



# CITY OF COMMERCE

Tina Baca Del Rio  
Mayor Pro Tem

November 7, 2011

United States Citizenship and  
Immigration Services  
24000 Avila Road, 2<sup>nd</sup> Floor  
Laguna Niguel, CA 92677

RE: EB-5 Letter of Support

To Whom It May Concern:

I am writing this letter in my individual capacity as a member of the Commerce City Council. This past summer, I met Mr. Edward and Mrs. Celia Chen as they considered locating their business, Home Paradise Design Center, to Commerce. At the time, in our conversations, they shared their interest in the EB-5 investment program. I was glad to hear that our government as part of its immigration policies was interested in attracting overseas investment to benefit our nation.

Consistent with our federal policies in the immigration and capital investment arena, I am offering this personal letter of support on behalf of the Chen family as they seek to participate in the immigrant investor programs ("EB-5") offered by the U.S. Department of Homeland Security.

Respectfully,

Tina Baca Del Rio  
Mayor Pro Tem

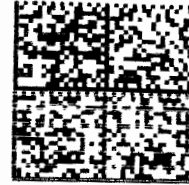
Cc: Celia Chen  
Home Paradise Design Center

C30277



# City of Commerce

2535 Commerce Way • Commerce, CA 90040



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Mailed From 90040

US POSTAGE

McGraw-Hill

**CSC**

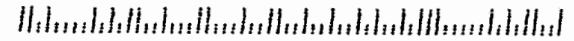
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United States Citizenship and  
Immigration Services  
24000 Avila Road, 2nd Floor  
Laguna Niguel, CA 92677

92677+3422





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

Date: **SEP 23 2011**

Edward Chen  
c/o Home Paradise Investment Center, LLC  
7000 E. Slauson Avenue  
Commerce, CA 90040

COPY

Application: Request for Designation as a Regional Center  
Applicant(s): Edward Chen

Re: Home Paradise Regional Center  
RCW1031910071/(Formerly W09002630)

Pursuant to Section 610 of the Appropriations Act of 1993, on October 6, 2010, Edward Chen submitted a proposal seeking approval and designation by U.S. Citizenship and Immigration Services (USCIS) of the Home Paradise Regional Center.

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

**GEOGRAPHIC AREA:**

The Home Paradise Regional Center shall have a geographic scope to include the counties of Kern, Los Angeles, Orange, San Bernardino, Riverside, San Diego and Imperial in the State of California.

**FOCUS OF INVESTMENT ACTIVITY:**

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

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

1. NAICS 444 Building Materials and Garden Equipment and Supplies Dealers
2. NAICS 445 Food and Beverage Stores

3. NAICS 44611 Pharmacies and Drug Stores
4. NAICS 448 Clothing and Clothing Accessories Stores
5. NAICS 451 Sporting Goods Stores
6. NAICS 453 Miscellaneous Store Retailers
7. NAICS 7211 Traveler Accommodation
8. NAICS 7221 Full-Service Restaurants
9. NAICS 7222 Limited-Service Eating Places
10. NAICS 54141 Interior Design Services

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

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

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

#### **EMPLOYMENT CREATION**

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

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

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

An alien investor's I-829 petition to remove the conditions which was based on an I-526 petition approval that involved the creation of new indirect jobs based on multipliers tied to job creation inputs such as revenue



generated by businesses occupying space and estimated project expenditures costs, needs to be supported by evidence showing the space is occupied by such businesses and that the funds were expended in the job-creating activity. Such evidence may include reasonable methodologies like multiplier tables, feasibility studies, and other economically or statistically valid forecasting devices which indicate the likelihood that the alien's investment has resulted in increased employment.

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

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

1. A copy of this letter, the Regional Center approval and designation.
2. A copy of the USCIS approved Regional Center narrative proposal and business plan.
3. A copy of the job creation methodology required in 8 CFR 204.6(j)(4)(iii), as contained in the final Regional Center economic analysis which has been approved by USCIS, which reflects that investment by an individual immigrant investor will create not fewer than ten (10) full-time employment positions, either directly or indirectly, per immigrant investor.
4. A legally executed copy of the USCIS approved documents:
  - a. Confidential Private Offering Memorandum      Sample submitted October 6, 2010
  - b. Subscription Agreement                              Sample submitted October 6, 2010
  - c. Escrow Agreement                                      Sample submitted October 6, 2010
  - d. Limited Partnership Agreement                      Sample submitted October 6, 2010

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

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

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

Effective November 23, 2010, the failure to timely file a Form I-924A Supplement for each fiscal years in which the regional center has been designated for participation in the Immigrant Investor Pilot Program will

result in the issuance of an intent to terminate the participation of the regional center in the Pilot Program, which may ultimately result in the termination of the approval and designation of the regional center.

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

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

Sincerely,



Rosemary Langley Melville  
Director  
California Service Center

cc: Linda Lau, Esq.

A #	Application/Petition I924 Application for Regional Center under Immigrant Investor Pilot Program	
Receipt # <b>RCW1031910071</b>	Application/Petitioner <b>Home Paradise Regional Center</b>	
Notice Date <b>June 1, 2011</b>	Page <b>1 of 10</b>	Beneficiary

REC'D CSC CALIFORNIA 10/12

C30070

LINDA LAU ESQ.  
GLOBAL LAW GROUP  
350 S. FIGUEROA ST, SUITE 760  
LOS ANGELES, CA 90071

ACTION COMPLETED  
APPROVED FOR FILING  
AUG 19 2011  
INITIALS: C30070  
FOC: Request for Evidence

Notice also sent to:

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

Note: You are given until **August 24, 2011** in which to submit the requested information to the address at the bottom of this notice.

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

For more information, visit our website at **www.uscis.gov**  
Or call us at **1-800-375-5283**

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

CSC1298 WS22123 DIV III JT

You will be notified separately about any other applications or petitions you filed. Save this notice. Please enclose a copy of it if you write to us about this case, or if you file another application based on this decision. Our address is:  
USCIS - CALIFORNIA SERVICE CENTER  
P.O. BOX 10590  
LAGUNA NIGUEL, CA 92607-0590  
800-375-5283

RCW1031910071

Please see additional information on the reverse side.

Form I-797E (Rev. 05/05/06)

23-15-2-1

## Additional Information for Applicants and Petitioners.

### General.

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

### Inquiries.

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

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

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

### Requests for Evidence.

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

### Reply Period.

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

### Approval for a Petition.

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

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

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

### Denials.

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

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

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

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

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

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

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

**Background:**

The proposed Regional Center entity, Home Paradise Investment Center LLC dba Home Paradise Regional Center [HPRC], was established on June 16, 2010 in California, and is structured as a LLC. HPRC is requesting jurisdiction over a geographic area within the State of California, including Imperial, Kern, Los Angeles, Orange, Riverside and San Diego counties. HPRC plans to offer EB-5 capital investment opportunities in affiliated new commercial enterprises, organized as corporations, focusing on projects in the following industry categories:

1. Interior Design Services (NAICS Code: 54141)
2. Retail (NAICS Code: 44-45)
3. Food Services (NAICS Code: 722); and
4. Hospitality (NAICS Code: 7211)

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

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

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

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

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

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

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

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

The Operational Plan submitted does not provide the source of capital or the expenses already incurred by the regional center.

Your proposal lacked a detailed statement regarding the amount and source of capital which has been committed to the regional center. (b) (4)

[REDACTED]

The detailed statement described in 8 CFR 204.6(m)(3)(iii) must include the exact amount of funds that have been dedicated to the regional center to accomplish the goals of the Immigrant Investor Pilot Program, the source of the funds, the expenditures already used, whether the remaining amount is sufficient to sustain the Regional Center's future endeavors and evidence that the remaining funds remain committed to the regional center.

Certain expenses, such as document preparation and economic analyses (which is dated after the bank statement showing the availability of the committed funds), that have been incurred prior to filing the application for regional center designation, should be included in the detailed statement regarding the amount and source of funds committed to the regional center. Money already spent should also be included in the detailed statement of funds committed to the Regional Center, along with their source of funds as well. Money


(b) (4)



The petitioner is, therefore, requested to provide an Operational Plan that outlines how the Regional Center will identify, assess and evaluate proposed investor projects and activities, and enterprises.

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

Note: A Regional Center must have sufficient capital to operate in the manner outlined in the proposal from sources apart from the immigrant investors' required capital investment. (b) (4)



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

(b) (4)



- **Economic Analysis (8 CFR 204.6(m)(3)(v):**

(b) (4)



(b) (4)



**General issues**

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

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

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

**NAICS Codes:**

Provide the NAICS codes used by North American Industry Classification System (NAICS) by the U.S. Census Bureau for each of the 8 target industry economic sectors.



The petitioner needs to be more specific in the NAICS codes provided. The use of 2 digit numbers is too general in nature. Unless the industry cluster is going to be all-encompassing, for instances, using Hospitality. Does the petitioner intend to operate and build a hotel, a casino hotel, a bed-and-breakfast, etc.? Be specific.

The NAICS code for Retail is the same way – 44-45. This is too general. Unless the petitioner is also planning to own and operate a car dealership and auto parts store, boat dealerships, etc. The RC proposal needs to be more specific in the plans the RC intends to fund.

The petitioner needs to be more specific with its Industry Clusters. Provide at least 3-4 digit codes for each industry requested.

**Translations:**

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

**Copies:**

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

### **Regulatory References**

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

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

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

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

#### **Qualifying employee**

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

#### **Regional center**

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

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

#### **Job creation --**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

RCW 1031910071

Page 10

alien entrepreneur must submit evidence that the commercial enterprise maintained the number of existing employees at no less than the pre-investment level for the period following his or her admission as a conditional permanent resident. Such evidence may include payroll records, relevant tax documents, and Forms I-9.



August 17, 2011

**Via FedEx (Tracking No. 7973 8918 1207)**

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

**EB5 Regional Center  
Application  
RFE Response**

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

**RE: Response to Request for Evidence**  
**Type of Application:**  
**Name of Proposed Regional Center:**  
**Name of Applicant:**  
**USCIS Case Receipt Number:**

**Initial Designation as EB-5 Regional Center**  
**Home Paradise Regional Center**  
**Home Paradise Investment Center LLC**  
***Db*a Home Paradise Regional Center**  
**RCW 1031910071**

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

The RFE asks for further explanation of the following items pertaining to the proposed Home Paradise Regional Center ("HPRC"): (1) a detailed statement regarding the amount and source of funds that have been dedicated to the regional center, including expenditures already incurred, and whether the remaining amount is sufficient to sustain the regional center; (2) a statement that fully describes the past, current and future promotional activities for the regional center, (3) documented evidence to support all the statements and assumptions described in the economic analysis; (4) summary of regional center information for public contact upon approval; and (5) more specific 3-4 digit NAICS codes for each industry requested. All requested items are contained in this RFE response. For ease of reference, the response enumerates each USCIS' request in the order that it appears in the RFE, followed by a response with reference to the relevant supporting Exhibits.



**USCIS Request #1** The detailed statement described in 8 CFR 204.6(m)(3)(iii) must include the exact amount of funds that have been dedicated to the regional center to accomplish the goals of the Immigrant Investor Pilot Program, the source of the funds, the expenditures already used, whether the remaining amount is sufficient to sustain the Regional Center's future endeavors and evidence that the remaining funds remain committed to the regional center.

Certain expenses, such as documents preparation and economic analyses...that have been incurred prior to filing the application for regional center designation, should be included in the detailed statement regarding the amount and source of funds committed to the regional center. Money already spent should also be included in the detailed statement of funds committed to the Regional Center, along with their source of funds as well. Money placed in the corporate bank account could be considered committed to the regional center.

The petitioner is also requested to provide an Operational Plan that outlines how the Regional Center will identify, assess, and evaluate proposed investor projects and activities, and enterprises.

**Response to Request #1:**

As requested, a detailed statement from Mr. Edward Chen ("Mr. Chen"), LLC Member and President of HPRC, concerning the amount and source of regional center operations funding is hereby submitted. Please refer to Exhibit 1A for the statement. Mr. Chen's statement addresses each item identified by USCIS Request #1, as follows.

(b) (4)





























(b) (4)



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**USCIS Request #5:** Provide the following as it relates to the Regional Center:

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

**Response to**

**Request #5:** Please find the requested regional center information below:



<b>Regional Center:</b> Home Paradise Regional Center	
<p><b>Contact:</b> Edward Chen, President and CEO, Home Paradise Investment Center LLC</p> <p>7000 East Slauson Avenue, Commerce, CA</p> <p>Phone: 626-284-9999</p> <p>Fax: 626-458-9888</p> <p>Email: info@homeparadiserc.com</p>	<p><b>Geographic Scope:</b> Imperial County, Kern County, Los Angeles County, Orange County, Riverside County, San Bernardino County, and San Diego County in California.</p> <p><b>Industries:</b> Retail (NAICS Codes: 444,445,446,447,448,451,453); Hospitality (NAICS Code: 7211); Food Services (NAICS Code: 7221,7222); and Interior Design Services (NAICS Code: 54141).</p>

**USCIS Request #6:** Provide the NAICS Codes used by North American Industry Classification (NAICS) by the U.S Census Bureau for each of the 8 target industry economic sectors...The petitioner needs to be more specific with its Industry Clusters. Provide at least 3-4 digit codes for each industry requested.

**Response to Request #6:** As requested, the revised more specific (at least 3-4 digits) NAICS codes are provided on Page 2 of the Amended Economic Impact Analysis Report prepared by Dr. Paul Sommers (See Exhibit 2C), and listed below for ease of reference:

Project	Industry	NAICS Code
Home and commercial design center	Building design advice, products, services	54141
Shopping center	Supermarket	445
	Clothing store	448



<b>Sporting goods store</b>	<b>451</b>
<b>Home center store</b>	<b>444</b>
<b>Pharmacy</b>	<b>44611</b>
<b>Full service restaurant</b>	<b>7221</b>
<b>Fast food restaurants</b>	<b>7222</b>
<b>Small retail shops</b>	<b>453</b>
<b>Hotel</b>	<b>7211</b>

**The revised NAICS codes are also included in the updated Overall Business Plan at Exhibit 3.**

All of the foregoing constitutes complete and timely response to the Request for Evidence issued by your office. Therefore, we respectfully request the approval of Home Paradise Regional Center's designation application.

Thank you for your kind consideration and assistance.

Sincerely,

Linda Lau, Esq.

*Enclosures*



**LIST OF EXHIBITS to RFE RESPONSE**  
**of HOME PARADISE REGIONAL CENTER (“HPRC”)**

- Exhibit 1A** Statement from Mr. Edward Chen, LLC Member and President of HPRC, detailing the amount and source of funds to sustain regional center operations, and its promotional activities;
- Exhibit 1B** Copy of a bank letter issued by Bank of the West confirming Mr. Edward Chen’s two capital commitments of HPRC;
- Exhibit 1C** Copy of most recent bank letter of HPRC (for August 8, 2011) from Bank of the West showing the amount of funds currently dedicated to HPRC for operational use;
- Exhibit 2A** Survey Report prepared by Hebert Research, dated August 2011;
- Exhibit 2B** Hebert Research’s background information from website;
- Exhibit 2C** Full Amended Economic Impact Analysis Report for HPRC by Dr. Paul Sommers dated August 2011;
- Exhibit 3** Updated Overall Business Plan for HPRC dated August 2011
- Exhibit 4** Operational Plan dated August 2011



# Home Paradise Investment Center, LLC<sup>®</sup>

7000 E. Slauson Ave., Commerce, CA 90040 Tel: 626.284.9999

August 17, 2011

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

Dear Sir or Madam:

My name is Edward Chen and I represent Home Paradise Investment Center LLC, doing business as Home Paradise Regional Center, an LLC Member and President. I am writing this letter in response to your request for information about the amount, source, and use of funds committed to Home Paradise Regional Center (“HPRC”) to be used for its operations and promotional activities.

## **I. Capital committed to the Regional Center**

(b) (4)









# Home Paradise Investment Center, LLC<sup>®</sup>

7000 E. Slauson Ave., Commerce, CA 90040 Tel: 626.284.9999

(b) (4)



Should you have questions about this matter, please do not hesitate to contact me.

*Edward Chen*

Edward Chen, LLC Member and President

Home Paradise Regional Center



August 4, 2011

Re: Home Paradise Investment Center LLC

Deposit verification

To whom It May Concerns:

This letter is to certify that Edward Chen has deposited (b) (4) under Home Paradise Investment Center LLC.

Total investment for this company is (b) (4)

If you have any question in regard to this matter, please contact the undersigned.

Ken C.W. Lin

VP & Manager





**BANK OF THE WEST**

August 8, 2011

Re: Home Paradise Investment Center LLC

Account number 012802629

Deposit verification

To Whom It May Concerns:

This letter is to state that Home Paradise Investment Center LLC has a business account with us. The account of this account as of today is (b) (4) They are our value customer since account opened.

If you have any question in regard to this matter, please contact the undersigned.

Sincerely,

Ken C.W. Lin

VP & Manager



Arcadia Branch  
1155 W Huntington Dr Arcadia, CA 91007  
(626) 445-3800 Fax (626) 445-2265

Member FDIC



**Research on Square Feet per Full-Time  
Employee and Construction Cost per  
Square Foot in Seven California Counties,  
as well as verifying revenue projection for  
an interior design project enclosed in  
regional center application**

*Prepared for Home Paradise Regional Center*

August 2011  
Report

**Prepared by**  
Jim Corbett, Research Director  
Brandon Dilbeck, Research Analyst

**Hebert Research, Inc.**

13629 NE Bel-Red Road  
Bellevue, WA 98005  
(425) 643-1337

# Research Goal

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## Goal

The goal of this research was to determine the average square footage per full-time employee (at least 35 hours per week) for selected industries and construction cost per square foot in seven contiguous California counties. The regional center also requested to verify the annual revenue projection for an interior design project, called Home and Commercial Design Center, which was enclosed in the client's regional center application.

## Objectives

The objectives of this research were to determine the following:

(1) Square footage per employee for these four industries in seven contiguous California counties.

- Food services
- Retail trade
- Hotels and motels
- Interior design services

(2) Construction cost per square foot of commercial buildings in seven contiguous California counties.

For these seven California counties:

- Imperial
- Kern
- Los Angeles
- Orange
- Riverside
- San Bernardino
- San Diego

(3) To verify the annual revenue projection for an interior design project, called Home and Commercial Design Center, which was enclosed in the client's regional center application.

# Methodology

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(b) (4)



## Sample Frame Details

<u>Description</u>	<u>NAICS</u>	<u>n</u>
<b>Food services</b>		<b>75</b>
Full-Service Restaurants	7221	
Limited-Service Eating Places	7222	
Limited-Service Restaurants	72221	
Cafeterias, Grill Buffets, and Buffets	72222	
Snack and Nonalcoholic Beverage Bars	72223	
<b>Retail trade</b>		<b>153</b>
Building Material and Garden Equipment and Supplies Dealers	444	
Food and Beverage Stores	445	
Health and Personal Care Stores	44611	
Clothing and Clothing Accessories Stores	448	
Sporting Goods, Hobby, Book, and Music Stores	451	
Miscellaneous Store Retailers	453	
Florists	4531	
Office Supplies, Stationery, and Gift Stores	4532	
Used Merchandise Stores	4533	
Other Miscellaneous Store Retailers	4539	
<b>Hotels/motels</b>		<b>45</b>
Hotels (excluding Casino Hotels) and Motels	7211	
<b>Interior design</b>		<b>30</b>
Interior Design Services	54141	

























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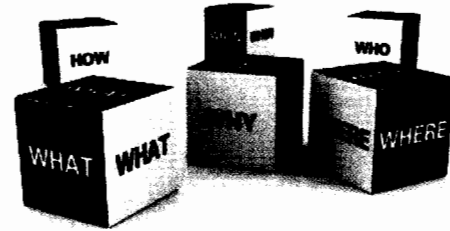
## About Us

Hebert Research is a well-established, full-service research firm headquartered in Bellevue, WA. The company was founded in 1978 with the objective of providing a source of independent, high quality research and practical insight for a wide range of organizations and issues.

Over the intervening years, the company has become one of the leading full-service market research groups in the United States, enabling public and private organizations to use reliable research findings to manage change and realize their vision. The company's research capabilities have guided start-ups, Fortune 500 corporations, non-profits and government agencies through complex, real-life problems to achieve their goals and reinvent a brighter future. In the process of providing market, product, consumer, public policy, and economic research to over 5,000 organizations, Hebert Research has earned a long list of wonderful clients such as Costco, PepsiCo, Toyota, Kraft Foods, Tropicana, Starbucks, Microsoft, Campbell Soups, T-Mobile, Weyerhaeuser, Quaker Oats, and Kimberly Clark, just to name a few.

Hebert Research is known for its client-centered focus, perceptive methodologies and a passionate pursuit of fact-based insights and practical knowledge. Each research project embodies the rich thinking and sound strategy gained from the staff's extensive hard-earned, hands-on management and research experience.

Customized research begins with developing a partnership with our clients, tailoring our research methods to unique project needs and getting it right. We are driven to create incisive information that leads our client's to deep insights, pioneering achievement and strategic success.



# Amended Economic Impact Analysis Report of Projected Impacts of Home Paradise Regional Center

Paul Sommers, Ph.D., Regional Economist  
August 2011

## Introduction

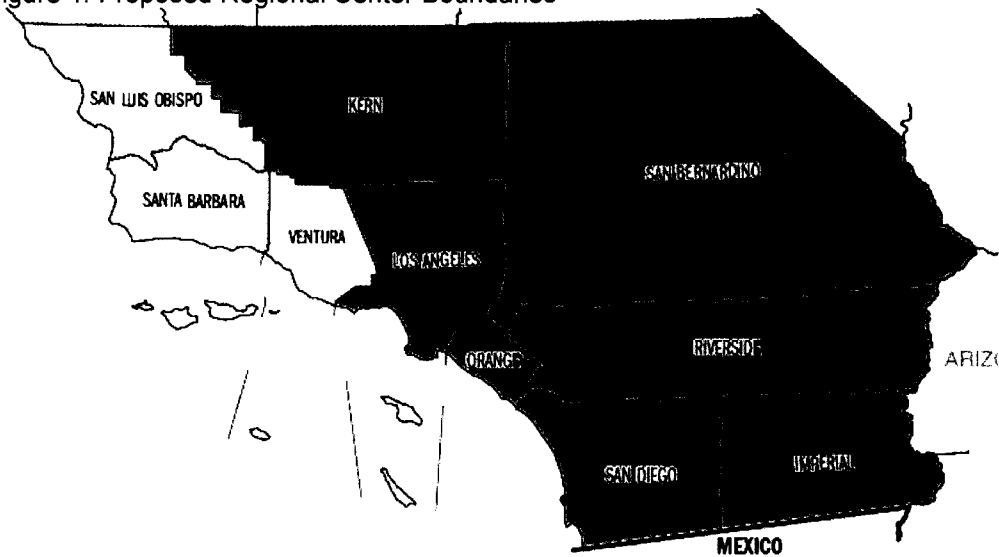
This amended Economic Impact Analysis Report supersedes the Economic Impact Analysis Report dated October 2010. A Request for Evidence was received by Home Paradise Regional Center requesting additional information on the following points:

1. More specific NAICS codes (at least 3-4 digits) for the industries included in the regional center
2. More recent evidence on sq. ft. per employee and construction costs, specific to the region proposed for this regional center
3. Documented evidence to support assumptions used in the report

This amended report responds to those points and includes all relevant contents of the previous report, substituting evidence from a survey of firms in the regional center counties for the various sources used in the previous draft to establish direct employment impacts and likely construction costs. The survey was conducted by a professional survey research company, based on a random sample of firms in the industries in which Home Paradise intends to invest or to which Home Paradise intends to lease facilities it will develop.

Home Paradise Regional Center (“Home Paradise”) is a proposed EB-5 regional center to consist of seven southern California counties (Imperial, Kern, Los Angeles, Orange, Riverside, San Bernardino, and San Diego). The area is shown in the map below with orange highlighting in the seven counties included in the proposed regional center.

Figure 1: Proposed Regional Center Boundaries



Source: Census – stco\_CA.pdf

According to Home Paradise’s business plan, two sample projects are currently planned: (1) a shopping center and (2) a Home and Commercial Design Center. These two sample projects, referred to as “hypothetical” because their exact locations are not yet finalized, are used in this report to demonstrate methodologies for projecting employment impacts. **Table 1** shows the industry types involved and the corresponding NAICS codes.

**Table 1: Industry Classifications Included in Home Paradise Sample Investments**

Project	Industry	NAICS Code
Home and commercial design center	Building design advice, products, services	54141
Shopping center	Supermarket	445
	Clothing store	448
	Sporting goods store	451
	Home center store	444
	Pharmacy	44611
	Full service restaurant	7221
	Fast food restaurants	7222
	Small retail shops	453
	Hotel	7211

This report demonstrates methodologies to be used in projecting employment impacts and provides projections of potential employment impacts and regional economic impacts of this center based on two sample projects. The projections of employment impacts and regional economic impacts will be developed using the IMPLAN input-output model. The methodology explained below for the sample projects will be applicable to actual projects of similar type, and the employment impact projections may be adjusted for actual projects later based on details provided in the business plans for such actual projects.

### **Terminology Used in This Report**

Under the EB-5 program, each alien investor’s investment in a new commercial enterprise must result in the creation of 10 new full-time jobs. The EB-5 regulations at 8 CFR 204.6(m)(7)(ii) state that “jobs created indirectly” by the new commercial enterprise may be counted toward the job creation requirement. The regulations also state that, “[t]o show that 10 or more jobs are actually created indirectly by the business, reasonable methodologies may be used.” IMPLAN has been recognized and accepted by USCIS as a reasonable methodology for projecting and verifying job creation. This report uses the IMPLAN model to project job creation within the proposed regional center, including

“jobs created indirectly.” To avoid confusion about the terminology used in this report, a few terms must first be defined. In input-output analysis, the terms “direct impacts”, “indirect impacts” and “induced impacts” are used by economists. Direct employment impacts in the context of an input-output methodology such as IMPLAN refer to jobs created at a business site. An example of a business site is a commercial building with various commercial tenants; direct employment impacts would refer to the employees of the tenants. Indirect employment impacts refer to jobs created off-site by a multiplier effect resulting from the creation of new direct employment impacts at the business site. Indirect employment impacts include employees of the producers of materials, equipment, and services that are used by commercial tenants at the business site. Induced employment impacts refer to employees of companies that benefit from expenditures resulting from the income of direct and indirect employment impacts.

It is important to note that direct employment impacts in an input-output analysis include both direct hired and indirect hired jobs. Thus, the term “direct employment impact” in this report should not be confused with the concept of “direct jobs” in an EB-5 new commercial enterprise that are measurable by Forms I-9, payroll records, or other similar documentation as set forth in 8 C.F.R. 204.6(j)(4)(i)(A). The direct employment impacts in this economic analysis represent hypothetical jobs derived from reliable square foot per employee data, based on the sample project specifications. In accordance with the EB-5 regulations, job creation ultimately will be proven through evidence that the planned square footage for particular uses has been constructed. Construction employment impacts will be based on the hard construction costs.

Indirect and induced impacts constitute the *multiplier impacts* of direct impacts. *Total impacts* are the sum of direct, indirect, and induced impacts. Impacts can be expressed in terms of employment or in terms of business revenues; both types of impacts are displayed in tables in this report. For reference, multipliers implied by the ratio of total to direct employment impacts are included in tables below. These multipliers are “estimated multipliers” in the sense that they reflect the ratio of total employment impacts to direct employment impacts in particular industries as estimated by the IMPLAN model run with the particular inputs specified in the tables below.

## **Projecting Direct Employment Impacts**

Direct impact estimates in this report are based on a survey of a random sample of firms in the industries listed in Table 1 and within the regional center counties. The survey was conducted by Hebert Research, a professional survey research company located in Bellevue, WA.<sup>1</sup> Complete survey results are provided in a separate report by Hebert Research, providing documentation for the direct impact estimates in this report. A summary of the relevant survey results used in this report is shown in **Table 2**.

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<sup>1</sup> For information about Hebert Research, see [www.hr2cloud.com](http://www.hr2cloud.com).

(b) (4)



### **Projecting Total Employment Impacts**

The forecasting methodology utilized in this report is based on the IMPLAN input-output model for 2008.<sup>2</sup> Input-output models estimate inter-industry production relationships, modeling inputs required from each industry to produce the outputs of any given industry. For example, if more cars are required, more output is required from the metal and rubber sectors, which in turn require more vehicles to haul their supplies, which necessitates further increases in metal and rubber output. The model also captures the impact of payroll spending by employees in impacted sectors for each round of impact. These backward linkages extend back infinitely, but in smaller and smaller quantities in each round, approaching zero as a limit. Input-output models capture this entire series of backward relationships through the concepts of indirect and induced impacts. Total impacts are the sum of direct, indirect, and induced impacts. For this report, a seven county version of IMPLAN is used to capture impacts of the investments within the seven- county contiguous regional center consisting of Imperial, Kern, Los Angeles, Orange, Riverside, San Bernardino, and San Diego Counties in California.

In addition to the impacts of routine operations of the companies established within the regional center due to the investments made, additional employment impacts will be realized due to the development and construction activities. When Home Paradise

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<sup>2</sup> Minnesota Implan Group, <http://www.implan.com/>

acquires properties, additional activity is experienced in the real estate sector for appraisals, econometric and other studies, marketing, and legal fees. After acquisition, renovation or new construction takes place to prepare the desired facilities for tenant occupancy. Total employment impacts in this report include the indirect employment impacts associated with construction (but not direct employment impacts).

### **Sample Projects within the Home Paradise Regional Center**

Two projects will be undertaken initially within Home Paradise Regional Center:

1. A Home and Commercial Design Center that will provide property owners or occupants with design advice, products, and service contracts for installation services.
2. A shopping center including the industries listed in Table 1 above.

Both of these sample projects are based on current plans; actual projects may vary in details from these sample projects and amended employment impact projections will be provided to USCIS when the developer's business plans are finalized.

(b) (4)



(b) (4)



## **Construction Costs**

<sup>3</sup> The following sources were used to establish possible physical store sizes for illustrative purposes in this study of a hypothetical shopping center's economic impact::

- Restaurants - <http://www.hoovers.com/free//ind/fr/profile/basic.xhtml?ID=269>
- "Big box" stores including supermarkets and home centers: <http://www.newrules.org/retail/how-big-are-bigbox-stores>
- Sporting goods: <http://www.nsga.org/i4a/pages/index.cfm?pageid=4038>
- Pharmacy/personal care products: <http://www.canadadrugs.com/media/timeline.php>
- Clothing store: <http://wikimapia.org/86091/Nordstrom>

In an actual project filing with USCIS after the regional center is approved, a more complete business plan with actual facility drawings would be provided, and the SF of each facility would be taken from that plan. The SF per job metrics developed from the Hebert survey would then be applied to the actual SF in the project business plan.



(b) (4)



## Total Economic Impacts

In addition to the direct employment impacts of the sample projects discussed in this report, the total economic impacts of investments made in a regional center include business revenues of all tenant companies occupying space in facilities developed with immigrant investor capital, multiplier impacts of these tenant company revenues, and tax revenues to local, state and federal units of government. The input-output model provides estimates of output impacts in all 440 economic sectors covered in the model for any input entered into the model. To economize on space, the simplified impact tables provided in this report are in aggregated industry categories, but the full 440 industry tables can be supplied upon request.

**Table 6** shows the IMPLAN sector used to project indirect and induced impacts for each sample project. This table demonstrates how the indirect and induced impacts are estimated based on the direct employment impact or revenue estimates reported above.

**Table 7** shows the projected total employment impacts for each sample project, as well as the total for both. Total employment impacts are the sum of direct, indirect, and induced employment impacts as shown in **Table 7**. The applicable multipliers are also shown in **Table 7**. The IMPLAN model projects that regional center employment will

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<sup>4</sup> Hebert Research report, p. 7 and R.S. Means report duplicated on p. 32.

increase by a total of (b) (4) once the multiplier impacts are added to direct employment impacts.

**Table 6: IMPLAN Sectors Used to Project Impacts and Corresponding NAICS Codes**

	IMPLAN Sector	NAICS Industry
<b>SAMPLE PROJECT 1</b>		
Home and Commercial Design Center	370 Specialized Design Services	54141
<b>SAMPLE PROJECT 2</b>		
Shopping Center		
Supermarket	324: Retail Stores – Food and Beverage	445
Clothing store	327: Retail Stores – Clothing and Clothing Accessories	448
Sporting goods	328: Retail Stores – Sporting Goods, Hobby and Music	451
Home center	323: Retail Stores – Building Material & Garden Supply	444
Pharmacy	325: Retail Stores – Health & Personal Care	446
Fast food restaurants	413: Food Services and Drinking Places	722211
Full service restaurant	413: Food Services and Drinking Places	7221
Small retail shops	330: Retail Stores – Miscellaneous	453
Hotel	411: Hotels and motels	72111

**Table 7: Total employment impacts created by Home Paradise Sample**

(b) (4)



\* Note: Employment impacts from construction activity are calculated based on construction cost. Direct employment impacts in this category are not counted.

**Verifying Direct Employment Impacts**

The direct employment impacts in this economic analysis represent hypothetical jobs derived from reliable square foot per employee data, based on the sample project specifications. In accordance with the EB-5 regulations, actual job creation ultimately will be proven through evidence that the planned square footage for particular uses has been constructed. For actual projects, impact estimates will be adjusted up or down using the metrics for establishing direct impacts shown in Table 4 if the actual projects are larger or smaller than the sample projects.

**Occupational Impacts**

Among the projected direct employment impacts are a wide variety of different occupations. Survey data collected by the U.S. Department of Labor, Bureau of Labor Statistics show the percentage of employment within an industry (at a 4-digit NAICS

code level) in each of over 200 specific occupations.<sup>5</sup> **Table 8** shows estimates of employment impacts by occupational group. These estimates were created by aggregating detailed data into the highest level occupational groupings present in the classification system used by the Bureau of Labor Statistics, and multiplying those aggregated percentages by the estimate of direct employment impacts in **Table 2** for Project 1 and **Table 3** for Project 2. Each sample industry included in the Home Paradise business plan has a distinctive occupational pattern, and these investments as a whole will create occupational opportunities for workers with many different skills. Considering all of the types of companies included in the plan, sales occupations are the most common type of occupational group that will be created, plus a substantial number of opportunities in service occupations.

(b) (4)



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<sup>5</sup> Data on the distribution of jobs by occupation within industries can be found at <http://www.bls.gov/oes/>.











## Conclusions

In an RFE, USCIS requested additional information about the projected economic impacts of a the proposed Home Paradise Regional Center. The three requests in the RFE are listed below along with a summary of the responses in this amended economic report.

1. More specific NAICS codes for the industries included in the regional center.  
Table 1 provides the requested NAICS codes at a 3 to 5 digit level. Table 6 shows the associated IMPLAN sector codes used for each of these NAICS codes in conducting the multiplier analysis.

2. (b) (4)

3.



# Home Paradise Regional Center<sup>®</sup>

## UPDATED OVERALL BUSINESS PLAN

August 2011

This Overall Business Plan supersedes for a prior overall business plan for Home Paradise Regional Center LLC dated October 2010 by including more specific NAICS codes, and updating construction costs and employment impacts.

*Strictly Private and Confidential*



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## 1.0 REGIONAL CENTER BUSINESS OVERVIEW

### 1.1 Summary

Pursuant to the Immigrant Investor Pilot Program, Home Paradise Regional Center ("HPRC") is proposed as a regional center to direct alien investor capital into commercial projects within the region consisting of 7 contiguous counties in the state of California. Specifically, these include Imperial, Kern, Los Angeles, Orange, Riverside, San Bernardino, and San Diego Counties. HPRC will focus investments into new commercial enterprises in the following target industries: retail, hospitality, food services and interior design service.

### 1.2 Geographic Area and Scope

The 7 contiguous counties are located within the southern region of the state of California. With a total area of 48,626 square miles, this geographic region is primarily a metropolitan area with an estimated 2009 population of 21,001,525, or 432 people per square mile. There is a wide range of diversity of industries and demographics across this region. This range varies between Los Angeles as the most densely populated to Kern County and Imperial County which both tend to be more agricultural and sparsely populated.



**HPRC's geographic area includes the following 7 contiguous counties:**

- Imperial
- Kern
- Los Angeles
- Orange
- Riverside
- San Bernardino
- San Diego

### **Imperial County**

Imperial County is located in the Imperial Valley in southeast California. The county borders both Mexico and the state of Arizona. Imperial County is the newest of the counties in California. The county population was 166,874 at the 2009 estimated U.S. Census. It may be the smallest county but it is the most economically diverse region in California. According to the U.S. Census Bureau, the county has a total area of 4,175 square miles. The county seat is the City of El Centro.

### **Kern County**

Kern County is located in the southern region of the Central Valley. It extends east beyond the southern slope of the eastern Sierra Nevada range into the Mojave Desert. As of 2009 the estimated population was 807,407. Kern County has a large agricultural base and is a significant producer of oil. The county accounts for one-tenth of overall U.S. oil production. According to the U.S. Census Bureau, the county has a total area of 8,141 square miles. Kern's county seat is Bakersfield.

### **Los Angeles County**

Los Angeles is a county located in southern California. It was one of the original counties in the state of California created at the time of statehood in 1850. The name Los Angeles is Spanish for the "City of Angels." Most of the population of Los Angeles County is located in the south and southwest region. It is the most populous county in the United States. The entertainment industry and two of the largest shipping ports in the U.S. coming from Long Beach and San Pedro drive much of the region's economy. As of 2009 the estimated population was 9,848,011. Los Angeles County borders 70 miles of the Pacific Ocean. According to the U.S. Census Bureau, the county has a total area of 4,061 square miles. Its county seat is Los Angeles.

### **Riverside County**

Riverside County is located in the southeastern part of the state of California. Many people have been moving to Riverside from San Diego and Los Angeles Counties in recent years due to a more favorable cost of living. The county population was 2,125,440 in the 2009 estimated U.S. Census. Riverside County has 12 federally recognized Indian reservations. Geographically it is mostly desert. The majority of Joshua Tree National Park is located in Riverside County. According to the U.S. Census Bureau, the county has a total area of 7,207 square miles. The county seat is Riverside.

### **Orange County**

Orange County is located in southwest California. It is known for its tourist attractions such as Disneyland, Knott's Berry Farm and many local beaches. Orange County is also known for its great affluence and overall political conservatism. The county population was 3,026,786 according to the 2009 estimates by the U.S. Census Bureau. There is no defined urban area in this county, but rather, it is mostly suburbanized. According to the U.S. Census Bureau, the county has a total area of 789 square miles. The county seat is Santa Ana.

## **San Bernardino County**

San Bernardino County is a county located in the southeastern part of California. It is the largest county in the continental United States in area. The population was 2,017,673 according to the 2009 estimates of the U.S. Census Bureau. San Bernardino County is the only county in California that is bordered by both Arizona and Nevada creating a total of 8 counties that San Bernardino County borders. According to the U.S. Census Bureau, the county has a total area of 20,053 square miles. Its county seat is San Bernardino.

## **San Diego County**

San Diego County is located in the most southwestern part of California. The county consists of the American metropolitan statistical area San Diego-Carlsbad-San Marcos. San Diego County has a population of 3,053,793 according to the 2009 estimates by the U.S. Census. San Diego is the birthplace of California. It is the eighth largest city in the United States and according to Forbes magazine San Diego is rated the fifth wealthiest city in the US. The top three sectors of San Diego's economy are manufacturing, defense, and tourism. According to the U.S. Census Bureau, the county has a total area of 41,200 square miles. The county seat and largest city is San Diego.

### ***1.3 Target Industry Groups***

Home Paradise Regional Center will finance the development, operational management of commercial real estate projects (with retail, hospitality and food uses) and Home and Commercial Design Centers. The target industry clusters are as follows.

#### **Retail (NAICS Codes 444, 445, 448, 44611, 451, 453)**

The backbone of a shopping center development, retail stores attract customers to the shopping center and bring benefit to the community with sales tax revenue and local job creation.

#### **Hospitality (NAICS Code 7211)**

Diversifying the uses in a shopping center by including hospitality facilities with the commercial centers increases the stability of the center and also diversifies job opportunities created by the development. The hospitality facilities will consist of hotels and/or motels.

#### **Food services (NAICS Code 7221, 7222)**

Food facilities are an important segment of retail because including restaurants within the commercial centers will provide new job opportunities. Both sit-down and fast food restaurants and bars will serve as added economic enterprises to benefit the surrounding community.

#### **Interior Design Services (NAICS Code 54141)**

Interior design services provide property owners and occupants with design advice, products, and service contracts for installation services. Clients will include both residential and commercial property owners.

### ***1.4 Regional Center Investment Structure and Funding***

For each project, investment capital will be contributed by individual alien investors into a limited partnership in exchange for limited partnership interests, with Home Paradise Investment Center LLC being the general partner. Each limited partnership either engages in the project itself or provide a loan to the project. Please see below the two investment structures that will be utilized based on the need of each project:

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(b) (4)



## ***1.5 Management Team***

### **Edward Chen, CEO**

Edward Chen is successful entrepreneur with a strong track record in retail by establishing hundred shopping locations. He has over 15 years of experience in real estate development, which provides him with a strong background and knowledge about the interior design services industry. Mr. Chen holds a Bachelor's degree in International Trade.

### **Jing Jiang, CFO**

Jing Jiang has over 20 years of executive finance experience beginning with 5 years as CFO of Jenny Investment Group, Inc., a company with over 500 properties sold. Subsequently, she served as CFO of Cabinet Home, Inc and has also been involved with overseeing projects and sourcing materials. Ms. Jiang holds a bachelor's degree in International Trade.



## ***1.6 Economic Analysis Expert***

### **Dr. Paul Sommers, Ph.D.**

Since 2004, Paul Sommers has been a professor at the Institute of Public Service and the Albers School of Business at Seattle University. Dr. Sommers actively conducts research focused on economic development and workforce topics. His expertise focuses on regional development, regional economics and workforce forecasting. During his 25-year career at Battelle Memorial Institute and the University of Washington, Dr. Sommers conducted many research projects consisting of national energy-industry topics, and rural and urban regional development issues in the Northwest. In the last several years, Dr. Sommers has been successful in preparing a number of job creation reports for investment groups participating in the EB-5 immigrant investor program, providing reports for projects in the states of California, Florida, Michigan, and Washington. Dr. Sommers is a member of the Washington State Governor's Council of Economic Advisors, is a past President of the Seattle Economists Club, and currently serves on the board of the Pacific Northwest Regional Economics Conference. Dr. Sommers earned his Ph.D. in Economics from Yale University.

## ***1.7 Immigration Counsel***

### **Linda Lau, Esq., Global Law Group, Principal**

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

## ***1.8 Architect & Engineer***

### **Antonio Tang, Architectural Engineer**

Antonio Tang is currently the General Contractor for Partner of Mega Home Development, Inc. Prior to serving in this position, Mr. Tang was an Associate of Nadel & Partner Architectural Firm from 1976-1987 and was the Owner of Promaster Development, Inc. for a little under 20 years. Since 1990, Mr. Tang has been in charge of major Commercial and Residential Projects in California. These projects have included shopping centers, condominiums, senior citizen housing, warehouses, and the renovation of the historical Clark Hotel located in downtown Los Angeles. The total project costs, for both Commercial and Residential Projects, range between 1.5 million to well over 12 million dollars. Mr. Tang holds a Bachelor of Architectural & Engineering and a Master of Urban Design.

## ***1.9 Banking Institution & Escrow***

Capital received from alien investors will be held in an escrow account at a reputable financial institution subject to release according to the terms of the Escrow Agreement.

In summary, funds will be held in an escrow account to be released upon filing of the alien investor's I-526 petition with USCIS.

**Bank Information:**

Bank of the West  
1155 W. Huntington Dr.  
Arcadia, CA 91007  
**Tel: 626-445-3800**

Jade Escrow, Inc. and other reputable escrow may serve as the escrow agent. It will hold EB-5 investor funds for each project according to the terms of the Escrow Agreement.

**Jade Escrow, Inc.**

9604 Las Tunas Drive  
Temple City, CA 91780  
Tel: (626) 642-8889  
Fax: (626) 642-8787

***1.10 Sample Investment Agreements***

Home Paradise includes the following sample investment agreements in this application:

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

**2.0 REGIONAL CENTER MARKET ANALYSIS**

***2.1 Regional Overview***

Home Paradise Regional Center encompasses 7 contiguous counties located in the state of California: San Diego, Imperial, Riverside, Orange, San Bernardino, Los Angeles, and Kern Counties. With a total area of 48,626 square miles, this geographic region is primarily a metropolitan area with an estimated 2009 population of 21,001,525, or 432 people per square mile.

<b>Regional Area Profile State</b>	<b>RC Counties</b>	<b>California</b>
Land Area (square miles)	48,626	155,959

Population (2009 estimate)	21,001,525	36,961,664
Population % change 2000-2009	+16%	+9.1%
Population Density (per square mile)	432	237

## ***2.2 Market Overview: Regional Challenges and Strengths***

### **Regional Strengths**

The region makes up nearly two-thirds of the population of California, which creates an available workforce for the new retail centers that will bring many jobs into the region. The proposed city for the retail center with food and hospitality space is a well-traveled location with many tourists passing through creating perfect demographics for business. With modern telecommunications systems, fast highways, and a mix of large and small airports the region is well connected to larger markets and is attracting even more industrial businesses.

## ***2.3 Overview: Commercial Real Estate Outlook Specific to the Proposed Regional Center***

In order to evaluate the market for commercial real estate within the proposed regional center, data was analyzed from the U.S. Census Bureau. There are two sets of reports, both available on their websites under: <http://quickfacts.census.gov> and <http://factfinder.census.gov>. The 2007 set of data is the latest set of economic data available. Each proposed industry is analyzed below:

### ***Retail Development***

The Census Bureau had the most comprehensive data in the retail trade section. In 2007, retail sales revenue in the proposed regional center amounted to US\$258.3 billion by 62,983 employer establishments.

	<b>2007 Retail Employer Establishments</b>	<b>2007 Retail Employer Sales (\$MM)</b>
San Diego County	9,948	\$ 38,711
Imperial County	534	\$ 1,727
Riverside County	5,320	\$ 24,146
Orange County	9,991	\$ 45,023
San Bernardino County	5,018	\$ 21,717
Los Angeles County	30,179	\$ 119,112
Kern County	1,993	\$ 7,876
<b>Regional Center Total</b>	<b>62,983</b>	<b>\$ 258,312</b>

Source: U.S. Census Bureau (<http://factfinder.census.gov>)

### Hospitality Development

In 2007 there were a total of 507,869 non-farm establishments that employed a total of 8 million people. There was a 20.8% increase in employment in the regional center from 2000 to 2007. Revenue for hospitality amounted to US\$15.9 billion from 2,978 establishments.

	2007 Hospitality Establishment s	2007 Hospitality Sales (\$MM)
San Diego County	548	\$ 4,083
Imperial County	35	\$ 23
Riverside County	310	\$ 2,305
Orange County	466	\$ 2,272
San Bernardino County	289	\$ 381
Los Angeles County	1,211	\$ 4,177
Kern County	119	\$ 126
<b>Regional Center Total</b>	<b>2,978</b>	<b>\$ 13,367</b>

Source: U.S. Census Bureau (<http://factfinder.census.gov>)

### Food Services Development

In 2007, revenue for food service industries amounted to US\$33.4 billion from 37,819 establishments within the proposed regional center.

	2007 Food Services	2007 Food Sales (\$MM)
San Diego County	6,051	\$ 5,468
Imperial County	226	\$ 145
Riverside County	2,982	\$ 2,531
Orange County	6,388	\$ 5,975
San Bernardino County	2,823	\$ 2,374
Los Angeles County	18,265	\$ 16,061
Kern County	1,084	\$ 815
<b>Regional Center Total</b>	<b>37,819</b>	<b>\$ 33,369</b>

Source: U.S. Census Bureau (<http://factfinder.census.gov>)

## Interior Design Services Development

In 2007, there were 1,260 Interior Design Services Establishments in the proposed regional center. 2007 Annual Revenue for these establishments came out tot \$1.33 billion, or roughly \$1.06 million in revenue per establishment. These establishments also hired 5,316 employees during this period, which equates to 4.22 employees per business. Data at the County level for this sector was missing or unavailable in Imperial and Kern Counties.

San Diego County	211	1,028	\$194
Imperial County	n/a	n/a	n/a
Riverside County	88	211	\$66
Orange County	262	1,133	\$303
San Bernardino County	33	111	\$16
Los Angeles County	647	2,833	\$751
Kern County	19	n/a	n/a
<b>Regional Center Total</b>	<b>1,260</b>	<b>5,316</b>	<b>\$1,331</b>

Source: U.S. Census Bureau (<http://factfinder.census.gov>)

## 2.4 County Specific Analysis

### IMPERIAL COUNTY

#### Profile and Summary:

Land Area (square miles):	4,175
Population (2009 estimate):	166,874
Population % change 2000-2009:	17.2%
Median Household Income (2008):	\$36,894
County Seat:	El Centro

#### Retail Industry:

Retail sales amounted to \$1.7 billion in 2007 from 534 establishments according to the U.S. Census Bureau.

**Hospitality Industry:**

\$23 million in sales came from 35 establishments in the accommodation service industry in 2007.

**Food Services Industry:**

\$145 million in sales came from 226 establishments in the food services industry in 2007.

**Interior Design Services Industry:**

Due to the rural nature of the area, there was no record of establishments in this industry in Imperial County.

**KERN COUNTY**

**Profile and Summary:**

Land Area (square miles):	8,141
Population (2009 estimate):	807,407
Population % change 2000-2009:	22.0%
Median Household Income (2008):	\$44,716
County Seat:	Bakersfield

**Retail Industry:**

Retail sales amounted to \$7.9 billion in 2007 from 1,993 establishments according to the U.S. Census Bureau.

**Hospitality Industry:**

\$126 million in revenue came from 119 establishments in the accommodation service industry in 2007.

**Food Services Industry:**

\$815 million in sales came from 1,084 establishments in the food services industry in 2007.

**Interior Design Services Industry:**

There were just 19 establishments recorded in the U.S. Census Bureau in 2007, but revenue was not available.

**LOS ANGELES COUNTY**

**Profile and Summary:**

Land Area (square miles):	4,061
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Population (2009 estimate):	9,848,011
Population % change 2000-2009:	3.5%
Median Household Income (2008):	\$55,452
County Seat:	Los Angeles

**Retail Industry:**

Retail sales amounted to a whopping \$119 billion in 2007 from 30,179 establishments according to the U.S. Census Bureau.

**Hospitality Industry:**

\$4.2 billion in revenue came from 1,211 establishments in the accommodation service industry in 2007.

**Food Services Industry:**

\$16.1 billion in sales came from 18,265 establishments in the food services industry in 2007.

**Interior Design Services Industry:**

\$751 million in sales came from 647 establishments in the interior design services industry in 2007.

**RIVERSIDE COUNTY**

**Profile and Summary:**

Land Area (square miles):	7,207
Population (2009 estimate):	2,125,440
Population % change 2000-2009:	37.5%
Median Household Income (2008):	\$57,590
County Seat:	Riverside

**Retail Industry:**

Retail sales amounted to \$24.1 billion in 2007 from 5,320 establishments according to the U.S. Census Bureau.

**Hospitality Industry:**

\$2.3 billion in sales came from 310 establishments in the accommodation service industry in 2007.

**Food Services Industry:**

\$2.5 billion in sales came from 2,982 establishments in the food services industry in 2007.

**Interior Design Services Industry:**

\$66 million in sales came from 88 establishments in the interior design services industry in 2007.

