and Nonalcoholic Beverage Bars	
5222	Nondepository Credit Intermediation	
5223	Activities Related to Credit Intermediation	
236220	Commercial and Institutional Building Construction	

B. Approved Industry Categories and/or Geographic Areas

The following industry categories and/or geographic areas have been determined to represent an appropriate application of a hypothetical project to support the industry categories, and/or geographic regions acceptable for use by the Regional Center.

1. Geographic Areas - Approved

State	Counties
Florida	Leon County
	Gadsden County
	Wakulla County
	Jefferson County
	Liberty County
Georgia	Grady County
	Decatur County

2. Industry Categories - Approved

NAICS	Industry Name
722511	Full-Service Restaurants
722513	Limited-Service Restaurants
722515	Snack and Nonalcoholic Beverage Bars
5222	Nondepository Credit Intermediation
5223	Activities Related to Credit Intermediation
236220	Commercial and Institutional Building Construction

C. Disallowed Geographic Areas

The following geographic areas have been disallowed because it has been determined that they do not represent an appropriate application of a hypothetical project to support the geographic regions acceptable for use by the Regional Center.

Geographic Areas - Disallowed

State	Counties		
Alabama	All Counties		
Florida	All Except Leon, Gadsden, Wakulla, and Jefferson Counties		
Georgia	All Except Grady and Decatur Counties		
Louisiana	All Counties		
Mississippi	All Counties		
North Carolina	All Counties		
South Carolina	All Counties		
Tennessee	All Counties		

Accompanying applicant's October 16, 2015 response to USCIS' July 28, 2015 Request for Evidence were a number of revised documents; most relevant to this point were the following:

American Opportunity Franchise Fund II, LP Comprehensive Business Plan, dated September 2015; and EB-5 Economic Impact Analysis: AOFF II Dunkin Donuts Project, authored by Kimberly R. Atteberry and dated September 11, 2015. (b)(4)

RCW14342520 Page 5	47			

3. Conclusion - Decision to Disallow

LCR Atlantic Gulf Regional Center

(b)(4)

Some aspects of the submitted proposal, as presently constituted, do not meet the regulatory requirements at 8 C.F.R. § 204.6. Therefore the request to grant the specific geographic areas, listed above cannot be approved.

The decision to disallow the geographic areas identified above does not preclude the filing of Form I-526 petitions related to a subsequent project using the disallowed industry categories, geographic areas, and/or hypothetical project(s). Any future petitions will be adjudicated on their own merit.

There is no appeal to this decision to disallow the specified industry categories and/or geographic scope explained above. However, pursuant to 8 CFR 103.5, a motion can be filed on Form I-290B. Such motion must be accompanied by the proper fee and filed within 30 days of this notice.

Please note that if the I-924 applicant elects to timely file a motion with USCIS and if said motion is granted the application will be reopened and/or reconsidered and a new decision rendered. If the applicant's proposal submitted in support of its motion meets the regulatory requirements at 8 C.F.R. § 204.6 the applicant will be accorded the geographic areas that meet EB-5 requirements. If no motion is filed within the time allowed this decision is final.

III. Job Creation

USCIS approves the geographic area and industry categories noted below based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

The approval of this Form I-924 application is based upon the economically and statistically valid assumptions and estimates provided in the business plan for job creation. Please refer to the input and multiplier analysis table above.

¹ Page 1 of the Instructions for Form I-924 read, in part, "The Regional Center must focus on a geographical area. This area must be contiguous..."

A hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998). As such, USCIS's approval of any hypothetical job creation estimates presented in a Form I-924 is not accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the LCR Atlantic Gulf Regional Center, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational and transactional documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review

in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional

Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Miles Colum

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program Mailstop 2235 Washington, DC 20529



July 27, 2015

Robert W Dziubla EB-5 Impact Capital Regional Center, LLC C/O EB5 Impact Advisors, LLC 916 Southwood Blvd, Suite 1G, PO Box 3003 Incline Village NV 89450

Application:

Form I-924, Application for Regional Center under the Immigrant Investor Pilot

Program

Applicant(s):

EB-5 Impact Capital Regional Center, LLC

Re:

Initial Regional Center Designation

EB-5 Impact Capital Regional Center, LLC

RCW1410551734 / ID1410551734

This notice is in reference to the Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on April 15, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in <u>Matter of Ho</u>, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate EB-5 Impact Capital Regional Center as an, LLC qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the EB-5 Impact Capital Regional Center, LLC based on the evidence submitted with the exemplar Form I-526.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties
Nevada	Clark and Nye
California	Kern, San Bernardino, Riverside, Los Angles, Orange and San Diego

B. Industry Categories¹

NAICS	Industry Name
6116	Other schools and instructions—sport, recreation and automobile instruction
4511	Sporting goods, hobby and musical instrument stores
7211	Traveler accommodation
7223	Special food services
7224	Drinking places
7225	Restaurants and other eating places
2361	Residential building construction
2362	Nonresidential building construction
2371	Utility system construction
2372	Land subdivision
2373	Highway, street and bridge construction
2379	Other heavy and civil engineering construction
2381	Foundation, structure and building exteriors contractors
2382	Building equipment contractors
2383	Building finishing contractors
2389	Other specialty trade contractors
3399	Other miscellaneous manufacturing
7112	Spectator sports
7131	Amusement parks and arcades
7132	Gambling industries
7139	Other amusement and recreation activities

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an exemplar Form I-526.

Project	Type of Project	Organization Documents	Date of Document
Las Vegas	Exemplar	Business Plan	Dated 03/2014
Development Fund,	Form	Economic Analysis	Dated 11/18/2013
<u>LLC</u>	I-526	Operating Agreement	Dated 03/26/2014
	Petition	Confidential Private Placement	
Geographic Location:	Project	Memorandum	Submitted 04/15/2014
Pahrump NV		Subscription Agreement	Submitted 04/15/2014
		Articles of Organization	Dated 02/03/2014
Focus of Investment:			
loan		Escrow Agreement	Submitted 04/15/2014

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

The proposal identifies the new commercial enterprise ("NCE") of the project as Las Vegas Devel Fund, LLC, which was formed in the State of Nevada on February, 3, 2014. The project is located Box 3003, 916 Southwood Blvd, Suite 1G in the City of Incline Village, Nevada mmigrant investors will subscribe to the NCE as limited partners in exchange for capital contributions of geach and an aggregate of	•

A. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

Economic methodology/model used in job creation

Economic activity prepared by Impact Econometrics LLC	Expenditure/revenue deflated 2010 \$	Final demand	# of direct	Direct effect		(h)
Hard Construction	denated 2010 3	multiplier	jobs	multiplier	Total jobs	(b)
Operations FSFTI	-					
Range Staff	-					
Maintenance Staff	-					
Office Staff	1					l
Retail Staff	1					
Patriot Pavilion Staff						
Total for Operations FSFTI	1					
Operations FSRVC	1					
General & Administrative	1					
Activities Personnel	1					
Food & Beverage	1					
Front Desk						
Housekeeping						
Maintenance						
Retail Outlet						
Gas Outlet						
Security						
Spa Manager						
Total for Operations FSRVC						
Visitor Spending	_					

The approval of this Form I-924 application supported by an exemplar Form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

IV. Guidelines for Filing Form I-526 Petitions Based on Las Vegas Development Fund LLC project

Each individual petition, in order to demonstrate that it is affiliated with the EB-5 Impact Capital Regional Center LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in <u>Matter of Ho</u>, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent

to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,

Nicholas Colucci Chief, Immigrant Investor Program

Milalo Colmi

cc: C. Matthew Schulz

1530 Page Mill Road, Ste 200

Palo Alto, CA 94304

U.S. Department of Homeland Security U.S. Citizenship and Immigration Services Immigrant Investor Program 131 M Street, NE, MS 2235 Washington, DC 20529



May 29, 2015

Daniel Lundy 1601 Market Street, Suite 2600 Philadelphia PA 19103

Application:

Form I-924, Application for Regional Center Under the Immigrant Investor Pilot

Program

Regional Center:

New York Immigration Fund Regional Center, LLC

ID103190184

Re:

Request to Amend Regional Center Designation

NCE: NYIF Columbus, LLC

RCW1507852630

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program, that was filed by the applicant with the U.S. Citizenship and Immigration Services (USCIS) on March 19, 2015. The applicant filed the Form I-924 to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under section 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in *Matter of Ho*, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the 90 Columbus, LLC project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The applicant has shown by a preponderance of the evidence that the 90 Columbus, LLC will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the 90 Columbus, LLC project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of

New York Immigration Fund Regional Center, LLC ID 1031910184 RCW1507852630 Page 2

fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

II. Procedural History

On July 8, 2010, USCIS approved the New York ("NYIFRC") for participation in the Immigrant Investor Program as a designated regional center with an approved geographical scope to 23 of the 30 counties in New York's Combined Statistical Area (CSA)

State	County
New Jersey	Bergen, Essex, Hudson, Morris, Passaic, Sussex and Union
	New York, Bronx, Richmond, Kings, Queens, Westchester, Rockland,
New York	Putnam, Duchess, Orange Ulster, Nassau and Suffolk
Connecticut	Litchfield, New Haven and Fairfield

Original geographic scope of Regional Center, amended includes 16 additional counties

NYIFRC now seeks to amend its previously approved regional center designation to include an actual project that will be managed by NYIF Columbus, LLC, an NCE established on November 24, 2014.

III. The Project

Effective the date of this notice, USCIS approves the applicant's amendment request to include the following actual capital investment project supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	Date of Document	
90 Columbus,	90 Columbus is a 51-story	Business Plan	February 2015	
<u>LLC</u>	multifamily high-rise	Economic Analysis	02/04/2015	
	property totaling 634 units,	Confidential Private	02/25/2015	
Geographic	and is located on a 0.50	Placement Memorandum		
Location:	acre site at 90 Christopher	Subscription Agreement	02/25/2015	
New York's	Columbus Drive in Jersey	Operating Agreement	Revision	
Combined	City, New Jersey		02/25/2015	
Statistical Area				
(CSA)	Investment:			
	Equity			
Exemplar of				
Form I-526				

Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment identifies the NCE of the proposed project as NYIF Columbus LLC which was
formed in the State of New York on November 24, 2014. NYIF Columbus LLC project is located within
a targeted employment area (TEA) in the City of Jersey, New Jersey. Approximately EB-5 investors
will subscribe to the NCE as a limited liability corporation in exchange for capital contributions of
each and an aggregate of
(b)(4)

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:	
IV. Job Creation	
	(b)(4)
ID 1031910184 RCW1507852630 Page 3	

New York Immigration Fund Regional Center, LLC

NAICS 1	Industry Name	Input (2010 \$M)	Multiplier	Jobs
2361	Hard construction costs			
5413	Architectural &Engineering			
5311	Rental Income			

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately irect and indirect jobs from construction and rental income will be associated with the 90 Columbus, LLC project.

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated with 90 Columbus, LLC. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation

(b)(4)

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

New York Immigration Fund Regional Center, LLC ID 1031910184 RCW1507852630 Page 4

methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions based on the 90 Columbus, LLC project

Each individual petition, in order to demonstrate that it is affiliated with the New York Immigration Fund Regional Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

- 1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
- 2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
- 3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in *Matter of Ho*.
- 4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
- 5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924A is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

New York Immigration Fund Regional Center, LLC ID 1031910184 RCW1507852630 Page 5

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at <u>USCIS.ImmigrantInvestorProgram@uscis.dhs.gov</u>.

Sincerely,

Nicholas Colucci

Chief, Immigrant Investor Program

Milels Colmi

cc: Buhm Jung Roe

C/O New York Immigration Fund Regional Center, LLC

267 Broadway, 2nd Floor New York, NY 10007