## **ORANGE COUNTY**

### **Profile and Summary:**

Land Area (square miles):	789
Population (2009 estimate):	3 million
Population % change 2000-2009:	6.3%
Median Household Income (2008):	\$74,862
County Seat:	Santa Ana

### **Retail Industry:**

Retail sales amounted to \$45 billion in 2007 from 9,991 establishments according to the U.S. Census Bureau.

### **Hospitality Industry:**

\$2.3 billion in sales came from 466 establishments in the accommodation service industry in 2007.

### **Food Services Industry:**

\$6 billion in sales came from 6,388 establishments in the food services industry in 2007.

### **Interior Design Services Industry:**

\$303 million in sales came from 262 establishments in the interior design services industry in 2007.

## **SAN BERNARDINO COUNTY**

### **Profile and Summary:**

Land Area (square miles):	20,053
Population (2009 estimate):	2 million
Population % change 2000-2009:	18.0%
Median Household Income (2008):	\$54,768
County Seat:	San Bernardino

### **Retail Industry:**

Retail sales amounted to \$21.7 billion in 2007 from 5,018 establishments according to the U.S. Census Bureau.

### **Hospitality Industry:**

\$381 million in sales came from 289 establishments in the accommodation service industry in 2007.



**Food Industry:**

\$2.4 billion in sales came from 2,823 establishments in the food services industry in 2007.

**Interior Design Services Industry:**

\$16 million in sales came from 33 establishments in the interior design services industry in 2007.

**SAN DIEGO COUNTY**

**Profile and Summary:**

Land Area (square miles):	4,200
Population (2009 estimate):	3,053,793
Population % change 2000-2009:	8.5%
Median Household Income (2008):	\$62,820
County Seat:	San Diego

**Retail Industry:**

Retail sales amounted to \$38.7 billion in 2007 from 9,948 establishments according to the U.S. Census Bureau.

**Hospitality Industry:**

Revenue from the hospitality industry amounted to \$4.1 billion in 2007 from 548 establishments.

**Food Services Industry:**

\$5.5 billion in sales revenue came from 6,051 establishments in the food service industry in 2007.

**Interior Design Services Industry:**

\$194 million in sales revenue came from 211 establishments in the interior design service industry in 2007.

**3.0 Sample Projects 1 & 2**

***3.1.0 Sample Project 1: Home and Commercial Design Center***

Initially, HPRC plans to undertake two types of projects which will also be called “hypothetical sample projects” for purposes of this application because the projects locations have not yet been finalized. Both of these sample projects are based on current plans; actual projects may vary in details from these sample projects and amended employment impact projections will be provided to USCIS when the developer’s business plans are finalized.

The first hypothetical sample project within the proposed HPRC is the establishment and operation of a Home and Commercial Design Center in the City of Industry, California, or other Targeted Employment Area (“TEA”), within HPRC’s proposed boundary. The center will provide design advice, products, and service contracts for installation services. EB-5 funds will be utilized to provide a loan to an entity that will set up, manage and operate the company. Funds will be used for capital equipment costs, inventory, and operations. Clients will include both residential and commercial property owners. Sales representatives that provide a retail component and skilled workers who provide installation services will staff the company, which will have office, warehouse, and showroom components at its headquarters. Operations will also generate various types of indirect and induced employment impacts.

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Industry Cluster:	Interior Design Services (NAICS CODE 54141)
Sample Project:	Establishment and operation of a Home and Commercial Design Center which will provide property owners with design advice, products, and service contracts for installation services
Sample Project Location:	City of Industry, or other TEA in California (within regional center boundary)
Sample Project Building Area:	45,000 sq ft.

### ***3.1.1 Market Analysis –City of Industry***

The City of Industry is an industrial suburb of Los Angeles in the San Gabriel Valley section of Los Angeles County. Home to over 2,200 businesses and 80,000 jobs, the city is almost entirely industrial. It was incorporated on June 18, 1957 to prevent surrounding cities from annexing industrial land for tax revenue. The City of Industry is primarily devoted to business: 92% is Industrial and 8% is Commercial. The City of Industry has no business taxes and is primarily funded through retail sales tax from shopping centers located within the city limits. There is also a revenue-generating hillside hotel resort know as the Pacific Palms Resort which offers state of the art

meeting facilities. Industry is the home to a foreign Trade Zone and is a popular investment area for Chinese businessmen.

City of Industry has a pro-business city government to ensure the development of new industrial businesses in the area. Industry is in the proximity of 4 major freeways, 2 international airports, and 2 transcontinental rail lines, which ensure necessary business and commercial travel to the many facilities within the area. With modern telecommunications systems, fast highways, and a mix of large and small airports the region is well connected to larger markets and is attracting industrial businesses. It's the perfect location for new retail facilities as the city offers many wide streets and clean business parks.

### ***3.1.2 Sample Project 1 Capitalization***

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### ***3.2.0 Sample Project 2: Retail Shopping Center with Food and Hospitality Space***

The second hypothetical sample project planned within HPRC is a mixed-use shopping center project with retail, food services, and hospitality buildings in Cabazon, California,

or other TEA within HPRC's geographic boundary. The project will involve the construction, management and operation of a retail building with shopping centers, a food court, and a 3-Star hotel (e.g. Westin/Courtyard). The three buildings will total 557,500 sq. ft. Capital investment funds contributed under the EB-5 program will be used to provide a loan to the developer for development and construction costs of the project as well as capital equipment costs for the facilities.

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New jobs will be created by the retail, food services and hospitality development. Jobs created through indirect and induced impacts of this new enterprise include retail sales and professional services.

Industry Clusters:	Retail, Food Services, and Hospitality (NAICS Codes: 444,445,448,44611,451,453;7221,7222;7211)
Sample Project:	Construction and management of retail shopping center with food court and hotel
Sample Project Location:	City of Cabazon, or other Targeted employment area in California (within regional center boundary)
Sample Project Building Area:	Total of 557,500 sq. ft.

### ***3.2.1 Market Analysis - Cabazon***

Located in the desert of Riverside County, Cabazon is a well-traveled place but has a low number of inhabitants, a little over 2,000.

Because Cabazon is only 15 miles southeast of Palm Springs, it experiences a continual flow of visitors who pass through year round. Cabazon has a wide array of attractions that appeal to tourists: it is the home of one of the largest Native American casinos in the United States; Morongo Casino, Resort, & Spa and to the famous Claude Bell's Dinosaurs. While Cabazon may be in the middle of nowhere, it is also a very popular destination for the many outlet stores located there. In fact, many people travel to Cabazon just to visit its outlets. Cabazon is a perfect location for a new retail development because it is a city guaranteed to have a steady flow of tourists who plan to shop.

**3.2.2 Sample Project 2 Capitalization**

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US\$500,000 in a new commercial enterprise in the United States. To participate in the immigrant investor program through investing the lower US \$500,000 amount, the alien must invest his or her capital into a geographic area that qualifies as a Targeted Employment Area ("TEA"). Immigration and Nationality Act ("INA") §203(b)(5)(B) and Title 8 of the Code of Federal Regulations ("8CFR") §204.6(e) define a TEA as an area that, at the time of investment, is a rural area or an area that has experienced an unemployment rate that is at least 150 percent of the national average.

Assuming the first proposed hypothetical project of HPRC will be located in City of Industry, California, per the most recently unemployment data published by Employment Development Department of the State of California (EDD), and U.S. Department of Labor's Bureau of Labor Statistics (BLS), City of Industry qualifies as a TEA area.

Assuming the second proposed hypothetical project of HPRC will be located in Cabazon, California, per the most recently unemployment data published by the EDD, and BLS, Cabazon also qualifies as a "TEA" area. Up to date unemployment rate information for City of Industry and Cabazon is included within this overall business plan.

Per the most recently unemployment data published by BLS, the national unemployment rate for August 2010 was 9.6%, while City of Industry's unemployment rate was 22.8% for August 2010, and Cabazon's unemployment rate was 35.5%, both well over 150% of the national average for the same period.

For additional projects to be undertaken within the industry clusters and geographic scope of HPRC, the minimum capital investment amount for any individual EB-5 investment will be \$500,000 if the project is within a TEA, or \$1,000,000 if it is outside a TEA at the time of investment.

#### **4.0 JOB CREATION AND OTHER ECONOMIC IMPACTS**

When completed, the two initial hypothetical sample projects planned within HPRC will produce many new jobs in the region. (b) (4)

As additional projects are undertaken within HPRC's industry and geographic scope, the employment and economic impacts will increase.

Similar projects which may vary in size or location within HPRC will be developed with jobs created based on the formula as stated in Economic Impact Report. A detailed discussion of the job creation for HPRC is included in the Economic Impact Report included with this application.




# **Home Paradise Regional Center<sup>®</sup>**

## **UPDATED OPERATIONAL PLAN**

**August 2011**

This Operational Plan supersedes a prior operational plan for Home Paradise Regional Center LLC dated October 2010 by including more specific NAICS codes and correcting the marketing budget on page 9.

***Strictly Private and Confidential***





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## I. REGIONAL CENTER OVERVIEW

### 1. BUSINESS SUMMARY

<b>PROPOSED REGIONAL CENTER</b>	Home Paradise Regional Center (“HPRC”)
<b>REGIONAL CENTER APPLICANT</b>	Home Paradise Investment Center LLC, a California Limited Liability Company organized on June 11, 2010. (“Applicant”)
<b>GEOGRAPHIC SCOPE</b>	Contiguous counties of San Diego, Imperial, Orange, Riverside, San Bernardino, Los Angeles, and Kern Counties in California
<b>TARGETED INDUSTRIES</b>	<p>Activities within HPRC will focus on the following industry clusters:</p> <ul style="list-style-type: none"><li>*Retail Trade (NAICS 444,445,448,44611,451,453)</li><li>* Hospitality (NAICS 7211)</li><li>*Food Services (NAICS 7221,7222)</li><li>* Interior Design Services (NAICS 54141)</li></ul> <p>For further detail regarding the planned activities of HPRC within the targeted industries, please refer to the overall business plan and economic impact analysis.</p>
<b>INVESTMENT STRUCTURE</b>	Projects within HPRC will be funded through various limited partnerships (i.e. EB-5 new commercial enterprises) of which Applicant will be the general partner and foreign investors investing pursuant to the EB-5 program will be limited partners. Depending on the type of project, capital contributions of limited partners will be provided by the limited partnership to a project according to either an equity structure or loan structure.
<b>PROJECT FUNDING</b>	Funding for projects within HPRC will be through limited partnerships and distinct from funding for the regional center entity’s operations. Limited partnerships will either directly invest in or loan funds to other companies doing development and management of commercial buildings for new job-creating enterprises. A portion of construction



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costs will be covered by EB-5 investment, subject to the quota set for the project based on job creation analysis. Bank loans and domestic investment may also be applied to construction costs. Limited partnership-specific business plans will provide specific funding details including the dollar amount of funds required for the job-creating project and a breakdown of financing by source and amount. In no event is the alien investor's capital to be applied to operational costs of HPRC, as those expenses will be funded in full through Home Paradise Investment Center LLC as well as administration fees collected from investors in addition to the capital investment amount.

2. OPERATIONS SUMMARY

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

**DUE DILIGENCE** Applicant will actively participate in due diligence screening of potential investors through the use of third party investigative or accounting firms, and will keep records of all investors and investments. Independent consultants will be retained to provide due diligence on all projects receiving EB-5 investment. Applicant will also provide annual reports as required by USCIS.

**MARKETING STRATEGY**

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**FUNDING FOR OPERATIONS**

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**POINT OF  
CONTACT**

The primary point of contact for HPRC is:  
Edward Chen, CEO  
Home Paradise Investment Center LLC  
7000 East Slauson Avenue  
Commerce, CA  
Email: info@homeparadiserc.com  
Tel: 626-284-9999  
Fax: 626-458-9888

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

## **II. ADMINSTRATIVE OVERSIGHT**

HPRC pursuant to USCIS regional center designation will operate in a manner that will serve to maintain its designation. It will maintain all records, data, and information related to the investors, the investments, the projects involved, and the movement of funds to and from each limited partnership. In addition, HPRC will compile specific reports as requested by USCIS.

Edward Chen, CEO of Applicant is the principal point of contact responsible for the normal operation, management and administration of the proposed regional center. Applicant will maintain offices in City of Industry, California. The office staff will travel overseas as necessary and will be bilingual and dedicated to investor relations and investor communications over the life of the regional center. Staff members in City of Industry are dedicated to managing investment properties funded with EB-5 capital and monitoring accounting and investment performance.

### **1. RECORD-KEEPING AND REPORTING**

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Applicant will specifically keep track of the following report information and be prepared to give reports to USCIS by Federal Fiscal Year:

**A. Investor Status Report**

- a. Primary Investor Name, DOB, Petition Receipt #, and Alien Registration #;
  - i. Status of 1-526 petition (filed, pending, approved, denied, withdrawn) and date(s) of such event.
- b. Number of visas included in petition (investor, spouse and children);
- c. Country of nationality of each alien investor who filed an I-526 petition;
- d. US city and state of residence or intended residence of each alien investor;
- e. Identify the following investment information in the commercial enterprise:
  - i. Date of investment in the commercial enterprise;
  - ii. Amount of investment in the commercial enterprise;
  - iii. Date, nature, and amount of any payment/remuneration/profit/ return on investment made to the alien investor by the commercial enterprise or Regional Center from time of investment to present.

**B. Regional Center Business Activity Report by Target Industry Categories**

- a. Identify and list received capital and aggregate amounts;
- b. List any non-EB-5 domestic capital and specify aggregate amounts;
- c. For investor capital (both alien and domestic), list of the following:
  - i. Name and address of each "direct" job creating commercial enterprise;
  - ii. Industry category for each indirect job creating investment activity.
- d. Project progress in light of job creation requirements pursuant to the USCIS-approved Employment and Economic Impact Analysis Report.

**C. Investor Status Report by Federal Fiscal Year**

- a. Total aggregate # of approved 1-526 petitions year to date;
- b. Total aggregate # of approved 1-829 petitions year to date;
- c. Total aggregate sum of EB-5 alien capital invested through Regional Center since approval and designation.

In addition to digital records, Applicant has a system to file and archive documents related to EB-5 investors. There is one staff person dedicated to record keeping for HPRC.

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2. FINANCIAL MONITORING:

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All capital investment funds contributed to a limited partnership for a given project will initially be deposited into an escrow account with Bank of the West, an approved reputable financial institution in the US. Funds invested pursuant to the EB-5 immigrant investor program will be released based on criteria set forth by Bank of the West and will process the payment for the escrow account upon approval and sufficient funding of the project.

**III. DUE DILIGENCE**

1. DUE DILIGENCE IN DEVELOPMENT PROCESS

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With respect to due diligence in the oversight of the development process, details as to each project will be set forth in the project-specific business plan that will be provided to investors for reference to include, but not be limited to the following project-specific content:

- Project Specifications
- Project Specific Market analysis
- Project Specific marketing strategy
- Project Schedule and Milestone details
- Project budget and financing details

**Underwriting**

HPRC follows a tightly controlled and managed process to examine all elements of a potential investment, including, with respect to real property, its location, and income-producing capacity, prospects for long-range appreciation, income tax considerations and liquidity. Only those assets meeting HPRC's investment criteria will be accepted for inclusion in as an HPRC project.

In an effort to keep an asset in compliance with those standards, an underwriting team will be involved through the investment life cycle of the asset and consults with other professionals responsible for the asset.



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**Tenant Creditworthiness**

(b) (4)



2. DUE DILIGENCE IN INVESTOR SCREENING

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**A. Investor screening process**

(b) (4)





(b) (4)

**Legal Service Agreement** - HPRC requires that investors sign a legal service agreement with a duly licensed immigration lawyer as a condition for admission to a limited partnership. This policy ensures that the applicant is screened by a competent immigration professional as a condition for, and prior to, admission into HPRC's program.

All information will be kept confidential. Once the prospective is deemed satisfactory, the prospective will proceed to the subscription process outlined below.

#### **B. Subscription process**

During the subscription process, the prospective investor will complete and sign a subscription agreement. The prospective will also receive a Confidential Private Offering Memorandum. The prospective investor will be given an opportunity to go over all three documents with a financial professional before signing the subscription agreement. The agreement will inform the prospective of the risks inherent in investing in the project and will contain an agreement that the investor will diligently file a Form I-526. Additionally, the agreement will contain an agreement that all funds for investment will come from legal sources and that the prospective will provide evidence proving such. For more information, please refer to the attached sample Subscription Agreement.

Additionally, a full set of sample Investment Documents, including the Private Offering Memorandum, Subscription Agreement, Limited Partnership Agreement, and Escrow Agreement, is filed with this application.

### **IV. PROMOTIONAL EFFORTS**

#### **1. MARKETING OBJECTIVE**

Through its local promotions and the efforts of overseas agents, Applicant aims to attract alien investor capital to commercial development projects that will result in job-creation and profits for investors.

2. MARKETING STRATEGIES

Applicant will promote investment offerings, with a focus on the communities in Mainland China. Once the marketing presence is firmly established in China, Applicant may consider marketing EB-5 investment offerings to other countries in Asia including Taiwan and South Korea. Applicant will design, develop and implement a variety of pre-marketing strategies and assist in structuring HPRC's market entry plan targeting the international investor.

Applicant will also establish relationships with a network of brokers and professional finders in China. They will work as independent contractors and may not negotiate on behalf of Applicant or handle funds. They only serve to disseminate information and introduce potential investors to HPRC.

The marketing team leader for HPRC will be Edward Chen, an accomplished entrepreneur/business development expert with a strong background and knowledge in the domestic home renovation industry. Edward Chen will provide the latest market trends analysis on HPRC's EB-5 investment offerings in China. He will also spearhead any moves to expand the marketing efforts to other countries in the future, but not until after the second year of operations.

3. PROMOTIONAL EFFORTS

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Applicant will promote its investment offerings locally to professionals with spheres of influence that include potential EB-5 investors. (b) (4)

[REDACTED]

[REDACTED] Promotional activities will aim at giving HPRC a high level of name recognition among relevant high net-worth communities.

**The Initial Promotional Campaign will include:**

1. **Printed Brochures:** HPRC will be promoted through bi-lingual brochures that explain and promote the EB-5 program while presenting job-creating investment opportunities through HPRC.
2. **Website:** A website is in construction.
3. **Advertising:** Advertising in print media will allow HPRC to target high net-worth individuals who may be potential immigrant investors.

4. **Meetings and Seminars:** Seminars including legal and project representatives will be a way to specifically educate and recruit qualified potential investors.
5. **Travel:** Local travel may be required in connection with recruiting and screening potential investors. This does not include the international travel for operations.

## V. FUNDING FOR REGIONAL CENTER OPERATIONS

Funding for regional center operations will be completely separate from funding for the projects within HPRC.

(b) (4)





From: (213) 830-9933  
Jean Gan  
Global Law Group  
909 El Centro Street, Suite 1  
South Pasadena, CA 90071

Origin ID: EMTA



J11201104290225

Ship Date: 08AUG11  
ActWgt: 1.0 LB  
CAD: 3464367/INET3180

Delivery Address Bar Code



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Ref # Home Paradise Regional Center  
Invoice #  
PO #  
Dept #

C30178

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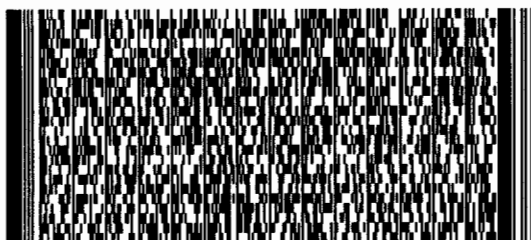
QZ JORA



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C30070

SHIP TO: (213) 830-9933 X 101 BILL SENDER  
ATTN: RFE  
USCIS California Service Center  
24000 AVILA RD., Room 2326  
P.O. BOX 10590  
LAGUNA NIGUEL, CA 92677



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# Global Law Group

A Professional Law Corporation

October 5, 2010

**Via Federal Express (Tracking # 7962 1800 3594)**

ATTN: EB-5 Regional Center Unit  
California Service Center  
U.S. Citizenship and Immigration Services  
24000 Avila Road, 2<sup>nd</sup> Floor, Room 2326  
Laguna Niguel, CA. 92677

**EB-5 Regional  
Center Designation  
Application**

**RE: Application for Designation as EB-5 Regional Center  
Name of Proposed Regional Center: Home Paradise  
Regional Center  
Name of Applicant: Home Paradise Investment Center LLC,  
dba Home Paradise Regional Center**

Dear Sir/ Madam:

This office represents the above-referenced applicant in connection with its request for USCIS designation of Home Paradise Regional Center pursuant to 8 C.F.R. Part 204.6(m).

Home Paradise Regional Center wishes to be designated as a regional center under Immigration and Nationality Act Sec.203 (b)(5) and 8 C.F.R. Part 204.6(m), thereby allowing qualified aliens who invest in projects within Home Paradise Regional Center to apply for U.S. permanent resident status.

Enclosed within this application please find the following items pertaining to Home Paradise Regional Center's proposal:

1. Form G-28, Notice of Entry of Appearance as Attorney
2. Letter from Applicant
3. Executive Summary
4. Overall Business Plan
5. Operational Plan
6. Economic Impact Report



# Global Law Group

A Professional Law Corporation

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7. Sample Investment Agreements, including
  - (a) Private Offering Memorandum
  - (b) Subscription Agreement
  - (c) Limited Partnership Agreement
  - (d) Escrow Agreement
  
8. Applicant's entity documents:
  - (a) LLC Articles of Organization
  - (b) Bank Statement
  - (c) Fictitious Business Name Statement filings
  - (d) Letter of Support

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

Thank you for your kind consideration of this application.

Sincerely,

Linda Lau, Esq.

*Enclosures*

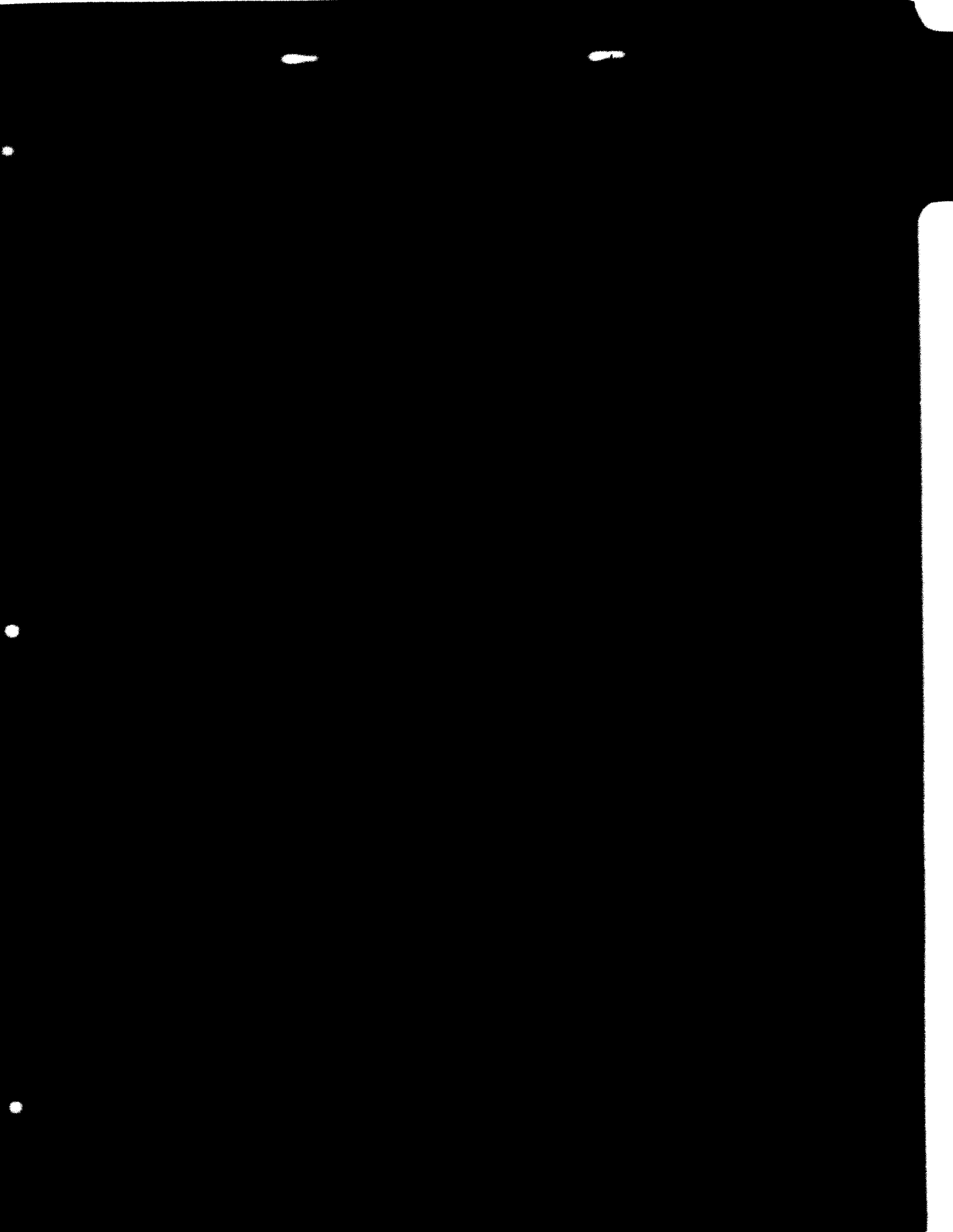
## Home Paradise Regional Center

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### LIST OF EXHIBITS

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







8

8



# Home Paradise Regional Center®

August 23, 2010

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

**RE: Initial Application for Designation as an EB-5 Regional Center**

<b>Name of Proposed Regional Center:</b>	<b>Home Paradise Regional Center</b>
<b>Name of Entity Seeking Designation:</b>	<b>Home Paradise Investment Center LLC, dba Home Paradise Regional Center</b>

To Whom It May Concern:

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

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

Thank you for your kind consideration of this matter.

Sincerely,



Edward CHEN  
President and CEO

Cc: Linda Lau, Esq.  
Tina Lee, Esq.

Enclosures



PROFILE OF PROPOSED REGIONAL CENTER

<b>Regional Center:</b> Home Paradise Regional Center	
<p><b>Contact:</b> Edward Chen, President and CEO, Home Paradise Investment Center LLC</p> <p>517 Monterey Pass Road, Monterey Park, CA 91754</p> <p>Phone: 626-284-9999</p> <p>Fax: 626-289-0888</p> <p>Email: info@homeparadiserc.com</p>	<p><b>Geographic Scope:</b> Imperial County, Kern County, Los Angeles County, Orange County, Riverside County, San Bernardino County, and San Diego County in California.</p> <p><b>Industries:</b> Retail (NAICS Codes: 44-45); Hospitality (NAICS Code: 7211); Food Services (NAICS Code: 722); and Interior Design Services (NAICS Code: 54141).</p>

**Name of Proposed Regional Center:** Home Paradise Regional Center (a registered fictitious business name of Home Paradise Investment Center LLC)

**Applicant:** The applicant, Home Paradise Investment Center LLC, dba Home Paradise Regional Center, is a California Limited Liability Company formed on June 11, 2010. Home Paradise Investment Center LLC is led by a team of highly experienced and accomplished professionals with extensive investment and private financing experience. Home Paradise Investment Center LLC is submitting an EB-5 regional center proposal to U.S. Citizenship and Immigration Services (USCIS) requesting approval and designation for participation in the EB-5 Immigrant Investor Pilot Program.

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

**Primary Contact:** The primary contact for Home Paradise Investment Center LLC is Mr. Edward Chen. He can be reached by email at info@homeparadiserc.com.

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

**Geographic Area:** Home Paradise Regional Center ("HPRC") will encompass the following seven (7) contiguous counties in California: Imperial, Kern, Los Angeles, Orange, Riverside, San Bernardino, and San Diego.

**Industry Clusters and Proposed Economic Activities:** HPRC will finance the development, operation and management of commercial real estate projects and Home and Commercial Design centers that will create a stable investment opportunity for the company and its shareholders, including immigrant investors, while boosting the local market, employment rates and living standards of the community. HPRC will focus on the following industry clusters of economic activity:

- Retail (NAICS: 44-45)
- Hospitality (NAICS: 7211)
- Food service (NAICS: 722)
- Interior design services (NAICS: 54141)

(b) (4)

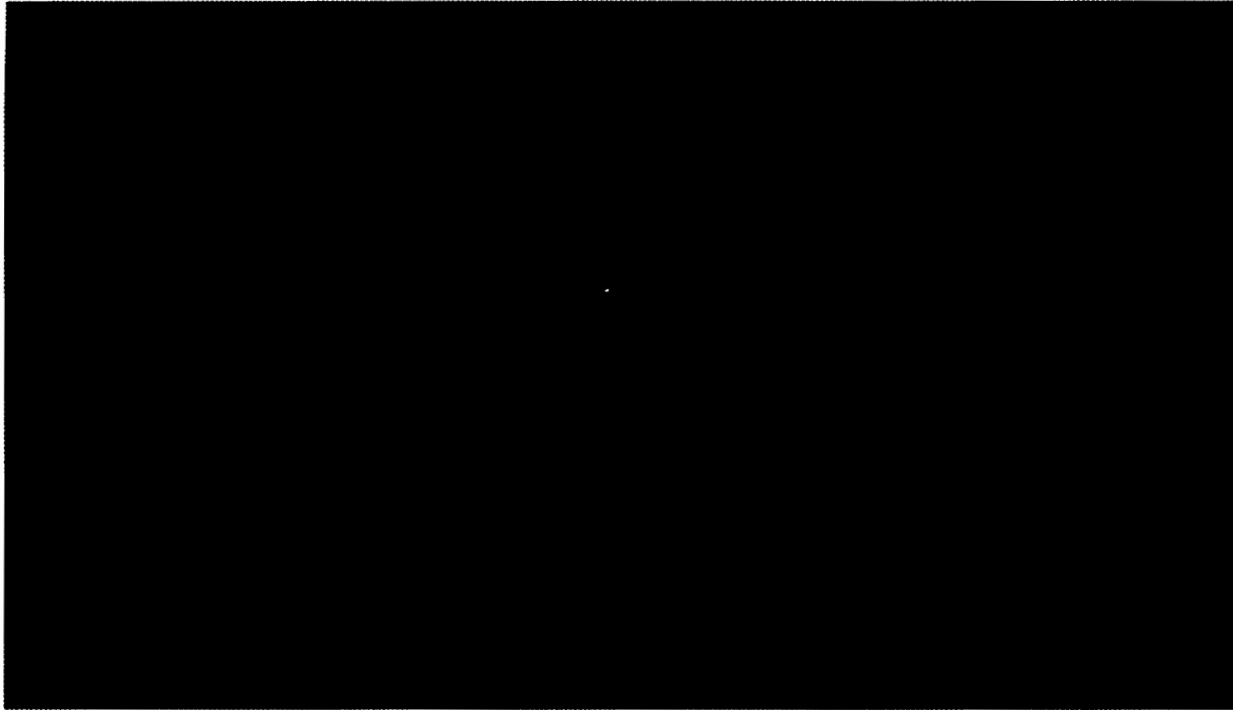


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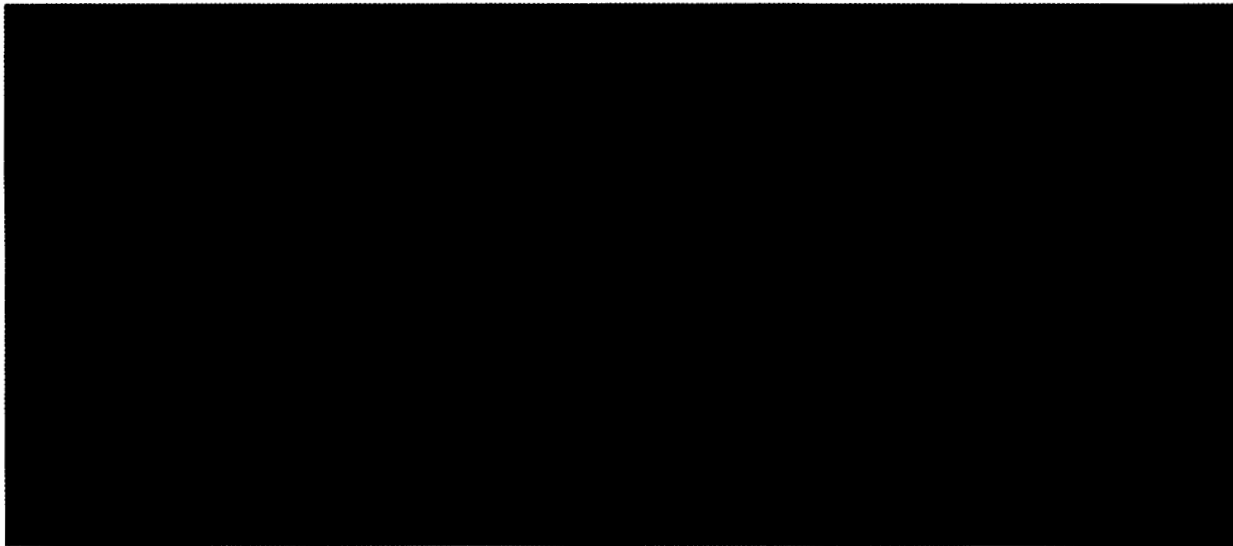


**Sample Capital Investment Projects within HPRC:** Initially, HPRC plans to undertake two projects, which will be called “hypothetical sample projects” for purposes of this application because the project locations have not yet been finalized. The first hypothetical sample project will be within the proposed Home Paradise Regional Center is the establishment and operation of a Home & Commercial Design Center in the City of Industry, or a Targeted Employment Area within the proposed regional center’s geographic boundary.





The second hypothetical sample project is a mixed-use shopping center project with retail, food service, and hospitality buildings in Cabazon, or other Targeted Employment Area within the proposed regional center's geographic boundary.



**Minimum Investment Amount:** Under the EB-5 immigrant investor program, an alien can become eligible to obtain U.S. lawful permanent resident status by investing either US\$1,000,000 or US\$500,000 in a new commercial enterprise in the United States. To

participate in the immigrant investor program through investing the lower US \$500,000 amount, the alien must invest his or her capital into a geographic area that qualifies as a Targeted Employment Area ("TEA"). Immigration and Nationality Act ("INA") §205(b)(5)(B) and Title 8 of the Code of Federal Regulations ("8 CFR") §204.6(e) define a TEA as an area that, at the time of investment, is a rural area or an area that has experienced an unemployment rate that is at least 150 percent of the national average.

Assuming the first proposed hypothetical project of HPRC will be located in City of Industry, California, per the most recently unemployment data published by the California Employment Development Department (EDD), and the U.S. Department of Labor's Bureau of Labor Statistics (BLS), City of Industry qualifies as a TEA.

Assuming the second hypothetical sample project of HPRC will be located in Cabazon, California, per the most recently unemployment data published by the EDD and BLS, Cabazon also qualifies as a TEA.

For additional projects to be undertaken within the geographic scope of HPRC, the minimum capital investment amount for any individual EB-5 investment will be \$500,000 if the project is within a TEA, or \$1,000,000 if it is outside a TEA at the time of investment.

**Job Creation:** In accordance with federal regulations governing the EB-5 regional center program, an Economic Impact Report was prepared by Dr. Paul Sommers, a professor at the Institute of Public Service and the Albers School of Business at Seattle University. Dr. Sommers actively conducts research focused on economic development and workforce topics. His expertise focuses on regional development, regional economics and workforce forecasting. Dr. Sommers is a member of the Washington State Governor's Council of Economic Advisors, and currently serves on the board of the Pacific Northwest Regional Economics Conference.

Based upon an economic study using the IMPLAN input/output model accepted by USCIS, it is estimated that the economic activity from the two initially proposed hypothetical sample projects will result in a total of (b) (4) new jobs, as detailed on the following page:



The report projected direct, indirect and induced employment impacts. In input-output analysis, the terms "direct impacts", "indirect impacts" and "induced impacts" are used by economists. Direct employment impacts in the context of an input-output model such as IMPLAN refer to jobs created at a business site by revenues. An example of a business site is a commercial building with various commercial tenants; direct employment impacts would refer to the employees of the tenants. Indirect employment impacts refer to jobs created off-site by a multiplier effect resulting from the creation of new direct employment impacts at the business site. Indirect employment impacts include employees of the producers of materials, equipment, and services that are used by commercial tenants at the business site. Induced employment impacts refer to employees of companies that benefit from expenditures resulting from the income of direct and indirect employment impacts.

The term "direct employment impact" in this report includes all jobs on premise of the project including but not limited to jobs of tenants. This term should not be confused with jobs that are measurable by Forms I-9, payroll records, or other similar documentation as set forth in ("8 CFR") §204.6(j)(4)(i)(A). The direct employment impacts and revenue projections in this economic analysis represent hypothetical jobs derived from reliable square foot per employee data (except for hotel and Home & Commercial Design Center which are based on revenue estimates), based on the sample project specifications. In accordance with the EB-5 regulations, actual job creation ultimately will be proven through evidence that the planned square footage for particular uses has been constructed and/or that the projected revenues have been generated by the tenant businesses.

**Promotional Efforts:** Through local promotions and the efforts of overseas agents, Home Paradise Investment Center LLC aims to attract alien investor capital to commercial development projects that will result in job creation and profits for investors.

Home Paradise Investment Center LLC will promote investment offerings, with a focus on Mainland China. Once the marketing presence is firmly established in China, HPRC offerings may be marketed to other countries in Asia including Taiwan and South Korea. Home Paradise Investment Center LLC will design, develop and implement a variety of pre-marketing strategies and assist in structuring HPRC's market entry plan targeting the international investor.

HPRC will also establish relationships with a network of brokers and professional finders in China. They will work as independent contractors and may not negotiate on behalf of HPRC or handle funds. They will only serve to disseminate information and introduce potential investors to HPRC.

(b) (4)

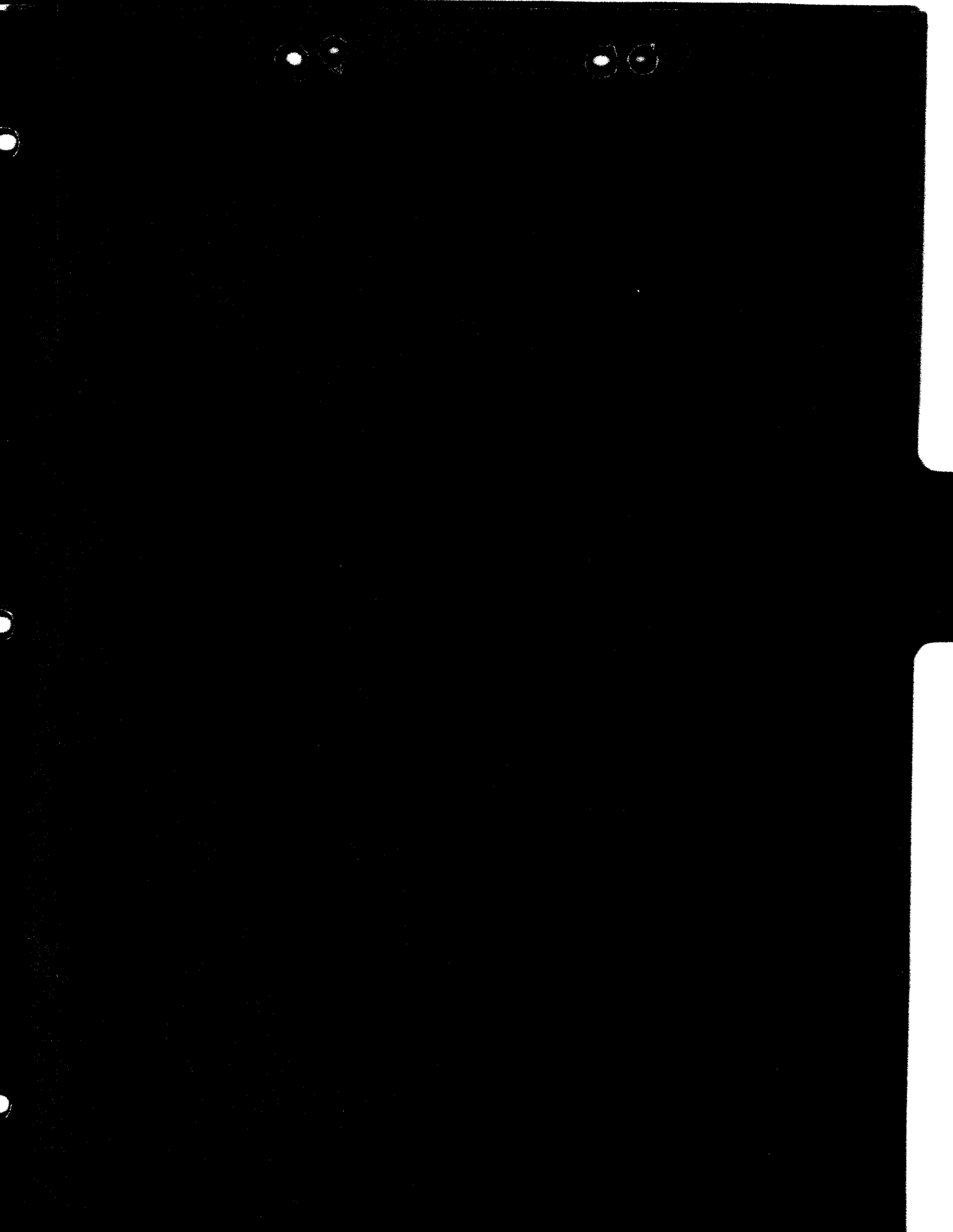


**Sample Investment Agreements:** Sample agreements to be used in connection with investments in HPRC are included within this application. These include the Private Offering Memorandum, Subscription Agreement, Limited Partnership Agreement, and Escrow Agreement.

**Escrow:** Capital received from each alien investor will be held in an escrow account in a reputable financial institution, to be released upon filing of the investor's I-526 petition with USCIS.

**Regional Center Administration:** Administration, management and oversight of HPRC will be conducted by Home Paradise Investment Center LLC in compliance with federal regulations set forth in ("8 CFR") §204.6(m)(6). Specific oversight and reporting responsibilities will be outlined in the approval letter for HPRC upon regional center designation by USCIS.

**Exemplar I-526 Petitions:** Upon approval and designation of HPRC, exemplar I-526 petitions with supporting documentation may be submitted to USCIS subsequently as an amendment to the approved regional center in order to aid in streamlining the adjudication of actual I-526 petitions that will be filed in the future following the structure and the content of the exemplar I-526 petitions.

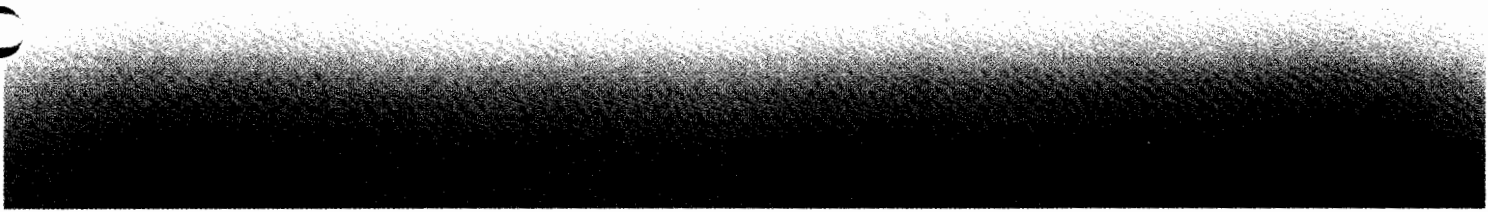


# **Home Paradise Regional Center®**

## **OVERALL BUSINESS PLAN**

October 2010

*Strictly Private and Confidential*



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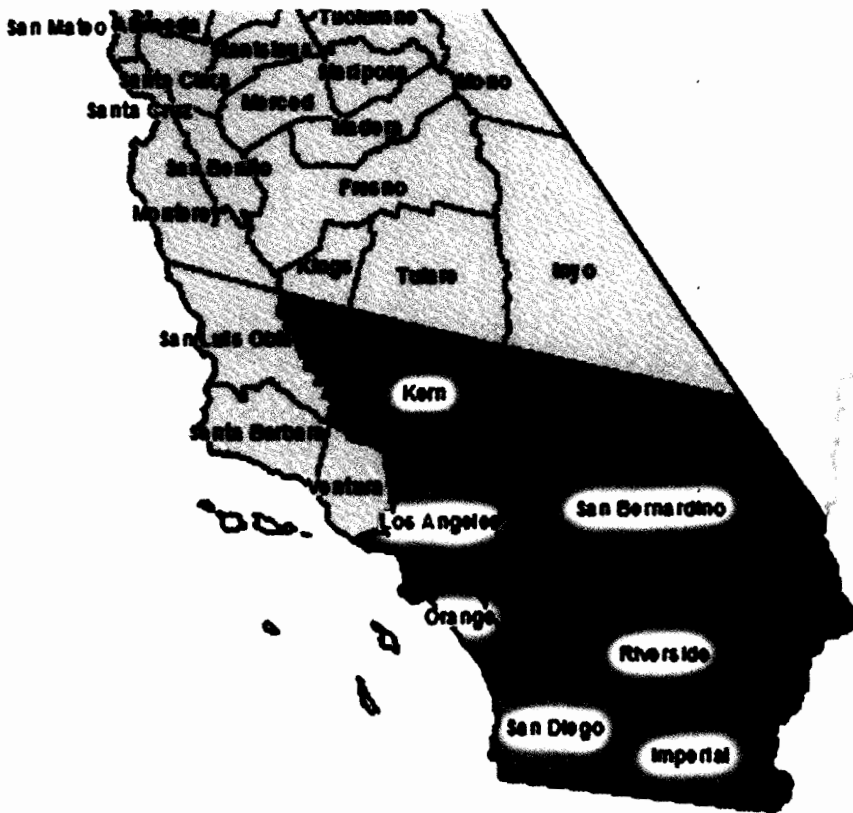
## 1.0 REGIONAL CENTER BUSINESS OVERVIEW

### 1.1 Summary

Pursuant to the Immigrant Investor Pilot Program, Home Paradise Regional Center ("HPRC") is proposed as a regional center to direct alien investor capital into commercial projects within the region consisting of 7 contiguous counties in the state of California. Specifically, these include Imperial, Kern, Los Angeles, Orange, Riverside, San Bernardino, and San Diego Counties. HPRC will focus investments into new commercial enterprises in the following target industries: retail, hospitality, food services and interior design service.

### 1.2 Geographic Area and Scope

The 7 contiguous counties are located within the southern region of the state of California. With a total area of 48,626 square miles, this geographic region is primarily a metropolitan area with an estimated 2009 population of 21,001,525, or 432 people per square mile. There is a wide range of diversity of industries and demographics across this region. This range varies between Los Angeles as the most densely populated to Kern County and Imperial County which both tend to be more agricultural and sparsely populated.



HPRC's geographic area includes the following 7 contiguous counties:

- Imperial
- Kern
- Los Angeles
- Orange
- Riverside
- San Bernardino
- San Diego

### **Imperial County**

Imperial County is located in the Imperial Valley in southeast California. The county borders both Mexico and the state of Arizona. Imperial County is the newest of the counties in California. The county population was 166,874 at the 2009 estimated U.S. Census. It may be the smallest county but it is the most economically diverse region in California. According to the U.S. Census Bureau, the county has a total area of 4,175 square miles. The county seat is the City of El Centro.

### **Kern County**

Kern County is located in the southern region of the Central Valley. It extends east beyond the southern slope of the eastern Sierra Nevada range into the Mojave Desert. As of 2009 the estimated population was 807,407. Kern County has a large agricultural base and is a significant producer of oil. The county accounts for one-tenth of overall U.S. oil production. According to the U.S. Census Bureau, the county has a total area of 8,141 square miles. Kern's county seat is Bakersfield.

### **Los Angeles County**

Los Angeles is a county located in southern California. It was one of the original counties in the state of California created at the time of statehood in 1850. The name Los Angeles is Spanish for the "City of Angels." Most of the population of Los Angeles County is located in the south and southwest region. It is the most populous county in the United States. The entertainment industry and two of the largest shipping ports in the U.S. coming from Long Beach and San Pedro drive much of the region's economy. As of 2009 the estimated population was 9,848,011. Los Angeles County borders 70 miles of the Pacific Ocean. According to the U.S. Census Bureau, the county has a total area of 4,061 square miles. Its county seat is Los Angeles.

### **Riverside County**

Riverside County is located in the southeastern part of the state of California. Many people have been moving to Riverside from San Diego and Los Angeles Counties in recent years due to a more favorable cost of living. The county population was 2,125,440 in the 2009 estimated U.S. Census. Riverside County has 12 federally recognized Indian reservations. Geographically it is mostly desert. The majority of Joshua Tree National Park is located in Riverside County. According to the U.S. Census Bureau, the county has a total area of 7,207 square miles. The county seat is Riverside.

### **Orange County**

Orange County is located in southwest California. It is known for its tourist attractions such as Disneyland, Knott's Berry Farm and many local beaches. Orange County is also known for its great affluence and overall political conservatism. The county population was 3,026,786 according to the 2009 estimates by the U.S. Census Bureau. There is no defined urban area in this county, but rather, it is mostly suburbanized. According to the U.S. Census Bureau, the county has a total area of 789 square miles. The county seat is Santa Ana.

## **San Bernardino County**

San Bernardino County is a county located in the southeastern part of California. It is the largest county in the continental United States in area. The population was 2,017,673 according to the 2009 estimates of the U.S. Census Bureau. San Bernardino County is the only county in California that is bordered by both Arizona and Nevada creating a total of 8 counties that San Bernardino County borders. According to the U.S. Census Bureau, the county has a total area of 20,053 square miles. Its county seat is San Bernardino.

## **San Diego County**

San Diego County is located in the most southwestern part of California. The county consists of the American metropolitan statistical area San Diego-Carlsbad-San Marcos. San Diego County has a population of 3,053,793 according to the 2009 estimates by the U.S. Census. San Diego is the birthplace of California. It is the eighth largest city in the United States and according to Forbes magazine San Diego is rated the fifth wealthiest city in the US. The top three sectors of San Diego's economy are manufacturing, defense, and tourism. According to the U.S. Census Bureau, the county has a total area of 41,200 square miles. The county seat and largest city is San Diego.

### ***1.3 Target Industry Groups***

Home Paradise Regional Center will finance the development, operational management of commercial real estate projects (with retail, hospitality and food uses) and Home and Commercial Design Centers. The target industry clusters are as follows.

#### **Retail (NAICS Codes 44-45)**

The backbone of a shopping center development, retail stores attract customers to the shopping center and bring benefit to the community with sales tax revenue and local job creation.

#### **Hospitality (NAICS Code 7211)**

Diversifying the uses in a shopping center by including hospitality facilities with the commercial centers increases the stability of the center and also diversifies job opportunities created by the development. The hospitality facilities will consist of hotels and/or motels.

#### **Food services (NAICS Code 722)**

Food facilities are an important segment of retail because including restaurants within the commercial centers will provide new job opportunities. Both sit-down and fast food restaurants and bars will serve as added economic enterprises to benefit the surrounding community.

#### **Interior Design Services (NAICS Code 54141)**

Interior design services provide property owners and occupants with design advice, products, and service contracts for installation services. Clients will include both residential and commercial property owners.

**1.4 Regional Center Investment Structure and Funding**

For each project, investment capital will be contributed by individual alien investors into a limited partnership in exchange for limited partnership interests, with Home Paradise Investment Center LLC being the general partner. Each limited partnership either engages in the project itself or provide a loan to the project. Please see below the two investment structures that will be utilized based on the need of each project:

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(b) (4)



### ***1.5 Management Team***

#### **Edward Chen, CEO**

Edward Chen is successful entrepreneur with a strong track record in retail by establishing hundred shopping locations. He has over 15 years of experience in real estate development, which provides him with a strong background and knowledge about the interior design services industry. Mr. Chen holds a Bachelor's degree in International Trade.

#### **Jing Jiang, CFO**

Jing Jiang has over 20 years of executive finance experience beginning with 5 years as CFO of Jenny Investment Group, Inc., a company with over 500 properties sold. Subsequently, she served as CFO of Cabinet Home, Inc and has also been involved with overseeing projects and sourcing materials. Ms. Jiang holds a bachelor's degree in International Trade.

## ***1.6 Economic Analysis Expert***

### **Dr. Paul Sommers, Ph.D.**

Since 2004, Paul Sommers has been a professor at the Institute of Public Service and the Albers School of Business at Seattle University. Dr. Sommers actively conducts research focused on economic development and workforce topics. His expertise focuses on regional development, regional economics and workforce forecasting. During his 25-year career at Battelle Memorial Institute and the University of Washington, Dr. Sommers conducted many research projects consisting of national energy-industry topics, and rural and urban regional development issues in the Northwest. In the last several years, Dr. Sommers has been successful in preparing a number of job creation reports for investment groups participating in the EB-5 immigrant investor program, providing reports for projects in the states of California, Florida, Michigan, and Washington. Dr. Sommers is a member of the Washington State Governor's Council of Economic Advisors, is a past President of the Seattle Economists Club, and currently serves on the board of the Pacific Northwest Regional Economics Conference. Dr. Sommers earned his Ph.D. in Economics from Yale University.

## ***1.7 Immigration Counsel***

### **Linda Lau, Esq., Global Law Group, Principal**

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

## ***1.8 Architect & Engineer***

### **Antonio Tang, Architectural Engineer**

Antonio Tang is currently the General Contractor for Partner of Mega Home Development, Inc. Prior to serving in this position, Mr. Tang was an Associate of Nadel & Partner Architectural Firm from 1976-1987 and was the Owner of Promaster Development, Inc. for a little under 20 years. Since 1990, Mr. Tang has been in charge of major Commercial and Residential Projects in California. These projects have included shopping centers, condominiums, senior citizen housing, warehouses, and the renovation of the historical Clark Hotel located in downtown Los Angeles. The total project costs, for both Commercial and Residential Projects, range between 1.5 million to well over 12 million dollars. Mr. Tang holds a Bachelor of Architectural & Engineering and a Master of Urban Design.

### ***1.9 Banking Institution & Escrow***

Capital received from alien investors will be held in an escrow account at a reputable financial institution subject to release according to the terms of the Escrow Agreement. In summary, funds will be held in an escrow account to be released upon filing of the alien investor's I-526 petition with USCIS.

#### **Bank Information:**

Bank of the West  
1155 W. Huntington Dr.  
Arcadia, CA 91007  
**Tel: 626-445-3800**

Jade Escrow, Inc. and other reputable escrow will serve as the escrow agent. It will hold EB-5 investor funds for each project according to the terms of the Escrow Agreement.

#### **Jade Escrow, Inc.**

9604 Las Tunas Drive  
Temple City, CA 91780  
Tel: (626) 642-8889  
Fax: (626) 642-8787

### ***1.10 Sample Investment Agreements***

Home Paradise includes the following sample investment agreements in this application:

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

## **2.0 REGIONAL CENTER MARKET ANALYSIS**

### ***2.1 Regional Overview***

Home Paradise Regional Center encompasses 7 contiguous counties located in the state of California: San Diego, Imperial, Riverside, Orange, San Bernardino, Los Angeles, and Kern Counties. With a total area of 48,626 square miles, this geographic region is primarily a metropolitan area with an estimated 2009 population of 21,001,525, or 432 people per square mile.

## **Regional Area Profile State**

	<b>RC Counties</b>	<b>California</b>
Land Area (square miles)	48,626	155,959
Population (2009 estimate)	21,001,525	36,961,664
Population % change 2000-2009	+16%	+9.1%
Population Density (per square mile)	432	237

## **2.2 Market Overview: Regional Challenges and Strengths**

### **Regional Strengths**

The region makes up nearly two-thirds of the population of California, which creates an available workforce for the new retail centers that will bring many jobs into the region. The proposed city for the retail center with food and hospitality space is a well-traveled location with many tourists passing through creating perfect demographics for business. With modern telecommunications systems, fast highways, and a mix of large and small airports the region is well connected to larger markets and is attracting even more industrial businesses.

## **2.3 Overview: Commercial Real Estate Outlook Specific to the Proposed Regional Center**

In order to evaluate the market for commercial real estate within the proposed regional center, data was analyzed from the U.S. Census Bureau. There are two sets of reports, both available on their websites under: <http://quickfacts.census.gov> and <http://factfinder.census.gov>. The 2007 set of data is the latest set of economic data available. Each proposed industry is analyzed below:

### **Retail Development**

The Census Bureau had the most comprehensive data in the retail trade section. In 2007, retail sales revenue in the proposed regional center amounted to US\$258.3 billion by 62,983 employer establishments.

San Diego County	9,948	\$ 38,711
Imperial County	534	\$ 1,727
Riverside County	5,320	\$ 24,146
Orange County	9,991	\$ 45,023
San Bernardino County	5,018	\$ 21,717
Los Angeles County	30,179	\$ 119,112
Kern County	1,993	\$ 7,876



**Regional Center Total                    62,983                    \$   258,312**

Source: U.S. Census Bureau (<http://factfinder.census.gov>)

**Hospitality Development**

In 2007 there were a total of 507,869 non-farm establishments that employed a total of 8 million people. There was a 20.8% increase in employment in the regional center from 2000 to 2007. Revenue for hospitality amounted to US\$15.9 billion from 2,978 establishments.

	2007 Hospitality Establishments	2007 Hospitality Sales (\$MM)
San Diego County	540	\$ 4,000
Imperial County	35	\$ 23
Riverside County	310	\$ 2,305
Orange County	466	\$ 2,272
San Bernardino County	289	\$ 381
Los Angeles County	1,211	\$ 4,177
Kern County	119	\$ 126
<b>Regional Center Total</b>	<b>2,978</b>	<b>\$ 13,367</b>

San Diego County	540	\$ 4,000
Imperial County	35	\$ 23
Riverside County	310	\$ 2,305
Orange County	466	\$ 2,272
San Bernardino County	289	\$ 381
Los Angeles County	1,211	\$ 4,177
Kern County	119	\$ 126

**Regional Center Total                    2,978                    \$   13,367**

Source: U.S. Census Bureau (<http://factfinder.census.gov>)

**Food Services Development**

In 2007, revenue for food service industries amounted to US\$33.4 billion from 37,819 establishments within the proposed regional center.

	2007 Food Services	2007 Food Sales (\$MM)
San Diego County	6,051	\$ 5,468
Imperial County	226	\$ 145
Riverside County	2,982	\$ 2,531
Orange County	6,388	\$ 5,975
San Bernardino County	2,823	\$ 2,374
Los Angeles County	18,265	\$ 16,061
Kern County	1,084	\$ 815

**Regional Center Total                    37,819                    \$   33,369**

Source: U.S. Census Bureau (<http://factfinder.census.gov>)

### Interior Design Services Development

In 2007, there were 1,260 Interior Design Services Establishments in the proposed regional center. 2007 Annual Revenue for these establishments came out tot \$1.33 billion, or roughly \$1.06 million in revenue per establishment. These establishments also hired 5,316 employees during this period, which equates to 4.22 employees per business. Data at the County level for this sector was missing or unavailable in Imperial

County	Establishments	Employees	Revenue (\$)
San Diego County	211	1,028	\$394
Imperial County	n/a	n/a	n/a
Riverside County	88	211	\$66
Orange County	262	1,133	\$303
San Bernardino County	33	111	\$46
Los Angeles County	647	2,833	\$751
Kern County	19	n/a	n/a
<b>Regional Center Total</b>	<b>1,260</b>	<b>5,316</b>	<b>\$1,331</b>

Source: U.S. Census Bureau (<http://factfinder.census.gov>)

## 2.4 County Specific Analysis

### IMPERIAL COUNTY

#### Profile and Summary:

Land Area (square miles):	4,175
Population (2009 estimate):	166,874
Population % change 2000-2009:	17.2%
Median Household Income (2008):	\$36,894
County Seat:	El Centro

**Retail Industry:**

Retail sales amounted to \$1.7 billion in 2007 from 534 establishments according to the U.S. Census Bureau.

**Hospitality Industry:**

\$23 million in sales came from 35 establishments in the accommodation service industry in 2007.

**Food Services Industry:**

\$145 million in sales came from 226 establishments in the food services industry in 2007.

**Interior Design Services Industry:**

Due to the rural nature of the area, there was no record of establishments in this industry in Imperial County.

**KERN COUNTY**

**Profile and Summary:**

Land Area (square miles):	8,141
Population (2009 estimate):	807,407
Population % change 2000-2009:	22.0%
Median Household Income (2008):	\$44,716
County Seat:	Bakersfield

**Retail Industry:**

Retail sales amounted to \$7.9 billion in 2007 from 1,993 establishments according to the U.S. Census Bureau.

**Hospitality Industry:**

\$126 million in revenue came from 119 establishments in the accommodation service industry in 2007.

**Food Services Industry:**

\$815 million in sales came from 1,084 establishments in the food services industry in 2007.

**Interior Design Services Industry:**

There were just 19 establishments recorded in the U.S. Census Bureau in 2007, but revenue was not available.

## LOS ANGELES COUNTY

### **Profile and Summary:**

Land Area (square miles):	4,061
Population (2009 estimate):	9,848,011
Population % change 2000-2009:	3.5%
Median Household Income (2008):	\$55,452
County Seat:	Los Angeles

### **Retail Industry:**

Retail sales amounted to a whopping \$119 billion in 2007 from 30,179 establishments according to the U.S. Census Bureau.

### **Hospitality Industry:**

\$4.2 billion in revenue came from 1,211 establishments in the accommodation service industry in 2007.

### **Food Services Industry:**

\$16.1 billion in sales came from 18,265 establishments in the food services industry in 2007.

### **Interior Design Services Industry:**

\$751 million in sales came from 647 establishments in the interior design services industry in 2007.

## RIVERSIDE COUNTY

### **Profile and Summary:**

Land Area (square miles):	7,207
Population (2009 estimate):	2,125,440
Population % change 2000-2009:	37.5%
Median Household Income (2008):	\$57,590
County Seat:	Riverside

### **Retail Industry:**

Retail sales amounted to \$24.1 billion in 2007 from 5,320 establishments according to the U.S. Census Bureau.

### **Hospitality Industry:**

\$2.3 billion in sales came from 310 establishments in the accommodation service industry in 2007.

### **Food Services Industry:**

\$2.5 billion in sales came from 2,982 establishments in the food services industry in 2007.

**Interior Design Services Industry:**

\$66 million in sales came from 88 establishments in the interior design services industry in 2007.

**ORANGE COUNTY**

**Profile and Summary:**

Land Area (square miles):	789
Population (2009 estimate):	3 million
Population % change 2000-2009:	6.3%
Median Household Income (2008):	\$74,862
County Seat:	Santa Ana

**Retail Industry:**

Retail sales amounted to \$45 billion in 2007 from 9,991 establishments according to the U.S. Census Bureau.

**Hospitality Industry:**

\$2.3 billion in sales came from 466 establishments in the accommodation service industry in 2007.

**Food Services Industry:**

\$6 billion in sales came from 6,388 establishments in the food services industry in 2007.

**Interior Design Services Industry:**

\$303 million in sales came from 262 establishments in the interior design services industry in 2007.

**SAN BERNARDINO COUNTY**

**Profile and Summary:**

Land Area (square miles):	20,053
Population (2009 estimate):	2 million
Population % change 2000-2009:	18.0%
Median Household Income (2008):	\$54,768
County Seat:	San Bernardino

**Retail Industry:**

Retail sales amounted to \$21.7 billion in 2007 from 5,018 establishments according to the U.S. Census Bureau.

**Hospitality Industry:**

\$381 million in sales came from 289 establishments in the accommodation service industry in 2007.

**Food Industry:**

\$2.4 billion in sales came from 2,823 establishments in the food services industry in 2007.

**Interior Design Services Industry:**

\$16 million in sales came from 33 establishments in the interior design services industry in 2007.

**SAN DIEGO COUNTY**

**Profile and Summary:**

Land Area (square miles):	4,200
Population (2009 estimate):	3,053,793
Population % change 2000-2009:	8.5%
Median Household Income (2008):	\$62,820
County Seat:	San Diego

**Retail Industry:**

Retail sales amounted to \$38.7 billion in 2007 from 9,948 establishments according to the U.S. Census Bureau.

**Hospitality Industry:**

Revenue from the hospitality industry amounted to \$4.1 billion in 2007 from 548 establishments.

**Food Services Industry:**

\$5.5 billion in sales revenue came from 6,051 establishments in the food service industry in 2007.

**Interior Design Services Industry:**

\$194 million in sales revenue came from 211 establishments in the interior design service industry in 2007.

**3.0 Sample Projects 1 & 2**

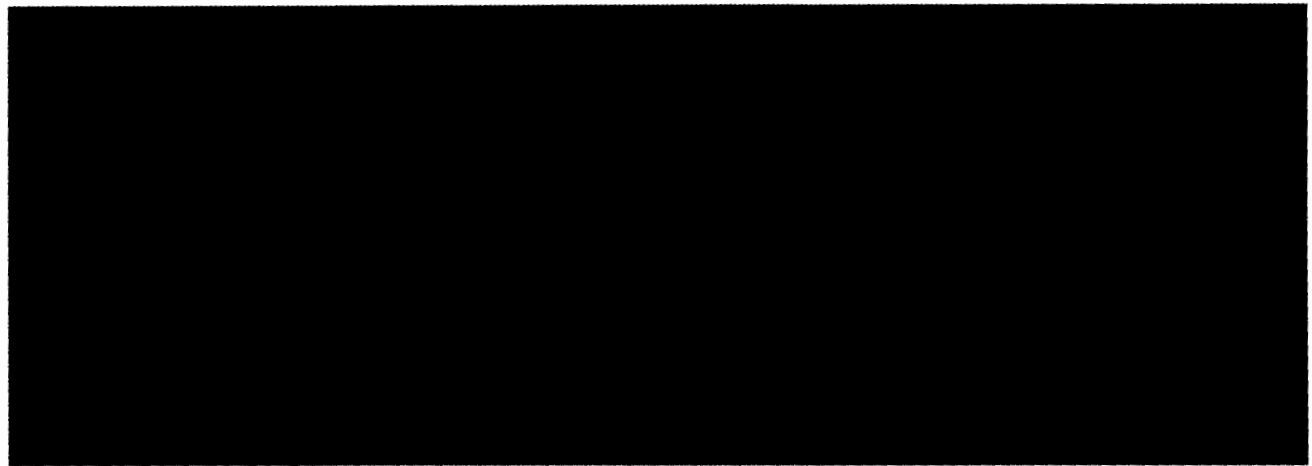
***3.1.0 Sample Project 1: Home and Commercial Design Center***

Initially, HPRC plans to undertake two types of projects which will also be called "hypothetical sample projects" for purposes of this application because the projects locations have not yet been finalized. Both of these sample projects are based on current

plans; actual projects may vary in details from these sample projects and amended employment impact projections will be provided to USCIS when the developer's business plans are finalized.

The first hypothetical sample project within the proposed HPRC is the establishment and operation of a Home and Commercial Design Center in the City of Industry, California, or other Targeted Employment Area ("TEA"), within HPRC's proposed boundary. The center will provide design advice, products, and service contracts for installation services. EB-5 funds will be utilized to provide a loan to an entity that will set up, manage and operate the company. Funds will be used for capital equipment costs, inventory, and operations. Clients will include both residential and commercial property owners. Sales representatives that provide a retail component and skilled workers who provide installation services will staff the company, which will have office, warehouse, and showroom components at its headquarters. Operations will also generate various types of indirect and induced employment impacts.

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### ***3.1.1 Market Analysis –City of Industry***

The City of Industry is an industrial suburb of Los Angeles in the San Gabriel Valley section of Los Angeles County. Home to over 2,200 businesses and 80,000 jobs, the city is almost entirely industrial. It was incorporated on June 18, 1957 to prevent surrounding cities from annexing industrial land for tax revenue. The City of Industry is

primarily devoted to business: 92% is Industrial and 8% is Commercial. The City of Industry has no business taxes and is primarily funded through retail sales tax from shopping centers located within the city limits. There is also a revenue-generating hillside hotel resort know as the Pacific Palms Resort which offers state of the art meeting facilities. Industry is the home to a foreign Trade Zone and is a popular investment area for Chinese businessmen.

City of Industry has a pro-business city government to ensure the development of new industrial businesses in the area. Industry is in the proximity of 4 major freeways, 2 international airports, and 2 transcontinental rail lines, which ensure necessary business and commercial travel to the many facilities within the area. With modern telecommunications systems, fast highways, and a mix of large and small airports the region is well connected to larger markets and is attracting industrial businesses. It's the perfect location for new retail facilities as the city offers many wide streets and clean business parks.

**3.1.2 Sample Project 1 Capitalization**

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### **3.2.0 Sample Project 2: Retail Shopping Center with Food and Hospitality Space**

The second hypothetical sample project planned within HPRC is a mixed-use shopping center project with retail, food services, and hospitality buildings in Cabazon, California, or other TEA within HPRC's geographic boundary. The project will involve the construction, management and operation of a retail building with shopping centers, a food court, and a 3-Star hotel (e.g. Westin/Courtyard). The three buildings will total 557,500 sq. ft. Capital investment funds contributed under the EB-5 program will be used to provide a loan to the developer for development and construction costs of the project as well as capital equipment costs for the facilities.

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New jobs will be created by the retail, food services and hospitality development. Jobs created through indirect and induced impacts of this new enterprise include retail sales and professional services.



#### **3.2.1 Market Analysis - Cabazon**

Located in the desert of Riverside County, Cabazon is a well-traveled place but has a low number of inhabitants, a little over 2,000.

Because Cabazon is only 15 miles southeast of Palm Springs, it experiences a continual flow of visitors who pass through year round. Cabazon has a wide array of attractions that appeal to tourists: it is the home of one of the largest Native American casinos in the United States; Morongo Casino, Resort, & Spa and to the famous Claude Bell's

Dinosaurs. While Cabazon may be in the middle of nowhere, it is also a very popular destination for the many outlet stores located there. In fact, many people travel to Cabazon just to visit its outlets. Cabazon is a perfect location for a new retail development because it is a city guaranteed to have a steady flow of tourists who plan to shop.

### **3.2.2 Sample Project 2 Capitalization**

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(b) (4)



### **3.3.0 Targeted Employment Area**

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

Assuming the first proposed hypothetical project of HPRC will be located in City of Industry, California, per the most recently unemployment data published by Employment Development Department of the State of California (EDD), and U.S. Department of Labor's Bureau of Labor Statistics (BLS), City of Industry qualifies as a TEA area.

Assuming the second proposed hypothetical project of HPRC will be located in Cabazon, California, per the most recently unemployment data published by the EDD, and BLS, Cabazon also qualifies as a "TEA" area. Up to date unemployment rate information for City of Industry and Cabazon is included within this overall business plan.

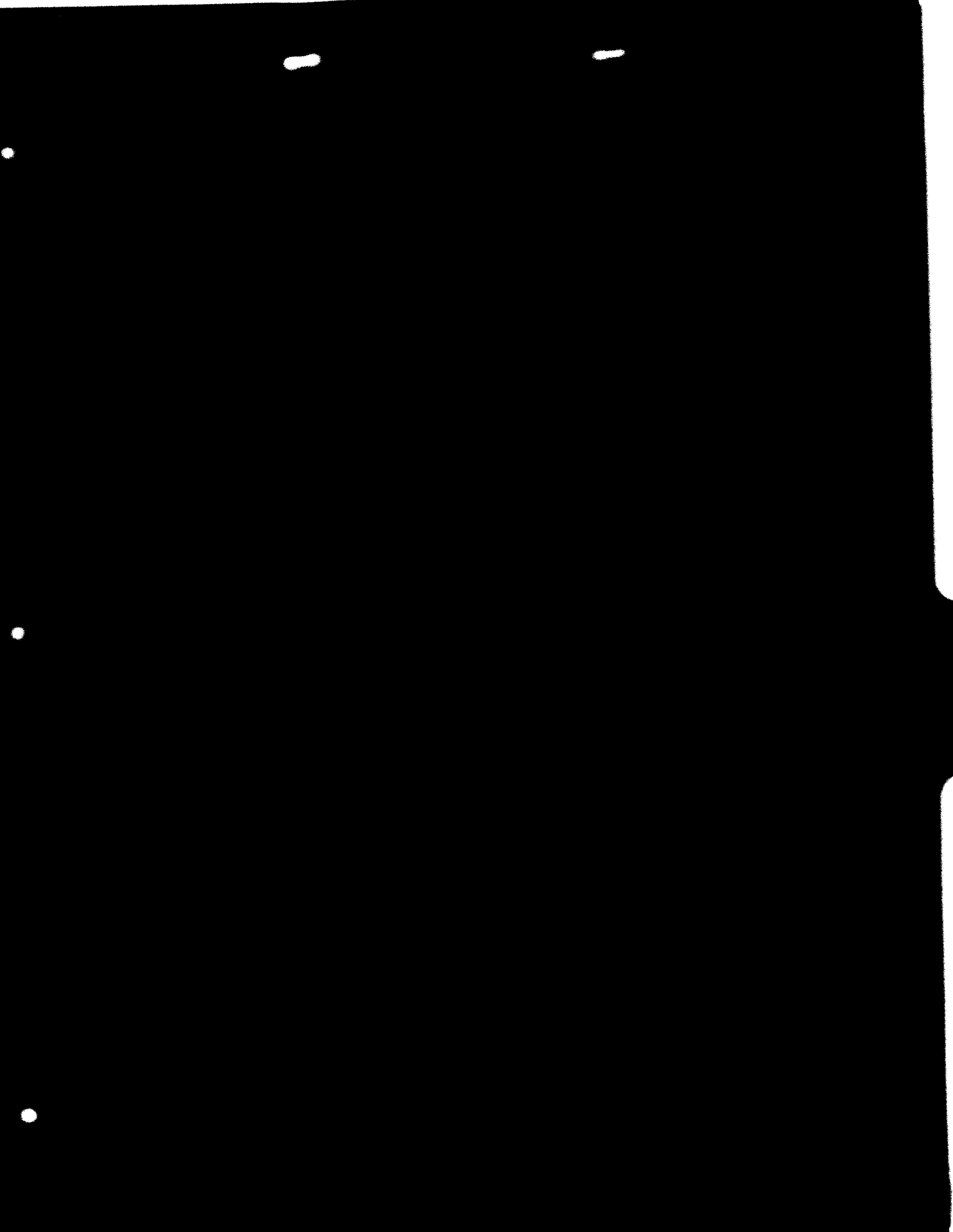
Per the most recently unemployment data published by BLS, the national unemployment rate for August 2010 was 9.6%, while City of Industry's unemployment rate was 22.8% for August 2010, and Cabazon's unemployment rate was 35.5%, both well over 150% of the national average for the same period.

For additional projects to be undertaken within the industry clusters and geographic scope of HPRC, the minimum capital investment amount for any individual EB-5 investment will be \$500,000 if the project is within a TEA, or \$1,000,000 if it is outside a TEA at the time of investment.

#### **4.0 JOB CREATION AND OTHER ECONOMIC IMPACTS**

When completed, the two initial hypothetical sample projects planned within HPRC will produce many new jobs in the region. Sample project 1 will result in the creation of 108 total new permanent jobs, and sample project 2 will result in the creation of 1,308 total new permanent jobs. The sample projects will result in an increase of \$43,090,960 in labor income and \$119,827,816 in business revenues for the region. As additional projects are undertaken within HPRC's industry and geographic scope, the employment and economic impacts will increase.

Similar projects which may vary in size or location within HPRC will be developed with jobs created based on the formula as stated in Economic Impact Report. A detailed discussion of the job creation for HPRC is included in the Economic Impact Report included with this application.

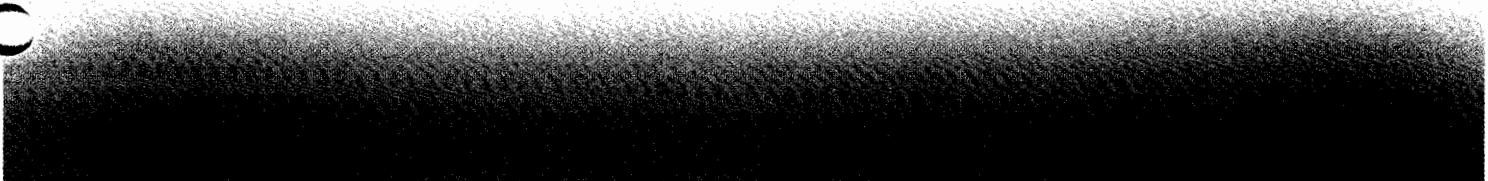


# **Home Paradise Regional Center<sup>®</sup>**

## **OPERATIONAL PLAN**

October 2010

*Strictly Private and Confidential*





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**I. REGIONAL CENTER OVERVIEW**

1. BUSINESS SUMMARY

<b>PROPOSED REGIONAL CENTER</b>	Home Paradise Regional Center ("HPRC")
<b>REGIONAL CENTER APPLICANT</b>	Home Paradise Investment Center LLC, a California Limited Liability Company organized on June 11, 2010. ("Applicant")
<b>GEOGRAPHIC SCOPE</b>	Contiguous counties of San Diego, Imperial, Orange, Riverside, San Bernardino, Los Angeles, and Kern Counties in California
<b>TARGETED INDUSTRIES</b>	Activities within HPRC will focus on the following industry clusters: <ul style="list-style-type: none"><li>*Retail Trade (NAICS 44-45)</li><li>* Hospitality (NAICS 7211)</li><li>*Food Services (NAICS 722)</li><li>* Interior Design Services (NAICS 54141)</li></ul> For further detail regarding the planned activities of HPRC within the targeted industries, please refer to the overall business plan and economic impact analysis.
<b>INVESTMENT STRUCTURE</b>	Projects within HPRC will be funded through various limited partnerships (i.e. EB-5 new commercial enterprises) of which Applicant will be the general partner and foreign investors investing pursuant to the EB-5 program will be limited partners. Depending on the type of project, capital contributions of limited partners will be provided by the limited partnership to a project according to either an equity structure or loan structure.
<b>PROJECT FUNDING</b>	Funding for projects within HPRC will be through limited partnerships and distinct from funding for the regional center entity's operations. Limited partnerships will either directly invest in or loan funds to other companies doing development and management of commercial buildings for new job-creating enterprises. A portion of construction

costs will be covered by EB-5 investment, subject to the quota set for the project based on job creation analysis. Bank loans and domestic investment may also be applied to construction costs. Limited partnership-specific business plans will provide specific funding details including the dollar amount of funds required for the job-creating project and a breakdown of financing by source and amount. In no event is the alien investor's capital to be applied to operational costs of HPRC, as those expenses will be funded in full through Home Paradise Investment Center LLC as well as administration fees collected from investors in addition to the capital investment amount.

2. OPERATIONS SUMMARY

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

**DUE DILIGENCE** Applicant will actively participate in due diligence screening of potential investors through the use of third party investigative or accounting firms, and will keep records of all investors and investments. Independent consultants will be retained to provide due diligence on all projects receiving EB-5 investment. Applicant will also provide annual reports as required by USCIS.

**MARKETING STRATEGY**

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**FUNDING FOR OPERATIONS**

**POINT OF  
CONTACT**

The primary point of contact for HPRC is:  
Edward Chen, CEO  
Home Paradise Investment Center LLC  
517 Monterey Pass Road  
Monterey Park, CA 91754  
Email: info@homeparadiserc.com  
Tel: 626-284-9999  
Fax: 626-289-0888

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

**II. ADMINSTRATIVE OVERSIGHT**

HPRC pursuant to USCIS regional center designation will operate in a manner that will serve to maintain its designation. It will maintain all records, data, and information related to the investors, the investments, the projects involved, and the movement of funds to and from each limited partnership. In addition, HPRC will compile specific reports as requested by USCIS.

Edward Chen, CEO of Applicant is the principal point of contact responsible for the normal operation, management and administration of the proposed regional center. Applicant will maintain offices in City of Industry, California. The office staff will travel overseas as necessary and will be bilingual and dedicated to investor relations and investor communications over the life of the regional center. Staff members in City of Industry are dedicated to managing investment properties funded with EB-5 capital and monitoring accounting and investment performance.

**1. RECORD-KEEPING AND REPORTING**

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Applicant will specifically keep track of the following report information and be prepared to give reports to USCIS by Federal Fiscal Year:

**A. Investor Status Report**

- a. Primary Investor Name, DOB, Petition Receipt #, and Alien Registration #;
  - i. Status of 1-526 petition (filed, pending, approved, denied, withdrawn) and date(s) of such event.
- b. Number of visas included in petition (investor, spouse and children);
- c. Country of nationality of each alien investor who filed an I-526 petition;
- d. US city and state of residence or intended residence of each alien investor;
- e. Identify the following investment information in the commercial enterprise:
  - i. Date of investment in the commercial enterprise;
  - ii. Amount of investment in the commercial enterprise;
  - iii. Date, nature, and amount of any payment/remuneration/profit/ return on investment made to the alien investor by the commercial enterprise or Regional Center from time of investment to present.

**B. Regional Center Business Activity Report by Target Industry Categories**

- a. Identify and list received capital and aggregate amounts;
- b. List any non-EB-5 domestic capital and specify aggregate amounts;
- c. For investor capital (both alien and domestic), list of the following:
  - i. Name and address of each "direct" job creating commercial enterprise;
  - ii. Industry category for each indirect job creating investment activity.
- d. Project progress in light of job creation requirements pursuant to the USCIS-approved Employment and Economic Impact Analysis Report.

**C. Investor Status Report by Federal Fiscal Year**

- a. Total aggregate # of approved 1-526 petitions year to date;
- b. Total aggregate # of approved 1-829 petitions year to date;
- c. Total aggregate sum of EB-5 alien capital invested through Regional Center since approval and designation.

**D. Inactivity Report** – If no investors are reported, following will be provided:

- a. Detailed written explanation for the inactivity;
- b. A specific plan with budget, timelines, milestones and critical steps to:
  - i. Actively promote HPRC's investment program;
  - ii. Identify and recruit legitimate and viable alien investors;
  - iii. Provide a strategy to invest into job creating enterprises and investment activities within the HPRC.

In addition to digital records, Applicant has a system to file and archive documents related to EB-5 investors. There is one staff person dedicated to record keeping for HPRC.

**2. FINANCIAL MONITORING:**

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All capital investment funds contributed to a limited partnership for a given project will initially be deposited into an escrow account with Bank of the West, an approved reputable financial institution in the US. Funds invested pursuant to the EB-5 immigrant investor program will be released based on criteria set forth by Bank of the West and will process the payment for the escrow account upon approval and sufficient funding of the project.

**III. DUE DILIGENCE**

**1. DUE DILIGENCE IN DEVELOPMENT PROCESS**

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With respect to due diligence in the oversight of the development process, details as to each project will be set forth in the project-specific business plan that will be provided to investors for reference to include, but not be limited to the following project-specific content:

- Project Specifications
- Project Specific Market analysis
- Project Specific marketing strategy
- Project Schedule and Milestone details
- Project budget and financing details

**Underwriting**

HPRC follows a tightly controlled and managed process to examine all elements of a potential investment, including, with respect to real property, its location, and income-producing capacity, prospects for long-range appreciation, income tax considerations

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and liquidity. Only those assets meeting HPRC's investment criteria will be accepted for inclusion in as an HPRC project.

In an effort to keep an asset in compliance with those standards, an underwriting team will be involved through the investment life cycle of the asset and consults with other professionals responsible for the asset.

### Tenant Creditworthiness

(b) (4)



## 2. DUE DILIGENCE IN INVESTOR SCREENING

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### A. Investor screening process

(b) (4)





(b) (4)



**Legal Service Agreement** - HPRC requires that investors sign a legal service agreement with a duly licensed immigration lawyer as a condition for admission to a limited partnership. This policy ensures that the applicant is screened by a competent immigration professional as a condition for, and prior to, admission into HPRC's program.

All information will be kept confidential. Once the prospective is deemed satisfactory, the prospective will proceed to the subscription process outlined below.

#### **B. Subscription process**

During the subscription process, the prospective investor will complete and sign a subscription agreement. The prospective will also receive a Confidential Private Offering Memorandum. The prospective investor will be given an opportunity to go over all three documents with a financial professional before signing the subscription agreement. The agreement will inform the prospective of the risks inherent in investing in the project and will contain an agreement that the investor will diligently file a Form I-526. Additionally, the agreement will contain an agreement that all funds for investment will come from legal sources and that the prospective will provide evidence proving such. For more information, please refer to the attached sample Subscription Agreement.

Additionally, a full set of sample Investment Documents, including the Private Offering Memorandum, Subscription Agreement, Limited Partnership Agreement, and Escrow Agreement, is filed with this application.



#### IV. PROMOTIONAL EFFORTS

##### 1. MARKETING OBJECTIVE

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Through its local promotions and the efforts of overseas agents, Applicant aims to attract alien investor capital to commercial development projects that will result in job-creation and profits for investors.

##### 2. MARKETING STRATEGIES

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Applicant will promote investment offerings, with a focus on the communities in Mainland China. Once the marketing presence is firmly established in China, Applicant may consider marketing EB-5 investment offerings to other countries in Asia including Taiwan and South Korea. Applicant will design, develop and implement a variety of pre-marketing strategies and assist in structuring HPRC's market entry plan targeting the international investor.

Applicant will also establish relationships with a network of brokers and professional finders in China. They will work as independent contractors and may not negotiate on behalf of Applicant or handle funds. They only serve to disseminate information and introduce potential investors to HPRC.

The marketing team leader for HPRC will be Edward Chen, an accomplished entrepreneur/business development expert with a strong background and knowledge in the domestic home renovation industry. Edward Chen will provide the latest market trends analysis on HPRC's EB-5 investment offerings in China. He will also spearhead any moves to expand the marketing efforts to other countries in the future, but not until after the second year of operations.

##### 3. PROMOTIONAL EFFORTS

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Applicant will promote its investment offerings locally to professionals with spheres of influence that include potential EB-5 investors. (b) (4)

[REDACTED]

Promotional activities will aim at giving HPRC a high level of name recognition among relevant high net-worth communities.

**The Initial Promotional Campaign will include:**

1. **Printed Brochures:** HPRC will be promoted through bi-lingual brochures that explain and promote the EB-5 program while presenting job-creating investment opportunities through HPRC.
2. **Website:** A website is in construction.
3. **Advertising:** Advertising in print media will allow HPRC to target high net-worth individuals who may be potential immigrant investors.
4. **Meetings and Seminars:** Seminars including legal and project representatives will be a way to specifically educate and recruit qualified potential investors.
5. **Travel:** Local travel may be required in connection with recruiting and screening potential investors. This does not include the international travel for operations.

**V. FUNDING FOR REGIONAL CENTER OPERATIONS**

Funding for regional center operations will be completely separate from funding for the projects within HPRC.

(b) (4)



2.

OPERATIONS FUNDING SOURCES

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(b) (4)







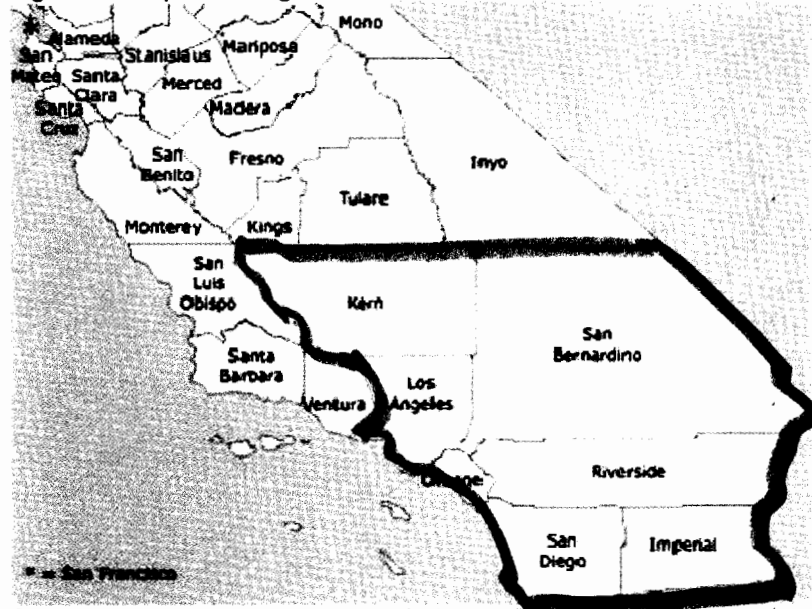
# Economic Impact Report of Projected Impacts of Home Paradise Regional Center

Paul Sommers, Ph.D., Regional Economist  
October 2010

## Introduction

Home Paradise Regional Center (“Home Paradise”) is a proposed EB-5 regional center to consist of seven southern California counties (Imperial, Kern, Los Angeles, Orange, Riverside, San Bernardino, and San Diego). The area is shown in the map below with orange highlighting in the seven counties included in the proposed regional center.

Figure 1: Proposed Regional Center Boundaries



Source: [http://gocalifornia.about.com/cs/maps//fb\\_castmap\\_cty.htm](http://gocalifornia.about.com/cs/maps//fb_castmap_cty.htm)

According to Home Paradise’s business plan, two sample projects are currently planned: (1) a shopping center and (2) a Home and Commercial Design Center. These two sample projects, referred to as “hypothetical” because their exact locations are not yet finalized, are used in this report to demonstrate methodologies for projecting employment impacts. **Table 1** shows the industry types involved and the corresponding NAICS codes.

**Table 1: Industry Classifications Included in Home Paradise Sample Investments**

Investment	Industry	NAICS Code
Home and commercial design center	Building design advice, products, services	54141
Shopping center	Supermarket	445
	Clothing store	448
	Sporting goods store	451
	Home center store	444
	Pharmacy	44611
	Full service restaurant	722
	Fast food restaurants	722
	Small retail shops	453
Hotel	7211	

This report demonstrates methodologies to be used in projecting employment impacts and provides projections of potential employment impacts and regional economic impacts of this center based on two sample projects. The projections of employment impacts and regional economic impacts will be developed using the IMPLAN input-output model. The methodology explained below for the sample projects will be applicable to actual projects of similar type, and the employment impact projections may be adjusted for actual projects later based on details provided in the business plans for such actual projects.

### **Terminology Used in This Report**

Under the EB-5 program, each alien investor's investment in a new commercial enterprise must result in the creation of 10 new full-time jobs. The EB-5 regulations at 8 CFR 204.6(m)(7)(ii) state that "jobs created indirectly" by the new commercial enterprise may be counted toward the job creation requirement. The regulations also state that, "[t]o show that 10 or more jobs are actually created indirectly by the business, reasonable methodologies may be used." IMPLAN has been recognized and accepted by USCIS as a reasonable methodology for projecting and verifying job creation. This report uses the IMPLAN model to project job creation within the proposed regional center, including "jobs created indirectly." To avoid confusion about the terminology used in this report, a few terms must first be defined. In input-output analysis, the terms "direct impacts", "indirect impacts" and "induced impacts" are used by economists. Direct employment impacts in the context of an input-output methodology such as IMPLAN refer to jobs created at a business site by revenues. An example of a business site is a commercial building with various commercial tenants; direct employment impacts would refer to the employees of the tenants. Indirect employment impacts refer to jobs created off-site by a

multiplier effect resulting from the creation of new direct employment impacts at the business site. Indirect employment impacts include employees of the producers of materials, equipment, and services that are used by commercial tenants at the business site. Induced employment impacts refer to employees of companies that benefit from expenditures resulting from the income of direct and indirect employment impacts.

It is important to note that direct employment impacts in an input-output analysis include both direct hired and indirect hired jobs. Thus, the term "direct employment impact" in this report should not be confused with the concept of "direct jobs" in an EB-5 new commercial enterprise that are measurable by Forms I-9, payroll records, or other similar documentation as set forth in 8 C.F.R. 204.6(j)(4)(i)(A). The direct employment impacts and revenue projections in this economic analysis represent hypothetical jobs derived from reliable square foot per employee data (except for hotel and Home & Commercial Design Center which are based on revenue), based on the sample project specifications. In accordance with the EB-5 regulations, actual job creation ultimately will be proven through evidence that the planned square footage for particular uses has been constructed and/or that the projected revenues have been generated by the tenant businesses.

Indirect and induced impacts constitute the *multiplier impacts* of direct impacts. *Total impacts* are the sum of direct, indirect, and induced impacts. Impacts can be expressed in terms of employment or in terms of business revenues; both types of impacts are displayed in tables in this report. For reference, multipliers implied by the ratio of total to direct employment impacts are included in tables below. These multipliers are "estimated multipliers" in the sense that they reflect the ratio of total employment impacts to direct employment impacts in particular industries as estimated by the IMPLAN model run with the particular inputs specified in the tables below.

### **Projecting Direct Employment Impacts**

One or more of three possible methods will be used to project direct employment impacts based on revenue projections:

#### *1. Developer or tenant plans*

In some projects, the developer is working with a particular tenant, and the tenant may be able to project likely employment levels at the facility. For these projects, a great deal of thought has typically gone into constructing a financial pro forma projection, and the revenue assumptions in the pro forma will be used to project direct employment impacts.

#### *2. Comparable projects*

Occasionally, a project may closely resemble another project the developer has previously completed. In this situation, the actual job creation of comparable tenants on a per sq. ft. basis or in relation to the comparable tenant's business plan and annual revenues may provide a clear and solid basis for estimating direct employment impacts or revenues for a new project.



### *3. Average industry statistics*

The Bureau of the Census, U.S. Department of Commerce conducts regular industry surveys and reports on the number of establishments and the level of employment for very detailed NAICS industry categories. In some cases, the average establishment size estimated by dividing total industry employment by the number of establishments will be used as a prediction of likely employment levels in a particular industrial project. Industry associations and well-regarded consulting organizations also publish useful information on typical establishment size, employment levels, or revenues that can be used to establish likely direct impact levels. Small scale retail tenants often do not have formal financial projections, and this approach could be used in that situation.

### **Projecting Total Employment Impacts**

The forecasting methodology utilized in this report is based on the IMPLAN input-output model for 2008.<sup>1</sup> Input-output models estimate inter-industry production relationships, modeling inputs required from each industry to produce the outputs of any given industry. For example, if more cars are required, more output is required from the metal and rubber sectors, which in turn require more vehicles to haul their supplies, which necessitates further increases in metal and rubber output. The model also captures the impact of payroll spending by employees in impacted sectors for each round of impact. These backward linkages extend back infinitely, but in smaller and smaller quantities in each round, approaching zero as a limit. Input-output models capture this entire series of backward relationships through the concepts of indirect and induced impacts. Total impacts are the sum of direct, indirect, and induced impacts. For this report, a seven county version of IMPLAN is used to capture impacts of the investments within the seven- county contiguous regional center consisting of Imperial, Kern, Los Angeles, Orange, Riverside, San Bernardino, and San Diego Counties in California.

In addition to the impacts of routine operations of the companies established within the regional center due to the investments made, additional employment impacts will be realized due to the development and construction activities. When Home Paradise acquires properties, additional activity is experienced in the real estate sector for appraisals, econometric and other studies, marketing, and legal fees. After acquisition, renovation or new construction takes place to prepare the desired facilities for tenant occupancy. Total employment impacts in this report include the indirect employment impacts associated with development and construction (but not direct employment impacts).

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<sup>1</sup> Minnesota Implan Group, <http://www.implan.com/>

## Sample Projects within the Home Paradise Regional Center

Two types of projects will be undertaken initially within Home Paradise Regional Center:

1. A Home and Commercial Design Center that will provide property owners or occupants with design advice, products, and service contracts for installation services.
2. A shopping center including the industries listed in Table 1 above.

Both of these sample projects are based on current plans; actual projects may vary in details from these sample projects and amended employment impact projections will be provided to USCIS when the developer's business plans are finalized.

(b) (4)



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<sup>2</sup> <http://wikimapia.org/86091/Nordstrom>.

<sup>3</sup> [http://www.eia.doe.gov/emeu/consumptionbriefs/cbecs/pbawebbsite/retailserv/retserv\\_howmanyempl.htm](http://www.eia.doe.gov/emeu/consumptionbriefs/cbecs/pbawebbsite/retailserv/retserv_howmanyempl.htm).



(b) (4)



### **Total Economic Impacts**

In addition to the direct employment impacts of the sample projects discussed in this report, the total economic impacts of investments made in a regional center include business revenues of all tenant companies occupying space in facilities developed with immigrant investor capital, multiplier impacts of these tenant company revenues, and tax revenues to local, state and federal units of government. The input-output model provides estimates of output impacts in all 440 economic sectors covered in the model for any input entered into the model. To economize on space, the simplified impact tables provided in this report contain only the sum of those impacts across all industries for either employment or output. In addition, total employment impacts are reported for

major sectors of the regional economy in a single table incorporating the impacts of both the shopping center and renovation services company sample investments. Likewise, regional labor earnings, business output increases, and tax impacts are reported in tables that add together the impacts from the two sample investments.

**Table 5** shows the IMPLAN sector used to project indirect and induced impacts for each sample project. This table demonstrates how the indirect and induced impacts are estimated based on the direct employment impact or revenue estimates reported above.

**Table 6** shows the projected total employment impacts for each sample project, as well as the total for both. Total employment impacts are the sum of direct, indirect, and induced employment impacts as shown in **Table 6**. The multipliers, calculated by dividing total employment impacts by direct employment impacts, are also shown in **Table 6**. The direct employment impact of both sample projects is projected at a total (b) (4) obs. The IMPLAN model projects that regional center employment accommodation will increase by a total of (b) (4) once the multiplier impacts are added to direct employment impacts.

**Table 5: IMPLAN Sectors Used to Project Impacts and Corresponding NAICS Codes**

	Direct Employment Impacts	IMPLAN Sector.	NAICS Industry
<b>SAMPLE PROJECT 1</b>			
Home and Commercial Design Center Shopping Center	50*	370 Specialized Design Services	54141
<b>SAMPLE PROJECT 2</b>			
Shopping Center			
Supermarket	38	324: Retail Stores – Food and Beverage	445
Clothing store	212	327: Retail Stores – Clothing and Clothing Accessories	448
Sporting goods	83	328: Retail Stores – Sporting Goods, Hobby and Music	451
Home center	83	323: Retail Stores – Building Material & Garden Supply	444
Pharmacy	20	325: Retail Stores – Health & Personal Care	446
10 fast food establ.	45	413: Food Services and Drinking Places	722211
Full service restaurant	21	413: Food Services and Drinking Places	7221

Small retail shops	167	330: Retail Stores – Miscellaneous	453
Hotel	7*	411: Hotels and motels	72111

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\*IMPLAN model driven by assumed revenues; the model projects the number of direct employees listed above

**Table 6: Total Jobs created by Home Paradise Sample Projects**

(b) (4)



\* Note: Employment impacts from construction activity are calculated based on construction cost. Direct employment impacts in this category are not counted.

\*\*Note: IMPLAN model driven by assumed revenues.

Among the projected direct employment impacts are a wide variety of different occupations. Survey data collected by the U.S. Department of Labor, Bureau of Labor Statistics show the percentage of employment within an industry (at a 4-digit NAICS code level) in each of over 200 specific occupations.<sup>5</sup> **Table 7** shows estimates of employment impacts by occupational group. These estimates were created by aggregating detailed data into the highest level occupational groupings present in the classification system used by the Bureau of Labor Statistics, and multiplying those aggregated percentages by the estimate of direct employment impacts in **Table 2** for Project 1 and **Table 3** for Project 2. Each sample industry included in the Home Paradise business plan has a distinctive occupational pattern, and these investments as a whole will

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<sup>5</sup> Data on the distribution of jobs by occupation within industries can be found at <http://www.bls.gov/oes/>.

create occupational opportunities for workers with many different skills. Considering all of the types of companies included in the plan, sales occupations are the most common type of occupational group that will be created, plus a substantial number of opportunities in service occupations.

(b) (4)


















## Conclusions

This report addresses potential impacts of 2 sample projects within proposed regional center encompassing seven southern California counties. Specific conclusions reached in this report include:

1. The investors in Home Paradise will invest in a shopping center and a home and commercial design center within high unemployment areas in a 7-county regional center (Imperial, Kern, Los Angeles, Orange, Riverside, San Bernardino and San Diego counties).
  2. (b) (4)
  - 3.
  - 4.
  - 5.
  - 6.
  - 7.
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**PAUL E. SOMMERS**  
Economist

**EDUCATION**

- 1978 Ph.D., Yale University; Economics  
1972 B.A., University of California, Berkeley; Economics

**SUMMARY**

Dr. Sommers was appointed Professor at the Institute of Public Policy and the Albers School of Business at Seattle University, effective July 1, 2004. At Seattle University, he teaches in the Institute of Public Service, a masters level public management program, as well as the Department of Economics in the Albers School of Business. In addition, he is responsible for developing a Center on Metropolitan Development that will involve research on economic trends and effective development strategies in metropolitan areas of the United States, with a particular focus on the Puget Sound. Recent research by Dr. Sommers includes economic impact studies, reviews of forecasting processes, regional economic assessments, economic development strategy assessments, and workforce projections for industry clusters. Projects completed in 2006 include an economic impact analysis for U.S. Navy bases in Washington State, and a review of the literature on the economic and social impacts of higher education for the Washington Office of Financial Management/Washington Learns.

From 1998 to 2003 he was a Senior Research Fellow at the University of Washington's Daniel J. Evans School of Public Policy conducting research related to regional economic trends, business assistance strategies, and workforce education and training, and industry clustering, particularly among advanced technology industries. In 2002-03, he completed two papers on technology-based development strategies and trends in the use of information technology for The Brookings Institution, as well as a project examining workforce needs of industry clusters in the State of Washington. In 2003, he also completed a study of the maritime cluster in Seattle.

Dr. Sommers served as Executive Director of the Northwest Policy Center at the Evans School from 1994 to 1998, and as Research Director of the Center from 1988 to 1994. In 1985 he helped create *Pacific Northwest Executive*, a quarterly regional economics publication of the University of Washington Graduate School of Business. He was that magazine's research director from 1985 to 1988. As an economist at Battelle's Seattle Research Center from 1978 to 1985, he directed studies of renewable energy and nuclear safety issues for a number of public and private sector clients. In addition, he served as the associate director of one of the four study centers on the Seattle campus.

He has been a member of the Governor's Council of Economic Advisors in Washington since 1994, and he served on the forecast review committee at Seattle City Light from 1982 to 1986. He served as an officer of the Seattle Economists Club from 1987 to 1990, and was President of the Club during 1989-90; in 1997-98 he served as Vice President and program director for the club. For 10 years he served on the board of the Northwest Natural Resource Group, serving as board president in 2004. He currently serves on the board of the Pacific Northwest Regional Economics Conference, and on the editorial board of the *Northwest Journal of Business and Economics* published by Western Washington University.



### SELECTED EXPERIENCE

- 2004- Professor, Institute of Public Service and Albers School of Business, and Director, Center on Metropolitan Development, Seattle University
- 1998-2003 Senior Research Fellow, Daniel J. Evans School of Public Affairs, University of Washington
- 1994- 1998 Executive Director, Northwest Policy Center and Research Associate Professor; Graduate School of Public Affairs, University of Washington
- 1988-1994 Research Associate Professor, 1990+; 1988-1990: Senior Research Associate, Graduate School of Public Affairs, University of Washington, and Research Director, Northwest Policy Center
- 1985-1988 Research Associate, Graduate School of Business Administration, University of Washington, and Research Director, *Pacific Northwest Executive*
- 1984-85 Associate Director, Science and Government Study Center, Battelle Human Affairs Research Centers
- 1978-84 Research Scientist, Science and Government Study Center, Battelle Human Affairs Research Centers, Seattle, Washington

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Moderator for Washington Technology Center Conference "Opportunities for Innovation," March 2-3, 1994.

"Washington Outlook." Western Economic Roundtable, Center for the New West, Denver, Colorado, February 21-22, 1994.

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"Diffusion Processes and the Validity of the Baughman-Joskow Regional Electrical Model." 1980 Summer Computer Simulation Conference, Seattle, WA, August 25, 26, 27, 1980, (Proceedings, pp. 489-492).

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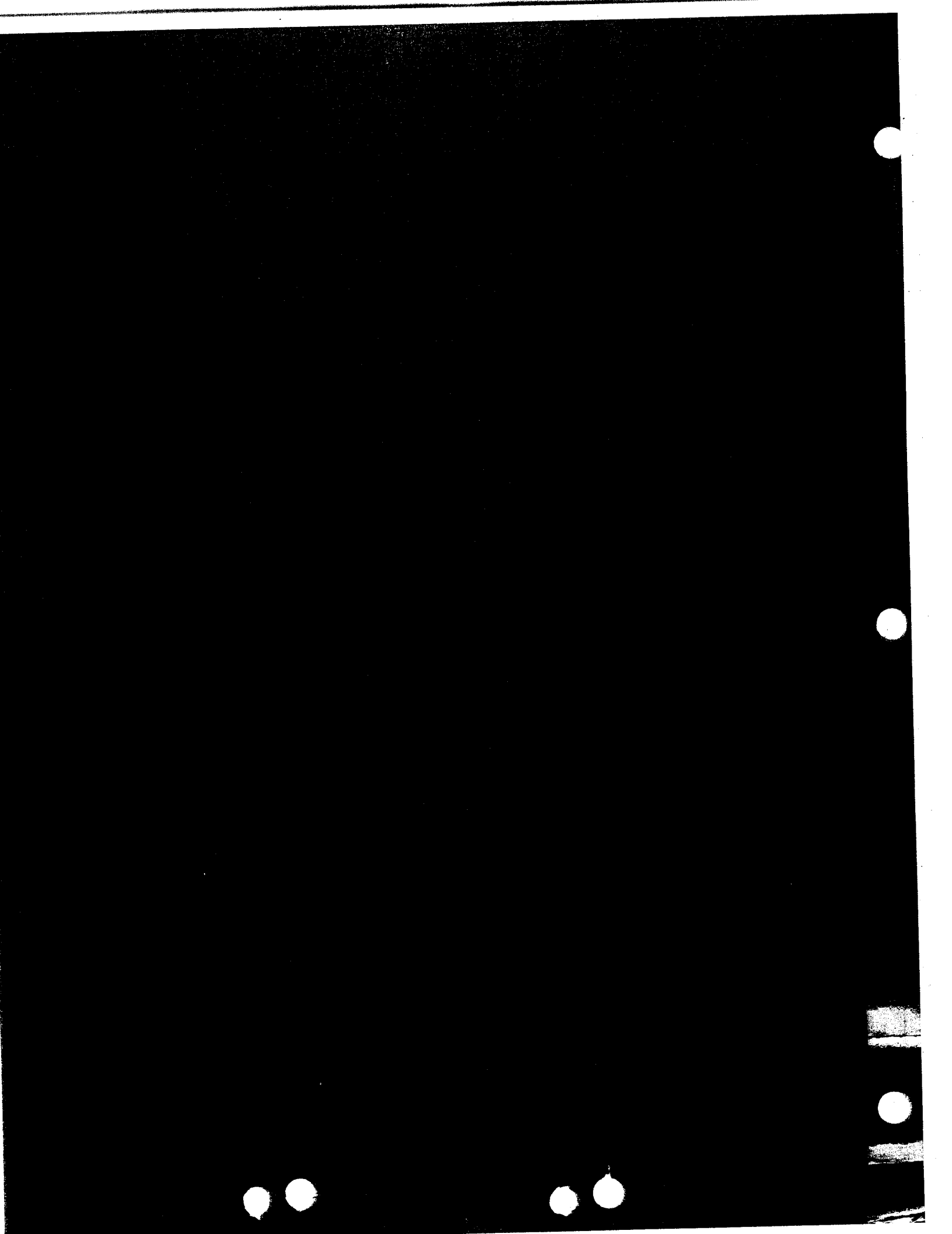
### PROFESSIONAL AFFILIATIONS

Seattle Economists Club (Secretary-Treasurer, 1987-88; Vice President, 1988-89; President, 1989-90; Vice President, 1997-98)

Board member, Pacific Northwest Regional Economics Conference, 1992-present

Editorial board, *Northwest Journal of Business and Economics*, Western Washington University, 1994-present

Board of Northwest Natural Resource Group, 1995-2004, Vice President, 2002-3, President, 2004



Dated: \_\_\_\_\_, 2010

Name: \_\_\_\_\_  
No.: \_\_\_\_\_

**SAMPLE CONFIDENTIAL PRIVATE OFFERING MEMORANDUM  
[ONE] UNIT[S]  
OF  
[L.P. I], LP  
(A California Limited Partnership)**

\$[500,000] of  
Limited Partnership Interests  
\$500,000 per Interest ("Unit")

Contact:

**Home Paradise Investment Center LLC, General Partner**  
517 Monterey Pass Road  
Monterey Park, CA 91754  
Telephone: [\_\_\_\_\_]   
Attn: [\_\_\_\_\_]



CONFIDENTIAL PRIVATE OFFERING MEMORANDUM

\_\_\_\_ UNITS OF  
[L.P. I], LP

This Confidential Private Offering Memorandum (this “**Memorandum**”) is submitted on a confidential basis for use by a limited number of potential investors (hereinafter, “**Investors**” or “**Subscribers**”) solely in consideration of the acquisition of the above captioned securities. The acceptance of this Memorandum constitutes agreement on the part of the recipient hereof and its representatives to maintain the confidentiality of the information contained herein. This Memorandum may not be reproduced in whole or in part, and its use for any purpose other than an investment in the securities described herein is not authorized and is prohibited.

(b) (4)



\* \* \* \* \*

## SUMMARY OF OFFERING TERMS

The following is only a summary of certain of the information contained in this Offering Memorandum, and is qualified in its entirety by reference to the more detailed discussions contained in this Offering Memorandum below, as well as to the Exhibits hereto (all of which are incorporated fully herein by this reference). In the case of any conflict between the summary, below, and the more detailed discussion in the body of the Memorandum, the latter shall control.

**The Partnership** [L.P. I], LP is a California limited partnership with its initial principal place of business located \_\_\_\_\_.

**General Partner** The General Partner of the Partnership is Home Paradise Investment Center, LLC, a California limited liability company with its initial principal place of business located at 517 Monterey Pass Road, Monterey Park, CA 91754.

**EB-5 Regional Center Designation** The Project is being undertaken through the direction of the General Partner, who previously received approval to establish, and now operates, the "Home Paradise Regional Center" (the "**Regional Center**"). The Regional Center is a "regional center" as designated by the United States Citizenship & Immigration Services ("USCIS") under the "EB-5 Immigrant Investor Pilot Program" (the "**EB-5 Pilot Program**") to establish and solicit investment from foreign investors under the EB-5 Pilot Program. The Project is believed to be a qualifying investment under the EB-5 Pilot Program. The geographic scope of the Regional Center encompasses the contiguous Southern California counties of Imperial, Kern, Los Angeles, Orange, Riverside, San Bernardino, and San Diego.

**The Project** The Partnership was organized to fund \_\_\_\_\_ located in City of Industry, Los Angeles County, California. See "Description of the Project" below for more detailed descriptions of the Project.

**Minimum Investment** \$500,000 (the total contribution by any Investor, each, a "**Capital Contribution**").

**Use of Proceeds** The Partnership intends to use the proceeds of this Offering to finance the Project as described herein.

**Escrow of Capital Contributions**

(b) (4)

**Administrative Fee**

(b) (4)

**Transfer Restrictions;  
No Resale**

**Allocation of Profits  
and Losses**

Except as otherwise required by the Internal Revenue Code, profits and losses of the Partnership shall be allocated to the Partners as provided in the Partnership Agreement.

**Distributions**

Subject to certain restrictions, the Partnership intends to make distributions from time to time to the Limited Partner. See “The Offering” below.

**Limited Partner Voting**

(b) (4)

**Commissions and Fees**

**Tax Risks**

Investment in the Partnership involves substantial tax risks. Each Investor is advised to consult with his or her own tax advisor regarding the tax consequences of investing in the Partnership. See “EB-5 Immigration Disclosures and Risk Factors” and “Tax Considerations,” below.

**Risk Factors**

An investment in the Units of the Partnership involves substantial risks, including reliance on management, general market risks, limited transferability of Units, reliance on the services of third parties, and other matters. See “EB-5 Immigration Disclosures and Risk Factors,” below, for a discussion of some of these risks.

**Reports**

Partners will receive annual financial statements and K-1 statements reflecting their allocable share of the Partnership’s profits and losses.

**Immigration Risk**

Neither the Partnership nor the General Partner guarantees that any Investor will be granted conditional or permanent residency in the United States as a result of their purchase of the Units of the Partnership. Each Investor must evaluate and accept the risk that he/she may not be granted residency in the United States after making their Capital Contribution and being admitted as a Limited Partner of the Partnership. See “EB-5

Immigration Disclosures and Risk Factors,” below.

**Subscription**

Investors may subscribe for the Units by executing and delivering the documents referenced in the Section entitled “Subscription,” below.

\* \* \* \* \*

## DESCRIPTION OF THE PROJECT

The Project will be developed as a 45,000 square foot home and commercial design center in City of Industry, Los Angeles County, California. The Project will offer supplies and design advice, as well as contracts for installation services.

The Partnership believes that the Project will benefit from the following:

- Excellent location. City of Industry is a primarily industrial city with a pro-business city government dedicated to ensuring the development of new industrial and commercial business in the area; as an example, the city assesses no business tax. Located close to multiple major population centers in Los Angeles County, City of Industry benefits from proximity to 4 highways, 2 major airports and trans-continental rail facilities. The city is also home to a Foreign Trade Zone, and regularly attracts significant foreign and domestic investment.
- Participation in well-known franchise with excellent brand recognition. The [name of franchise] franchise is a successful national franchise with proven brand appeal. The franchise package will include training and advisory services provided to the Developer and managers of the Project, which will streamline the marketing and sales process.
- Attractiveness to residential and commercial developers. The Project will appeal to developers and contractors in both the commercial and residential real estate space, as well as “Do-it-Yourself” homeowners.
- Strong developer with proven track record. The General Partner will partner with a developer with a strong track record developing similar retail complexes.

According to publicly available sources, City of Industry is home to 2,200 businesses and 80,000 jobs. Although the City of Industry itself only has 777 residents, neighboring towns such as La Puente, Hacienda Heights, Diamond Bar and Walnut are densely populated semi-urban and suburban cities, with a combined population close to 200,000, providing a solid residential customer base for the Project. Moreover, the Project will most likely benefit from its location in the heavily populated Los Angeles County, with a 2009 population of 9,848,011.

The Project will be located in City of Industry, qualifying it as a Targeted Employment Area (as defined in “EB-5 Immigration Disclosures and Risk Factors,” below).

The Project hopes to provide a range of economic and employment benefits to the local population. Numerous construction jobs will stem from the construction of the facility. Moreover, an economic impact analysis predicts that the Project will generate a total of (b) (4). The Partnership also anticipates increased labor earnings and increased state/local government tax revenue for the area.

For additional information about the project, please contact the General Partner.

\* \* \* \* \*

MANAGEMENT, ADVISORS, AND CONSULTANTS  
BIOGRAPHIES

**BIOGRAPHIES**

**Home Paradise Investment Center LLC (the General Partner)**

The General Partner of the Partnership is Home Paradise Investment Center LLC, a California limited liability company organized on June 11, 2010, with its principal place of business located at 517 Monterey Pass Road, Monterey Park, CA 91754.

**The Regional Center**

In 2010, Home Paradise Investment Center LLC applied under the EB-5 Immigration Investor Pilot Program as a “regional center” for the specific purpose of investing EB-5 monies into targeted commercial enterprises located in the geographic area of the Regional Center. On \_\_\_\_\_, 2010, the Regional Center received designation as an EB-5 Regional Center approving it to solicit qualifying investments from foreign investors, and administer those investments, under the EB-5 Pilot Program. Under the title of “Home Paradise Regional Center,” the Regional Center was approved for four (4) targeted industry clusters: (1) Retail; (2) Hospitality (including hotels/motels within commercial centers), (3) Food Service (including restaurants within commercial centers), and (4) Interior design services. The project is located in a Targeted Employment Area. See “EB-5 Immigration Disclosures and Risk Factors,” below.

**Paul Sommers, Ph.D., Economist**

An Economic Impact Report was prepared by Dr. Paul Sommers, a professor at the Institute of Public Service and the Albers School of Business at Seattle University. Dr. Sommers actively conducts research focused on economic development and workforce topics. His expertise focuses on regional development, regional economics and workforce forecasting. Dr. Sommers is a member of the Washington State Governor’s Council of Economic Advisors, and is currently serves on the board of the Pacific Northwest Regional Economics Conference.

**Edward Chen, CEO**

Edward Chen has over 15 years of experience in real estate development, which provides him with a superior background and knowledge about the interior design service industry. Edward is also a successful entrepreneur with a track record in retail by establishing hundred shopping locations. Edward Chen holds a bachelor’s degree in International Trade.

**Jing Jiang, CFO**

Jing Jiang has over 20 years of executive finance experience beginning with 5 years as CFO of Jenny Investment Group, Inc., a company with over 500 properties sold. Subsequently she has served as CFO of Cabinet Home, Inc and has also been involved with overseeing projects and sourcing materials. Ms. Jiang holds a bachelor’s degree in International Trade.

\* \* \* \* \*

## FINANCIAL CONSIDERATIONS

The financial projections presented herein contain “forward-looking statements” based on the General Partner’s experience and expectations and are subject to a number of risk factors. Please review carefully the section entitled “EB-5 Immigration Disclosures and Risk Factors,” below.

### *Loan Proceeds*

The Offeror intends to derive its revenues primarily from making a loan (the “**Loan**”) to Developer. Following are some material terms of the Loan:

(b) (4)



For more information or to see the Loan documentation, please contact the General Partner.

### *In General*

The Project will be new construction, and, accordingly, has no operating history. The Partnership expects that the Project will generate revenues through multiple profit centers after completion of construction and the start of operation of the Project.

\* \* \* \* \*



## THE OFFERING

The Offering consists of [1] Unit[s] at a per Unit price of \$500,000, and is being offered on a “best-efforts” private placement basis only to accredited investors. The Partnership will not accept subscriptions for fractional interests of a Unit or investments in an amount less than \$500,000 per Unit. The Partnership may accept or reject any subscription in its sole and absolute discretion.

The partnership may, in its sole and absolute discretion, cancel, terminate, close, or extend the Offering at any time. In the event the Offering is canceled or terminated, the General Partner shall return subscription amounts to the subscribers.

### *Administrative Fee*

In addition to the minimum investment of \$500,000, each individual Subscriber is required to pay an administrative fee of (b) (4) .

### *Return on Investment*

From time to time, the Partnership may make distributions to the Limited Partners from net cash flow.

(b) (4)

. Certain conditions affect whether these distributions will be made and when they can be made. For more information, please see the Partnership Agreement attached as Exhibit A to the Memorandum.

\* \* \* \* \*

## TAX CONSIDERATIONS

PROSPECTIVE INVESTORS ARE URGED TO CONSULT WITH THEIR PERSONAL TAX ADVISERS REGARDING THE FEDERAL, STATE, LOCAL, AND FOREIGN TAX CONSEQUENCES ARISING FROM THE PURCHASE, OWNERSHIP, AND SALE OF UNITS.

It is intended that the Partnership will be classified and treated as a partnership for U.S. federal income tax purposes. There can be no assurance that the relevant law will not be changed during the life of the Partnership or that the Partnership Agreement will not be amended in a manner that might cause the Partnership to be taxed other than as a partnership.

As a partnership for U.S. federal income tax purposes, the Partnership itself is not subject to federal income tax. Each Partner, however, will be required to report on its U.S. federal income tax or information return each year its distributive share, whether or not actually distributed, of the income, gains, losses, deductions, or credits of the Partnership. If the Partnership were not treated as a partnership for U.S. federal income tax purposes, but were taxed as a corporation in any year, its taxable income would be taxable to the Partnership and not to the Members, and distributions by the Company to the Members would, to the extent of the Company’s earnings and profits, be taxable to the Members as dividend income.

\* \* \* \* \*



## EB-5 IMMIGRATION DISCLOSURES AND RISK FACTORS

Although this Offering has been structured to maximize the possibility that Investors will be able to meet the requirements of the immigrant investor (EB-5) visa category under U.S. immigration laws currently in effect as of the date of this Memorandum, no guarantee or assurance can be given that an Investor will obtain conditional resident alien status from the U.S. Citizenship and Immigration Services (“USCIS”) or that, if obtained, that the USCIS will ultimately remove such conditional status in the future. It is possible lawful permanent resident status may not be approved or delayed due to factors outside the control of the Limited Partnership or the Investor, such as changes in current laws, regulations and policies or circumstances specific to the Investor. It is impossible to predict processing times for immigrant petitions as well as immigrant visa processing or adjustment of status. Investors who obtain conditional or permanent residence status must intend to make the United States their primary residence. Permanent residents who continue to live abroad risk revocation of their conditional or permanent residence status. Investors are urged to seek professional advice to better understand the EB-5 immigration process, relevant visa quotas, and thoroughly familiarize themselves with the extent of their immigration risks associated with this Offering.

AN INVESTMENT IN THE PARTNERSHIP HAS CERTAIN ELEMENTS OF RISK DIFFERENT FROM AND/OR GREATER THAN THOSE ASSOCIATED WITH OTHER INVESTMENTS. THE HIGHER DEGREE OF RISK MAKES AN INVESTMENT IN THE PARTNERSHIP SUITABLE ONLY FOR INVESTORS (i) WHO HAVE A CONTINUING LEVEL OF ANNUAL INCOME AND A SUBSTANTIAL NET WORTH, (ii) WHO CAN AFFORD TO BEAR THOSE RISKS, (iii) WHO HAVE PREVIOUSLY MADE INVESTMENTS OF THE NATURE AND RISK OF THIS OFFERING, AND (iv) WHO HAVE NO NEED FOR LIQUIDITY FROM THESE INVESTMENTS. EACH INVESTOR SHOULD CONSIDER CAREFULLY THE RISK FACTORS ASSOCIATED WITH THIS INVESTMENT, INCLUDING, WITHOUT LIMITATION, THE FOLLOWING, AND SHOULD CONSULT HIS OR HER OWN LEGAL, TAX, AND FINANCIAL ADVISORS WITH RESPECT THERETO. INVESTORS UNABLE OR UNWILLING TO ASSUME THE FOLLOWING RISKS, AMONG OTHERS, MUST NOT CONSIDER AN INVESTMENT IN THE PARTNERSHIP.

***Lack of Operating History.*** The Partnership is being formed for the specific purpose of acquiring the applicable property and developing and operating the Project and has no operating history. The Partnership has described certain aspects and projections for this Project in this Memorandum which are based primarily on its own knowledge and its experience, which is limited, and has not been verified.

***General Risks of Real Estate Ownership.*** The Partnership’s investment in the Project will be subject to the risks generally incident to the ownership of real property and factors which are beyond the control of the Partnership and the General Partner.

***Future Market Value of the Project.*** The economic future of the geographic area of the Project, future construction activity, interest rates, demographic changes, changes in tax laws, and numerous other factors will determine the future market value of the Project. There is no assurance that the Project will increase in value or even maintain its current value.

***Distributions from Operations.*** Because distributions are related to market conditions for rentals, vacancy factors, costs of operating the Project, and numerous other factors, there is no assurance that there will be cash from operations available for distribution to Limited Partners of the Partnership as dividends or otherwise.

***Illiquidity.*** The Units are a highly illiquid asset in that they cannot be readily sold or pledged as collateral for a loan or other obligation.

***Potential Conflict of Interest.*** The obligations of the General Partner to the Partnership are not exclusive, and the General Partner need only devote so much time to the Partnership's affairs as the General Partner, in its sole discretion, determines to be necessary to manage the Partnership's business. The General Partner and/or its affiliates may, from time to time, be involved in the development of other properties that may compete with the Project.

***Construction Risks.*** The Project development involves significant construction activity. Unanticipated delays and/or cost increases may require the Partnership to raise or borrow additional capital to complete construction of the Project. In addition, failure to complete Project development according to the Project's original specifications or schedule, if at all, may give rise to potential liabilities affecting the Investors' return on investment in the Units.

***No Firm Commitments to Purchase Units.*** No commitment exists by anyone to purchase all, or any portion, of the Units being offered. The Partnership can give no assurance that the Offering of the Units will be completely sold.

***Lack of Diversification.*** The Partnership will have all of its resources initially invested in the development of the Project and related marketing initiatives. This lack of diversification increases the risk of materially adverse results, including an Investor's loss of his entire investment.

***Dependence on Management and Personnel.*** The Partnership is dependent upon the continued involvement of Home Paradise Investment Center, LLC and its members in this Project personally. The loss of Home Paradise Investment Center, LLC's services (or those of its members) could have a material adverse effect on the Partnership's business, financial condition, and results of operations.

***Competition.*** In addition to the market for the Partnership's proposed Project property currently having intense competition, at a future date a similar development may be constructed in the proposed vicinity of the Project. This competition may reduce revenues and net income.

***Financial Risks.*** Developing and establishing a market share for the Project may require a substantial additional investment of capital and other resources, primarily in marketing the Project's tenants' products and/or services and convincing potential tenants and patrons that its facilities, and by extension its developments, are safe and desirable.

***Government Regulation.*** Regulations, regulatory actions, and court decisions in the future could have both a positive and/or negative impact on the operations and financial condition of the Project and its ability to compete. Additionally, the Partnership will be under substantial scrutiny by USCIS.

## SUBSCRIPTION

### *Who May Subscribe*

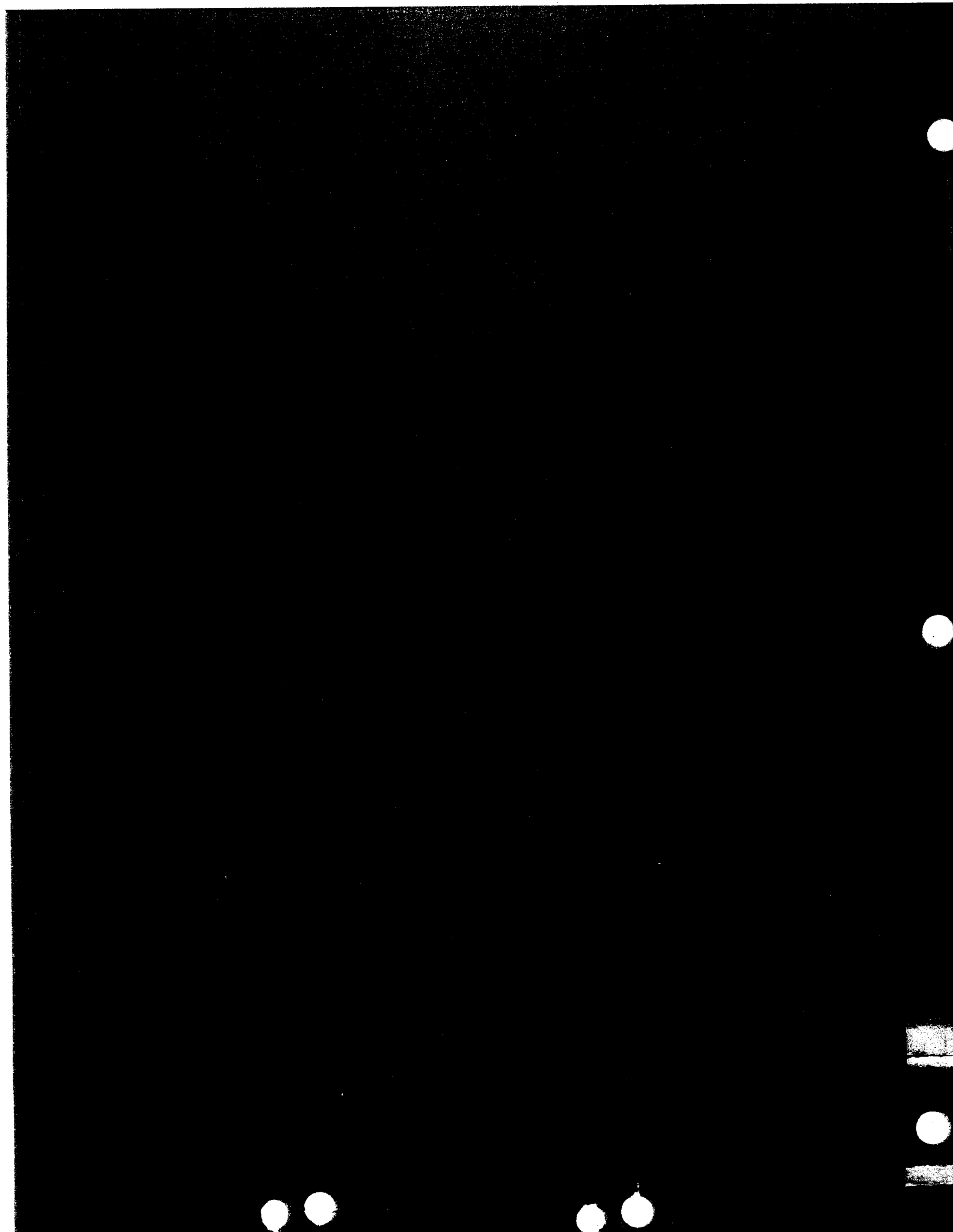
This Offering is only available to qualified investors. By subscribing for the Offering, the Investor must be able to make representations and warranties in the Subscription Agreement (Exhibit B). If a potential Investor has received this Memorandum or investment package in error, or if such person does not qualify as an investor, please notify the Offeror immediately.

### *Subscription Process*

(b) (4)



\* \* \* \* \*



[L.P. I], LP

**Limited Partnership Interests**

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**Sample Subscription Agreement**

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*If you decide not to participate in this offering, please return the Private Offering Memorandum (together with all amendments, appendices, and supplements thereto), this Subscription Agreement and all related documentation to*

*[L.P. I], LP*

---

*Telephone: [ \_\_\_\_\_ ]*

**Copy No.** \_\_\_\_\_

---

[L.P. I], LP  
Subscription Instructions

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1. **Please complete, date, and sign the Subscription Agreement.** By signing, you agree to abide by the Limited Partnership Agreement of [L.P. I], LP (the "Limited Partnership") and to the terms and conditions of the Subscription Agreement. **Please keep a signed copy of all completed and signed documents for your records.**

2. **Please send the original of your completed, dated and signed Subscription Agreement to:**

[L.P. I], LP  
Home Paradise Investment Center LLC, General Partner  
517 Monterey Pass Road  
Monterey Park, CA 91754

3. **Please enclose your check for your per unit subscription amount of \$[500,000] plus the additional subscription fee of \$ \_\_\_\_\_ for a total of \$ \_\_\_\_\_, payable to "[L.P. I], LP."** If your subscription is not accepted, your check will be returned. **If you prefer to wire transfer the funds, wait until Home Paradise Investment Center LLC (the "General Partner"), notifies you that your subscription has been accepted, then wire transfer the funds to the Limited Partnership's custodial account according to the instructions on the following page. To ensure proper processing, please call \_\_\_\_\_ at \_\_\_\_\_ to confirm your wire transfer. PLEASE NOTE THAT ALTHOUGH FUNDS IN THE CUSTODIAL ACCOUNT MAY BEAR INTEREST, YOU WILL NOT RECEIVE NOR BE ENTITLED TO SUCH INTEREST.**

4. **If your subscription is accepted, the General Partner will countersign your Subscription Agreement to confirm your admission to the Limited Partnership and will send you a copy of the countersigned signature page.**

**QUESTIONS:**

Home Paradise Investment Center LLC, the General Partner  
Attn: [ \_\_\_\_\_ ]  
517 Monterey Pass Road  
Monterey Park, CA 91754  
Telephone: [ \_\_\_\_\_ ]

WIRE TRANSFER INSTRUCTIONS:

[Bank]  
[Address]

ABA # \_\_\_\_\_  
Acct # \_\_\_\_\_  
for further credit to  
[L.P. I], LP  
Acct # \_\_\_\_\_

Ref: \_\_\_\_\_  
Legal Name of Investor

The [Bank] contact is \_\_\_\_\_ (phone (\_\_\_\_) \_\_\_\_-\_\_\_\_, fax (\_\_\_\_) \_\_\_\_-\_\_\_\_).

Please notify \_\_\_\_\_ at \_\_\_\_\_ or fax \_\_\_\_\_ when the wire transfer has been executed.

Home Paradise Investment Center LLC  
517 Monterey Pass Road  
Monterey Park, CA 91754  
Telephone: [ ]

Re: [L.P. I], LP

Ladies and Gentlemen:

The undersigned (the "Investor") hereby subscribes to purchase limited partnership interests ("Interests"), in the investment amount (the "Investment Amount") of [five hundred thousand dollars] (\$[500,000]) per unit, in [L.P. I], LP, a California limited partnership (the "Limited Partnership") and hereby pays an additional (b) (4) ) as an additional administrative fee (the "Administrative Fee") to be kept and used by the Limited Partnership and/or Home Paradise Investment Center LLC, the general partner of the Limited Partnership (the "General Partner"). The Investor understands that the Limited Partnership and/or Home Paradise Investment Center LLC, the general partner of the Limited Partnership (the "General Partner"), may reject this subscription for any reason. If this subscription is rejected or if the offering is not fully subscribed, and in the General Partner's sole discretion is unlikely to be fully subscribed, then the subscription amount and subscription fee shall be returned to the Investor without interest.

The Investor acknowledges that the information contained herein is being furnished to determine whether the Investor's Subscription Agreement complies with the requirements of various securities laws, including Section 4(2) of the Securities Act of 1933, as amended (the "Federal Act"), Regulation D ("Regulation D") and Regulation S ("Regulation S"), as well as the requirements of certain state securities laws. The Investor understands that the General Partner and the Limited Partnership will rely upon the information contained herein for purposes of such determination.

For purposes of such investment in the Limited Partnership, the Investor hereby represents, warrants, and agrees as follows:

1. **General Representations and Warranties.** The Investor hereby represents and warrants as follows to the Limited Partnership and the General Partner:
  - (a) *General Information.* The general information regarding the Investor previously submitted, submitted hereby, or to be submitted in the future to the Limited Partnership, including, but not limited to the Investor Eligibility Questionnaire, is and shall be true, complete, and correct.
  - (b) *Accredited Investor Status.* The Investor has reviewed the definition of "accredited investor" as such term is defined in Rule 501 of Regulation D, and the Investor meets one or more of the requirements to qualify as an "accredited investor."



- (c) *Regulation S Compliance.* If the Investor is subscribing to purchase Interests outside the United States, the Investor has delivered to the Limited Partnership a copy of an IRS Form W-8 completed by the Investor.
- (d) *Knowledge and Experience.* The Investor has such knowledge and experience in financial, tax, and business matters that it is capable of evaluating the merits and risks of acquisition of the Interests and of making an informed investment decision with respect to such investment.
- (e) *Investment Intent.* The Investor is acquiring the Interests for its own account, for investment purposes only, and not with a view to the resale or other distribution thereof, in whole or in part.
- (f) *Review of Investment.* The Investor has investigated the purchase of Interests in the Limited Partnership to the extent it has deemed necessary or desirable and has determined that the Interests are a suitable investment for the Investor.
- (g) *Ability to Bear Risks.* The Investor is able to bear the economic risks associated with an investment in the Limited Partnership.
- (h) *Private Offer.* The Investor is subscribing to purchase the Interests outside the United States and the Limited Partnership's offer of Interests was privately communicated to the Investor.
- (i) *Taxpayer Identification.* Under penalty of perjury, the Investor certifies that the taxpayer identification number supplied to the Limited Partnership is or will be the Investor's correct taxpayer identification number and that the Investor is not subject to backup withholding under section 3406(a)(1)(c) of the Internal Revenue Code, as amended ("IRC"). The Investor shall promptly provide the Limited Partnership with a taxpayer identification number at the request of the General Partner or the Limited Partnership.
- (j) *Compliance.* Investor acknowledges that the Limited Partnership will not accept the investment of funds by any Investor acting, directly or indirectly, in contravention of any applicable anti-money laundering regulations or conventions of the United States or any applicable international jurisdictions, or on behalf of terrorists, terrorist organizations or narcotics traffickers, including those persons or entities that are included on any relevant lists maintained by the United Nations, North Atlantic Treaty Organization, Financial Action Task Force on Money Laundering of Organization for Economic Cooperation and Development, Office of Foreign Assets Control of U.S. Department of the Treasury, U.S. Securities and Exchange Commission, U.S. Federal Bureau of Investigation, U.S. Central Intelligence Agency, or U.S. Internal Revenue Service, all as may be amended from time to time ("Prohibited Investments"). Investor's subscription for the Interests is not a Prohibited Investment.

2. **EB-5 Investors.**

- (a) Independent Counsel. The Investor shall hire an independent counsel for immigration processing and other legal matters. The Investor shall be responsible for payment of legal fees and costs. The General Partner reserves the right to approve the Investor's choice of counsel to insure that such counsel has experience processing EB-5 regional center visa petitions.
  - (b) Filing the Immigration Petition. The General Partner shall use reasonable efforts to assist the Investor's counsel with the filing of Investors I-526 and I-829 petitions, and verifying required direct and indirect employment until the removal of the Investor's conditional permanent residency. The General Partner shall not charge additional fees to assist with the Investor's permanent residence application.
  - (c) Denial of I-526 Petition, Adjustment of Status or Immigrant Visa Application. If the Investor's I-526 petition, including adjustment of status or consular interview processing, is denied, the Limited Partnership shall return the Investor's Investment Amount and the Administrative Fee within ninety (90) days of the Investor's written request. In the event any I-526 Petition, adjustment of status or immigrant visa application is denied as described above, the Investor's rights are limited to the return of his capital contribution, or portions thereof, as set forth herein.
3. **Notice of Changes**. The Investor will promptly notify the General Partner in writing of any changes in the representations, warranties, and covenants it makes under this Subscription Agreement. Absent any such notice, such representations shall be deemed made by the Investor at the time of each investment by it in the Limited Partnership, and may be relied upon as complete and correct by the General Partner and the Limited Partnership.
4. **Additional Information**. The Investor acknowledges that the Limited Partnership and the General Partner may require other documentation in addition to this Subscription Agreement, and the Limited Partnership and the General Partner reserves the right to request such documentation prior to deciding whether or not to accept this subscription.
5. **Adoption of LP Agreement**. Effective upon the acceptance of this Subscription Agreement by the Limited Partnership, the Investor hereby accepts, adopts and agrees to be bound by each and every provision contained in the LP Agreement, and agrees to become a Limited Partner, as defined therein.
6. **Indemnification**. The Investor agrees to indemnify and hold harmless the General Partner, each other owner of Interests, and the Limited Partnership from and against any and all losses, liabilities, claims, damages and expenses (including any expense reasonably incurred in investigating, preparing or defending against any claim whatsoever) related to any false representation or breach of any warranty or agreement contained herein.

7. **Successors of the Investor.** The representations, warranties, covenants, and agreements in this Subscription Agreement shall be binding on the Investor's successors, permitted assigns, heirs and legal representatives and shall inure to the benefit of the respective successors and assigns of the General Partner and the Limited Partnership.
8. **Privacy.** The Investor agrees that information supplied in this Subscription Agreement and otherwise in connection with his or her subscription for the Interests may be retained by the Limited Partnership or the General Partner and will be used for the purposes of processing the subscription.
9. **Confidentiality.** The Investor understands that this Subscription Agreement and all other documents delivered to the Investor in connection with this private placement of the Interests are confidential documents prepared solely for the benefit of qualified investors acceptable to the Limited Partnership. The Investor agrees that he or she will not reproduce or distribute any of such documents in whole or in part and if this subscription is rejected he or she will promptly return the subscription materials to the Limited Partnership.
10. **Counterparts and Delivery.** This Subscription Agreement may be executed in any number of counterparts, each of which shall be considered an original. Delivery of a copy of this Subscription Agreement bearing an original signature by facsimile transmission, by electronic mail in "portable document format" (".pdf") form, or by any other electronic means intended to preserve the original graphic and pictorial appearance of a document, will have the same effect as physical delivery of the paper document bearing the original signature.
11. **Applicable Law and Jurisdiction.** Except to the extent covered by applicable United States federal law, this Subscription Agreement and the rights and obligations of the parties hereto with respect to the subscription shall be interpreted and enforced in accordance with, and governed by, the laws of the State of California applicable to agreements made and to be performed wholly within that jurisdiction.
12. **Entirety of Agreement; Amendment.** This Subscription Agreement constitutes the entire agreement among the parties hereto with respect to the subject matter hereof, and supersedes all prior agreements (whether oral or written), and may not be amended, modified, terminated or revoked except by written agreement of the parties. In the event of any conflict between the LP Agreement and this Subscription Agreement, the LP Agreement will prevail.

\*\*\*\*\*

*(signature page follows)*

IN WITNESS WHEREOF, the undersigned has executed this Subscription Agreement as of

\_\_\_\_\_.

**SIGNATURE FOR INVESTOR**

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Print Name)

**ACCEPTANCE**

Home Paradise Investment Center LLC, as general partner of the Limited Partnership, hereby accepts the above subscription to acquire Interests.

Dated: \_\_\_\_\_

Home Paradise Investment Center LLC  
a California limited liability company

By: \_\_\_\_\_  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_



## SAMPLE LIMITED PARTNERSHIP AGREEMENT OF

[L.P. I], LP

This limited partnership agreement (this "Agreement") is entered into as of \_\_\_\_\_, 2010 ("Effective Date"), by and among Home Paradise Investment Center LLC, a California limited liability company, as general partner ("General Partner"), and the persons listed on Exhibit A attached hereto as the limited partners, as such exhibit may be updated from time to time in accordance with this Agreement (collectively, "Limited Partners," and separately, "Limited Partner"). The General Partner and the Limited Partners are referred to in this Agreement collectively as "Partners" and separately as "Partner."

### Recitals

A. [L.P. I], LP, a California limited partnership, was formed upon the filing of its Certificate of Limited Partnership with the California Department of State on [\_\_\_\_\_] 2010 ("the Partnership").

B. The Partners desire to enter into this Agreement to specify their respective rights, duties, and obligations.

Now, therefore, the Partners agree as follows:

### 1 Formation and Name

- 1.1 **Formation.** The Partnership was organized by the General Partner under the provisions of the California Revised Uniform Limited Partnership Act of 2008, as set forth in the California Corporations Code Chapter 15900 et seq. as amended from time to time ("Re-RULPA"). The limited partnership interests in the Partnership shall be represented by one or more units of ownership in the Partnership ("Units") issued to those Limited Partners who shall be admitted to the Partnership upon acceptance of their respective counterpart signature pages by the General Partner, each of which shall be effective as of the date of such acceptance.
- 1.2 **Name.** The name of the Partnership is [L.P. I], LP.
- 1.3 **Name Change.** The General Partner may change the name of the Partnership or adopt such trade or fictitious names as it may determine appropriate, from time to time.
- 1.4 **Registered Office and Agent.** The registered agent of the Partnership shall be [\_\_\_\_\_] , and the registered office shall be the principal place of business of the registered agent. The General Partner may change the registered agent or registered office from time to time.
- 1.5 **Annual Report.** As required by law, the General Partner shall cause the

Partnership to file an annual report with the Secretary of State each calendar year, on the form provided by the Secretary of State. The General Partner shall cause the Partnership to maintain at its principal office a copy of the three most recent annual reports filed by the Partnership with the California Department of State.

- 1.6 **Names and Addresses of the Partners.** The names and addresses of the General and Limited Partners are set forth in Exhibit A, which exhibit shall be updated from time to time by the General Partner.
- 1.7 **Purpose.** The sole purpose of the Partnership is to operate as an investment partnership under the EB-5 Immigrant Investor Pilot Program to finance \_\_\_\_\_ located in City of Industry, Los Angeles County, California (the "Project"). The Partnership has been structured to comply with the requirements of the USCIS criteria for Immigrant Investors, as defined under Section 203(b)(5) of the Immigration and Nationality Act.
- 1.8 **Principal Place of Business.** The principal place of business of the Partnership shall be at \_\_\_\_\_, City of Industry, CA. The General Partner may change the principal place of business of the Partnership from time to time.
- 1.9 **Term.** The term of the Partnership commenced on [\_\_\_\_], 2010, the date stated in the Certificate of Limited Partnership filed in the office of the California Secretary of State in accordance with Re-RULPA and shall continue until the winding up and liquidation of the Partnership and its business is completed following a Liquidating Event, as provided in Section 9.1.

## 2 Capital Contributions by Partners

- 2.1 **Capital Accounts.** The Partnership shall establish and maintain an individual capital account for each Partner (collectively, "Capital Accounts" and each individually, a "Capital Account"), which Capital Accounts shall be determined and maintained in accordance with the provisions set forth in Treas Reg §1.704-1(b)(2)(iv).
- 2.2 **Initial Capital.** Each Limited Partner shall contribute cash in the amount of \$500,000 per Unit (each, a "Capital Contribution") to the capital of the Partnership, for which that Partner shall receive a corresponding credit to its Capital Account.
- 2.3 **Additional Capital Contributions.** No Partner shall be obligated to contribute additional capital to the Partnership.
- 2.4 **No Interest or Guaranty.** No Partner shall be entitled to receive interest on the unreturned balance of that Partner's Capital Contribution. No Partner guarantees the return of any other Partner's Capital Contribution or any other investment in the Partnership.
- 2.5 **No Withdrawal.** Except as expressly provided otherwise in this Agreement, no Partner shall have the right, without the prior written consent of all Partners, to withdraw from

the Partnership or withdraw all or any part of its Capital Contribution from the Partnership.

- 2.6 **Visa Denial.** In the event that a Limited Partner's I-526 application is denied, upon receipt by the General Partner of notice to such effect, it shall return the Limited Partner's Capital Contribution within ninety days of the Limited Partner's written request.

### 3 Percentage Interests

- 3.1 **Definitions.** For purposes of this Agreement:

3.1.1 "EB-5 Minimum Capital Requirement" means the minimum amount of money necessary for a Limited Partner at the time he or she is admitted to the Partnership to meet the investment requirement of then applicable EB-5 Program rules and regulations. At the date of this agreement, such minimum investment amount is \$500,000.

3.1.2 "EB-5 Program" means the EB-5 immigrant investment program established pursuant to the Immigration Act.

3.1.3 "Immigration Act" means 8 U.S.C. §1153 (b)(5)(A)(i)-(iii),(C).

3.1.4 (b) (4)

3.1.5 "Net Cash Flow" means income received from the operation of the Partnership, after deducting funds used to pay all expenses and debts of the Partnership, including administrative operational expenses, debt payments, capital improvements, and less the amount set aside by the General Partner, in the exercise of its sole discretion, for reserves.

3.1.6 "Unrecovered Capital Contribution" means an amount equal to the excess, if any, of the Capital Contribution made by a Unit holder (or that Unit holder's predecessor in interest) over the aggregate amount of distributions received by that Unit holder (or that Unit holder's predecessor in interest), determined as of the date required under this Agreement.

- 3.2 **Manner of Distributions.** From time to time, on a quarterly basis, the General Partner may, but is not obligated to, determine the amount, if any, of Net Cash Flow and cause the Partnership to distribute such Net Cash Flow to the General Partner and the Unit holders in accordance with Section 3.3.

- 3.3 **Distribution of Net Cash Flow.** Subject to Section 3.2, Net Cash Flow shall be distributed to the General Partner and Unit holders as follows:

3.3.1 (b) (4)



(b) (4)

3.3.2

#### 3.4 **Limitations on Distributions.**

3.4.1 The Partnership may not make a distribution to a Partner in violation of this Agreement.

3.4.2 The Partnership may not make a distribution to a Partner if after the distribution:

3.4.2.1 The Partnership would not be able to pay its debts as they become due in the ordinary course of the Partnership's activities; or

3.4.2.2 The Partnership's total assets would be less than the sum of its total liabilities plus the amount that would be needed, if the Partnership were to be dissolved, wound up, and terminated at the time of the distribution, to satisfy the preferential rights of Partners upon dissolution, winding up and termination whose preferential rights are superior to those of persons receiving the distribution.

3.4.3 Anything in this Article 3 to the contrary notwithstanding, prior to the fifth anniversary date of a Limited Partner's Capital Contribution, distributions may be made to that Limited Partner only to the extent that such distributions do not result in his Unrecovered Capital Contribution being less than the minimum amount of his EB-5 Minimum Capital Requirement. After the fifth anniversary date, the foregoing distribution restriction shall no longer apply.

## 4 Profits and Losses

4.1 **Determination of Profits and Losses.** Partnership profits and losses shall be determined in accordance with Internal Revenue Code §§703 and 704, as amended, and the treasury regulations promulgated by the United States Department of the Treasury thereunder (Treasury Regulations).

4.2 **Allocation of Profit and Losses.** Subject to Section 4.3, Partnership profits and losses shall be allocated to the Partners, pro rata, in accordance with their respective Percentage Interests. Notwithstanding the foregoing, loss allocations to a Partner shall be made only to the extent that such loss allocations will not create a deficit Capital Account balance for the Partner in excess of an amount, if any, equal to the Partner's share of Partnership Minimum Gain (which term shall have the meaning set forth in Treas Reg §1.704-2(d)). Any loss not allocated to a Partner because of the foregoing provision shall be allocated to the other Partners (except to the extent the other Partners are limited with respect to the allocation of losses under this Section 4.2). Any loss reallocated under this Section 4.2 shall be taken into account in computing subsequent allocations of income and losses, so that the net amount of any item so allocated and the income and losses allocated to each Partner under this Section 4.2, to the extent possible, shall be equal to the net amount that

would have been allocated to each Partner under this Section 4.2 if no reallocation of losses had occurred.

## 5 Accounting and Records

- 5.1 **Books and Records.** The Partnership shall maintain at its principal place of business separate books of account for the Partnership.
- 5.2 **Reports to EB-5 Limited Partners.** In addition to the reports to Partners listed above, as soon as reasonably practicable after the date when a Limited Partner has made its Capital Contribution to the Partnership in full and has otherwise complied with its obligations under this Agreement, the Partnership shall provide such Limited Partner or its designated immigration counsel with the copies of information provided to the Partnership by the General Partner, including:
- 5.2.1 A copy of the USCIS letter of designation of the General Partner as a regional center under the EB-5 Program;
  - 5.2.2 A copy of the overall business plan submitted to USCIS by the General Partner.
  - 5.2.3 A copy of the approved economic report which concludes that the investments to be made by the Partnership from the Capital Contributions of Limited Partners, including the Capital Contributions of such Limited Partner, will generate full-time employment positions, either directly or indirectly, for not fewer than ten qualifying U.S. workers per Limited Partner whose Capital Contributions have been so applied;
  - 5.2.4 If claiming investment for no less than \$500,000, but less than \$1 million, by electing to restrict the investment by the Partnership of its Capital Contribution to investments located within a "target employment area" as defined by USCIS rules and regulations ("TEA"), documented evidence that the location of the Partnership's investment of such Limited Partner's Capital Contribution is located within a TEA; and
  - 5.2.5 A certified copy of this Agreement, including the Schedules hereto, evidencing that such Limited Partner has made at least the minimum applicable investment required; that such investment is "at risk;" and that the Limited Partner has been admitted to the Partnership as a Limited Partner.

## 6 General Partner

- 6.1 **Rights and Powers.** Except as expressly provided otherwise in this Agreement, the General Partner shall have exclusive control over the Partnership's day-to-day business and all real and personal (tangible and intangible) property of the Partnership (the "Assets") and shall have all rights, power, and authority to transact business on behalf of the Partnership. The General Partner shall assume all rights and shall exercise all responsibilities imposed by Re-RULPA.

- 6.2 **Compensation.** The General Partner and any of its Affiliates shall be entitled to receive reasonable compensation for services rendered by or on behalf of the Partnership, payable only from revenue generated by the Project.
- 6.3 **Standard of Care and Liability to Limited Partners.** The General Partner shall not be liable or obligated to the Partnership or a Limited Partner for any matter arising in any manner out of or in connection with the operation of the Partnership's business, except as to those matters arising by reason of the General Partner's fraud, gross negligence, reckless conduct, intentional misconduct, or knowing violation of law. The General Partner is expressly authorized to satisfy any Partnership obligation for which the General Partner is personally liable before satisfying a Partnership obligation for which the General Partner is not personally liable.
- 6.4 **Devotion of Time and Other Activities.** The General Partner shall devote to the Partnership such time as is reasonably necessary and appropriate to carry out its obligations under this Agreement in a diligent, proper, and business-like manner. The General Partner may engage in any business activity for its own profit or advantage without the other Partners' consent.
- 6.5 **Administrative Matters.** The General Partner shall keep, at the Partnership's expense, accurate records of all transactions entered into with respect to the Partnership's business, and all records and documents required to be maintained under Corporations Code §15901.11.
- 6.6 **Tax Returns.** The General Partner shall cause all income and other tax returns of the Partnership to be prepared and filed in a timely manner. The General Partner shall furnish to each General Partner and Unit holder the necessary tax information (with respect to the Partnership) for the preparation of their United States federal income tax returns on an annual basis. The General Partner shall use its best efforts to furnish such information within ninety days after the end of the Fiscal Year of the Partnership.
- 6.7 **Expenses and Indemnification.** The Partnership shall bear the cost of all expenditures and liabilities that the General Partner incurs in the proper conduct of the Partnership's business. The Partnership, to the extent of its Assets, shall indemnify, defend, and hold the General Partner harmless from and against any and all losses, expenses, damages, and liabilities of every kind, arising in any manner out of or in connection with the operation of the Partnership's business, except as to those matters arising by reason of the General Partner's fraud, gross negligence, reckless conduct, intentional misconduct, or knowing violation of law.

## 7 Limited Partners

- 7.1 **Rights and Powers.** The Limited Partners shall engage in policy formulation activities and be granted certain rights expressly afforded to them as limited partners under the Act, but the Limited Partners shall otherwise not have the right to participate in the conduct, management or control of the Partnership's day-to-day business nor the power to bind the Partnership in any contract, agreement, compromise, or undertaking.

- 7.2 **Liability of Limited Partners.** The Limited Partners shall not be personally liable for the Partnership's debts, obligations, or losses, except to the extent expressly provided otherwise in this Agreement or provided by law. A Limited Partner may engage in any business activity for its own profit or advantage without the other Partners' consent.
- 7.3 **Acknowledgment.** The Limited Partners acknowledge that the Partnership interests represented by this Agreement have been acquired for investment and have not been registered under the Securities Act of 1933, as amended, or the securities laws of any state. Each Limited Partner represents that it is purchasing its Partnership interest for its own account and not with a view to or for sale in connection with any distribution. In addition to any other restrictions on transfers set forth in this Agreement or provided by law, a Limited Partner may not sell, assign, pledge, hypothecate, or otherwise transfer or encumber all or any part of its interest in the Partnership without first registering or qualifying that interest under applicable state and federal securities laws, unless, in the opinion of counsel satisfactory to the Partnership, registration or qualification is not required.

## 8 Transfer of Partnership Interests

- 8.1 **General Prohibition.** Except as expressly provided otherwise in this Agreement, no Partner may sell, assign, pledge, hypothecate, or otherwise transfer or encumber all or any part of its interest in the Partnership without the prior written consent of the General Partner (such transfer, a "Permitted Transfer"). Subject to waiver by the General Partner, no Limited Partner may transfer its interest in the Partnership prior to receiving USCIS approval of such Limited Partner's I-829 petition, thereby removing conditions on permanent residence. Any attempted action in violation of this Section 8.1 shall be invalid and of no force or effect. The Partnership shall not dissolve by reason of a Permitted Transfer.
- 8.2 **Conditions of Transfer.** Any permitted transferee who acquires an interest in the Partnership must: (1) execute and deliver to the General Partner such documents and instruments of conveyance and assumption as may be necessary or appropriate in the reasonable opinion of the General Partner to effect such transfer and to affirm the permitted transferee's agreement to be bound by this Agreement and assumption of all obligations and duties of the transferor with respect to the Unit or Units being transferred, and (2) reimburse the Partnership for all reasonable legal and accounting fees and other costs which the Partnership must pay as a result of the transaction. On the satisfaction of these conditions, the transferee shall succeed to the Partnership Interest of the transferor Partner in the same capacity as the transferor Partner held in the Partnership. If any of these conditions are not satisfied or waived in writing by the General Partner, then the transferor Partner shall not be relieved of any of its obligations as a partner of the Partnership (as those obligations are set forth in this Agreement or conferred by law), and the transferee shall not be entitled to any rights of a Partner under this Agreement, other than the right to receive as much of the transferor Partner's share of Partnership profits, losses, and distributions to which the transferor Partner otherwise would be entitled under

this Agreement.

- 8.3 **Acquisition by Operation of Law.** If any party acquires all or any part of a Partner's interest in the Partnership by operation of law (including by death or court decree), that party shall not be entitled to vote on any Partnership matter or otherwise participate in the Partnership's business, unless the acquisition is approved in writing by the General Partner, and the conditions set forth in Section 8.2 are satisfied.

## 9 Dissolution and Winding Up

- 9.1 **Liquidating Events.** The Partnership shall dissolve and commence winding up and liquidating upon the first to occur of the following events ("Liquidating Events"):
- 9.1.1 The sale or other disposition of all or substantially all of the Partnership's assets or the Project;
  - 9.1.2 The agreement of the General Partner and Limited Partners holding at least 51% of the Units to dissolve, wind up, and liquidate the Partnership;
  - 9.1.3 The happening of any other event that makes it unlawful, impossible, or impractical to carry on the business of the Partnership; or
  - 9.1.4 The termination by legal action of the Partnership's authority to transact business;
  - 9.1.5 Except as provided in Sections 9.1.6 and 9.1.7, the happening of any event that causes a dissolution of a California limited partnership under Re-RULPA;
  - 9.1.6 The dissociation of a general partner; provided, however, that the Partnership shall not be dissolved if (A) at the time of such event, there is at least one remaining general partner, or (B) there is no other general partner, but, within 90 days after such event, the Limited Partners agree in writing to continue the Partnership and to the appointment of a substitute general partner. If the Limited Partners agree to continue the Partnership, then a substitute general partner shall be elected by a majority in interest of Limited Partners and such Person shall take all necessary action to continue the Partnership.
  - 9.1.7 The dissociation of the last remaining Limited Partner, provided, however, that the Partnership shall not be dissolved or required to be wound up if the General Partner admits at least one Limited Partner to the Partnership within 90 days after such event.
- 9.2 **Winding Up.** Upon the occurrence of a Liquidating Event, the Partnership shall continue solely for the purposes of winding up its affairs in an orderly manner, liquidating its assets, and satisfying the claims of its creditors and Partners.

## 10 Miscellaneous Provisions

- 10.1 **Amendment**. This Agreement is subject to amendment only with the written consent of those Partners whose consent is required under this Agreement to accomplish the action reflected in that amendment.
- 10.2 **Cumulative Remedies**. A Partner's remedies under this Agreement are cumulative and shall not exclude any other remedies to which such Partner may be lawfully entitled under this Agreement, at law, in equity, or otherwise.
- 10.3 **No Third-Party Rights**. The provisions of this Agreement are for the exclusive benefit of the Partnership and the Partners and no other party (including without limitation, any creditor of the Partnership or any Partner, and, except to the extent required by non-waivable provisions of Re-RULPA, any Unit holder who has not been admitted as a Partner) shall have any right or claim against the Partnership or any Partner by reason of those provisions or be entitled to enforce any of those provision against the Partnership or any Partner.
- 10.4 **Integration**. This Agreement and any other documents executed by the Partners and/or their Affiliates contemporaneously with the execution of this Agreement is the entire agreement between the parties with respect to the subject hereof and supersedes any prior agreement or understanding between the Partners. Except as otherwise provided in this Agreement, no alteration, modification, amendment, restatement or interpretation hereof shall be binding unless in writing and signed by the Partners.
- 10.5 **Notices**. Any notice required or permitted under this Agreement shall be given in writing and shall be deemed effectively given (1) on personal delivery; (2) 72 hours after deposit with a reputable express courier, addressed to a Partner at the address designated in the Partnership's records (and with simultaneous electronic mail notification of delivery), or (3) when delivered to the recipient by facsimile or electronic mail, which shall be followed by delivery by first-class postage or reputable overnight courier, addressed to a Partner at the address designated in the Partnership records. A Partner may designate another address for notice purposes on written notice to the Partners.
- 10.6 **Governing Law and Severability**. This Agreement shall be construed and enforced in accordance with the laws of the State of California. If a court of competent jurisdiction finds any provision in this Agreement to be invalid, its invalidity shall not affect the remainder of the Agreement. In that event, the invalid provision shall be deemed severed from the remainder of the Agreement, which shall remain enforceable in accordance with its terms and of full force and effect.
- 10.7 **Spousal Consent**. Each Partner agrees to cause his or her spouse, if any, to execute a spousal consent in form and substance reasonably satisfactory to the General Partner.

IN WITNESS WHEREOF, the Partners have executed this Agreement as of the date first above written.

**GENERAL PARTNER:**

HOME PARADISE INVESTMENT CENTER  
LLC

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

Name:

Its:

**LIMITED PARTNER:**

[ \_\_\_\_\_ ]

To be attached to and made a part of the Limited Partnership Agreement dated as of \_\_\_\_\_, 2010, of [L.P. I], LP

**LIMITED PARTNER SIGNATURE PAGE**

The undersigned hereby acknowledge(s) that the undersigned has (have) received a copy of the Limited Partnership Agreement of [L.P. I], LP ("the Partnership") dated as of \_\_\_\_\_, 2010 ("the Partnership Agreement"),

The undersigned hereby execute(s) the Partnership Agreement as a Limited Partner by adoption of this Signature Page and consents to be bound by all of the terms and conditions of the Partnership Agreement as a Limited Partner having the number of units subscribed for by the undersigned as set forth below upon acceptance of the Subscription Agreement of the undersigned by the General Partner of the Partnership as provided therein. By executing this document, the undersigned hereby confirms those representations set forth in the Subscription Agreement.

**Name of Limited Partner**

\_\_\_\_\_  
[Please Print or Type Legal Name]

**Limited Partner's Address (All Notices Regarding Units to Be Sent Here):**

[Street and Number] \_\_\_\_\_

[City/State/Zip] \_\_\_\_\_

[Telephone/Facsimile Number] \_\_\_\_\_

**Number of Units Purchased:** [1]

**Total Capital Contribution:** \$[500,000]

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

\_\_\_\_\_  
Signature



**EXHIBIT A**

**NAMES, ADDRESSES, ETC., OF PARTNERS**

**GENERAL PARTNER:**

Home Paradise Investment Center LLC  
[Attn: \_\_\_\_\_]  
517 Monterey Pass Road  
Monterey Park, CA 91754

**LIMITED PARTNERS:**

**EXHIBIT B**

**SCHEDULE OF CAPITAL CONTRIBUTIONS AND UNITS**

**CAPITAL CONTRIBUTIONS AND UNITS**

<u>GENERAL PARTNER:</u>	<u>CONTRIBUTION</u>	<u>UNITS</u>
HOME PARADISE INVESTMENT CENTER LLC	\$_[ ]	[ ]

**LIMITED PARTNERS:**

**TOTAL:**

8

8

1

1

1

1

**SAMPLE ESCROW AGREEMENT**  
**FOR INVESTMENT CAPITAL CONTRIBUTION**

This Escrow Agreement (this "Agreement") is made this \_\_\_\_ day of \_\_\_\_ 2010, by and among the undersigned investor (the "Investor"), [L.P. I], LP, a California limited partnership (hereinafter called the "Company"), and [\_\_\_\_], a [\_\_\_\_] (hereinafter called the "Escrow Agent").

WHEREAS, the Investor has executed and delivered to Company that certain Subscription Agreement of even date herewith (the "Subscription Agreement") concerning the purchase and sale of [\_\_\_\_] units, which [\_\_\_\_] units were offered pursuant to the Memorandum.

WHEREAS, pursuant to the terms of the Subscription Agreement, the Investor is required to deposit the capital contribution in the amount of \$500,000 (the "Capital Contribution") into an escrow account held by the Escrow Agent (the "Escrow Account").

WHEREAS, the Escrow Agent, the Company and the Investor now desire to enter into an agreement governing the terms and conditions of the escrow of the Capital Contribution;

NOW THEREFORE it is agreed:

**1. Definitions**

All capitalized terms used herein and not otherwise defined shall have the meanings ascribed thereto in the Subscription Agreement.

**2. Currency**

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

**3. Appointment of Escrow Agent; Escrow Agent Fee**

The Escrow Agent is hereby appointed to act, and the Escrow Agent agrees to act, as escrow agent in accordance with the terms and conditions of this Agreement. The Escrow Agent shall be entitled to compensation for its services as stated in the fee schedule attached hereto as Exhibit A (the "Escrow Agent Fee"), which shall be paid by the Company and may be deducted from the Administration Fee to the extent the Company is entitled to receive such fee.

**4. Capital Contribution**

The Company shall deliver the Capital Contribution in the amount of \$500,000 to the Escrow Agent by certified or cashier's check or by wire transfer of funds. The Escrow Agent hereby agrees to hold the Capital Contribution in a bank account, which shall include the name of the Company and the Investor or some other identification that reasonably identifies the Company and the Investor.

## **5. Company Requirements**

The Company shall supply to the Escrow Agent copies of such documentation that the Escrow Agent deems appropriate in its reasonable discretion.

## **6. Release of Escrowed Funds**

6.1 The Escrow Agent shall release the Capital Contribution and all other amounts in the Escrow Account to the Company upon Escrow Agent's receipt of copies of (i) the Company's written notice to the Investor regarding the closing of the subscription and (ii) USCIS' notice of receiving the filing for the Investor's Form I-526 Petition.

6.2 The Escrow Agent shall release the Capital Contribution without interest to the Investor and release any remaining amounts in the Escrow Account to the Company upon Escrow Agent's receipt of a copy of the Company's written notice to the Investor regarding the rejection of the Investor's subscription or the cancellation of the Offering.

6.3 The Escrow Agent shall release the Capital Contribution without interest to the Investor and release any remaining amounts in the Escrow Account to the Company upon Escrow Agent's receipt of notice by the Company that the Company is terminating the Investor's subscription due to the USCIS's denial of approval of Investor's Form I-526 Petition.

## **7. Investment of Escrow Funds.**

The Escrow Agent shall invest the Capital Contribution as directed by the Company in writing, in an interest earning deposit account offered by the Escrow Agent. Any accrued interest earned shall be used first to pay the Escrow Agent Fee and the balance will be paid to the Company.

## **8. Termination**

This Agreement, other than Section 9 and the immunity provisions of Section 10, shall terminate and cease to be of any further force or effect on the date that the last of the escrowed funds have been released pursuant to this Agreement. The provisions of Section 9 and the immunity provisions of Section 10 shall continue in effect indefinitely notwithstanding the resignation or removal of the Escrow Agent, the payment of all amounts required to be paid hereunder or the termination of this Agreement.

## **9. Indemnification of Escrow Agent**

The Company and Investor severally agree to indemnify the Escrow Agent, its officers and directors from, and to hold it harmless against, any loss, liability, claims, damages or expense incurred or suffered by it arising from a claim against it made by the parties hereto or a third party in connection with this Agreement, except to the extent that such loss, liability or expense is the result of the bad faith, gross negligence or willful misconduct of the Escrow Agent. The Escrow Agent shall be entitled to rely absolutely on documents and written notices delivered to it pursuant to this Agreement without independent verification or inspection. The

Escrow Agent shall not be responsible for any losses resulting from the sale or depreciation in the market value of such investment thereof.

#### **10. Rights, Duties and Immunities of Escrow Agent**

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

10.1 The duties and obligations of the Escrow Agent shall be determined solely by the express provisions of this Agreement and applicable law and the Escrow Agent shall not be liable except for the performance of such duties and obligations as are specifically set out in this Agreement and applicable law. The Escrow Agent shall not be required to inquire as to the performance or observation of any obligation, term or condition under the Subscription Agreement. The Escrow Agent is not a party to, and is not bound by, any agreement or other document out of which this Agreement may arise. The Escrow Agent shall not be subject to any liability to any party hereto by reason of any failure on the part of any party hereto or any maker, guarantor, endorser or other signatory of any document or any other person to perform such person's obligations under any such document. The Escrow Agent shall not be bound by any waiver, modification, termination or rescission of this Agreement or any of the terms hereof, unless evidenced by a writing delivered to the Escrow Agent signed by the proper party or parties and, if the duties or rights of the Escrow Agent are affected, unless it shall give its prior written consent thereto. This Agreement shall not be deemed to create a fiduciary relationship between the parties hereto under state or federal law.

10.2 The Escrow Agent shall not be responsible in any manner for the validity or sufficiency of this Agreement or of any property delivered hereunder, or for the value or collectability of any note, check or other instrument, if any, so delivered, or for any representations made or obligations assumed by any party other than the Escrow Agent. Nothing herein shall be deemed to obligate the Escrow Agent to deliver any cash, instruments, documents or any other property referred to herein, unless the same shall have first been received by the Escrow Agent pursuant to this Agreement.

10.3 The Escrow Agent shall rely only upon the instructions of the Company, its general partner and any authorized signatory thereof (each, an "Authorized Party") with respect to any notice, certificate, instrument, demand, request, direction, instruction, waiver, receipt, consent or other document or communication required or permitted to be furnished to the Escrow Agent hereunder, and the Escrow Agent shall not rely on any instructions delivered by any other person. The Escrow Agent shall be fully protected in acting or and relying upon any written notice, direction, request, waiver, consent, receipts or other paper or document which the Escrow Agent in good faith believes to have been signed and presented by an Authorized Party.

10.4 The Escrow Agent shall not be liable for any error of judgment, or for any act done or step taken or omitted by it in good faith or for any mistake in act or law, or

for anything which it may do or refrain from doing in connection herewith, except its own bad faith, gross negligence or willful misconduct.

10.5 The Escrow Agent may seek the advice of legal counsel in the event of any dispute or question as to the construction of any of the provisions of this Agreement or its duties hereunder, and it shall incur no liability and shall be fully protected in respect of any action taken, omitted or suffered by it in good faith in accordance with the advice or opinion of such counsel.

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

#### **11. Resignation of Escrow Agent**

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

#### **12. Headings**

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

#### **13. Invalidity of Provisions**

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

#### **14. Entire Agreement; Waiver**

This Agreement constitute the entire agreement between the parties hereto pertaining to the subject matter hereof. There are no warranties, representations or agreements between the parties in connection with the subject matter hereof except as specifically set forth or referred to in this Agreement. Except as expressly provided in this Agreement, no

amendment, waiver or termination of this Agreement shall be binding unless executed in writing by the party to be bound thereby. No wavier of any provision of this Agreement shall constitute a waiver of any other provision nor shall any waiver of any provision of this Agreement constitute a continuing waiver unless otherwise expressly provided.

**15. Governing Law; Venue**

This Agreement shall be governed by and construed in accordance with the laws of California and the laws of the United States applicable therein and the courts of California shall have exclusive jurisdiction in connection with any disputes under this Agreement. Each of the parties hereto submits to personal jurisdiction in the State of California for the enforcement of this Agreement and waives any and all personal rights to object to such jurisdiction with respect to any action or proceeding related to this Agreement.

**16. Successors and Assigns**

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

**17. Notice**

All notices or other communications given or made hereunder shall be in writing and shall be delivered personally, by messenger or by mail, postage prepaid, to the address or facsimile number set forth below in this Section or on the signature page. Delivery of any notice shall be deemed made on the date of actual receipt if personally delivered. Any such notice sent by regular mail shall be deemed delivered 10 days after the same is mailed by regular mail or immediately upon acknowledgement of receipt. Notices delivered by a reputable overnight courier that guarantees next day delivery shall be deemed delivered two business days after delivery of the same to the courier. Notices transmitted by facsimile transmission shall be deemed delivered upon telephonic confirmation of receipt (confirmation report from fax machine is sufficient), provided a copy is also delivered via mail. A party may change its address for notice by notice to each other party given in accordance with this Section.

**If to Escrow Agent:**

[address]

**If to Company:**

[L.P. I], LP

**18. Execution of Counterparts**

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

**[Signature Section on Following Page]**



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

**"INVESTOR"**

**"COMPANY"**

[L.P. I], LP

**Investor**

\_\_\_\_\_

By: Home Paradise Investment Center LLC

Its: General Partner

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

Its: \_\_\_\_\_

**"ESCROW AGENT"**

[\_\_\_\_\_]

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

Name:

Title:

88

88

C

C

C

**State of California**  
**Secretary of State**



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

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



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

JUN 16 2010

A handwritten signature in cursive script that reads "Debra Bowen".

**DEBRA BOWEN**  
Secretary of State



**State of California  
Secretary of State**

LLC-1

File # **201016610040**

**LIMITED LIABILITY COMPANY  
ARTICLES OF ORGANIZATION**

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

**JUN 11 2010**

A \$70.00 filing fee must accompany this form.

**IMPORTANT - Read instructions before completing this form.**

This Space For Filing Use Only

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

1. NAME OF LIMITED LIABILITY COMPANY

HOME PARADISE INVESTMENT CENTER LLC

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

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

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

3. NAME OF INITIAL AGENT FOR SERVICE OF PROCESS

EDWARD CHEN

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

517 MONTEREY PASS RD., MONTEREY PARK, CA 91754      CA

**MANAGEMENT** (Check only one)

5. THE LIMITED LIABILITY COMPANY WILL BE MANAGED BY:

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

**ADDITIONAL INFORMATION**

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

**EXECUTION**

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

06/08/10

DATE

  
SIGNATURE OF ORGANIZER

EDWARD CHEN

TYPE OR PRINT NAME OF ORGANIZER







STATEMENT

PAGE 1 OF 1

ARCADIA OFFICE  
1155 WEST HUNTINGTON DRIVE  
ARCADIA CA 91006 800-488-2265

00719

STATEMENT PERIOD  
07/06/10 THROUGH 07/31/10

HOME PARADISE INVESTMENT CENTER LLC  
517 MONTEREY PASS ROAD  
MONTEREY PARK CA 91754 2416

012-802629

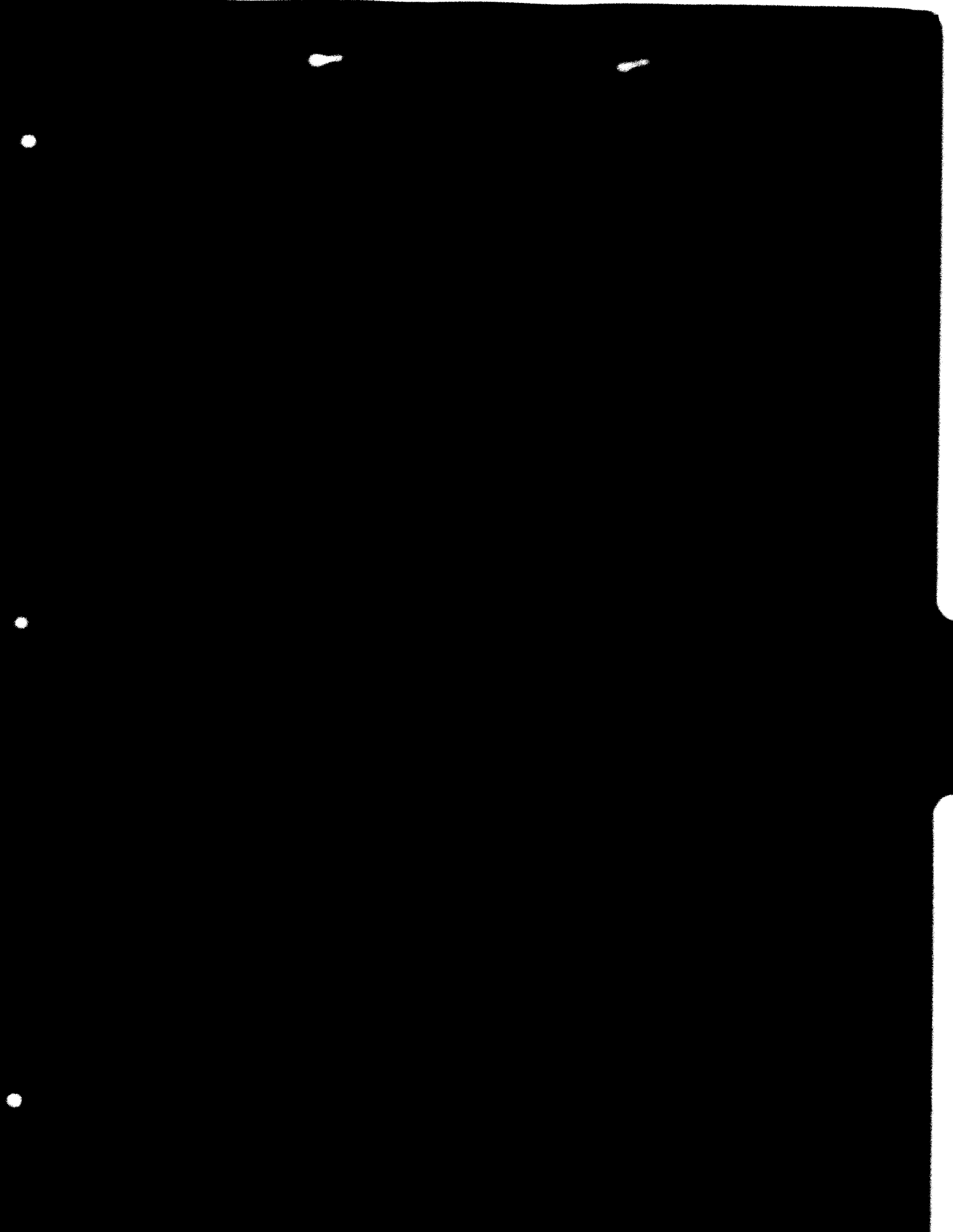
0 ITEMS ENCLOSED

GETTING GREAT MORTGAGE RATES HAS NEVER BEEN EASIER! SIGN UP  
FOR RATE MATCH AT WWW.BANKOFWEST.COM/MORTGAGE TO RECEIVE  
PERSONAL RATE OFFERS. TERMS SUBJECT TO CREDIT APPROVAL.  
BASIC BUSINESS CHECKING ACCOUNT NUMBER 012-802629

(b) (4)



For Your Protection Please examine this statement for errors and discrepancies - 800-488-2265



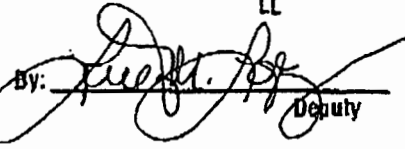


**Dolores Provencio**  
**Clerk / Recorder**  
**Imperial County**  
 940 Main Street, Suite 202  
 El Centro, CA 92243  
 (760) 482-4427

Filed in County Clerk's Office, Imperial County

8/16/2010  
 4:12 PM  
 LL

**Dolores Provencio**  
 County Clerk / Recorder

By:   
 Deputy

Doc#: 201010000611



EcgID - 9464

DocType: FBN  
 Pages: 2  
 Fees: \$20.00

**FICTITIOUS BUSINESS NAME STATEMENT**  
**PUBLICATION NEEDED WITHIN 30 DAYS**

FBN Number : 201010000611  
 Filing Type : FBN Filing  
 Date Filed: : 8/16/2010  
 Began Transacting Business : N/A  
 Filing Expires On : 8/16/2015  
 Business is Conducted By : A Limited Liability Company

Fictitious Business Name(s) : HOME PARADISE REGIONAL CENTER

Business Address : 2407 MARSHALL AVE.  
 IMPERIAL, CA 92251

Phone Number : 626-284-9999

County of Principal Place of Business: IMPERIAL

Mailing Address : 517 MONTEREY PASS ROAD  
 MONTEREY PARK, CA 91754

Registrant(s) : HOME PARADISE INVESTMENTS CENTER LLC  
 Address : 525 W. VALELY BLVD. #C  
 ALHAMBRA, CA 91803

AI#: 201016610040

State: CA

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

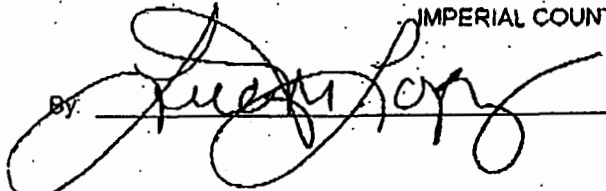
Signature: \_\_\_\_\_

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

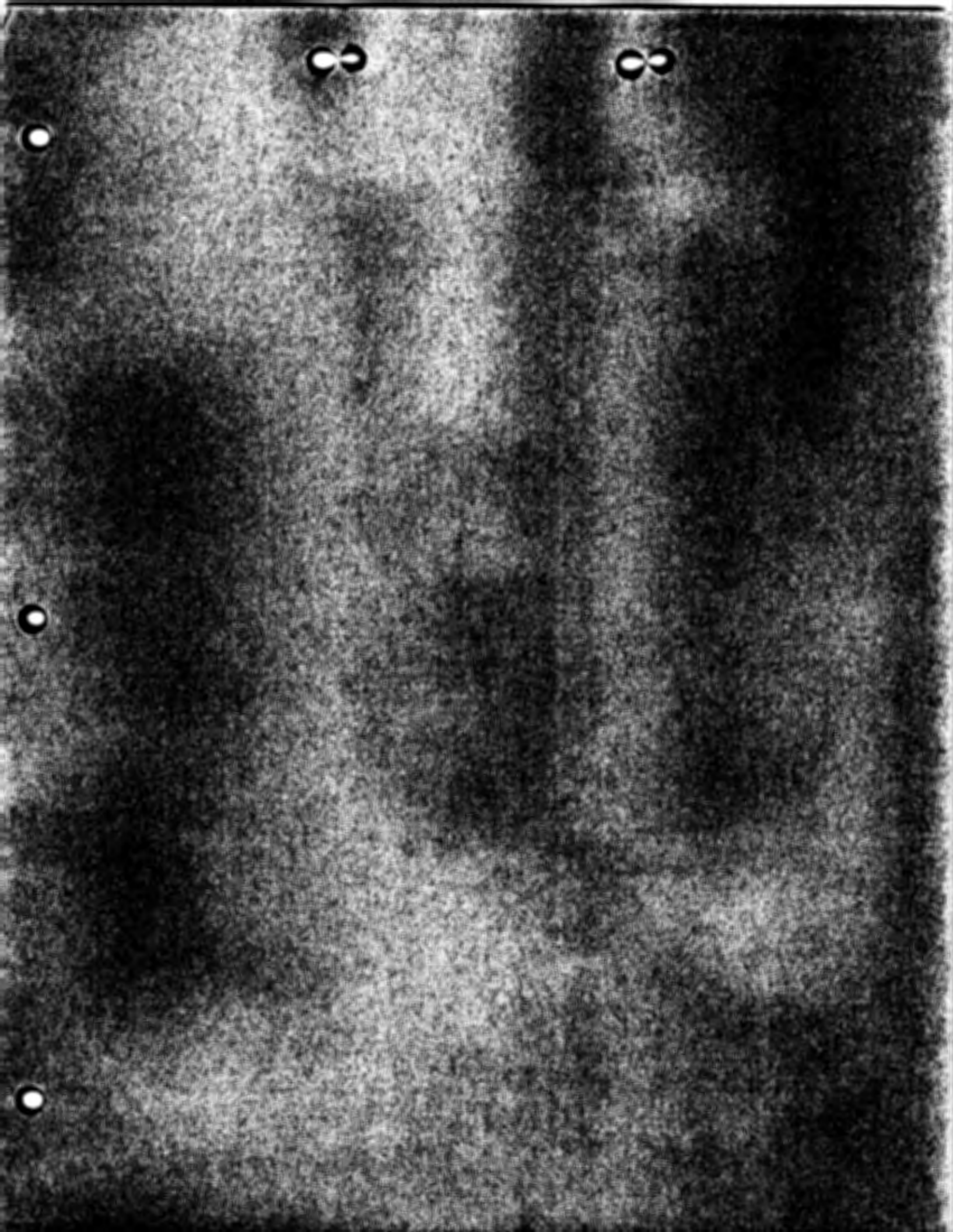
Officer Title: \_\_\_\_\_

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

BY SIGNING, I DECLARE THAT ALL INFORMATION IN THIS STATEMENT IS TRUE AND CORRECT. A registrant who declares as true information, which he or she knows to be false, is guilty of a crime (B&P Code 17913). I am also aware that all information on this statement becomes Public Record upon filing.

IMPERIAL COUNTY CLERK  
 By:   
 Deputy







**Larry Walker**  
Auditor/Controller-Recorder,  
County Clerk  
222 W. Hospitality Lane, 1<sup>st</sup> Floor  
San Bernardino CA 92415-0022  
(909) 386-8970 or (909) 386-8969

B

**LARRY WALKER**  
Auditor/Controller - Recorder

Doc#: 20100009032



EcgiD - 126617

DocType: FBN  
Pages: 4  
Fees: \$40.00

PUBLICATION IS REQUIRED  
FIRST TIME FILING, REFILING  
WITH CHANGES OR FILING EXPIRED  
& P 17917

**FILING FICTITIOUS BUSINESS NAME STATEMENT**

**ABANDONMENT:** County of Original Filing Date of Original Filing File No.

Fee \$40.00 includes up to one partner (please make check payable to "County Clerk")  
\$10.00 ea. additional FBN name filed on same statement and operating at same location.  
\$10.00 ea. additional partner \$10.00 ea. additional partner

Please TYPE or PRINT legibly and firmly in DARK ink (no alterations). See reverse side for filing and publishing instructions. The determination whether or not publication is required by law is ENTIRELY THE RESPONSIBILITY OF THE REGISTRANT. Neither the County Clerk nor his deputies are permitted by law to give legal advice or assistance. THE FOLLOWING PERSON(S) IS (ARE) DOING BUSINESS AS:

1	LIST FICTITIOUS BUSINESS NAME BELOW (list any additional business names on additional form)	County of Principal Place of Business		
	Home Paradise Regional Center	San Bernardino		
	Street Address of Principal Place of Business (P.O. Box or PMB address NOT acceptable)	City	State	Zip Code
2	10322 Jefferson St	Yucaipa	CA	92399
	Mailing Address (Optional)	City	State	Zip Code
	517 Monterey Pass Rd	Monterey Park	CA	91754
	(1) Name of Individual Registrant (First name)	(Middle initial only)	(Last name)	
	(1) Name of corporation or limited liability company as set out in the Articles of Inc./Org./Reg.	State of Inc./Org./Reg.	Inc./Org./Reg. No.	
	Home Paradise Investment Center LLC	CA	201016610040	
	Residence Street Address (Mailing address is NOT acceptable)	City	State	Zip Code
3	525 W. Valley Blvd #C	Alhambra	CA	91803
	(2) Name of Individual Registrant (First name)	(Middle initial only)	(Last name)	
	(2) Name of corporation or limited liability company as set out in the Articles of Inc./Org./Reg.	State of Inc./Org./Reg.	Inc./Org./Reg. No.	
	Residence Street Address (Mailing address is NOT acceptable)	City	State	Zip Code

List any additional names on additional form

(CHECK ONE ONLY) This business is/was conducted by (if corporation or limited liability company, registrant must include copy of "Articles of Incorporation", "Articles of Organization" or "Articles of Registration"):

- An Individual
- A General Partnership
- A Limited Partnership
- A Limited Liability Company
- A Limited Liability Partnership
- An Unincorporated Assoc. Other Than a Partnership
- A Corporation (include "Articles of Incorporation")
- Copartners
- Husband & Wife
- State or Local Registered Domestic Partners
- A Joint Venture
- A Trust

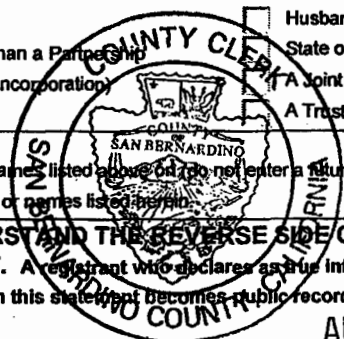
(CHECK ONE ONLY) enter date ONLY if first box is checked:

- Registrant commenced to transact business under the fictitious business name or names listed above (do not enter a future date)
- Registrant has not yet begun to transact business under the fictitious business name or names listed above

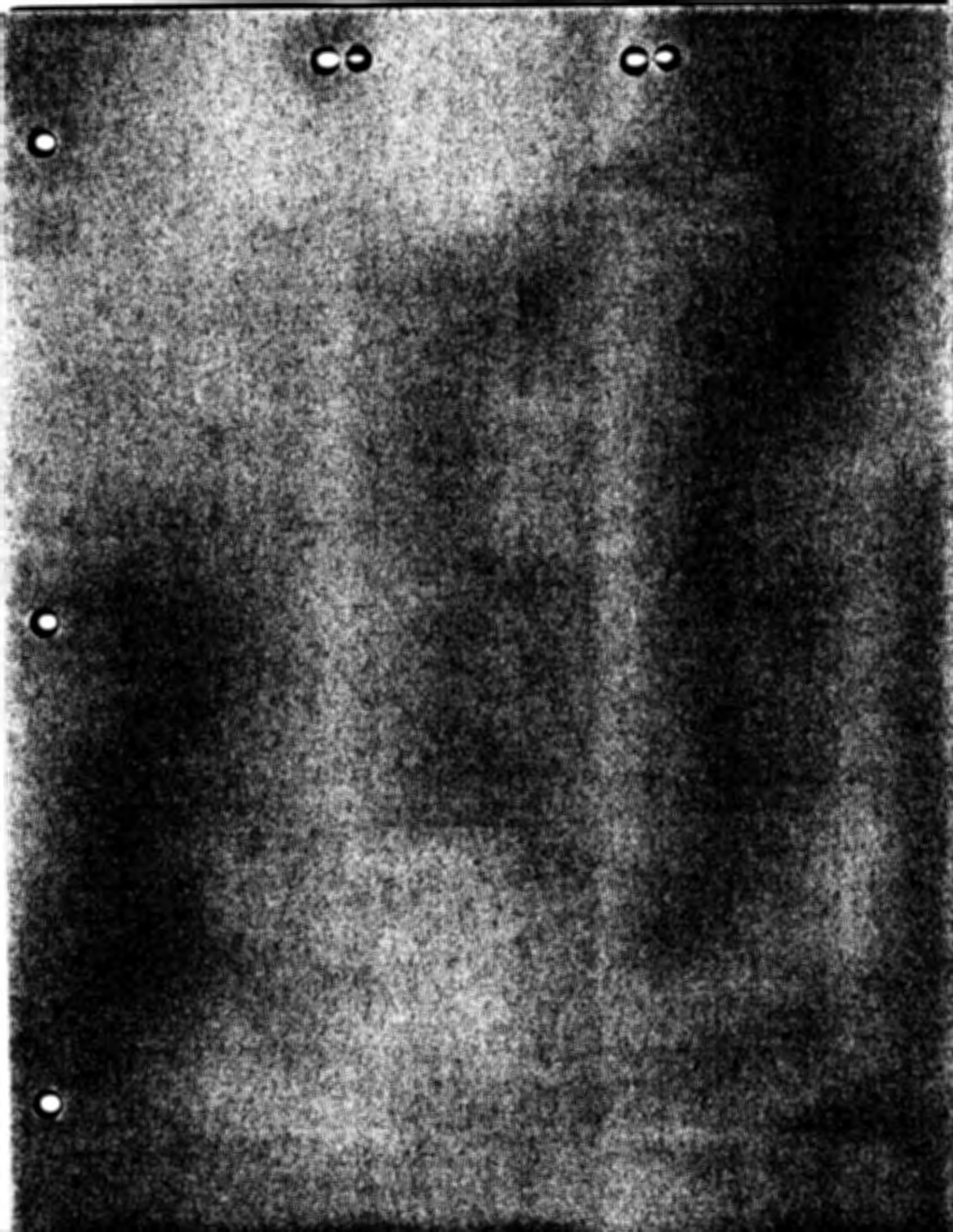
BY SIGNING BELOW, I DECLARE THAT I HAVE READ AND UNDERSTAND THE REVERSE SIDE OF THIS FORM AND THAT ALL INFORMATION IN THIS STATEMENT IS TRUE AND CORRECT. A registrant who declares as true information, which he or she knows to be false, is guilty of a crime. (B&P Code 17913) I am also aware that all information on this statement becomes public record upon filing pursuant to the California Public Records Act (Government Code Sections 6250-6277).

Sign below (see instructions on reverse for signature requirements):

Print Name (as appears on this statement) \_\_\_\_\_  
 Registrant: Home Paradise Investment Center LLC By Signature: Edward Chen  
 Printed Name of Person Signing: Edward Chen Print Title of Person Signing: CEO Date: 08-13-10



AUG 16 2010







LARRY W. WARD  
 COUNTY OF RIVERSIDE  
 ASSESSOR-COUNTY CLERK-RECORDER

P.O. Box 751, Riverside, CA 92502-0751 -- (951) 486-7000  
 82-675 Hwy. 111, Rm. 113, Indio, CA 92201 -- (760) 863-8732

OFFICE OF THE COUNTY CLERK

FICTITIOUS BUSINESS NAME STATEMENT

USE BLACK INK ONLY -  
 MUST BE TYPED OR PRINTED  
 INITIAL CROSS OUTS  
 NO WHITE OUT ALLOWED

CLERK'S USE ONLY  
 \$ 35 # 2961380  
 Fee Receipt  
 Comments: \_\_\_\_\_

**FILED**  
 RIVERSIDE COUNTY CLERK'S OFFICE  
 LARRY W. WARD  
**R-2010-08823**  
 08/16/2010 Fee: 35.00  
 Page 1 of 1

SEE REVERSE SIDE FOR FEES AND INSTRUCTIONS

THE FOLLOWING PERSON(S) IS (ARE) DOING BUSINESS AS:

**N. MEDINA**

1a. Fictitious Business Name (If more than one business name at same address - Attach Supplemental Sheet)

Home Paradise Regional Center

1b. List COMPLETE Physical Business Address (No P.O. Boxes or Postal Facilities)

1353 N. Hargrave St., Banning, CA 92220

1c. NAME OF COUNTY in which business is located

Riverside

Mailing Address (If Different than business address - Optional)

517 Monterey Pass., Monterey Park CA 91754

2a. Registrant Information (only list name of Corp/LLC if filing as such)

Home Paradise Investment Center LLC

Full Name of Registrant- Spell out first, MIDDLE and last names (no initials)

~~Edward Chen~~

Residence Address

517 Monterey Pass Rd CA 91754

City State Zip

Monterey Park

(List State of Corp/LLC Must be registered in California)

2b. Registrant Information (only list name of Corp/LLC if filing as such)

Full Name of Registrant- Spell out first, MIDDLE and last names (no initials)

Residence Address

City State Zip

(List State of Corp/LLC Must be registered in California)

2c. Registrant Information (only list name of Corp/LLC if filing as such)

Full Name of Registrant - Spell out first, MIDDLE and last names (no Initials)

Residence Address

City State Zip

(List State of Corp/LLC Must be registered in California)

2d. Registrant Information (only list name of Corp/LLC if filing as such)

Full Name of Registrant - Spell out first, MIDDLE and last names (no Initials)

Residence Address

City State Zip

(List State of Corp/LLC Must be registered in California)

3. This business is conducted by: (If More Than 4 Registrants - Attach Additional Sheet Showing Owner Information)

- Individual  Husband & Wife  Trust  Corporation  General Partnership  
 A Limited Partnership  Co-partners  Joint Venture  Limited Liability Company  Limited Liability Partnership  
 An Unincorporated Association - other than a partnership  State or Local Registered Domestic Partnership

4.  Registrant has not yet begun to transact business under the fictitious name(s) listed above.

Registrant commenced to transact business under the fictitious business name(s) listed above on 6-11-2010

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

5. Signature(s) Edward Chen  
 (Only one is required)

Typed or Printed Name(s) Edward Chen

If Limited Liability Company/Corporation, Title CEO

QC'D BY: KL

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

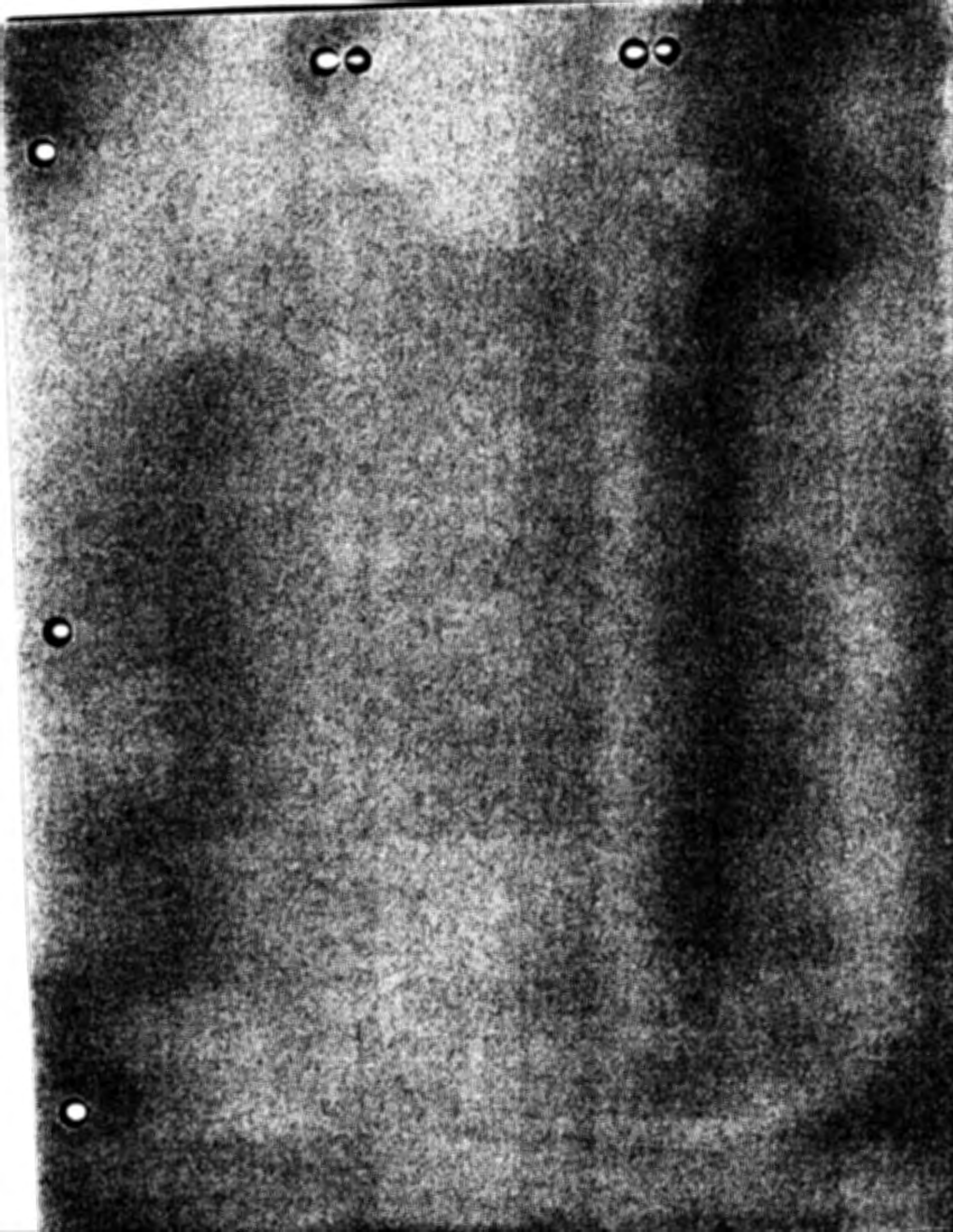
NOTICE IN ACCORDANCE WITH SUBDIVISION (a) OF SECTION 17920, A FICTITIOUS BUSINESS NAME STATEMENT GENERALLY EXPIRES AT THE END OF FIVE YEARS FROM THE DATE ON WHICH IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK, EXCEPT, AS PROVIDED IN SUBDIVISION (b) OF SECTION 17920, WHERE IT EXPIRES 40 DAYS AFTER ANY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

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

LARRY W. WARD  
 RIVERSIDE COUNTY CLERK  
 By: [Signature], Deputy

INDICATED NEWSPAPERS IN RIVERSIDE COUNTY

NAME	ADDRESS	CITY	ZIP CODE	Publishing Days	PHONE NUMBER	FAX / Website
Anza Valley Outlook	127 W Elder St	Fallbrook	92028	wkly on Friday	(951) 676-1839	(760) 723-9606
Black Voice	4290 Brockton Ave	Riverside	92501	wkly on Thursday	(951) 682-6070	(951) 276-0877
Business Journal	4129 Main St., Ste. 209	Riverside	92501	wkly on Tuesdays & Thursdays	(951) 784-0111	(951) 784-6947
Calimesa News-Mirror	1107 Calimesa Blvd., Ste. B	Calimesa	92320	wkly on Thursday	(909) 797-9101	(909) 797-0502
Desert Post Weekly	750 N Gene Autry Tr	Palm Springs	92262	wkly on Thursday	(760) 778-4578	legals@thedesertsun.com
Desert Valley Star	66538 Eighth St	Desert Hot Springs	92240	wkly on Thursday	(760) 671-6604	desertvalleystar.com
Idyllwild Town Crier	54185 Pine Crest	Idyllwild	92549	wkly on Thursday	(951) 659-2145	(951) 659-2071
Jurupa Valley Times	3540 12th Street	Riverside	92501	wkly on Friday	(951) 369-5890	(951) 369-5891
Norco News	2354 Corydon Ave	Norco	92860	wkly on Thursday	(951) 371-4036	(951) 371-0827
Palo Verde Valley Times	153 S. Broadway	Blythe	92225	wkly on Wednesdays & Fridays	(760) 922-3181	(760) 922-3184
Perris Progress	240 West 4th St.	Perris	92570	wkly on Wednesday	(951) 657-1810	(951) 940-1832
Record Gazette	218 N. Murray St.	Banning	92220	wkly on Friday	(951) 849-4586	(951) 849-2437
Riverside County Record	8175 Limonite Ave., Ste A-4	Riverside	92519	wkly on Thursday	40 (951) 685-6191	(951) 685-2961
Sentinel Weekly News	1307 B, West 6th St., Ste. 217	Corona	92882	wkly on Wednesday	(951) 737-9784	(951) 737-9785
The Californian	28765 Single Oak Dr., Ste. 100	Temecula	92590	Daily	(951) 676-4315	(951) 699-1467
The Desert Sun	750 N Gene Autry Tr	Palm Springs	92262	wkly on Wednesday - Sunday	(760) 778-4578	legals@thedesertsun.com
The Friday Flyer	31558 Railroad Cyn. Rd.	Canyon Lake	92587	wkly on Friday	(951) 244-1866	(951) 244-2748
The Hemet News	474 W. Esplanade Ave.	San Jacinto	92583	Wkly on Tuesday-Sunday / NO WALK-INS	(951) 763-3411	(951) 763-3410
The Press Enterprise	3450 Fourteenth St.	Riverside	92501	Daily	(800) 880-0345	(951) 368-9018
The Public Record	78370 Hwy 111, Ste 250	La Quinta	92253	wkly on Tuesday	(760) 771-1155	(760) 771-1188
The Valley Chronicle	2091 W. Florida Ave	Hemet	92545	wkly on Friday	(951) 652-6529	(951) 652-4009





**TOM DALY**  
**CLERK-RECORDER**  
**12 CIVIC CENTER PLAZA, ROOM 106**  
**POST OFFICE BOX 238**  
**SANTA ANA, CA 92702-0238**

Official Records, Orange County  
 Tom Daly, Clerk-Recorder  
 20106239497 23.00  
 08/11/2010 15:30:00  
 194 97 F01  
 23.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00

**FICTITIOUS BUSINESS NAME STATEMENT**

**THE FOLLOWING PERSON(S) IS (ARE) DOING BUSINESS AS:**

1.	Fictitious Business Name(s) HOME PARADISE REGIONAL CENTER	(optional) Business Phone No.
1A	<input checked="" type="checkbox"/> New Statement <input type="checkbox"/> Refile - list previous No. <input type="checkbox"/> Change	
2.	Street Address, City & State of Principal place of Business (Do not use P.O. box or P.M.B.) 2800 N MAIN STREET STE 282 SANTA ANA, CA 92705 ORANGE	City State Zip Code County
3.	Full name of Registered Owner (If Corporation, enter corporation name) HOME PARADISE INVESTMENT CENTER LLC	If Corporation / LLC State of Incorporation or organization CA
	Res. / Corp. Address (Do NOT use a P.O. Box or P.M.B.) 517 MONTEREY PASS ROAD	City State Zip Code MONTEREY PARK CA 91754
4.	(CHECK ONE ONLY) This business is conducted by: <input type="checkbox"/> an individual <input type="checkbox"/> a general partnership <input type="checkbox"/> a limited partnership <input type="checkbox"/> an unincorporated association other than a partnership <input type="checkbox"/> a corporation <input type="checkbox"/> a Limited Liability Partnership <input type="checkbox"/> co-partners <input type="checkbox"/> a husband and wife <input type="checkbox"/> a joint venture <input checked="" type="checkbox"/> Limited Liability Co.	
5.	Have you started doing business yet? <input checked="" type="checkbox"/> Yes Insert Date: 06/11/2010 <input type="checkbox"/> No	Notice: This Fictitious Business Name Statement expires five years from the date it was filed in the Office of the County Clerk-Recorder. The statement expires 40 days after any change in the facts is made other than a change in the residences address of the registered owner. A new Fictitious Business Name Statement must be filed before either expiration. When ceasing to transact business under an active Fictitious Business Name Statement, Abandonment shall be filed. The filing of this statement does not of itself authorize the use in this state of a Fictitious Business Name in violation of the rights of another under federal, state or common law (see section 14411 et seq., Business and Professions Code).
6.	If the registered owner is NOT a corporation, sign below: (See Instructions on the reverse side of this form)  Signature: _____  _____ (Type or Print Name)  I declare that all information in this statement is true and correct. (A Registered owner who declares as true information which he or she knows to be false is guilty of a crime.)	If the registered owner is: a corporation, an officer of the corporation signs below. any type of partnership, the general partner signs below. a limited liability company, a manager or an officer signs below. HOME PARADISE INVESTMENT CENTER LLC _____ Limited Liability Company/Corporation/Partnership Name  _____ Signature and Title of Officer/Manager or General Partner  I declare that all information in this statement is true and correct. (A Registered owner who declares as true information which he or she knows to be false is guilty of a crime.) EDWARD CHEN CEO _____ Title of Officer/Manager or General Partner

**These fees apply at time of filing:**  
 Filing fee \$23.00 for one business name.  
 \$7.00 for each additional business name  
 \$7.00 for each additional partner after first two  
 Please provide a self-addressed, stamped, return envelope if mailed.

## Adjudicated Newspapers in Orange County

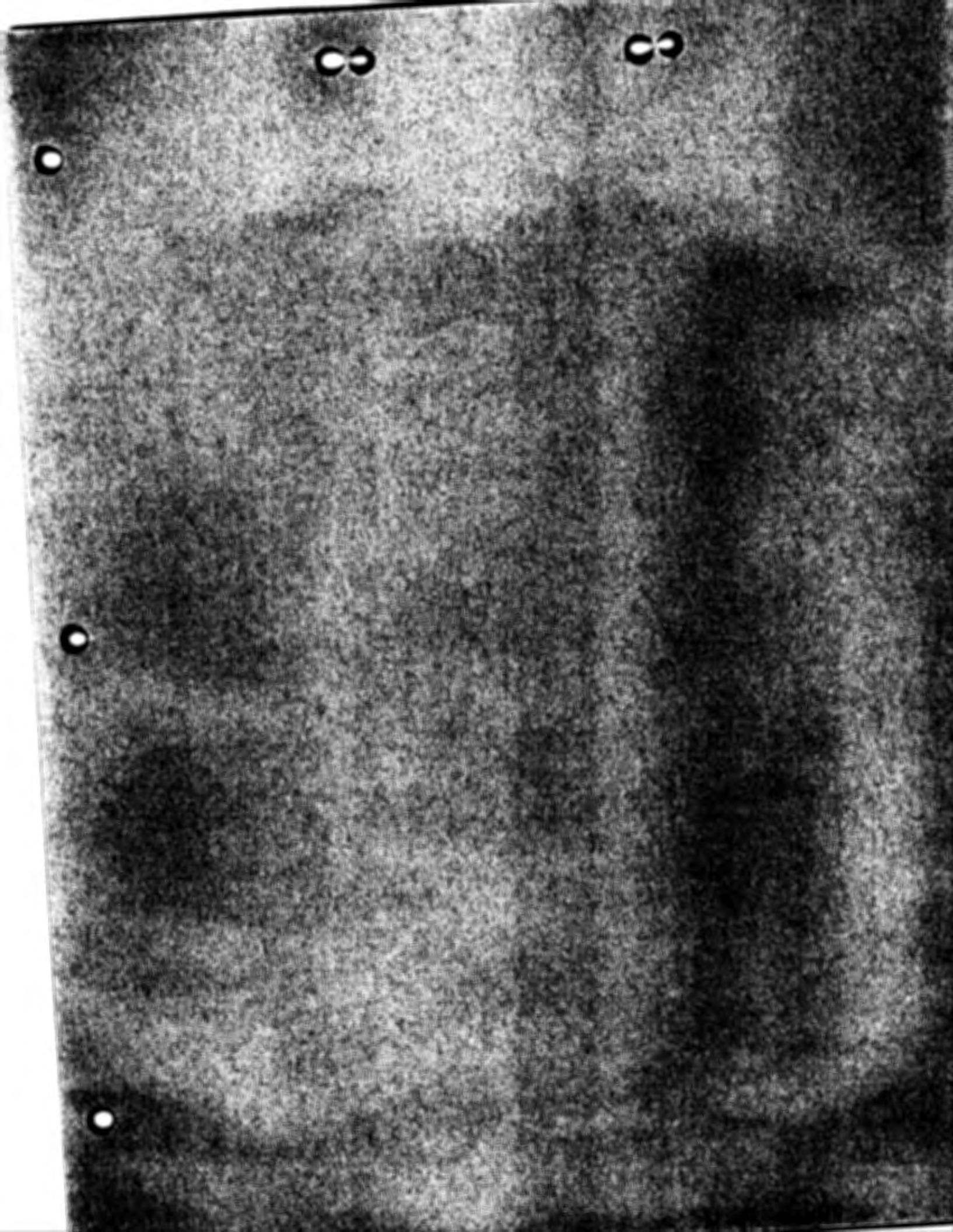
NOTE: If this is a withdrawal, abandonment, a new statement or a changed statement you shall publish in an adjudicated paper within 30 days of filing. If this is a refile because the prior statement has expired, the refiling need not be published unless there has been a change in the information required in the expired statement, provided the refiling is filed within 40 days of the date the statement expired.

\* Most papers publish only once a week; please take this into consideration and publish as soon as possible.

- Buena Park/Anaheim Independent  
9551 Valley View St.  
Cypress, CA 90630  
Ph: (714) 952-8505  
Fax: (714) 952-8506  
[www.gjournal.com](http://www.gjournal.com)
- Coast Line Pilot  
1375 Sunflower Ave.  
Costa Mesa, CA 92626  
Ph: (714) 966-4689  
Fax: (714) 966-4663  
[www.coastlinepilot.com](http://www.coastlinepilot.com)
- Coto De Caza News  
23472 Vista del Verde, #6  
Coto de Caza, CA 92679  
Ph: (949) 589-9990  
Fax: (949) 589-6429
- Cypress Event Newspapers  
9559 Valley View St.  
Cypress, CA 90630  
Ph: (714) 220-0292  
Fax: (714) 952-8506
- Cypress News Enterprise  
La Palma, Los Alamitos &  
Seal Beach New Enterprise  
11110 Los Alamitos Blvd., #101  
Los Alamitos, CA 90720  
Ph: (714) 527-8210  
Fax: (562) 493-2310
- Newport Beach/  
Costa Mesa Daily Pilot  
1375 Sunflower Ave.  
Costa Mesa, CA 92626  
Ph: (714) 966-4689  
Fax: (714) 966-4663  
[www.dailyjournal.com](http://www.dailyjournal.com)
- Garden Grove Journal  
12866 Main St., #203  
Garden Grove, CA 92840  
Ph: (714) 539-6018  
Fax: (714) 539-6079
- Huntington Beach Independent  
1375 Sunflower Ave.  
Costa Mesa, CA 92626  
Ph: (714) 966-4689  
Fax: (714) 966-4663  
[www.hbindependent.com](http://www.hbindependent.com)
- Los Alamitos Sun  
11110 Los Alamitos Blvd., #101  
Los Alamitos, CA 90720  
Ph: (562) 431-1397  
Fax: (562) 493-2310
- The Mission Viejo News  
23472 Vista del Verde, #6  
Coto de Caza, CA 92679  
Ph: (949) 589-2333  
Fax: (949) 589-6429
- Orange County Business Journal  
18500 Von Karman Ave, #150  
Irvine, CA 92612  
Ph: (949) 833-8373  
Fax: (949) 833-8751  
[www.ocbj.com](http://www.ocbj.com)
- Orange County Register  
4<sup>th</sup> Floor Legal Advertising  
625 N. Grand Ave.  
Santa Ana, CA 92701  
Ph: (714) 796-2209  
[www.ocregister.com/classified/legal](http://www.ocregister.com/classified/legal)
- Orange County Reporter  
600 W. Santa Ana Blvd., #205  
Santa Ana, CA 92701  
Ph: (714) 481-0544  
Fax: (714) 542-6841  
[www.dbastore.com](http://www.dbastore.com)
- Orange County News  
Buena Park/Anaheim Independent  
7441 Garden Grove Blvd., #G  
Garden Grove, CA 92841
- Seal Beach Sun/Sun Journal  
Huntington Harbour  
216 Main St.  
Seal Beach, CA 90740  
Ph: (562) 430-7555
- Tri-County Bulletin  
1677 W. Baseline  
San Bernardino, CA 92411  
Ph: (909) 889-0597  
[www.prgroupnews@adelphia.net](http://www.prgroupnews@adelphia.net)
- Westminster Herald  
5789 Westminster Blvd.  
Westminster, CA 92683  
Ph: (714) 893-4501  
Fax: (714) 893-4502  
[www.westmherald@aol.com](http://www.westmherald@aol.com)
- Westminster Journal  
7441 Garden Grove Blvd., #G  
Garden Grove, CA 92841  
Ph: (714) 895-3484
- La Opinion  
700 S. Flower St., Ste. 3000  
Los Angeles, CA 90017  
Phone: (213) 896-2204

**Community Newspapers:**  
Aliso Viejo News, Anaheim  
Bulletin, Capistrano Valley News,  
Current, Dana Point News,  
Fountain Valley View, Fullerton  
News Tribune, Huntington Beach  
Wave, Irvine World News, Laguna  
News Post, Laguna Woods Globe,  
Orange City News, Placentia News  
Times, Saddleback Valley News,  
Star Progress, Sun Post, Tustin  
News, Yorba Linda Star





YOUR RETURN MAILING ADDRESS

NAME: MICHAEL CHEN

ADDRESS: 33 E VALLEY BLVD #217

CITY: ALHAMBRA

STATE: CA

ZIP CODE: 91801

LOS ANGELES REGISTERAR-RECORDER/ COUNTY CLERK



# FICTITIOUS BUSINESS NAME STATEMENT

TYPE OF FILING AND FILING FEE (Check one)

- Original- \$23.00 (FOR ORIGINAL FILING WITH ONE BUSINESS NAME ON STATEMENT)
  - New Filings- \$23.00-
  - Raffle \$18.00 (NO CHANGES IN THE FACTS FROM ORIGINAL FILING)
  - (CHANGES IN FACTS FROM ORIGINAL FILING REQUIRES PUBLICATION)
- \$4.00- FOR EACH ADDITIONAL BUSINESS NAME FILED ON SAME STATEMENT, DOING BUSINESS AT THE SAME LOCATION \$4.00- FOR EACH ADDITIONAL OWNER IN EXCESS OF ONE OWNER

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

\*1. HOME PARADISE REGIONAL CENTER

2.

Print Fictitious Business Name(s)

\*\* 517 MONTEREY PASS ROAD

Street address of principal place of business

Mailing address if different

MONTEREY PARK	CA	91754	LOS ANGELES			
City	State	Zip	COUNTY	City	State	Zip

Articles of Incorporation or Organization Number (if applicable): AI #ON 201016610040

\*\*\* REGISTERED OWNER(S):

1. HOME PARADISE INVESTMENT CENTER LLC

2.

Full Name/Corp/LLC  
 517 MONTEREY PASS ROAD  
 Residence Address (P.O. Box not accepted)  
 MONTEREY PARK CA 91754  
 City State Zip

Full Name/Corp/LLC  
 Residence Address (P.O. Box not accepted)  
 City State Zip

If Corporation or LLC - Print State of Incorporation/Organization

If Corporation or LLC - Print State of Incorporation/Organization

3.

4.

Full Name/Corp/LLC  
 Residence Address (P.O. Box not accepted)  
 City State Zip

Full Name/Corp/LLC  
 Residence Address (P.O. Box not accepted)  
 City State Zip

If Corporation or LLC - Print State of Incorporation/Organization

If Corporation or LLC - Print State of Incorporation/Organization

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

\*\*\*\* THIS BUSINESS IS CONDUCTED BY: (Check one)

- an Individual
- a General Partnership
- a Limited Partnership
- a Limited Liability Company
- an Unincorporated Association other than a Partnership
- a Corporation
- a Trust
- Copartners
- Husband and Wife
- Joint Venture
- State or Local Registered Domestic Partners
- a Limited Liability Partnership

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

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

REGISTRANTS/CORP/LLC NAME (PRINT) EDWARD CHEN TITLE CEO

REGISTRANT SIGNATURE [Signature] IF CORP OR LLC, PRINT NAME HOME PARADISE INVESTMENT CENTER LLC

If corporation, also print corporate title of officer. If LLC, also print title of officer or manager.

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

THE FILING OF THIS STATEMENT DOES NOT OF ITSELF AUTHORIZE THE USE IN THIS STATE OF A FICTITIOUS BUSINESS NAME IN VIOLATION OF THE RIGHTS OF ANOTHER UNDER FEDERAL, STATE, OR COMMON LAW (SEE SECTION 14411 ET SEQ., BUSINESS AND PROFESSIONS CODE). I HEREBY CERTIFY THAT THIS COPY IS A CORRECT COPY OF THE ORIGINAL STATEMENT ON FILE IN MY OFFICE.

DEAN C. LOGAN, LOS ANGELES COUNTY CLERK

BY: T. YATES, Deputy

This page is part of your document - DO NOT DISCARD



20101124339



Pages:  
0002

Recorded/Filed in Official Records  
Recorder's Office, Los Angeles County,  
California

08/12/10 AT 03:55PM

FEES :	23.00
TAXES :	0.00
OTHER :	0.00
PAID :	23.00



LEADSHEET



201008121230056

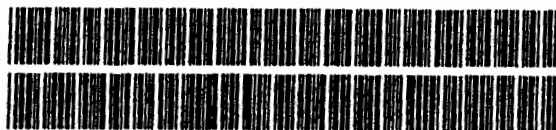
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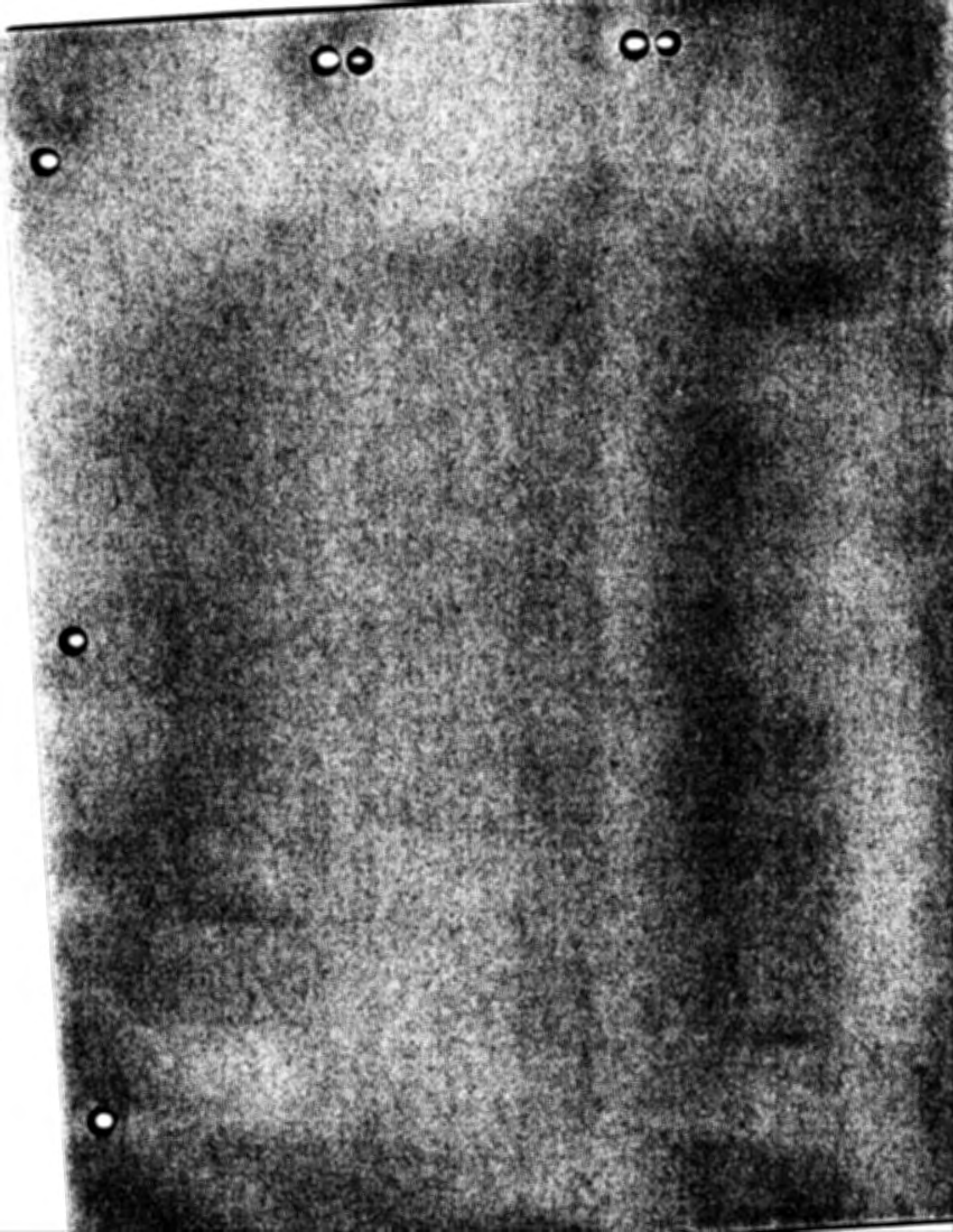
002830029

SEQ:  
01

DAR - Counter (Hard Copy)



THIS FORM IS NOT TO BE DUPLICATED





**ANN K. BARNETT**  
**Kern County Auditor-Controller-County Clerk**  
**1115 Truxtun Ave, Bakersfield, CA 93301**  
**(661) 868-3588**



**FICTITIOUS BUSINESS NAME STATEMENT**

Fictitious Business Name (DBA) (If listing more than two DBAs, attach additional sheets as needed.)

<b>1</b>	<b>DBA #1</b>	Home Paradise Regional Center	2010-B5122
	<b>DBA #2</b>		

<b>2</b>	Street address of principal place of business				Mailing address of business (Write out, do not enter "same")		
	8500 Stockdale Hwy.,2				517 Monterey Pass Rd		
	City	State	Zip	County	City	State	Zip
	Bakersfield	CA		Kern	Monterey Park	CA	91754

<b>3</b>	<b>Registrants</b>						
	<b>A</b>	Last name of individual, partner, or name of Corporation, LLC, or LP					State of incorporation or organization
		Home Paradise Investment Center LLC					
		First name of individual or partner					
	Street address (P.O. Box not acceptable)		City	State	Zip		
	517 Monterey Pass Rd		Monterey Park	CA	91754		
<b>B</b>	Last name of individual, partner, or name of Corporation, LLC, or LP					State of incorporation or organization	
	First name of individual or partner						
	Street address (P.O. Box not acceptable)		City	State	Zip		

<b>4</b>	Choose the option that best describes how the business is being conducted (See instructions for table of one-letter codes.)	D-LLC
----------	-----------------------------------------------------------------------------------------------------------------------------	-------

<b>5</b>	Insert the date the business commenced (mm/dd/yyyy) If the business has not started, enter "N/A"	6-11-2010
----------	--------------------------------------------------------------------------------------------------	-----------

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

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

Signature	
Printed name and if Corp or LLC, state title	Edward Chen CEO
Daytime Telephone Number	626-284-9999 <input checked="" type="checkbox"/> Check here if you do not want your number published

**DO NOT TYPE OR WRITE BELOW THIS LINE - COUNTY CLERK USE ONLY**

Date Statement Filed	Date Statement Expires	ANN K. BARNETT, Auditor-Controller-County Clerk
08/17/2010	08/17/2015	By:

**\*\*\*PUBLICATION NOTICE\*\*\***

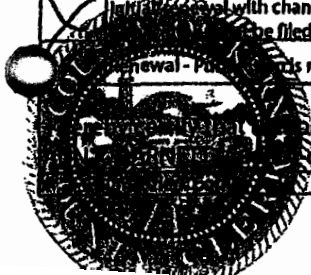
Statement with changes - Must be published once a week for four successive weeks (publication to start within 30 days of the file date) and an affidavit of publication filed with the County Clerk within 30 days after publication has been completed.

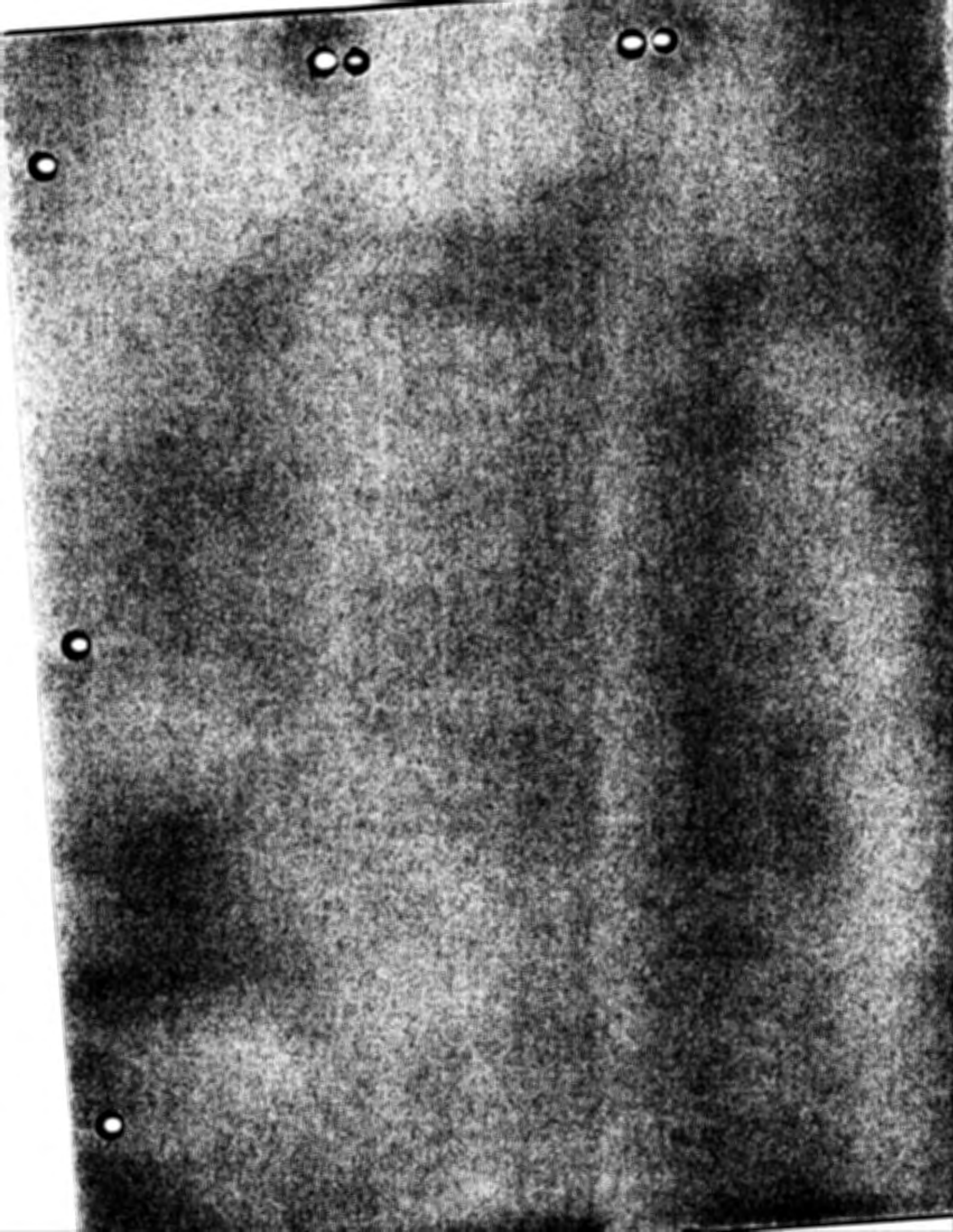
Renewal - Publication is not required, pursuant to Business and Professions Code Section 17917 (c)

**\*\*\*BANK CERTIFICATION\*\*\***

Enclosed is a correct copy of the original filed in my office on 08, 17, 2010  
 Auditor-Controller-County Clerk, By: Deputy Clerk.

Bank Copy	Newspaper Copy	Registrant Copy	DBA #1: 2010-B5122
-----------	----------------	-----------------	--------------------





DAVID L. BUTLER  
RECORDER/COUNTY CLERK  
COUNTY OF SAN DIEGO  
1600 PACIFIC HIGHWAY, SUITE 260  
P.O. BOX 121750, SAN DIEGO, CA 92112-1750  
(619) 237-0502

2010-022171



AUG-16-2010

FILED  
DAVID L. BUTLER  
SAN DIEGO COUNTY CLERK  
FEES: 32.00  
EXPIRES: AUG-16-2015  
DEPUTY: MDUTRA

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CUSTOMER  Yes  No

Each Copy is \$2.00 Extra

FORM INSTRUCTIONS ON BACK

\$ 30.00- FOR FIRST BUSINESS NAME ON STATEMENT  
\$ 5.00- FOR EACH ADDITIONAL BUSINESS NAME  
FILED ON SAME STATEMENT AND DOING  
BUSINESS AT THE SAME LOCATION  
\$ 5.00- FOR EACH ADDITIONAL OWNER IN EXCESS  
OF ONE OWNER

THIS SPACE FOR USE OF RECORDER/COUNTY CLERK

### FICTITIOUS BUSINESS NAME STATEMENT

(1) FICTITIOUS BUSINESS NAME(S):

a. HOME PARADISE REGIONAL CENTER

b.

(2) LOCATED AT: 1640 CAMINO DEL RIO NORTH #335 / SAN DIEGO / CA / SAN DIEGO / 92108  
Street Address (P.O. Box not acceptable) City State COUNTY Zip

Mailing Address: 517 MONTEREY PASS ROAD, MONTEREY PARK, CA 91754  
(Optional)

(3) THIS BUSINESS IS CONDUCTED BY:

- A. An Individual  E. Joint Venture  I. A Limited Liability Company  
 B. Husband and Wife  F. A Corporation  J. Limited Liability Partnership  
 C. A General Partnership  G. A Trust  K. An Unincorporated Association-Other than a Partnership  
 D. A Limited Partnership  H. Co-Partners  L. State or Local Registered Domestic Partners

(4) THE FIRST DAY OF BUSINESS WAS: 06/11/2010 OR IF NOT YET STARTED, CHECK HERE

THIS BUSINESS IS HEREBY REGISTERED BY THE FOLLOWING:

#1 HOME PARADISE INVESTMENT CENTER LLC #2

Owner's, Partner's, Trustee's Name or Corporation/LLC Name  
517 MONTEREY PASS ROAD

Residence/Corporation/LLC Street Address/PO Box not allowed  
MONTEREY PARK CA 91754  
City State Zip

CALIFORNIA

Corporation or LLC - Print STATE of Incorporation/Organization

Owner's, Partner's, Trustee's Name or Corporation/LLC Name

Residence/Corporation/LLC Street Address/PO Box not allowed

City State Zip

Corporation or LLC - Print STATE of Incorporation/Organization

#3 Owner's, Partner's, Trustee's Name or Corporation/LLC Name

Residence/Corporation/LLC Street Address/PO Box not allowed

City State Zip

Corporation or LLC - Print STATE of Incorporation/Organization

#4 Owner's, Partner's, Trustee's Name or Corporation/LLC Name

Residence/Corporation/LLC Street Address/PO Box not allowed

City State Zip

Corporation or LLC - Print STATE of Incorporation/Organization

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

(6)   
(Signature of Registrant)

EDWARD CHEN

(Print name)

CEO

(Corp./LLC print Title)

STATEMENT WAS FILED WITH THE RECORDER/COUNTY CLERK OF SAN DIEGO COUNTY AS INDICATED BY THE FILE STAMP ABOVE.  
THIS FICTITIOUS NAME STATEMENT EXPIRES FIVE (5) YEARS FROM THE DATE IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK. A NEW  
FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED BEFORE THAT TIME.  
FILING OF THIS STATEMENT DOES NOT OF ITSELF AUTHORIZE THE USE IN THIS STATE OF A FICTITIOUS BUSINESS NAME IN VIOLATION OF THE RIGHTS OF  
ANY PERSON UNDER FEDERAL, STATE, OR COMMON LAW (SEE SECTION 14411 ET SEQ., BUSINESS AND PROFESSIONS CODE).  
IT IS THE RESPONSIBILITY OF THE REGISTRANT TO DETERMINE THAT THE FICTITIOUS BUSINESS NAME SELECTED WILL NOT VIOLATE  
ANYONE'S RIGHTS ESTABLISHED UNDER THE LAW.







# Board of Supervisors County of Los Angeles

MICHAEL D. ANTONOVICH  
SUPERVISOR

August 27, 2010

U.S. Citizenship and Immigration Services  
20 Massachusetts Avenue N.W.  
Washington, DC 20529

RE: Home Paradise Regional Center Application

Dear Sir or Madam:

I strongly support the designation of the Home Paradise Regional Center as an EB-5 regional center. It is my understanding that there will be a shopping center development and the establishment of a property renovation company to be located in Los Angeles County's City of Industry.

Home Paradise Regional Center projects will bring much needed investment capital into Los Angeles County and will serve as a catalyst to the growth and revitalization of our County's economy by enhancing employment opportunities, productivity and consumer choices.

Thank you for favorable consideration of the designation of Home Paradise Regional Center's proposed EB-5 regional center.

Sincerely,

A handwritten signature in black ink that reads "Michael Antonovich".

MICHAEL D. ANTONOVICH  
Supervisor



C

C

# Home Paradise Regional



## Global Law Group

A Professional Law Corporation

**Tina Lee**  
Attorney at Law

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

**Tel: 213.830.9933** Fax: 213.830.9930

Skype: Tina.global  
Tina@GlobalLawGroup.net  
www.GlobalLawGroup.net



## 美国加州王令蒂律师事务所

**王令蒂律师**  
美国和英国执照律师

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


电话: 00-1-213-830-9933 手机: 00-1-213-700-4023  
传真: 00-1-213-830-9930  
电邮: Linda@GlobalLawGroup.net  
网站: www.GlobalLawGroup.net

# **Home Paradise Regional Center<sup>®</sup>**

## **Regional Center Designation Application**

October 2010

*Strictly Private and Confidential*

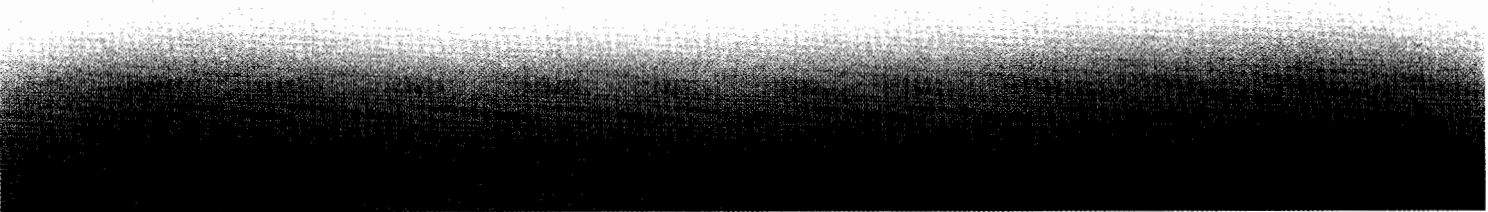


# **Home Paradise Regional Center®**

## **Regional Center Designation Application**

October 2010

***Strictly Private and Confidential***



From: Origin ID: EMTA (213) 830-9933  
Anna Baran  
Global Law Group  
350 S Figueroa St Ste 760  
  
Los Angeles, CA 90071



Ship Date: 07SEP10  
ActWgt: 5.0 LB  
CAD: 3464367/INET3060

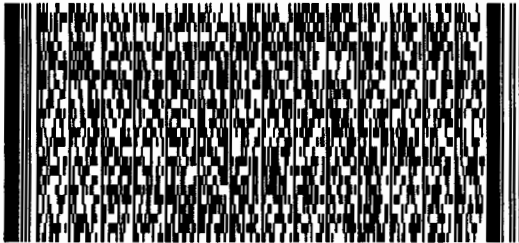
Delivery Address Bar Code



Ref # RE: Home Paradise RC  
Invoice #  
PO #  
Dept #

Stamp # 18  
SEP 08 2010  
CSC

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

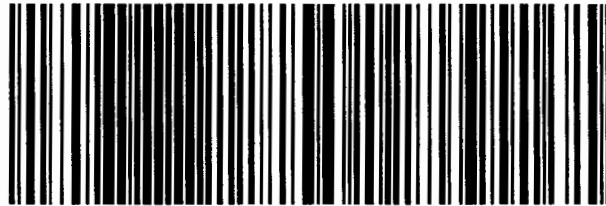


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Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay,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





































































































# Home Paradise Regional Center®



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4. [EB-5 簽證](#)
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## 主頁

### Welcome

Home Paradise Regional Center (HPDRC) offers comprehensive solutions to EB-5 investment needs.

We understand that the EB-5 immigration and relocation process can be a difficult experience. Our staff consists of legal and real estate professionals to assist with your investments, EB-5 application, and relocation to the United States.

We can help you with everything from finding a new house in a good school district, providing relocation logistical support, establishing a new business, or assisting with admission to the best preparatory schools and colleges anywhere in the U.S.

### Investment Options

HPDRC provides passive investment opportunities for our EB-5 investors, whereby the EB-5 investor is not responsible for the day-to-day management of the investment.

HPDRC professionals work with Los Angeles-based companies to comply with EB-5 requirements to allow our EB-5 investors the opportunity to pursue other hobbies, careers, or retire.

### Visit Los Angeles

Los Angeles is one of the most widely recognized and desirable locations in the world to live, work, and invest. Los Angeles includes such world-renowned cities as Beverly Hills, Long Beach, Santa Monica, Pasadena and Hollywood. There are over 150 universities located within Los Angeles County, including UCLA, USC and Cal Tech. Moreover, Los Angeles is home to world-class manufacturing & industrial, financial, commercial, fashion, hotel & recreation, and entertainment industries. Los Angeles remains the 8th largest economy in the world!

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## 項目簡介

### 1.1 Summary

Pursuant to Section 610 of the Appropriations Act of 1993 the Immigrant Investor Pilot Program, Home Paradise Regional Center ("HPRC") is proposed as a regional center to direct alien investor capital to invest in retail and franchises into real estate construction, development and management projects within the region consisting of 7 contiguous counties across the state of California. Specifically, these include Imperial, Kern, Los Angeles, Orange, Riverside, San Bernardino, and San Diego, Imperial, Riverside, Orange, San Bernardino, Los Angeles, and Kern Counties. HPRC will focus investments into new commercial enterprises in the following target industries: retail (including various retail with home renovation stores and retail with shopping centers), hospitality (hotel/motel with the commercial centers), and food services (including restaurant within the commercial centers) and property renovation services. The project's focus will be the construction of strip malls in high-unemployment areas.

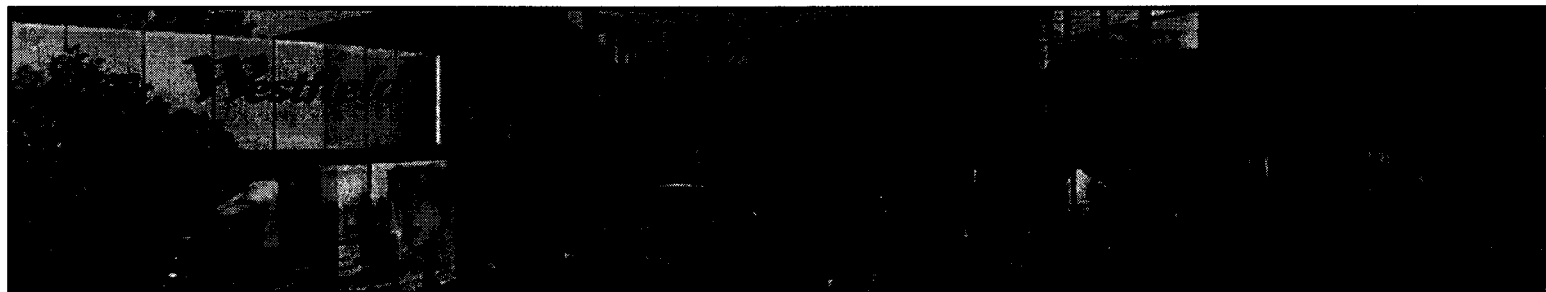
### 1.2 Geographic Area and Scope

The 7 contiguous counties are located within the state of California in the Southern region of the State. With a total area of 48,626 square miles, this geographic region is primarily a metropolitan area with an estimated 2009 population of 21,001,525, or 432 people per square mile. There is a wide range of diversity of industries and demographics across this region. This range varies between Los Angeles as the most densely populated to Kern County and Imperial County which both tend to be more agricultural and sparsely populated.



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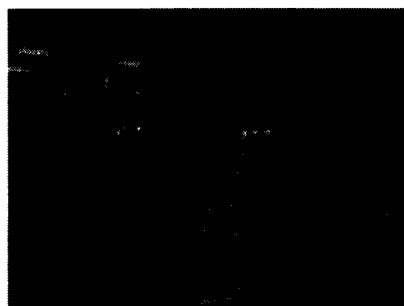
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## 項目照片

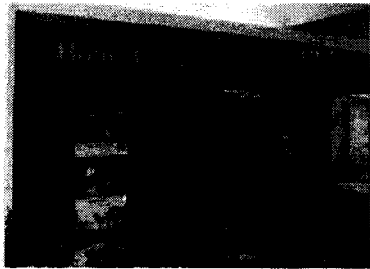
以下是部份 Home Paradise 店鋪的照片



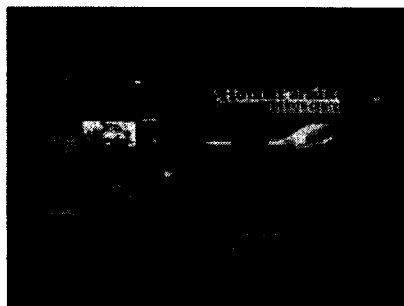
Westfield Mission Valley



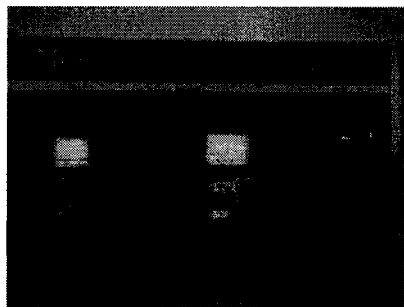
Westside Pavilion



Westfield Topanga



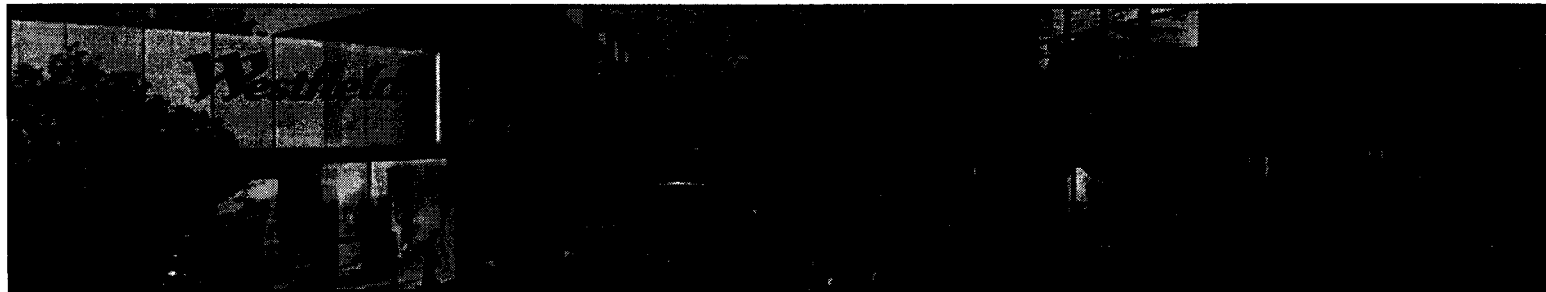
Glendale Galleria



Westfield MainPlace

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## EB-5 簽證

- **EB-5 Visa**

The EB-5 Visa provides the most flexible path to a green card based on a US investment. The EB-5 visa does not require the applicant to manage the day-to-day affairs of a business. One may invest in an existing business, or a new business. More than one person may invest in the same business. The EB-5 investor may be a minority owner of the business.

- **EB-5 Visa — The rules**

One may qualify for an EB-5 as follows:

1. Invest \$1 million and hire ten employees anywhere in the USA
2. Invest \$500,000 and hire ten employees in an area where the unemployment rate exceeds the national average unemployment rate by 150%
3. Invest in a regional center.

INS designated specific areas, called Regional Centers, as eligible to receive immigrant investor capital. INS approved over 20 Regional Centers. Regional Center investors may rely on indirect job creation rather than directly hiring ten

employees. A competent professional, such as an economist, must quantify the indirect employment. If the regional center is in a high unemployment area the required capital is reduced to \$500,000.

Of the 10,000 investor visas (i.e., EB-5 visas) available annually, 5,000 are set aside for those who apply under a pilot program involving an INS-designated "Regional Center." To date, the quota has not been exceeded.

- **Home Paradise, Inc.'s Regional Centers**

*Home Paradise, Inc.* was founded in 1997. This regional center is also called the Cabinet Home. It comprises the industrial district immediately south of downtown Seattle, commonly known as CH Home. In 1996, USCIS approved a proposal to use immigrant investor capital to purchase, renovate and manage aging industrial properties and new developments in the SODO area. The State of Washington and the Federal government had previously designated the same area as an economic zone qualified for various tax incentives designed to attract investment.

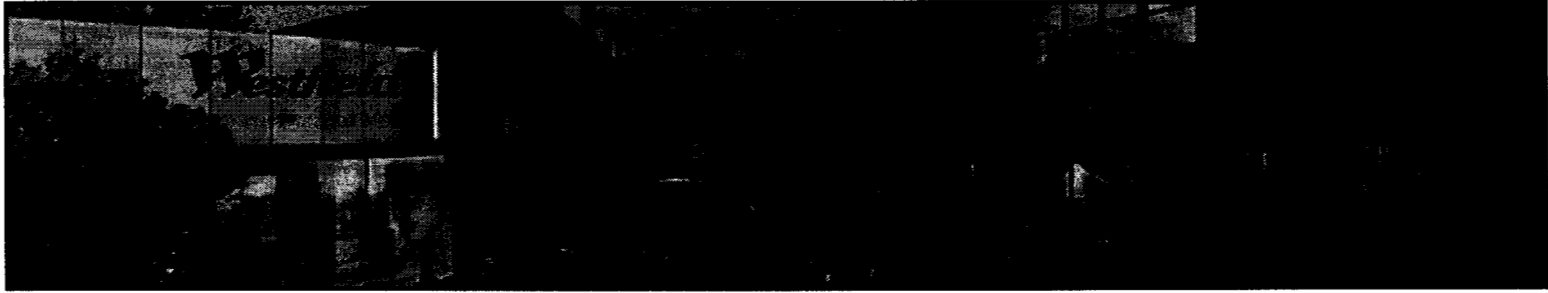
*Home Paradise, Inc.* is the Managing Member of American Life Ventures LLC who established regional centers in Tacoma, Washington and Everett, Washington in 2008. These Regional Centers encompass much of the central areas of Tacoma and Everett and may pool immigrant capital into new real estate developments as well as rehabilitation of existing buildings.

Each Regional Center investor purchases a partnership interest in a specific investment partnership, managed by *American Life Inc.*, that owns, renovates and manages a property in the Regional Center. Indirect employment results from jobs created by elevating a previously underutilized property to a more productive use. Thus, the investment in the *American Life Inc.* partnership meets the requirement for the EB-5 visa.

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## 關於我們

美麗家園項目主頁：<http://www.homeparadise.com>

### 1.0 PROPOSED REGIONAL CENTER OVERVIEW

Home Paradise Investment Center, LLC, dba Home Paradise Regional Center, is a California Limited Liability Company engaged in the development and management of commercial real estate properties and retail home renovation businesses in seven contiguous counties in California. These counties include San Diego, Imperial, Orange, Riverside, San Bernardino, Los Angeles, and Kern Counties. Home Paradise Investment Center, LLC is the applicant for the proposed Home Paradise Regional Center ("HPRC"), and will be the general partner for a series of limited partnerships offered for investment to alien investors under the EB-5 program as well as other investors.

### 1.1. BUSINESS FOCUS AND OBJECTIVES

Home Paradise Regional Center ("HPRC") will involve investment in the development and management of (1) mixed-use commercial real estate for the purpose of retail, hospitality and food facility use, and (2) property renovation services for residential and commercial buildings. The activities within HPRC will be aimed to create stable investment opportunities for shareholders, including immigrant investors, while boosting the local market, employment rates, and living standards of the communities invested in.

#### Objectives

- Acquire project sites ideal for retail, food facilities, office, and hospitality use
- Join with civic partners for potential joint ventures
- Recognize and identify community, local and regional demands and needs
- Create opportunities for new job-creating enterprises

#### Geographic Scope

HPRC will encompass the following contiguous geographic area:

- San Diego County, CA
- Imperial County, CA

- Riverside County, CA
- Orange County, CA
- San Bernardino County, CA
- Los Angeles County, CA
- Kern County, CA

#### Industry Focus

Home Paradise Regional Center will target their investments on the following industries of economic activity:

- Retail Trade (NAICS 44-45)
- Hospitality (NAICS 721)
- Food Services (NAICS 722)
- Property Renovation Services (NAICS 236)

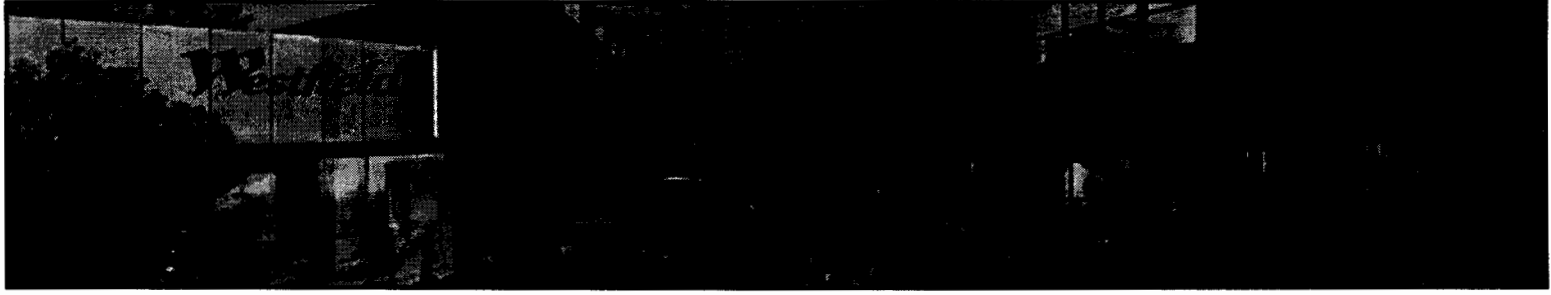
#### **1.2 BUSINESS STRUCTURE**

Home Paradise Investment Center, LLC is the principal of the Regional Center and is responsible for the management and administration of regional center operations.

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## 聯繫我們

Name:

Email:

Message:

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Form: I924  
Receipt: RCW1031910071  
Status: APPROVAL NOTICE SENT

Received Date: 10/06/2010

**Information About Principal of the Regional Center**

Last Name: Middle Name: First Name:

C/O:

Street Address/P.O. Box:

City: State: 00 Zip Code:

Date of Birth: 01/01/1900

Application Type: A Regional Center ID: ID1031910071

Signed: N

Name of Regional Center: HOME PARADISE REGIONAL CENTER

Street Address/P.O. Box: 517 MONTEREY PASS RD

City: MONTEREY PARK State: CA Zip Code: 91754

Web Site: E-Mail: INFO@HOMEPARADISERC.COM Fax: (626) 289-0888 Telephone Number: (626) 284-9999

Name of Managing Company:

Street Address/P.O. Box:

Street Address 2:

City: State: 00 Zip Code:

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

Name of Other Agent:

Street Address/P.O. Box:

Street Address 2:

City: State: 00 Zip Code:

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

**Contact Information**

Last Name: CHEN Middle Name: First Name: EDWARD

Street Address/P.O. Box: HOME PARADISE INVESTMENT CENTER LLC

Address 2: 517 MONTEREY PASS RD

City: MONTEREY PARK State: CA Zip Code: 91754

Geographic Area of the Regional Center Description: Imperial County, Kern County, Los Angeles County, Orange County, Riverside County, San Bernardino County, San Diego County in California

**G28 Information**

Last Name: LAU Middle Name: First Name: LINDA

Firm Name: GLOBAL LAW GROUP

Street Address/P.O. Box: 909 EL CENTRO ST STE 1

City: SOUTH PASADENA State: CA Zip Code: 91030

Action Date	Action	User ID
09/23/2011 08:00:27	APPROVAL NOTICE SENT	gmendoza
09/21/2011 13:01:06	APPROVED/NOTICE ORDERED	jjfreta
08/23/2011 22:22:39	DATA CHANGED IN RECORD	maginger
08/23/2011 22:21:18	DATA CHANGED IN RECORD	maginger
08/19/2011 18:04:20	RESPONSE TO REQUEST NOTICE TO APPLICATION/PETITION RECEIVED	ajhughs
06/01/2011 11:42:52	REQUEST FOR ADDITIONAL EVIDENCE SENT	jtanudja
06/01/2011 11:08:38	INITIAL AND ADDITIONAL EVIDENCE REQUESTED NOTICE ORDERED	jjfreta
10/06/2010 09:00:00	RECEIVED - FEE COLLECTED ELSEWHERE	

Geographic State/Territory
California

Industry Category Title	NAICS Code
Retail	000000
Hospitality	000000
Food Services	000000
Interior Design Services	000000

















# Decision Processing Worksheet

*Rec'd. 10.6*

Officer Name: <b>FRIETH</b>	Receipt #: <b>RCW/031910071</b>
Officer Stamp #: <b>1298</b>	

Form Type: <b>I-924</b>	Classification: <b>RC</b>	Division: <b>III</b>	Team: <b>I</b>	WS <b>22123</b>
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## Action:

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

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

Date Received: <b>08-24-11</b>	# of Un-Named Beneficiaries:	# of Named Beneficiaries:
--------------------------------	------------------------------	---------------------------

Officer Received Date:	AST Action Completed:
------------------------	-----------------------

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

<b>Officer Prepares or Completes</b> <small>(Notice Ordered)</small> RFE/30/42/84    ITD/30    ITR/30 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>  (1 <sup>st</sup> Initial & Last Name)  (Date & Time)	<b>Clerical/Officer Completes RFE/ITD/ITR</b> <small>(Notice Sent)</small>  (1 <sup>st</sup> Initial & Last Name)  (Date & Time)	<b>RFE/ITD/ITR Response Received</b>  (1 <sup>st</sup> Initial & Last Name)  (Date & Time)	<b>Officer Completes Final Decision</b> <small>(Notice Ordered - Approval/Denial)</small>  (1 <sup>st</sup> Initial & Last Name)  (Date & Time)	<b>Clerical/Officer Completes Final Action</b> <small>(Notice Sent)</small>  (1 <sup>st</sup> Initial & Last Name) <b>SEP 23 2011</b> <small>(Date &amp; Time)</small>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Mailer Enclosed? <b>Y</b> <b>N</b>	SCAO Review:	Final Decision:
------------------------------------	--------------	-----------------

**Officer's Comment:** *PLS FIX & RETURN - 09/13/2011 / GTC.*

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

**DUPLICATE PETITION INCLUDED:**  YES     NO

## Supervisor Review and Comments:

Initials/Date: <b>[Signature]</b>	2 <sup>nd</sup> Review Initials/Date:	3 <sup>rd</sup> Review Initials/Date:
-----------------------------------	---------------------------------------	---------------------------------------

Clerical Processing Completed: Initials: _____ Date: _____	<b>SEP 23 2011</b>
DUP PETITION PULLED by ISO: <input type="checkbox"/> YES <input type="checkbox"/> NO    Duplicate sent to KCC: <input type="checkbox"/> YES    Date duplicate sent: _____ Initials: _____	

## File Room Processing

<b>To: 103 Hold Shelf</b>	
<b>Call-Up Date:</b> _____	

Rev 03/05/2010



Form: 1924 Receipt: RCW1031910071 Status: APPROVEDNOTICE ORDERED

Add On Note

Received Date: 10/05/2010

**Information About Principal of the Regional Center**

Last Name: Middle Name: First Name:

C/O:

Street Address/P.O. Box:

Suite:

City: State: 00 Zip Code:

Date of Birth:

Application Type: A Regional Center ID: ID1031910071

Signed: N

**G28 Information**

Last Name: LAU Middle Name: First Name: LINDA

Firm Name: GLOBAL LAW GROUP

Street Address/P.O. Box: 909 EL CENTRO ST STE 1

City: SOUTH PASADENA State: CA Zip Code: 91030

Action Date	Action	User ID
09/21/2011 13:01:08	APPROVEDNOTICE ORDERED	jfrata
09/23/2011 22:22:39	DATA CHANGED IN RECORD	majinger
09/23/2011 22:21:18	DATA CHANGED IN RECORD	majinger
09/19/2011 18:04:20	RESPONSE TO REQUEST NOTICE TO APPLICATION/PETITION RECEIVED	ajhughes
09/01/2011 11:42:52	REQUEST FOR ADDITIONAL EVIDENCE SENT	janette
09/01/2011 11:08:38	INITIAL AND ADDITIONAL EVIDENCE REQUESTED NOTICE ORDERED	jfrata
10/06/2010 09:00:00	RECEIVED - FEE COLLECTED ELSEWHERE	

Please Select an Action







**Eberling, George**

---

**From:** Eberling, George  
**Sent:** Tuesday, September 13, 2011 5:14 PM  
**To:** Frlata, Joe J  
**Subject:** I-924 Case Review: RCW1031910071

Joe,

I reviewed your draft approval and have some suggested changes.

Please see the marked up copy for those changes. Please return for a final review.

Once reviewed, we can forward to Sasha for her review and comment.

George



U.S. Citizenship  
and Immigration  
Services

Date:

Edward Chen  
Home Paradise Investment Center, LLC  
7000 E. Slauson Avenue  
Commerce, CA 90040

Application: Request for Designation as a Regional Center  
Applicant(s): Edward Chen

Re: Home Paradise Regional Center  
RCW1031910071 (Formerly W09002630)

Pursuant to Section 610 of the Appropriations Act of 1993, on October 6, 2010, Edward Chen submitted a proposal seeking approval and designation by U.S. Citizenship and Immigration Services (USCIS) of the Home Paradise Regional Center.

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

**GEOGRAPHIC AREA:**

The Home Paradise Regional Center shall have a geographic scope to include the counties of Kern, Los Angeles, Orange, San Bernardino, Riverside, San Diego and Imperial in the State of California.

**FOCUS OF INVESTMENT ACTIVITY:**

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

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

- 1. NAICS 444, 445, 44611, 448, 451, 453 Retail
- 2. NAICS 7211 Hospitality

*Handwritten:* ~~444 Building Material~~  
~~mal~~

*Handwritten:* → SEE BACK PAGE!

*Handwritten:* small  
↓  
"C/O"

- NAICS 444 Building Material and Garden  
Equipment and Supplies Dealers
- NAICS 445 Food and Beverage Stores
- NAICS 44611 Pharmacies and Drug Stores
- NAICS 448 Clothing and Clothing Accessories  
Stores
- NAICS 451 Sporting Goods Stores
- NAICS 453 Miscellaneous Store Retailers
- NAICS 7211 Traveler Accommodation
- NAICS 7221 Full-Service Restaurants
- NAICS 7222 Limited-Service Eating Places
- NAICS 54141 Interior Design Services

5th page

3. NAICS 7221, 7222

Food Services

4. NAICS 54141

Interior Design Services

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

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

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

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

### **EMPLOYMENT CREATION**

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

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

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



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

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

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

1. A copy of this letter, the Regional Center approval and designation.
2. A copy of the USCIS approved Regional Center narrative proposal and business plan.
3. A copy of the job creation methodology required in 8 CFR 204.6(j)(4)(iii), as contained in the final Regional Center economic analysis which has been approved by USCIS, which reflects that investment by an individual immigrant investor will create not fewer than ten (10) full-time employment positions, either directly or indirectly, per immigrant investor.
4. A legally executed copy of the USCIS approved documents:
  - a. Confidential Private Offering Memorandum      Sample submitted October 6, 2010
  - b. Subscription Agreement      Sample submitted October 6, 2010
  - c. Escrow Agreement      Sample submitted October 6, 2010
  - d. Limited Partnership Agreement      Sample submitted October 6, 2010

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

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

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

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

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

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

Sincerely,

Rosemary Langley Melville  
Director  
California Service Center

cc: Linda Lau, Esq.

# I-924 Regional Center Proposal

Receipt Number: RCW1031910071 Attorney: Linda Lau

Regional Center: Home Paradise Regional Center G-28

General Partner: Edward Chen Requester's Name: Edward Chen

- Economic Unit-Organizational Documents for Regional Center 06-16-10 Home Paradise Investment Center LLC dba Home Paradise Regional Center (dba
- Target  Non-Target  Both (filed 8-16-10)
- Geographic Area Delineated: Imperial, Kern, Los Angeles, Orange, San Riverside and San Diego Counties San Bernardino,
- Economic Growth Analysis
- Regional or National Impact- Economic Analysis
- Indirect Job Creation:  
 Troubled Business  Non-Troubled Business
- Econometric Model: IMPLAN
- Economic Analysis of Job Creation: \_\_\_\_\_
- Business Plan:  
 Hypothetical Investment Plan  Investment Plan
- Industries: Retail, Hospitality, Food Services, Interior Design
- Activities: \_\_\_\_\_ Services
- Operational Plan:
- Project Evaluation and assessment
- Amount and Source of Regional Center's Capital
- Recruitment and Due Diligence
- Promotional Efforts
- Administrative Oversight
- OPTIONAL- Enterprise organizational documents:
- Draft Operating Agreement
- Draft Partnership Agreement
- Draft Subscription Agreement
- Draft Escrow Agreement
- List of Escrow Agents
- Draft Offering Letter etc
- Articles of Incorporation etc for Enterprise
- Other relevant documents: Letter of Support from Board of Supervisors, County of Los Angeles, Private of Young Memorandum

① NAICS codes are 2-3 digits. Need to be more specific, unless the industry cluster is going to be all-encompassing, such as Hospitality. Does the petitioner intend to operate and build a hotel, a casino, a food & beverage, etc? Be specific.

The NAICS code for Detail is the same way - 44-45. This is too general, unless the petitioner is also planning to own and operate a car dealership and auto parts store, boat dealerships, etc. The RC proposal needs to be more specific in the plans the RC intends to fund.

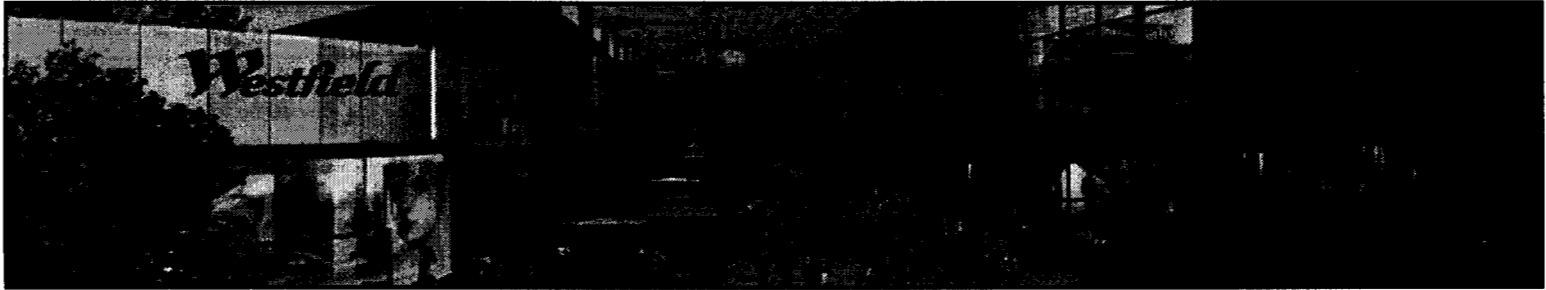
The only industry cluster well defined is Interiors Design Services (NAICS code: 54141). Perhaps it is because this is the only NAICS code available for this industry. Nonetheless the other industry clusters need to be as well defined and broken down.

- (2) The Business Plan appears to include the business plan for the industry project as well as the business plan for the operation of the RC. The petitioner is requested to submit a Business Plan for each industry cluster, and a separate Business Plan for the operation of the RC.

The Business Plans for each industry cluster needs to meet the definition of Matter of Ho.

The Operational Plan needs to include the Management Team outline provide in the Business Plan. The Business Plan does not need to include this aspect of the Operational Plan.

# Home Paradise Regional Center®



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## 主頁

### Welcome

Home Paradise Regional Center (HPDRC) offers comprehensive solutions to EB-5 investment needs.

We understand that the EB-5 immigration and relocation process can be a difficult experience. Our staff consists of legal and real estate professionals to assist with your investments, EB-5 application, and relocation to the United States.

We can help you with everything from finding a new house in a good school district, providing relocation logistical support, establishing a new business, or assisting with admission to the best preparatory schools and colleges anywhere in the U.S.

### Investment Options

HPDRC provides passive investment opportunities for our EB-5 investors, whereby the EB-5 investor is not responsible for the day-to-day management of the investment.

HPDRC professionals work with Los Angeles-based companies to comply with EB-5 requirements to allow our EB-5 investors the opportunity to pursue other hobbies, careers, or retire.

### Visit Los Angeles

Los Angeles is one of the most widely recognized and desirable locations in the world to live, work, and invest. Los Angeles includes such world-renowned cities as Beverly Hills, Long Beach, Santa Monica, Pasadena and Hollywood. There are over 150 universities located within Los Angeles County, including UCLA, USC and Cal Tech. Moreover, Los Angeles is home to world-class manufacturing & industrial, financial, commercial, fashion, hotel & recreation, and entertainment industries. Los Angeles remains the 8th largest economy in the world!

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## 項目簡介

### 1.1 Summary

Pursuant to Section 610 of the Appropriations Act of 1993 the Immigrant Investor Pilot Program, Home Paradise Regional Center ("HPRC") is proposed as a regional center to direct alien investor capital to invest in retail and franchises into real estate construction, development and management projects within the region consisting of 7 contiguous counties across the state of California. Specifically, these include Imperial, Kern, Los Angeles, Orange, Riverside, San Bernardino, and San Diego, Imperial, Riverside, Orange, San Bernardino, Los Angeles, and Kern Counties. HPRC will focus investments into new commercial enterprises in the following target industries: retail (including various retail with home renovation stores and retail with shopping centers), hospitality (hotel/motel with the commercial centers), and food services (including restaurant within the commercial centers) and property renovation services. The project's focus will be the construction of strip malls in high-unemployment areas.

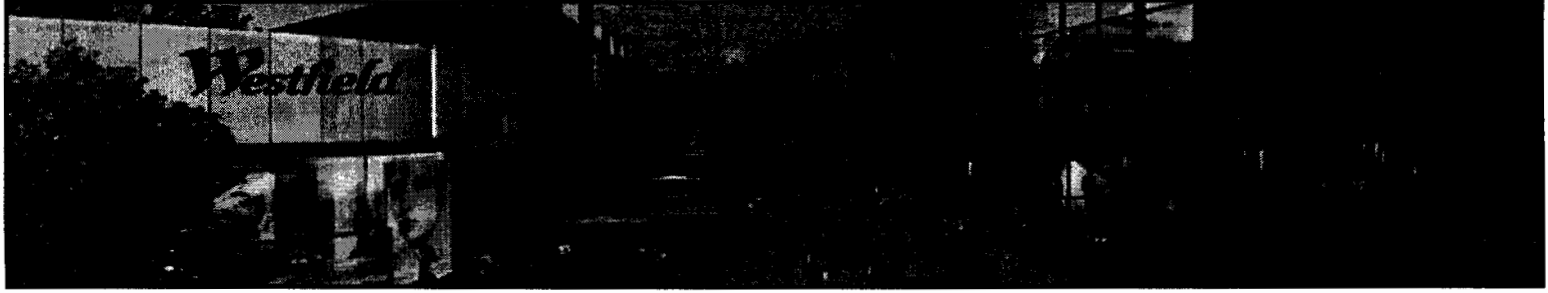
### 1.2 Geographic Area and Scope

The 7 contiguous counties are located within the state of California in the Southern region of the State. With a total area of 48,626 square miles, this geographic region is primarily a metropolitan area with an estimated 2009 population of 21,001,525, or 432 people per square mile. There is a wide range of diversity of industries and demographics across this region. This range varies between Los Angeles as the most densely populated to Kern County and Imperial County which both tend to be more agricultural and sparsely populated.



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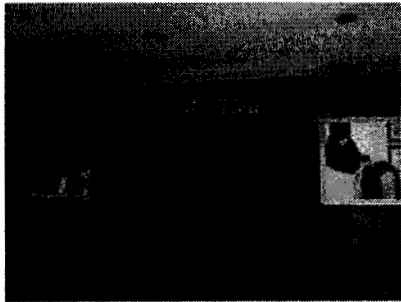
# Home Paradise Regional Center®



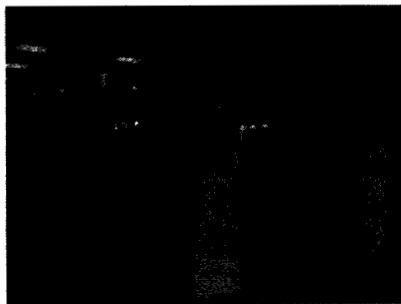
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## 項目照片

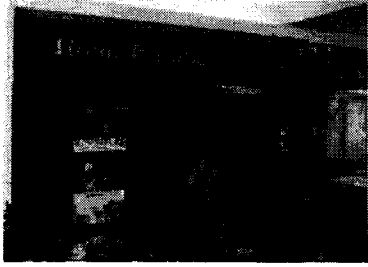
以下是部份 Home Paradise 店鋪的照片



[Westfield Mission Valley](#)



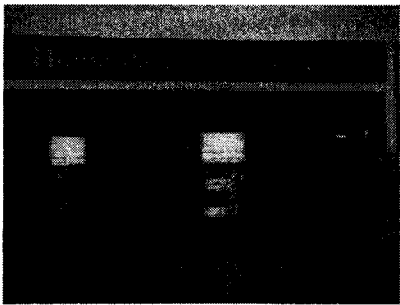
[Westside Pavilion](#)



Westfield Topanga



Glendale Galleria



Westfield MainPlace

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## EB-5 簽證

- **EB-5 Visa**

The EB-5 Visa provides the most flexible path to a green card based on a US investment. The EB-5 visa does not require the applicant to manage the day-to-day affairs of a business. One may invest in an existing business, or a new business. More than one person may invest in the same business. The EB-5 investor may be a minority owner of the business.

- **EB-5 Visa — The rules**

One may qualify for an EB-5 as follows:

1. Invest \$1 million and hire ten employees anywhere in the USA
2. Invest \$500,000 and hire ten employees in an area where the unemployment rate exceeds the national average unemployment rate by 150%
3. Invest in a regional center.

INS designated specific areas, called Regional Centers, as eligible to receive immigrant investor capital. INS approved over 20 Regional Centers. Regional Center investors may rely on indirect job creation rather than directly hiring ten

employees. A competent professional, such as an economist, must quantify the indirect employment. If the regional center is in a high unemployment area the required capital is reduced to \$500,000.

Of the 10,000 investor visas (i.e., EB-5 visas) available annually, 5,000 are set aside for those who apply under a pilot program involving an INS-designated "Regional Center." To date, the quota has not been exceeded.

- **Home Paradise, Inc.'s Regional Centers**

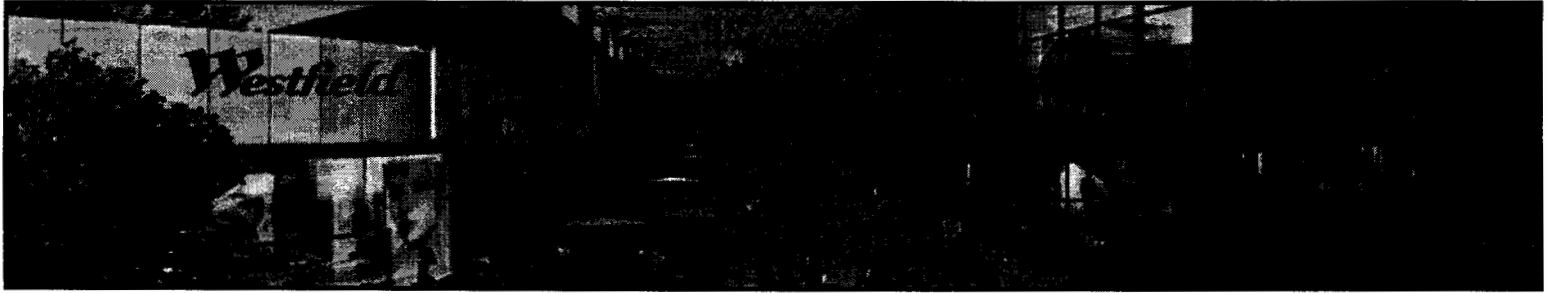
*Home Paradise, Inc.* was founded in 1997. This regional center is also called the Cabinet Home. It comprises the industrial district immediately south of downtown Seattle, commonly known as CH Home. In 1996, USCIS approved a proposal to use immigrant investor capital to purchase, renovate and manage aging industrial properties and new developments in the SODO area. The State of Washington and the Federal government had previously designated the same area as an economic zone qualified for various tax incentives designed to attract investment.

*Home Paradise, Inc.* is the Managing Member of American Life Ventures LLC who established regional centers in Tacoma, Washington and Everett, Washington in 2008. These Regional Centers encompass much of the central areas of Tacoma and Everett and may pool immigrant capital into new real estate developments as well as rehabilitation of existing buildings.

Each Regional Center investor purchases a partnership interest in a specific investment partnership, managed by *American Life Inc.*, that owns, renovates and manages a property in the Regional Center. Indirect employment results from jobs created by elevating a previously underutilized property to a more productive use. Thus, the investment in the *American Life Inc.* partnership meets the requirement for the EB-5 visa.

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## 關於我們

美麗家園項目主頁：<http://www.homeparadise.com>

### 1.0 PROPOSED REGIONAL CENTER OVERVIEW

Home Paradise Investment Center, LLC, dba Home Paradise Regional Center, is a California Limited Liability Company engaged in the development and management of commercial real estate properties and retail home renovation businesses in seven contiguous counties in California. These counties include San Diego, Imperial, Orange, Riverside, San Bernardino, Los Angeles, and Kern Counties. Home Paradise Investment Center, LLC is the applicant for the proposed Home Paradise Regional Center ("HPRC"), and will be the general partner for a series of limited partnerships offered for investment to alien investors under the EB-5 program as well as other investors.

### 1.1. BUSINESS FOCUS AND OBJECTIVES

Home Paradise Regional Center ("HPRC") will involve investment in the development and management of (1) mixed-use commercial real estate for the purpose of retail, hospitality and food facility use, and (2) property renovation services for residential and commercial buildings. The activities within HPRC will be aimed to create stable investment opportunities for shareholders, including immigrant investors, while boosting the local market, employment rates, and living standards of the communities invested in.

#### Objectives

- Acquire project sites ideal for retail, food facilities, office, and hospitality use
- Join with civic partners for potential joint ventures
- Recognize and identify community, local and regional demands and needs
- Create opportunities for new job-creating enterprises

#### Geographic Scope

HPRC will encompass the following contiguous geographic area:

- San Diego County, CA
- Imperial County, CA

- Riverside County, CA
- Orange County, CA
- San Bernardino County, CA
- Los Angeles County, CA
- Kern County, CA

#### Industry Focus

Home Paradise Regional Center will target their investments on the following industries of economic activity:

- Retail Trade (NAICS 44-45)
- Hospitality (NAICS 721)
- Food Services (NAICS 722)
- Property Renovation Services (NAICS 236)

#### **1.2 BUSINESS STRUCTURE**

Home Paradise Investment Center, LLC is the principal of the Regional Center and is responsible for the management and administration of regional center operations.

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Kitchen Package **40% OFF**

Lighting **50% OFF~30% OFF**

San Diego Store

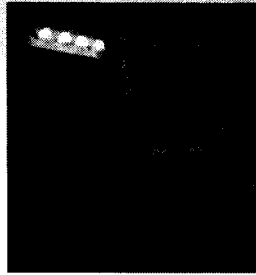


1. On-site measurement and client consultation
2. Professional consultation and design
3. Project management and design
4. Construction project timely inspection and quality control.
5. Customer satisfaction survey and re-visit service.
6. Commitment to best design, product and service.

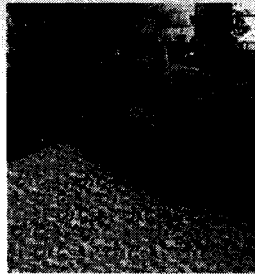
Featured Category



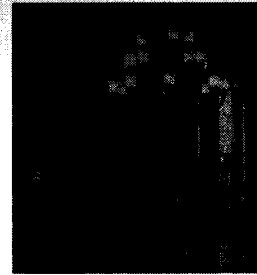
[Kitchen](#)



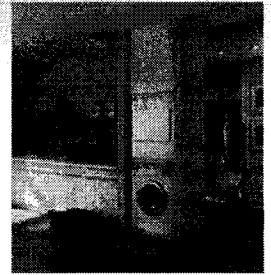
[Bath](#)



[Tiling & Flooring](#)

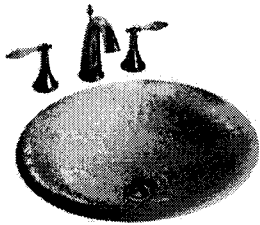


[Lighting](#)

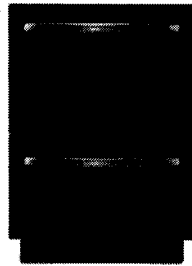


[Appliances](#)

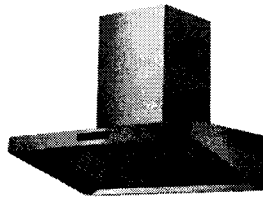
### Featured Products



[Iron Etchings design on Iron Bell Vessels lavatory](#)  
\$662.00



[KitchenAid Double Drawer 6 Cycles / 4 Cycle Options Architect Se](#)

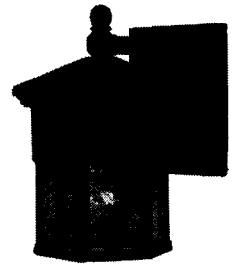


[K-STAR Wall Mount Style Stainless Steel](#)

**Call for price**



[Painting Tile 6017](#)  
\$450.00



[30122CDCE, Scottsdale 1-Light Outdoor Wall Lantern](#)  
~~\$207.00~~ \$144.90

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- [KOHLER Specials](#)

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## About Us

Home Paradise Design Center is the biggest home remodeling company in Southern California and a leading home renovation destination for discerning buyers. We redefine the possibilities of the home design experience with the finest materials, skilled designers and expert installation to insure customer satisfaction.

Located in beautiful upscale shopping malls with a total of 60,000 square feet showroom, we are open seven days a week, with the convenience of the Mall hours for our customers. Home Paradise offers a unique one-stop shopping environment with extensive product lines, professional design services and licensed and bonded installation teams.

With multiple store locations, more than 30 skilled designers and more than 40 quality vendor partners, Home Paradise is able to offer premium brands at competitive prices from flooring to fixtures, custom cabinets to counter tops, and appliances to a wide range of lighting options. Go to our website for more detailed information about our product lines.

Our goal is to provide excellent products at the most Competitive Price ,and we are looking for nation wide distributors now. We accept orders nationwide. No matter how big or small your order is - we will ship it all!

Follow us on Facebook to see the newest information about us!



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## Talk to Designer

Call a Designer Now !!!

Our Toll Free number is: **(866) 779-5666**

VIP Program Email: [vip@homeparadise.com](mailto:vip@homeparadise.com)

Customer Service Email: [customer@homeparadise.com](mailto:customer@homeparadise.com)

More information About Us: [info@homeparadise.com](mailto:info@homeparadise.com)

English Service depend on you location:

**Santa Ana:** (714) 835-0100

**Torrance:** (310) 371-0022

**Topanga:** (818) 713-8885

**San Diego:** (619) 819-6330

**Glendale:** (818) 660-2201

**Los Angeles:** (310) 860-6203

**Alhambra** Chinese & Spanish Service: (626)458-6666

**Main Office** (no Sales): (626)284-9999

For Fax Number and other locations detail please go to Locations Page.

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# Branch Location

Branch ATM

Page 1 of 1

Search Again:  
Enter Address, City,  
State or Zip Code

91007

Number of  
Locations

5   ATM  Branch

**1. Temple City**

9934 E Las Tunas Drive  
Temple City, CA 91780

626 286-6550

To - From (~1.01 mi.)

More info...

**2. Arcadia (CB)**

1155 W Huntington Drive  
Arcadia, CA 91006

626 445-3800

To - From (~1.26 mi.)

More info...

**3. Sierra Madre**

100 W Sierra Madre Blvd  
Sierra Madre, CA 91024

626 355-3373

To - From (~2.79 mi.)

More info...

**4. Rosemead**

9000 E Valley Blvd  
Rosemead, CA 91770

626 312-5700

To - From (~3.18 mi.)

More info...

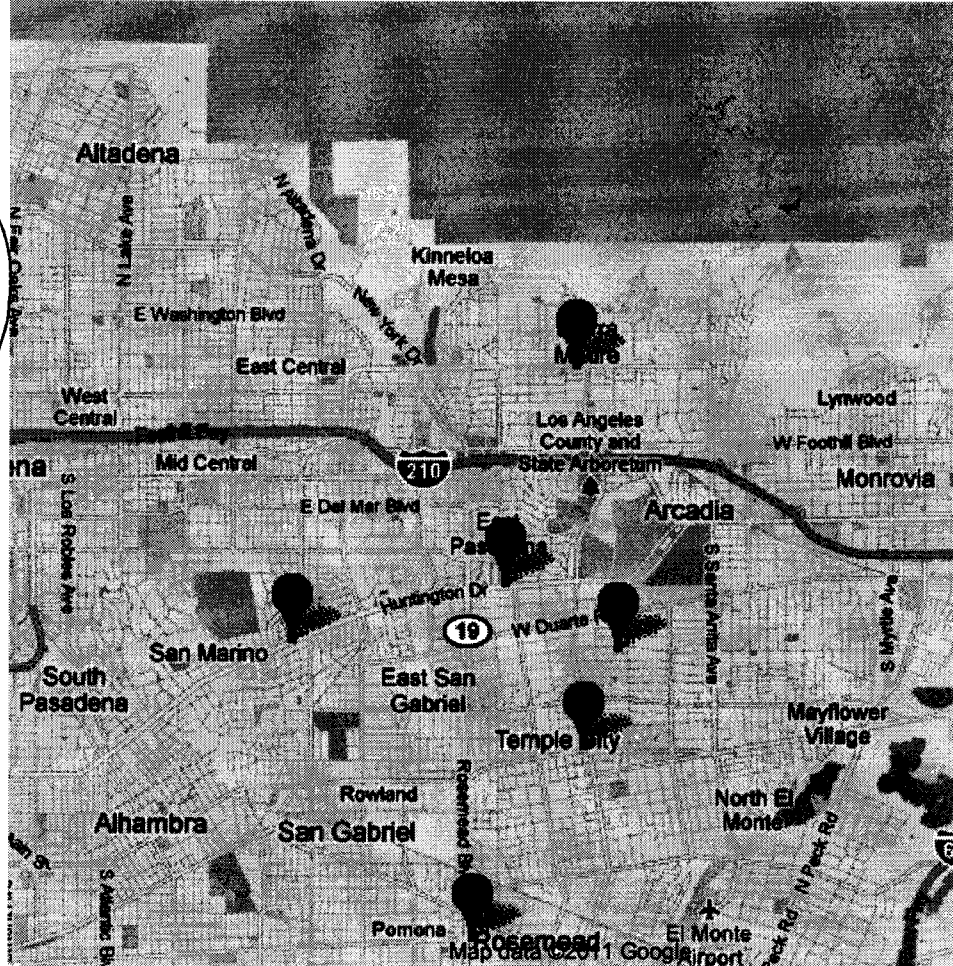
**5. San Marino (CB)**

2395 Huntington Drive  
San Marino, CA 91108

626 568-8300

To - From (~3.18 mi.)

More info...



Page 1 of 1

**Bank of the West believes in relationships, customer service, providing solid, secure banking products, and being committed to the communities we live and work in.**

- [Personal Service](#)
- [Secure & Stable](#)
- [Committed to Community](#)

Our passion for customer service is appreciated by our loyal customers and sets us apart from our banking peers. Friendly and knowledgeable team members, reliable transaction processing and simple, straightforward products and services are hallmarks of our style of award-winning relationship banking.

## **our products and services**

### **Checking Accounts**

### **Savings & Money Market, CDs, IRAs**

### **Credit Cards**

### **Loans**

### **Wealth Management**

### **Insurance**

## **bank of the west - in the community**

Bank of the West invests in local charities and nonprofit organizations that are making a difference.

---

## **events calendar**

September 5, 2011  
Labor Day-closed  
October 10, 2011  
Columbus Day-closed  
November 11, 2011  
Veterans' Day-closed

November 24, 2011  
Thanksgiving Day-closed  
December 26, 2011  
Christmas Day-closed

## Our Location:

1155 W Huntington Drive  
Arcadia, CA 91006

## Phone:

626 445-3800

## Lobby Hours:

M-Th 9-5, Fri 9-6, Sat Closed, Sun Closed

[Get Directions](#)   [View Larger Map >](#)



## How can we help you?

I need to:

- [Compare Rates](#)
- [Find a Routing Number](#)
- [Order Checks](#)
- [Open an Account](#)
- [Report a Fraud](#)
- [Apply for a Job](#)
- [Change my Password](#)
- [Switch my Accounts](#)
- [Save for Retirement](#)
- [Apply for a Loan](#)
- [Invest my Money](#)

# Your Branch

## Branch Specialties

- **Mortgages**  
Anita Huang, Mortgage Banker
- **Loans**
- **Home Equity loans**
- **Financial planning**
- **Savings plans**
- **Checking accounts**
- **Retirement planning**

## Frequently Asked Questions

- [Where's my routing number? >](#)
- [How do I order checks? >](#)
- [Who do I call about mortgages? >](#)

# CALIFORNIA SERVICE CENTER ROUTING SLIP

Receipt # \_\_\_\_\_

A # \_\_\_\_\_

Rev.08/03/11

**USCIS**

<input type="checkbox"/> AST Incoming: <u>XB800</u> <input type="checkbox"/> MR Returns: _____ <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> Incoming: <u>AD477</u> <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> Incoming: <u>XA925</u> <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> Incoming: <u>XA930</u> <input type="checkbox"/> QA Corrections: <u>ET116</u> <input checked="" type="checkbox"/> W/S: <u>22123</u> ATTN: _____
---------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<input type="checkbox"/> Incoming: <u>XB641</u> <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> CPAU Incoming: <u>RS601</u> <input type="checkbox"/> CFF Incoming: <u>RS902</u> <input type="checkbox"/> RRU BIA: <u>RS339</u> Incoming: _____	<input type="checkbox"/> Incoming: <u>WR000</u> <input type="checkbox"/> CSC Counsel ATTN: _____ <input type="checkbox"/> WS: _____	<input type="checkbox"/> Rap Sheets/ EPS Incoming: <u>SZ132</u> <input type="checkbox"/> Incoming: <u>SZ131</u>
-------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------

<input type="checkbox"/> Incoming: <u>XB641</u> <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> RRU Incoming: <u>RS554</u> Outside <input type="checkbox"/> RRU Ponds: <u>W/S 24201</u> <input type="checkbox"/> CIS Review: <u>RC464</u> Incoming: _____ W/S: _____ ATTN: _____	<input type="checkbox"/> FTR Incoming: <u>RS500</u> ATTN: <u>Outside WS24271</u>	<input type="checkbox"/> BCU/Top 4: <u>SZ714</u>  <input type="checkbox"/> WS: _____ ATTN: _____
-------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------

<input type="checkbox"/> Incoming: <u>XO036</u> <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> Incoming: <u>XB919</u> <input type="checkbox"/> W/S: _____ ATTN: _____	<input type="checkbox"/> CFDO Incoming: <u>DU000</u> <input type="checkbox"/> Religious Worker Incoming: <u>DU700</u> <input type="checkbox"/> ASVVP H1B Incoming: <u>DU701</u> <input type="checkbox"/> ASVVP DE Return: <u>DU702</u> <input type="checkbox"/> W/S: _____ ATTN: _____	<p style="text-align: center;"><b>SCOSS</b></p> <input type="checkbox"/> NTA Shelf (TPS / I-485 / I-751 / I-539 B1/B2 / I-360 / Misc.): <u>RC445</u> <input type="checkbox"/> Non-EPS Incoming (I-485 / I-130 / Misc.): <u>RC448</u>
-------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<b>SCOSS</b>	ATTN: _____	W/S: _____	<b>RPC:</b> _____
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<input type="checkbox"/> NRC Hold Approved: _____ <input type="checkbox"/> NRC Hold Denied: <u>RC417</u> <input type="checkbox"/> HBG Hold Approved: _____ <input type="checkbox"/> HBG Hold Denied: <u>RC418</u>	<input type="checkbox"/> Return to JIT * <u>RC419</u> * Specify application / petition type in Comments field below <input type="checkbox"/> SCAN CR I-89 / 698 / 829: <u>RC318</u> <input type="checkbox"/> FR Backend Appeal Pod: <u>RC410</u>	<input type="checkbox"/> Routing Hub: <u>RC422</u> ATTN: _____ <input type="checkbox"/> CIS FTR Review Complete * <u>RC442</u> * Attach sheet and / or file	<input type="checkbox"/> EDMS PRINTS: <u>RC321</u> ATTN: _____ <input type="checkbox"/> I-612 DOS COPY: <u>RC472</u>
<input type="checkbox"/> Interfiling: <u>WS23222</u> <input type="checkbox"/> I-485 EB: <u>RC474</u> Approved RDF <input type="checkbox"/> I-485EB: <u>RC475</u> Denied RDF	<input type="checkbox"/> Backend Scan: <u>RC307</u> <input type="checkbox"/> SNAP Incoming: <u>RC302</u> <input type="checkbox"/> 103 Hold (RFE / ITD): <u>RC420</u> <input type="checkbox"/> I-512 Incoming: <u>RC313</u>	<input type="checkbox"/> Transfer to FCO: <u>RC421</u> <input type="checkbox"/> TPS Haitian (RDF): <u>RC465</u> <input type="checkbox"/> Transfer to NVC: <u>RC438</u> <input type="checkbox"/> FTC Incoming: <u>RC437</u> <input type="checkbox"/> I-130 Upgrades: <u>RC055</u>	<input type="checkbox"/> F/R A-File-Create: <u>RC413</u> <input type="checkbox"/> File Consolidate: <u>RC423</u> <input type="checkbox"/> I-485 File Consolidate: <u>RC439</u> <input type="checkbox"/> Approved Awaiting I-89: <u>RC428</u>

R F E RESPONSE

Comments Below: \_\_\_\_\_

REV.08/03/11

Note: The current printable format can be found @ O:Common/Forms/CSC Routing Slip. Incomplete or outdated routing slip

# Decision Processing Worksheet

Officer Name: <b>FRLEYA</b>	Receipt #: <b>RCW1031910071</b>
Officer Stamp #: <b>1298</b>	
Form Type: <b>I.924</b>	Classification:
Division: <b>III</b>	Team: <b>I</b>
WS22123	

### Action:

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

Initials/Date: <b>JWA</b>	2 <sup>nd</sup> Review Initials/Date:	3 <sup>rd</sup> Review Initials/Date:
---------------------------	---------------------------------------	---------------------------------------

### I-129 H2A Expedite Processing:

Date Received: <b>03/11/11</b>	# of Un-Named Beneficiaries:	# of Named Beneficiaries:
Officer Received Date:	AST Action Completed:	

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

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

**Officer's Comment:**

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

DUPLICATE PETITION INCLUDED:  YES    NO

**Supervisor Review and Comments:**

Initials/Date: <b>MJA 6-1-2011</b>	2 <sup>nd</sup> Review Initials/Date:	3 <sup>rd</sup> Review Initials/Date:
------------------------------------	---------------------------------------	---------------------------------------

Clerical Processing Completed: Initials: **JY**    Date: **6/1/11**

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

## File Room Processing

**To: 103 Hold Shelf**

**Call-Up Date:**                     8/24/11                    

Rev 03/05/2010

A #	Application/Petition <b>I924, Application for Regional Center under Immigrant Investor Pilot Program</b>	
Receipt # <b>RCW1031910071</b>	Application/Petitioner <b>Home Paradise Regional Center</b>	
Notice Date <b>June 1, 2011</b>	Page <b>1 of 10</b>	Beneficiary

LINDA LAU ESQ.  
GLOBAL LAW GROUP  
350 S. FIGUEROA ST, SUITE 760  
LOS ANGELES, CA 90071

Request for Evidence

Notice also sent to:

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

Note: You are given until **August 24, 2011** in which to submit the requested information to the address at the bottom of this notice.

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

For more information, visit our website at **www.uscis.gov**  
Or call us at **1-800-375-5283**

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

**COPY**

CSC1298 WS22123 DIV III JT

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

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



RCW1031910071

## Additional Information for Applicants and Petitioners.

### General.

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

### Inquiries.

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

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

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

### Requests for Evidence.

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

### Reply Period.

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

### Approval for a Petition.

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

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

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

### Denials.

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

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

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

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



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

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

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

**Background:**

The proposed Regional Center entity, Home Paradise Investment Center LLC dba Home Paradise Regional Center [HPRC], was established on June 16, 2010 in California, and is structured as a LLC. HPRC is requesting jurisdiction over a geographic area within the State of California, including Imperial, Kern, Los Angeles, Orange, Riverside and San Diego counties. HPRC plans to offer EB-5 capital investment opportunities in affiliated new commercial enterprises, organized as corporations, focusing on projects in the following industry categories:

1. Interior Design Services (NAICS Code: 54141)
2. Retail (NAICS Code: 44-45)
3. Food Services (NAICS Code: 722); and
4. Hospitality (NAICS Code: 7211)

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

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

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

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

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

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

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

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

The Operational Plan submitted does not provide the source of capital or the expenses already incurred by the regional center.

Your proposal lacked a detailed statement regarding the amount and source of capital which has been committed to the regional center. (b) (4)

[REDACTED]

The detailed statement described in 8 CFR 204.6(m)(3)(iii) must include the exact amount of funds that have been dedicated to the regional center to accomplish the goals of the Immigrant Investor Pilot Program, the source of the funds, the expenditures already used, whether the remaining amount is sufficient to sustain the Regional Center's future endeavors and evidence that the remaining funds remain committed to the regional center.

Certain expenses, such as document preparation and economic analyses (which is dated after the bank statement showing the availability of the committed funds), that have been incurred prior to filing the application for regional center designation, should be included in the detailed statement regarding the amount and source of funds committed to the regional center. Money already spent should also be included in the detailed statement of funds committed to the Regional Center, along with their source of funds as well. Money


(b) (4)



The petitioner is, therefore, requested to provide an Operational Plan that outlines how the Regional Center will identify, assess and evaluate proposed investor projects and activities, and enterprises.

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

Note: A Regional Center must have sufficient capital to operate in the manner outlined in the proposal from sources apart from the immigrant investors' required capital investment. (b) (4)



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

(b) (4)



- **Economic Analysis (8 CFR 204.6(m)(3)(v):**

(b) (4)



(b) (4)



**General issues**

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

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

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

**NAICS Codes:**

Provide the NAICS codes used by North American Industry Classification System (NAICS) by the U.S. Census Bureau for each of the 8 target industry economic sectors.

The petitioner needs to be more specific in the NAICS codes provided. The use of 2 digit numbers is too general in nature. Unless the industry cluster is going to be all-encompassing, for instances, using Hospitality. Does the petitioner intend to operate and build a hotel, a casino hotel, a bed-and-breakfast, etc.? Be specific.

The NAICS code for Retail is the same way – 44-45. This is too general. Unless the petitioner is also planning to own and operate a car dealership and auto parts store, boat dealerships, etc. The RC proposal needs to be more specific in the plans the RC intends to fund.

The petitioner needs to be more specific with its Industry Clusters. Provide at least 3-4 digit codes for each industry requested.

**Translations:**

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

**Copies:**

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

## Regulatory References

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

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

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

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

### Qualifying employee

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

### Regional center

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

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

### Job creation --

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



alien entrepreneur must submit evidence that the commercial enterprise maintained the number of existing employees at no less than the pre-investment level for the period following his or her admission as a conditional permanent resident. Such evidence may include payroll records, relevant tax documents, and Forms I-9.

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

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

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

**Background:**

The proposed Regional Center entity, Home Paradise Investment Center LLC dba Home Paradise Regional Center [HPRC], was established on June 16, 2010 in California, and is structured as a LLC. HPRC is requesting jurisdiction over a geographic area within the State of California, including Imperial, Kern, Los Angeles, Orange, Riverside and San Diego counties. HPRC plans to offer EB-5 capital investment opportunities in affiliated new commercial enterprises, organized as corporations, focusing on projects in the following industry categories:

1. Interior Design Services (NAICS Code: 54141)
2. Retail (NAICS Code: 44-45)
3. Food Services (NAICS Code: 722); and
4. Hospitality (NAICS Code: 7211)

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

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

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


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

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

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

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

(b) (4), (b) (5)



Certain expenses, such as document preparation and economic analyses (which is dated after the bank statement showing the availability of the committed funds), that have been incurred prior to filing the application for regional center designation, should be included in the detailed statement regarding the amount


(b) (4)



The petitioner is, therefore, requested to provide an Operational Plan that outlines how the Regional Center will identify, assess and evaluate proposed investor projects and activities, and enterprises.

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

Note: A Regional Center must have sufficient capital to operate in the manner outlined in the proposal from sources apart from the immigrant investors' required capital investment. (b) (4)



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

(b) (4)



- **Economic Analysis (8 CFR 204.6(m)(3)(v):**

(b) (4)



**General issues**

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

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

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

**NAICS Codes:**

Provide the NAICS codes used by North American Industry Classification System (NAICS) by the U.S. Census Bureau for each of the 8 target industry economic sectors.

The petitioner needs to be more specific in the NAICS codes provided. The use of 2 digit numbers is too general in nature. Unless the industry cluster is going to be all-encompassing, for instances, using Hospitality. Does the petitioner intend to operate and build a hotel, a casino hotel, a bed-and-breakfast, etc.? Be specific.

The NAICS code for Retail is the same way – 44-45. This is too general. Unless the petitioner is also planning to own and operate a car dealership and auto parts store, boat dealerships, etc. The RC proposal needs to be more specific in the plans the RC intends to fund.

The petitioner needs to be more specific with its Industry Clusters. Provide at least 3-4 digit codes for each industry requested.

**Translations:**

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

**Copies:**

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

### **Regulatory References**

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

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

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

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

#### **Qualifying employee**

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

#### **Regional center**

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

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

#### **Job creation --**

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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alien entrepreneur must submit evidence that the commercial enterprise maintained the number of existing employees at no less than the pre-investment level for the period following his or her admission as a conditional permanent resident. Such evidence may include payroll records, relevant tax documents, and Forms I-9.

MOVIE 6-28

CHECK 6 CLAIMS FOR 6-28 (MAD)

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

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

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

**Background:**

The proposed Regional Center entity, Home Paradise Investment Center LLC dba Home Paradise Regional Center [HPRC], was established on June 16, 2010 in California, and is structured as a LLC. HPRC is requesting jurisdiction over a geographic area within the State of California, including Imperial, Kern, Los Angeles, Orange, Riverside and San Diego counties. HPRC plans to offer EB-5 capital investment opportunities in affiliated new commercial enterprises, organized as corporations, focusing on projects in the following industry categories:

1. Interior Design Services (NAICS Code: 54141)
2. Retail (NAICS Code: 44-45)
3. Food Services (NAICS Code: 722); and
4. Hospitality (NAICS Code: 7211)

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

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

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

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

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

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

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

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

*Repeats*

The Operational Plan submitted does not provide the source of capital or the expenses already incurred by the regional center.

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

②

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


Your proposal lacked a detailed statement regarding the amount and source of capital which has been committed to the regional center. The statement on the bottom of page 3 of the Operational Plan and the statements provided on pages 10 and 11 do not clearly provide a detailed statement as to the amount and source of capital committed to the regional center. A bank statement for the regional center was also submitted showing the availability of the noted funds. However, it should be noted that the phrase "committed to the regional center" is in the past tense. The evidence should show the amount of money already committed as well as the planned expenditures. The statements with regards to funds, although supported by a bank statement from Bank of the West in Arcadia, California, doesn't define unknown expenditures. Therefore, the evidence is insufficient with regard to funds committed to the regional center. The detailed statement described in 8 CFR 204.6(m)(3)(iii) must include the exact amount of funds that have been dedicated to the

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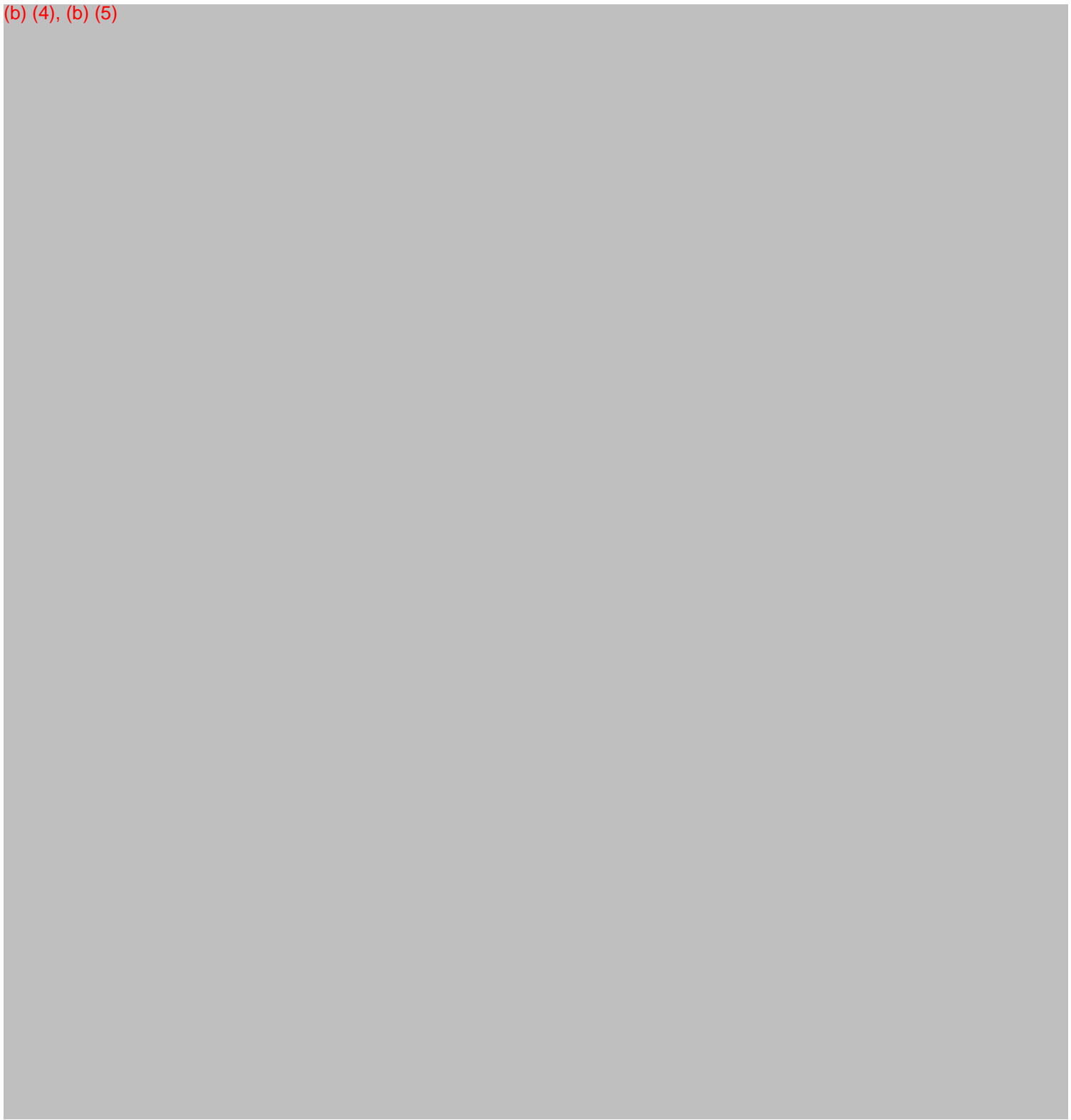
(b) (5)



(b) (4), (b) (5)



(b) (4), (b) (5)

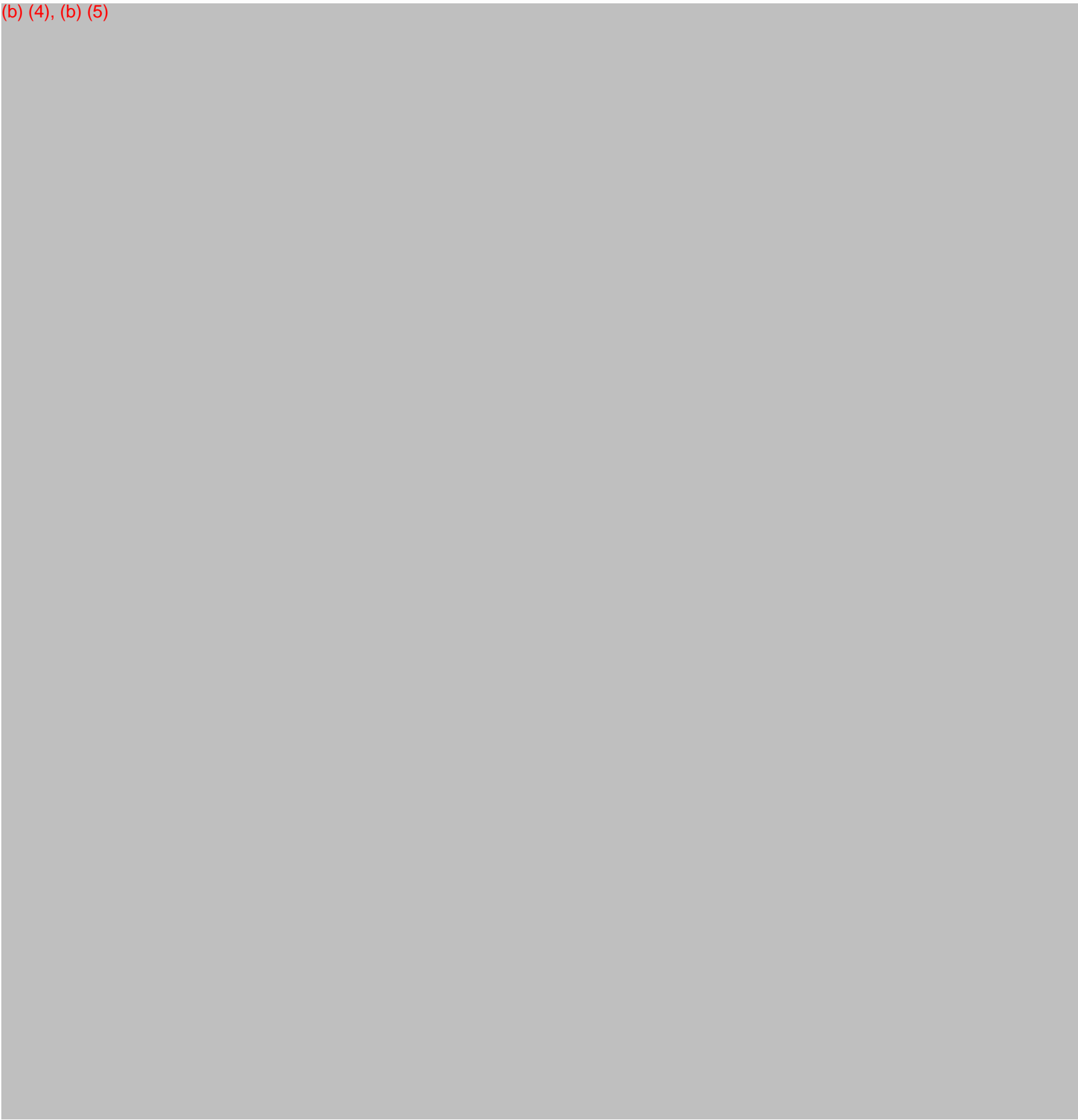





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(b) (4), (b) (5)



(b) (4), (b) (5)



**General issues**

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

If the Regional Center Proposal is approved, then public contact information relating to the Regional Center

will be posted on the USCIS web site. In order to provide accurate and updated information provide the following, as it relates to the Regional Center:

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

**NAICS Codes:**

Provide the NAICS codes used by North American Industry Classification System (NAICS) by the U.S. Census Bureau for each of the 8 target industry economic sectors.

The petitioner needs to be more specific in the NAICS codes provided. The use of 2-~~3~~<sup>digit</sup> numbers is too general in nature. Unless the industry cluster is going to be all-encompassing, for instances, using Hospitality. Does the petitioner intend to operate and build a hotel, a casino hotel, a bed-and-breakfast, etc.? Be specific.

The NAICS code for Retail is the same way – 44-45. This is too general. Unless the petitioner is also planning to own and operate a car dealership and auto parts store, boat dealerships, etc. The RC proposal needs to be more specific in the plans the RC intends to fund.

The only industry cluster well defined is Interior Design Services (NAICS code: 54141). Perhaps it is because this is the only NAICS code available for the industry. Nonetheless, the other industry clusters need to be as well defined and broken down.

The petitioner needs to be more specific with its Industry Clusters.

*Provide at least 3-4 digits codes for each industry requested*

**Translations:**

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

**Copies:**

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### **Regulatory References**

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

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

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

#### **Qualifying employee**

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

#### **Regional center**

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

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

#### **Job creation --**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

RCW 1031910071

Page 11

alien entrepreneur must submit evidence that the commercial enterprise maintained the number of existing employees at no less than the pre-investment level for the period following his or her admission as a conditional permanent resident. Such evidence may include payroll records, relevant tax documents, and Forms I-9.

# North American Industry Classification System

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## 2007 NAICS Definition

### 721110 Hotels (except Casino Hotels) and Motels

This industry comprises establishments primarily engaged in providing short-term lodging in facilities known as hotels, motor hotels, resort hotels, and motels. The establishments in this industry may offer food and beverage services, recreational services, conference rooms and convention services, laundry services, parking, and other services.

Cross-References. Establishments primarily engaged in--



- Providing short-term lodging with a casino on the premises--are classified in Industry 721120, Casino Hotels; and
- Providing short-term lodging in facilities known as bed-and-breakfast inns, youth hostels, housekeeping cabins and cottages, and tourist homes--are classified in Industry 721119, Other Traveler Accommodation.

2007 NAICS	2002 NAICS	1997 NAICS	Corresponding Index Entries
721110	721110	721110	Alpine skiing facilities with accommodations (i.e., ski resort)
721110	721110	721110	Auto courts, lodging
721110	721110	721110	Automobile courts, lodging
721110	721110	721110	Health spas (i.e., physical fitness facilities) with accommodations
721110	721110	721110	Hotel management services (i.e., providing management and operating staff to run hotel)
721110	721110	721110	Hotels (except casino hotels)
721110	721110	721110	Hotels (except casino hotels) with golf courses, tennis courts, and/or other health spa facilities (i.e., resorts)
721110	721110	721110	Hotels, membership
721110	721110	721110	Hotels, resort, without casinos
721110	721110	721110	Hotels, seasonal, without casinos
721110	721110	721110	Membership hotels
721110	721110	721110	Motels
721110	721110	721110	Motor courts
721110	721110	721110	Motor hotels without casinos
721110	721110	721110	Motor inns
721110	721110	721110	Motor lodges
721110	721110	721110	Resort hotels without casinos
721110	721110	721110	Seasonal hotels without casinos
721110	721110	721110	Ski lodges and resorts with accommodations
721110	721110	721110	Summer resort hotels without casinos
721110	721110	721110	Tourist lodges

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Source: U.S. Census Bureau | North American Industry Classification System (NAICS) | (888) 756-2427  
 | [naics@census.gov](mailto:naics@census.gov) | Last Revised: February 18, 2011

*Donna's request re. funds able to sustain the RC also emailed a copy to Russ and me*

**Capital (8 CFR 204.6(m)(3)(iii)):**

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

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

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

(b) (4)



# CALIFORNIA SERVICE CENTER ROUTING SLIP

Receipt # \_\_\_\_\_ A # \_\_\_\_\_ Rev.09/10/10

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<input type="checkbox"/> MR Returns: _____	<input type="checkbox"/> W/S: _____	<input type="checkbox"/> W/S: _____	<input type="checkbox"/> QA Corrections: <b>ET116</b>
<input type="checkbox"/> W/S: _____	ATTN: _____	ATTN: _____	<input checked="" type="checkbox"/> W/S: <b>24064</b>
ATTN: _____			ATTN: _____

DIVISION IV	DIVISION VII	DIVISION VIII/ COUNSEL	DIVISION X-Background Check Unit
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<input type="checkbox"/> W/S: _____	<input type="checkbox"/> CFF Incoming: <b>RS902</b>		<input type="checkbox"/> Incoming: <b>SZ131</b>
ATTN: _____	<input type="checkbox"/> RRU BIA <b>RS339</b>	<input type="checkbox"/> CSC Counsel	
	<input type="checkbox"/> Incoming: <b>RS554</b>	ATTN: _____	<input type="checkbox"/> BCU/Top 4: <b>SZ714</b>

DIVISION V	DIVISION VII (cont.)	DIVISION VIII/ COUNSEL (cont.)	DIVISION X-Background Check Unit (cont.)
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<input type="checkbox"/> W/S: _____	<input type="checkbox"/> RRU Ponds: <b>W/S 24201</b>	<input type="checkbox"/> WS: _____	
ATTN: _____	<input type="checkbox"/> CIS Review <b>RC464</b>		<input type="checkbox"/> WS: _____
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	ATTN: _____	ATTN: _____	

DIVISION VI	DIVISION XII	DIVISION XI/CFDO	SCOSS
<input type="checkbox"/> Incoming: <b>XO036</b>	<input type="checkbox"/> Incoming: <b>XB919</b>	<input type="checkbox"/> CFO: <b>DU000</b>	<input type="checkbox"/> NTA Shelf (TPS / I-485 / I-751 / I-539 B1/B2 / I-360- / Misc.): <b>RC445</b>
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<input type="checkbox"/> NRC Hold Denied: <b>RC417</b>	* Specify application / petition type in Comments field below	ATTN: _____	
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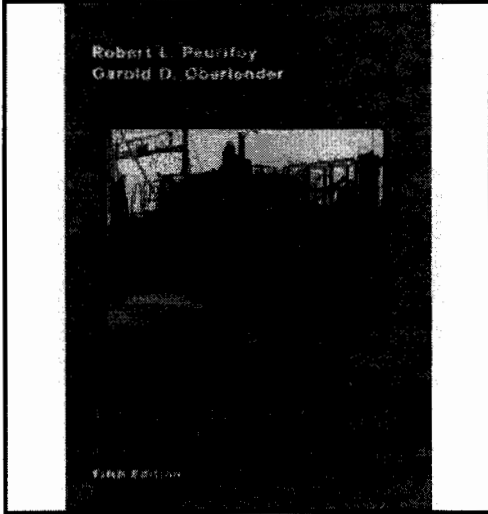
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Robert L Peurifoy and Garold D Oberlender  
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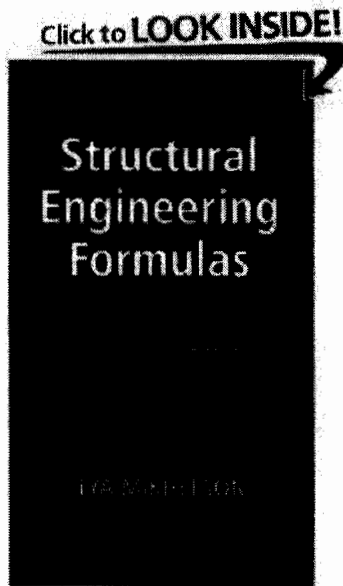
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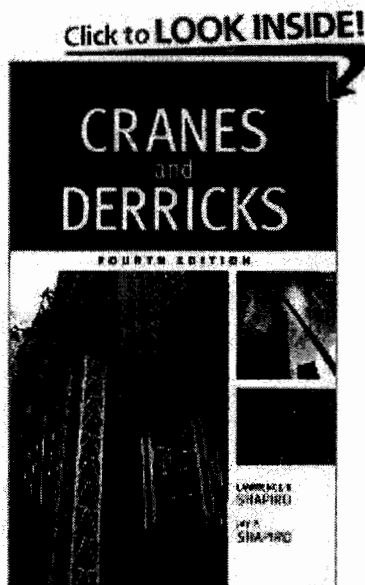
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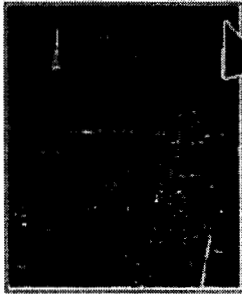


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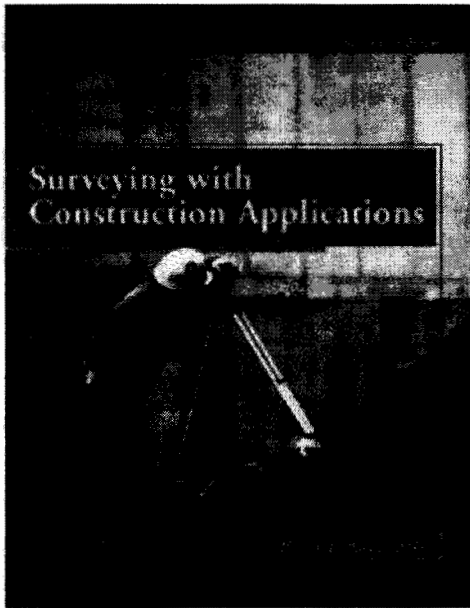
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If you need to compute the square footage you'll need for your new office, the most common method is to allocate a certain number of square feet per employee based on industry standards for your business type. A real estate advisor, architect, or space planner can also help you establish these projections quickly and efficiently.

Real estate industry groups and associations like the Building Owners and Managers Association (BOMA) are good resources for benchmarking studies on space utilization.

The overall trend in office design is toward a more open space with fewer enclosed offices and a higher density of employees per square foot. As I said, square footage per employee varies from industry to industry. For example, law firms typically have much more space per employee — 300 square feet or more per employee — than call centers, which have very dense, open floor plans — 150 to 175 square feet per employee.

A good broker or property manager can help you find outside janitorial services if you need them, but don't rely on your broker to set it up automatically.

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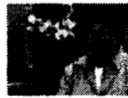
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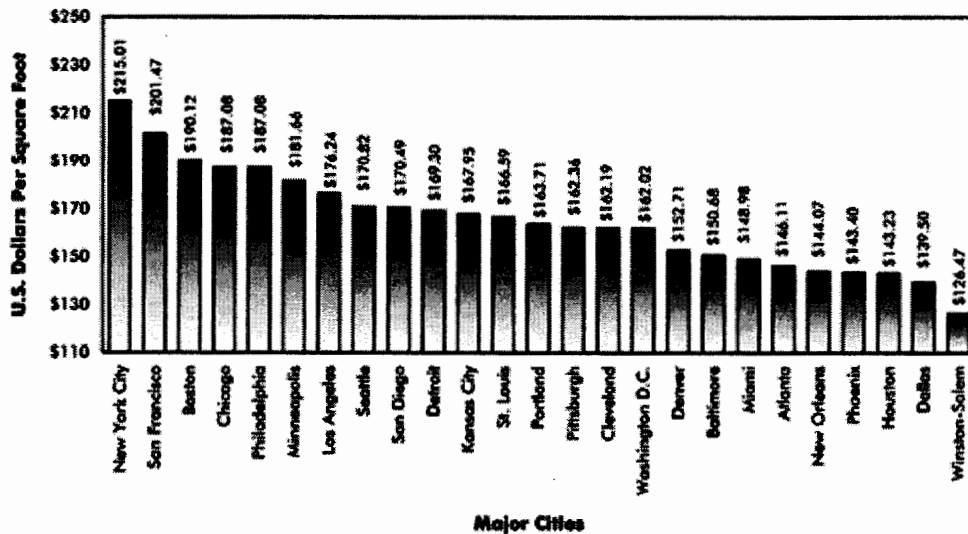
# Cost per Square Foot of Commercial Construction by Region

Posted by [Dean Dalvit](#) • August 6, 2009 • [Printer-friendly](#)

We get this question all the time: **How much does it cost to build a commercial building?** There is no quick answer and without more information about the project and its location, is essentially akin to asking how many angels can dance on the head of a pin. However, there is some guidance provided we know where you are located and what kind of building you are looking to build. Local economy is a very important factor in construction cost as well as the type of construction you intend to build.

We subscribe to **RSMeans'**, researchers of construction cost data nationwide, and have come across some important current data on the cost of commercial construction for four different commercial project types as a function of their location. Note, that **not all types of construction cost the same per square foot**, and even more importantly, **the cost of construction per square foot varies significantly with location**.

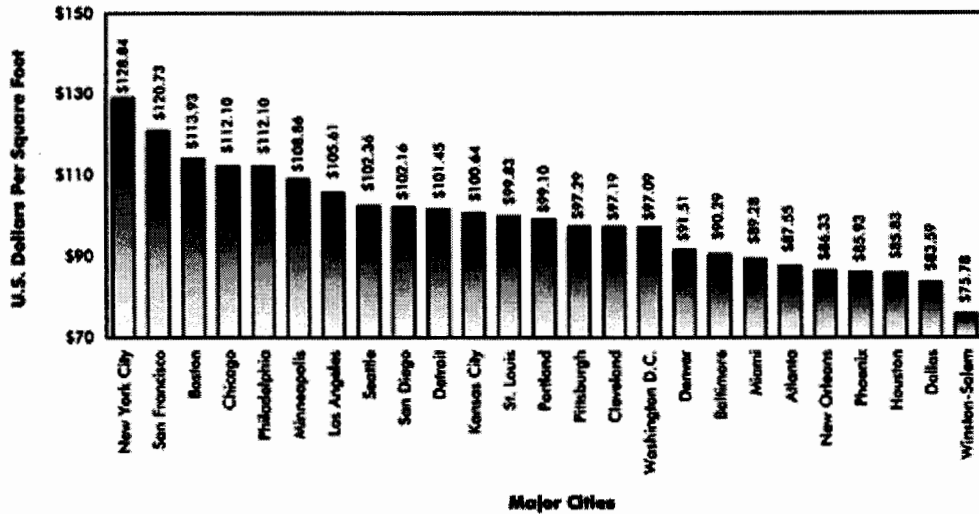
Below are four different types of commercial construction and the varying cost per square foot to expect for each in different regions. All graph images are courtesy of **RSMeans Construction Cost Data**. *Data source: Reed Construction Data – RSMeans/Charts: Reed Construction Data – CanaData*



One Story Office Building

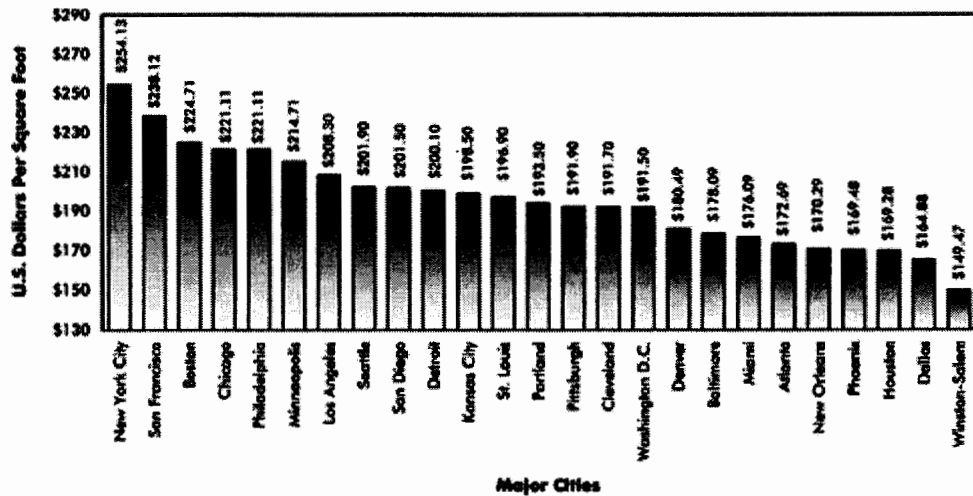
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As you can see from the range of cost per square foot, **location alone can represent as much as 70% of the cost driver for a single story office building.** The median for this type of construction is between \$160 and \$170 per square foot. Not surprisingly, New York tops the charts for most expensive city to build in for all of these building types.



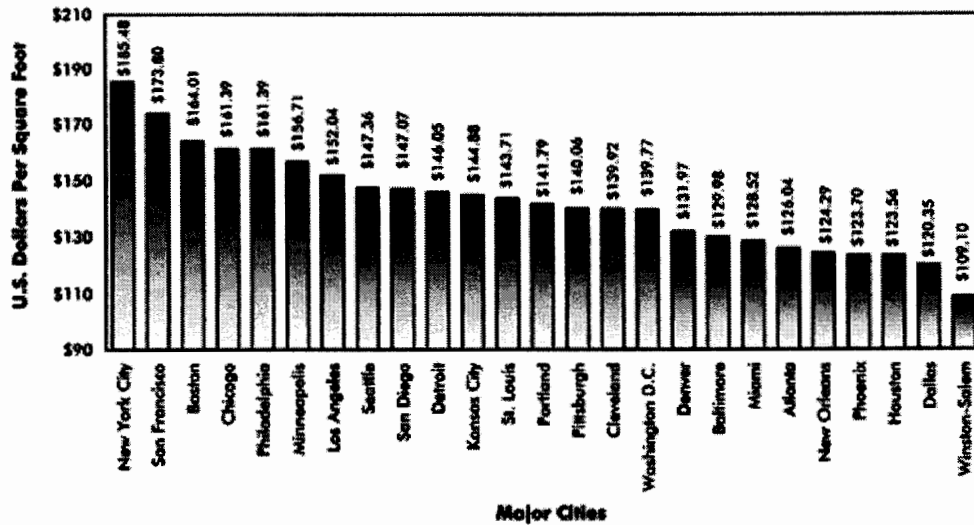
### Convenience Store

Convenience stores are generally less expensive to construct than the other building types because of their simpler nature. The median cost for this commercial building type hovers around \$100 per square foot.



### Fast Food

Because of the new trends in fast food being more boutique and less assembly line, the cost for a typical fast food restaurant is on the rise. Expenses for kitchen equipment also drive this building type to a median of near \$200 per square foot, the most expensive of the four building types in this discussion.



### Day Care

It is increasingly important to understand the cost drivers for any commercial project and how building type, construction type and location can all be huge variables that will drive your cost per square foot. These are always a part of the initial programming discussions and the Architect will play a huge role in helping to define the ranges of cost to expect for the project.

Related Articles:

1. [Construction Types V-A and V-B in the International Building Code](#)
2. [How Much Does it Cost to Build a Home?](#)
3. [Designing a Commercial Kitchen – What the Small Restaurant Owner Needs to Give Their Architect](#)
4. [Is it More Cost Effective to Build Up or Build Out?](#)
5. [Construction Materials Prices Likely to Begin Rising by Mid Year 2009](#)
6. [Commercial Stair Design – Guidelines, Criteria and Dimensions](#)
7. [Residential or Commercial](#)
8. [C-1 Commercial Property For Sale in Clear Creek County](#)

## 29 Responses »



1. **Guingamp Fixtures**  
**September 16, 2009 • 10:54 am**

I really like your blog! I have bookmarked it! Keep up the good work!



2. **Elizabeth Lisk**  
**January 21, 2010 • 2:29 pm**

I would like to know how much for a senior citizen center would cost per square feet for the Dallas, TX area. We are 30 miles north of Dallas in a community of about 40,000 and growing. We are not concerned with the land or the inside equipment.

3.

**Gene Dane**

**January 22, 2010 • 8:52 am**

Elizabeth,

My name is Gene Dane and I am the "Principal In Charge" of the Texas office of EV Studio. Thank you for your recent inquiry about the cost per square foot of a Senior Center in the Dallas, Texas area.

In order to most accurately answer your question, there are several questions that I must ask regarding the type of facility you are considering building.

- Is there a need for a commercial kitchen in the facility?
- Will there be full time staff at the facility?
- Do you have an interest in incorporating any renewable energy resources into the project (solar or wind are currently the most practical)?
- What level of quality is anticipated for the interior finishes?
- What is the anticipated procurement method for the project (competitive bid, negotiated contract, design /build, etc.)?

The short and quick answer is most likely between \$100 per square foot and \$140 per square foot. The point I was trying to make earlier is that there are many decisions that our clients make that ultimately determine the cost per square foot of their projects. It is our responsibility as architects and engineers to make sure the appropriate questions are asked and answered before we even get close to starting the design process.

The most important question that we ask our clients concerns the budget for their project. The first process we go through with our clients is the evaluation of the project program vs. the project budget. In order to start down the path towards the successful design and construction of your project the program and the budget must be complimentary. We routinely help our clients match the scope of their project to their budget, or determine the appropriate budget if the scope is already clearly defined.

The following is a quick example of how client needs determine the cost per square foot of a building:

Client A and client B both have the same \$500,000 budget for a Senior Center.

Client A needs the maximum amount of space possible and lower quality finishes are acceptable. This scenario would result in a larger building and a lower cost per square foot. (5000 square foot building for \$500,000 = \$100 per square foot)

Client B needs high end finishes and well appointed spaces. The size of the building is of secondary importance. This scenario would result in a smaller building and a higher cost per square foot. (3571 square foot building for \$500,000 = \$140 per square foot)

Successful projects are the result of the completed facility meeting or exceeding our client's expectations. We pay very close attention to communicating with our clients to insure their expectations are aligned with



their budget and their program.

Elizabeth, we appreciate the time you took to post your question and I hope I have answered your initial question. Please feel free to contact me directly with any other questions you might have concerning your project. We have successfully completed many projects like the one you are asking about and would enjoy working with you on this one.

Sincerely,

Gene Dane, AIA  
913 South Main Street  
Copperas Cove, Texas 76522  
(254) 547-3930 office  
(254) 547-4248 fax

website: <http://www.evstudio.us> || blog: <http://www.evstudio.info>

Did you know that EV Studio provides full scope Structural and Civil Engineering services in addition to Architecture and Planning? Click Here to find out more!



4.

*Rick Dotsch*

**January 28, 2010 • 6:40 am**

I lost my brother last year. He left me his share of our apartment rental business. I am in the process of trying to estimate the value of the real estate. One of the estimates will be replacement cost. What would be the range of building cost in Fort Lauderdale, FL. for apartments. Our product is economical 650 square foot 2 br 1 bath. Nice but low end cabinets, base appliances, etc. CBS, rectangle buildings, gable end roofs. I have built in 30 years. I don't know how much cost have increased because of hurricane codes and increased government fees. Any guidance would be helpful. Thanks Rick



5.

*Dean Dalvit*

**January 29, 2010 • 9:08 am**

Hi Rick,

I'm sorry to hear about your loss. As I mention in the article, local economies can significantly affect the cost of construction. I understand that the economy in Florida has been hit particularly hard in this recession, however, there is also a reasonable floor to the low end of construction cost. In other words, labor and materials would not go lower than the industry could tolerate, regardless of how dismal the market value of the real estate would be. In this scenario, new construction ceases, but replacement cost can still be determined.

For your situation, your property is very similar to a product type we are very involved with in the markets

we serve. For economy apartments with relatively uncomplicated structures, I would expect the cost per square foot to be in the range of \$130 and \$160 per square foot. Given current market conditions in your area, you would likely be on the lower end of that range. I would be hard pressed though to think that it could be much lower than that range though. Also bear in mind that there are local pockets in the country that can be insulated by the recession to some degree due to demographics or unique features even if they are surrounded by areas that are hardest hit by the recession. If you happen to be in one of these areas, then your replacement cost may be on the higher end of that range as industry trades would still be functioning well in those areas.

Good luck to you and if you ever need architectural or engineering help with your development, we are capable of serving the Florida market and would be happy to discuss how we can serve you.

-Dean



6.

**Sean O'Hara**  
**January 30, 2010 • 6:36 pm**

Of course what Dean is talking about is market rate apartments and he's including some of the soft costs.

I've designed affordable housing under \$100/sf. Of course replacement cost is generally much lower than the actual value because it doesn't include items like the land, the site improvements and the entitlements. That's why your insurance coverage amount is frequently lower than your sales price.



7.

**Steve Wallace**  
**January 31, 2010 • 10:31 am**

I am currently specializing in custom built single family homes- I am trying to branch into the commercial market- I have the opportunity to bid on a church rec center in a small town in Ohio- my fear is not knowing the range of commercial cost per square foot so I can check my bid- the project is a 5375sq' activity center- very simple structure - wood frame- brick wainscoting exterior- metal vertical 26 gauge siding- wood siccor truss- asphalt shingles- interior mezanene of 535sq'- bathrooms to accomodate 276 total occupancy- small kitchen with stainless range/ vent hood/ sinks ect. - with this criteria do you have an educated cost per square foot I should be in

much appreciated

Steve Wallace



8.

**Sean O'Hara**  
**January 31, 2010 • 10:56 am**

Hi Steve, I'm hoping that you'll be able to get bids from your subs and get a real number if its already

designed. We recently did something similar in Colorado. <http://evstudio.us/holly-park-community-center-commerce-city-colorado/> This one is about 3,700 sf and the construction cost was about \$500K, so that's about \$135/sf. Now this is a base levels of finishes and doesn't include furnishings. Hope that helps.



9.

*Sean O'Hara*

**January 31, 2010 • 10:59 am**

Steve, did you see this post? <http://evstudio.info/2010/01/16/construction-cost-per-square-foot-of-community-centers-in-major-us-cities/>



10.

*Sunil*

**February 5, 2010 • 6:47 pm**

Gene, This cost of construction excludes the value of the land doesn't it? Are construction costs for residential projects a lot more or less?



11.

*Dean Dalvit*

**February 8, 2010 • 12:02 pm**

Sunil,

Dean here to address your question. The cost of construction should always exclude the cost of the land, financing costs, and often times most soft costs (entitlement attorneys, appraisers, real estate agents, architects, engineers, surveyors etc.). These variables would not allow us to compare projects on an apples to apples comparison. In addition, other related industries (like the lenders) also need to keep these separate as values for the building and the land have significant implications to the financing and should be looked at separately in all cases.

Residential projects will have a very wide range of construction cost due to the custom nature and the ability to spend much more on significantly less square footage than a large commercial building. The result is that the cost per square foot winds up being very sensitive to things as simple as your cabinetry selection. The low end for very economic single family residential would be in the ballpark of \$110 on the low end, but the high end can be extreme. We've seen \$400 or more per square foot regularly on luxury vacation homes in Vail and Aspen and I've even seen as high as \$1000 per square foot! These are not ordinary residential homes though, as most of us aren't Hollywood stars. For a more realistic high end custom home, you should consider in the ballpark of \$180-\$220 per square foot.

Because every project is different, you really need to discuss this first when you are programming the project with an architect. We help guide the budget expectations from the very first step in the design, and every subsequent step so that the project meets your budget expectations. If you need any help with this or you would like to discuss your project further, feel free to give us a call. We're happy to help!



12.

*iyad sabrah*

**June 12, 2010 • 9:53 pm**

I'd like to find out what is the next step in finding the construction company to do your project. I'm looking for a right company to build an office building or multiple. Would you give me a suggestion where do I start from. Do I call different construction companies or is there any construction companies website to look them over for bidding and so on? please any advise will be appreciated. The location is in wichita, ks.

Thanks.



13.

*Dean Dalvit*

**June 14, 2010 • 2:36 pm**

Hello,

Your architect should actually be coordinating the bidding and negotiation on your behalf and aid you in the contractor selection process. You should speak with them about that scope of services as it is actually quite important to have them involved since they are also a party to the construction contract and carry numerous roles and responsibilities throughout construction all the way to the very end. If you have not yet selected an architect or started design for your project, please let me know and we would be happy to provide services in your location. Thanks!



14.

*Dean Dalvit*

**June 25, 2010 • 10:06 am**

Here's a recent question I received by direct e-mail through this post...

Message:

I MAY GET A PROJECT IN NEWARK DELAWARE A 16,000 SQUARE FT BLDING FOR OFFICES ONE STORY ANY IDEA ON HOW MUCH PER SQUARE FT.

While cost per square foot varies by both region as well as local economies, I would expect single story office space in your area to be in the range of \$150-\$180/square feet, depending on many factors, from design configuration and level of finish to site requirements and availability of local labor. Concrete block warehouse-type office space on an open lot will be considerably less expensive, while specialty construction with tight site constraints could be more.

RSMeans provides the general index for construction costs to be used in developing a starting point for a project budget. However, the actual design will drive actual costs and the budget should be validated at all benchmarks throughout the design process. A line item budget would be developed as soon as schematic architectural drawings are developed.

If you would like to discuss the project in more detail, we can provide full scope architectural and

engineering design services in your region, and would be happy to help at any level from schematic design to permitting and contract administration.

Thank you for your interest in EVstudio,

-Dean



15.

***Melissa Osburn***

**July 13, 2010 • 4:18 pm**

I am looking for building maintenance cost per square foot for a case study on church facilities, do you all track that information too?



16.

*Dean Dalvit*

**July 15, 2010 • 11:35 pm**

Hi Melissa, Thanks for your inquiry. We actually do not study building maintenance costs as those can vary so greatly from one facility to the next. As a commercial building owner, however, I can recommend the best way to arrive at these costs is to prepare a pro forma for the individual annual costs associated with the building, both actual and expected. There should be dozens of line items including everything from the cost of utilities, trash removal, cleaning, etc. to the cost of insurance, property taxes, etc.. I also include a % for capital improvements that can accrue over time and pay for large, infrequent items like reroofing or repaving a parking lot. Once you have developed all of those costs, then you can forecast future years using a simple inflationary escalation rate. This way, you can develop an operations budget and adjust it at year end to keep it on track.

I hope that helps and good luck with your project!

-Dean



17.

***David Zikorus***

**November 1, 2010 • 9:42 am**

Dean:

First time reviewing the website and information- as we are always getting the same questions posed to us relative to the "square foot" costs of a project. Your points are great notations all of us involved in a project often provide back for feedback to give the "ballpark"- good stuff

We are close to Newark, DE- (2 tuition payments to UD) and did anything ever evolve from the June correspondence about the 16,000 sf building?

Regards,

David Zikorus  
Interstate Construction and Development Co  
Baltimore, MD

18.



*Dean Dalvit*  
**November 8, 2010 • 12:23 pm**

David,

Thank you for your compliments. We haven't heard from that contact in DE since our reply. Would be interested though to see if it moved forward. Take care!

19.



*Glenn MacKenzie*  
**November 8, 2010 • 1:10 pm**

Great Web Site with lots of information, question during these slow period of custom home building. We are looking into small commercial tenant build outs. We have three small projects to bid on all the same scope, an existing commercial building with open tenant space. One customer is looking at 4000 sq. ft of basic office space. 2 bathrooms, kitchen area, conference room, balance to be offices any ideas on sq. ft. costs. This project is south of Boston Mass. no unions involved.  
Thanks for your feed back

20.



*Dean Dalvit*  
**November 8, 2010 • 2:02 pm**

Hi Glen, thanks for your interest. In the western region, we typically see approximately \$40-\$50 per square foot for general office Tenant Finish. That figure can be considerably higher for higher end finishes, high tech features or complex functions (eg. medical). From what you described, it sounds like median-level offices, but your location would also drive that figure. Given that Boston is on average 25% higher in construction costs than the Denver area, I might use a figure of approximately \$50-\$65 per square foot. Other factors can really influence that as well, but assuming all other conditions are typical, that's a place to start until you can develop the plan and generate a line item budget. Good luck!

21.



***Marilyn Stadler***  
**December 28, 2010 • 12:32 pm**

We would like to add 1800 square feet to our facility for our weight machines. We are located in

anacortes, WA 98221. There would be no bathrooms, but we would have windows (3 - 6) and an entrance from the lobby. It would be on a slab and one story. I would appreciate any information you can share.

22.



*Dean Dalvit*

**January 4, 2011 • 5:07 pm**

Hi Marilyn, thanks for contacting us.

Have you had any initial design work done?

As architects we can certainly give you a ballpark number based on rules of thumb. From what you described, I would estimate that you would be looking at about \$100 per square foot (or \$180,000) once you've stitched the addition into the existing space. Although how the new space affects the existing and the scope of remodel required is impossible to estimate without a plan. If you'd like to get into greater specifics, we should talk about doing some programming and conceptual design work to help you get closer.

Do you have a budget for the project? It is better to start with a budget, and then design the project to meet it. This way, you are making decisions that are informed by the project criteria, rather than putting the cart before the horse.

Thanks, Dean

23.



*Dean Dalvit*

**January 24, 2011 • 12:10 pm**

Just a looking for a clarifier on this page form your website:

**<http://evstudio.info/cost-per-square-foot-of-commercial-construction-by-region/>**

I am wondering if this is construction from a concrete slab to a completed building or construction cost of an existing building.  
-Ronald Bland

24.



*Dean Dalvit*

**January 24, 2011 • 12:10 pm**

Ronald,

Thank you for your inquiry. This data represents new construction from a vacant site to a completed building.

If you need any help with architecture or engineering for your project, please let us know and we would be

happy to discuss. Thanks!

-Dean



25.

*Charles*

**March 3, 2011 • 6:34 pm**

Hi,

I have a few questions that I would like help with regards to finding a second location for my business...

(1) I am currently looking at purchasing a 16,000 sq.ft building and property. This building is occupied currently on the first floor. (8000sq.ft). The second floor, will have another lease for 2000 sq.ft. I will occupy 4000 sq.ft and lease the remainder of the second floor (2000sq.ft). This building is approximately 10 years old and will need minimal build out. This is more of a high end building and would require much more purchase capital. This has greater investment potential but also much more risk should tenants not reopt upon the end of the leases.

(2) Second scenario is a much smaller building and property built back in the 1950's. My business would be the sole occupant in a 2400 sq.ft space (foot print) which is one large work area. This will need to be redone inside and outside and office space built out. Septic installed, water tapped, bathroom, added parking spaces and new curb cuts from the highway. This has about a 90% cheaper purchase price. This has the potential for a second floor doubling the space in the future, but would require an elevator for professional offices. This is a kind of K.I.S.S (keep it simple stupid) property which is cheaper, needs more work, and has less risk as well as less tenant lease potential.

(3) Third scenario is find vacant land and build new construction. Much harder to get financing for in this economy and sell at a premium price to developers for retail store fronts.

The first two properties have great visibility and locations. The third land is unknown at this time but be in a similar area.

Though I would like to go with the first scenario, all prices being equal, I'm not sure the financial institutions would want to take the risk even though 2/3's of the space will be occupied. In all cases, the majority would be financed.

Which leads me to....

How is the price per sq.ft assessed for the purchase of these type of existing buildings and properties versus buying land and new construction costs?

The properties are located in Morris County, New Jersey, 30 minutes outside of New York City.



26.

*Dean Dalvit*

**March 8, 2011 • 2:04 pm**



Hi Charles,

Thank you for your comment. These construction costs are "bricks and mortar" costs per square foot. They are for the buildings themselves, with interior and exterior finishes. They do not include land costs, soft costs, entitlement costs or financing costs. So, in order to get an apples to apples comparison, you would really need to run a pro forma for each scenario that includes all of the costs, with the building costs being one of the many factors.

On existing property, typical commercial appraisals will break out the value of the land and the value of the building(s). This way, you can compare apples-apples. For a renovation, it's a similar story. Look at the land value, the building value, add in the renovation cost (at \$30-\$60/sq.ft. depending on finishes), and compare to the other scenarios.

The purchase of a building involves investment strategies that are keyed to timelines as well, so your financing structure will be a critical piece of your pro forma. If you occupy 50% or more of the building, you qualify for SBA lending which requires less money down and a reasonable interest rate. Traditional financing will be a completely different story, and then there are hard money lenders which is yet a different picture. Too many variables to cover here, but if you are looking to build or renovate, we would love to continue the discussion on how EVstudio could help you with the architecture, engineering, planning and interiors of your project. Thanks!

-Dean

## Trackbacks

1. [\*\*Cost Per Square Foot of Educational Facilities by Region | Architecture, Engineering & Planning EVstudio | Denver & Evergreen Architect | Colorado & Central Texas | Blog\*\*](#)
2. [\*\*Construction Cost per Square Foot of Community Centers in Major US Cities | Architecture, Engineering & Planning EVstudio | Denver & Evergreen Architect | Colorado & Central Texas | Blog\*\*](#)
3. [\*\*The Dark Side of Mankato's Downtown Revitalization | Nathaniel M Hood\*\*](#)

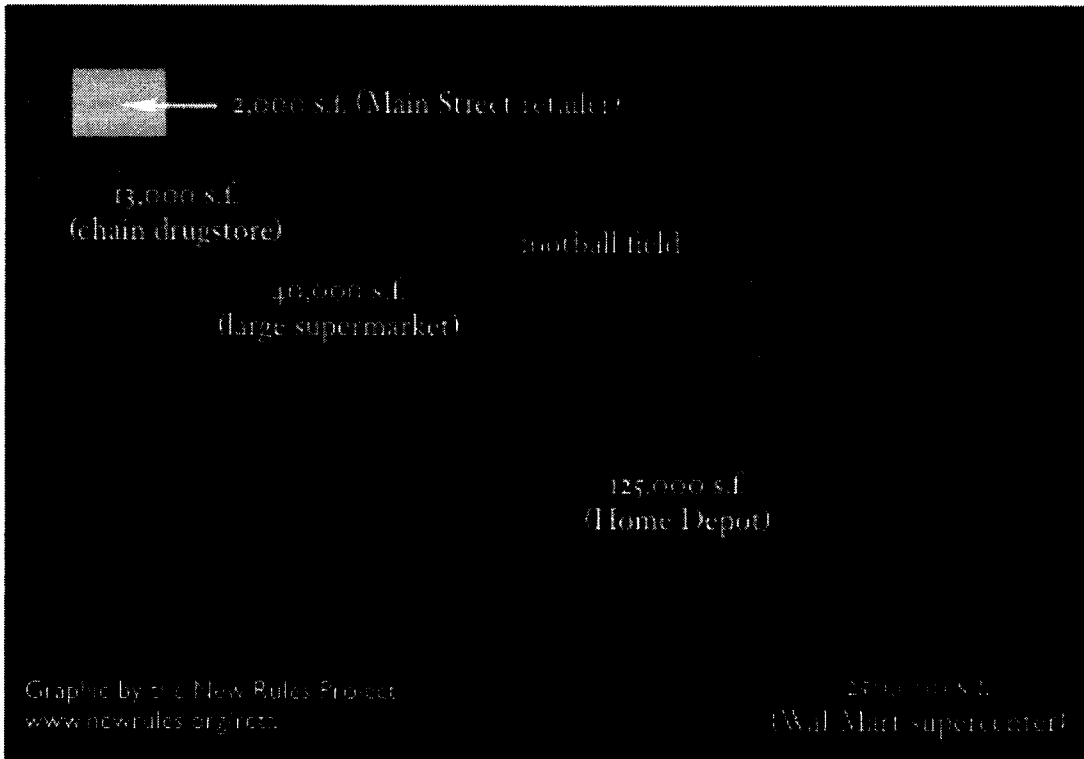
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## How Big are Big-Box Stores?



Wal-Mart and Target are currently building "supercenters," which combine their usual array of merchandise with a full supermarket and numerous specialty services from cut flowers to eye glasses. Supercenters typically range from 180,000 to 250,000 square feet, or between 4.1 to 5.7 acres. The parking lots that surround these stores are several times the size of the store itself. Many other big box retail stores---including earlier-generation Wal-Mart outlets, Home Depot, Lowe's, Office Depot, Bed Bath & Beyond, etc.---are in the 60,000 to 140,000 square foot range. Barnes & Noble and Borders Books stores range from 25,000 to 45,000 square feet, or about the size of a very large supermarket. Free-standing chain drugstores operated by Walgreens, Rite Aid, and CVS are generally 11,000-15,000 square feet.

As for independent retailers, there's quite a range. Many Main Street stores are under 1,000 square feet. A full-service neighborhood grocery store might be 10,000 square feet. Locally owned hardware stores generally range from 2,000 to 20,000 square feet. An independent bookstore might be 1,500 square feet.

A growing number of cities and towns are adopting **store size caps** to ensure that new retail development is scaled appropriately for the community and does not overwhelm the local economy or exacerbate sprawl and traffic congestion. Most communities choose an upper limit of between 35,000 and 75,000 square feet.

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## Nordstrom



Fashion Show Mall is located at 3200 Las Vegas Boulevard South on the Las Vegas Strip in Paradise, Nevada (an unincorporated town in the Las Vegas area). With 1,888,151 ft<sup>2</sup> of space, this is one of the largest enclosed malls in the world. The mall has over 200 stores, 7 anchors, an elevated stage, a fashion runway, and the Cloud.

Fashion shows occur in the Fashion Show Mall every Friday, Saturday, and Sunday.

The Cloud, at The Strip entrance is about 128 feet (39 m) above the sidewalk and is 480 feet (150 m) long. During the day, the structure provides shade for the entrance and at night it serves as a movie screen.

The mall features several high end restaurants, some accessible from private entrances and elevators so they may operate when the mall is closed.

For the winter holidays, the mall has scheduled snow storms inside.

#### [edit] History

The mall opened in 1981 with Dillard's, Bullock's, Goldwaters, Neiman Marcus, and Saks Fifth Avenue.

In 2003, Neiman Marcus expanded from 102,000 ft<sup>2</sup> to 160,000 ft<sup>2</sup>, Saks Fifth Avenue and Dillard's both relocated in the west end of the mall, and Macy's and Robinsons-May expanded as well. A whole West end was added to the mall adding 500,000 ft<sup>2</sup> of store space, including The Great Hall, where fashion shows are performed throughout the day. Also, Bloomingdale's Home (first in the nation) and Nordstrom opened in the west end of the mall as well. Lord & Taylor was scheduled to open in the former spot of Dillard's, as part of the mall's east expansion, but that location is still empty, as the Lord & Taylor chain halted its national expansion plans and canceled its store here in 2003. The mall is currently searching for an anchor to occupy the location. A Nokia Experience was built in front of the building's entrance of the anchor. Also, as part of the east expansion, the Cloud and an 11,000 square foot food court opened on the 3rd level. Also Victoria's Secret selling lingerie and hosiery (slips and stockings) - they also sell skirts and dresses on the net.

Rouse, the previous owner, was purchased by General Growth Properties in 2004.

On September 9, 2006, following Federated's purchase of May Department Stores, Robinsons-May became the second Macy's store at Fashion Show. This store is just a regular Macy's like everywhere else. It is known as Macy's Fashion Show. The original Macy's, known as Macy's Las Vegas, has a ThisIsIt store on the 2nd floor as well as a Macy's Men's Store. It is also the flagship of all of the Las Vegas Macy's. Both stores feature different sales, as well as different products. They both have different atmospheres and different name brands. Macy's Fashion Show has a home department. The Macy's Home Store is found down the street at Spring Mountain and Arville.

#### [edit] Anchor stores

Bloomingdale's Home (Opened 2002, 100,000 sq. ft.) (Only location in Nevada)

Dillard's (Opened 1981, moved to its current location 2002, 200,000 sq. ft.)

Macy's Las Vegas with the Macy's Men's Store and ThisIsIt (Opened 1981 as Bullock's, became Macy's 1996, expanded 2002, 199,000 sq. ft.)

Macy's Fashion Show (see above) (Opened 1981 as Goldwaters, became May Company 1989, Robinsons-May 1993, expanded 2002, Macy's 2006, 200,000 sq. ft.)

Neiman Marcus (Opened 1981, expanded 2002, 167,000 sq. ft.) (Only location in Nevada)

Nordstrom (Opened in 2002, 200,000 sq. ft.) (Only location in Nevada)

Saks Fifth Avenue (Opened 1981, moved to its current location 2002, 166,000 sq. ft.) (Only location in Nevada)

## [edit] Major Stores

Abercrombie &amp; Fitch (17,826 sq. ft. flagship store)

abercrombie kids (opening summer 2007)

Apple Inc.

Ann Taylor

Ann Taylor Loft

Aveda

Bailey Banks &amp; Biddle

Bakers

Banana Republic

Bang &amp; Olufsen

Bath &amp; Body Works

BCBG Max Azria

bebe

Capital Grille (10,848 sq. ft.)

Coach

Cole Haan

Express (15,632 sq. ft.)

Forth &amp; Towne (opening Summer 2007)

Frederick's of Hollywood

French Connection

Gap

Godiva Chocolatier

J. Crew

Jessica McClintock

Limited, The

Limited Too

Louis Vuitton

Lucky Brand

Nine West

Puma

Ruehl No. 925 (opening Spring 2007)

Quicksilver

Skechers

Steve Madden

Swarovski

Tommy Bahama

Victoria's Secret

Victoria's Secret Beauty

Wet Seal

White House/Black Market

Whitehall Co. Jewelers

Z Gallerie (11,126 sq. ft.)

Zales

Zara (12,205 sq. ft.)

This place is a building

Category: [store / shop](#), [mall](#), [fashion](#), [las](#), [vegas](#), [nordstrom](#), [zara](#), [show](#)

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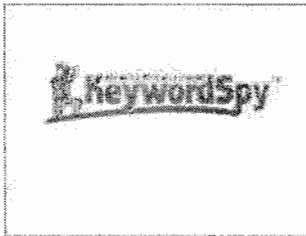


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1. Extreme Sports - National Sporting Goods Association Industry Event & Trade Show Schedule · Information Center's "Dan, The Answer Man" Q & A · Mailing Lists ... NSGA Individual Sports Participation Reports ...
2. Credit Card Processing Program - National Sporting Goods Association Elavon is the preferred provider of credit card processing for NSGA. We have successfully served the members of ... 2009 National Sporting Goods Association.
3. Specialty Retailers Show Strong Profitability and Productivity ... The largest specialty retailers, those with sales of more than \$2 million, improved net profit before taxes to total revenue to 4.2% versus 3.6% two years ...
4. Varsity Athletic Apparel, Inc. - National Sporting Goods Association VARSITY ATHLETIC APPAREL INC 159 Old Belmont Avenue, Bala Cynwyd, PA 19004 ... We are the largest supplier of varsity jackets and blankets to college ...
5. Store Display & Design Services - National Sporting Goods Association Number of Sporting Goods Stores · Number of Employees in Sporting Goods Stores · Consumer Price Index for Sptg Gds ... 2009 National Sporting Goods Association.
6. Marketing <br>Opportunities - National Sporting Goods Association Number of Sporting Goods Stores · Number of Employees in Sporting Goods Stores · Consumer Price Index for Sptg Gds ... 2009 National Sporting Goods Association.
7. Cost of Doing Business Survey: Sample Page - National Sporting ... Cost of Doing Business Survey: Sample Page ... ISD - Insufficient data. 2006-2007 NSGA Cost of Doing Business Survey 6 Page 48 ...
8. Cost of Doing Business Survey: Sample Page - National Sporting ... NSGA Individual Sports Participation Reports ... Cost of Doing Business Survey: Sample Page ... 2006-2007 NSGA Cost of Doing Business Survey 6 Page 48 ...
9. Yellow Transportation & UPS Freight sm - National Sporting Goods ... PartnerShip and NSGA have teamed up to offer NSGA Members great savings on inbound and outbound freight/LTL shipments with UPS Freightsm and Yellow ...

10. Yellow Transportation & UPS Freight sm - National Sporting Goods ...  
 Yellow Transportation & UPS Freight sm ... This service offers high-volume LTL freight shippers a full suite of individualized logistics management services ...

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#### Categories

Business > Consumer Goods and Services > Sporting Goods > Associations

Domains  Keywords  Destination URLs  Ad Copies

Sometimes you don't know exactly what you are looking for in a Research data. That's when our searching options may come handy.

#### The Domain Search

This search allows you to enter the domain name of the site you want to analyze. For example, you may enter "amazon.com" in the KeywordSpy search bar.

#### The Keyword Search

This will let you enter terms and key phrases in the search bar such as "send flowers", "cover letters", "keyword software," and even a single broad term like "chocolate".

#### The Ad Copy Search

This allows you to enter any texts or content included in an ad copy, whether the ones in ad copy headline or the ones in description lines. For example: "sunglasses".

#### The Destination URL Search

This search allows you to enter the destination URL of the site that you want to analyze.

The destination URL is the address where a searcher is taken when an advertisement copy in search engines is clicked. Please take note that the destination URL differs from the display URL which appears at the bottom of advertisement copies.

Please be reminded to always include http:// at the beginning of your Destination URL search. For example: "http://www.proflowers.com".

In addition, if you want to find all the ads that KeywordSpy indexed for a specific affiliate network e.g. **Hydra Network**. You should search in Destination URL the string **lynxtrack.com**. Category

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KeywordSpy is a powerful web-based keyword tool which currently caters the advertising market in the USA, United Kingdom, Australia, Canada, and 30 more countries. It is the sole competitive intelligence search engine which made a dramatic difference in the role of keyword research in various areas of online PPC advertising, affiliate marketing and campaign tracking. We track over 30 million domains such as ebay.com, amazon.com, nsga.org and others.

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# CD MEDIA CENTER

CanadaDrugs.com > Media Center

 Reporter

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- [Company Profile](#)
- [Company Timeline](#)
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### CanadaDrugs.com Timeline

2001 March	CanadaDrugs.com launches website
2001 March	Opened in 500 sq. ft. of space
2001 April	Joins Better Business Bureau
2001 December	Relocation to 900 sq. ft. of space
2002 July	Relocation to 9,000 sq. ft. of space
2002 July	Staff total reaches 50 (including 12 licensed pharmacists)
2002 August	25,000 patients
2002 September	100,000 prescriptions filled
2002 October	Approved by MIPA (Manitoba International Pharmacists Association)
2002 October	Approved by CIPA (Canadian International Pharmacists Association)
2002 October	Staff total reaches 100 (including 15 licensed pharmacists)
2002 November	Approved by NAPAC (North American Pharmacy Accreditation Commission)
2003 January	staff total reaches 150 (including 16 licensed pharmacists)
2003 March	250,000 prescriptions filled
2003 March	Complete restructuring of senior management
2003 April	Expansion of an additional 15,000 sq. ft. to a total of 24,000 sq. ft.
2003 June	Approved by IMPAC (Internet Mailorder Pharmacy Accreditation Commission)

[Patient Brochure](#)

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CanadaDrugs.com is Canada's Largest International Mailorder Pharmacy.

Alexa ranks Canada Drugs as the #1 Canadian Prescription Service Pharmacy by volume of visitors.

2003 July	Staff total reaches 200 (including 16 licensed pharmacists)
2003 November	500,000 prescriptions filled
2004 January	75,000 patients
2004 February	Wisconsin endorses CanadaDrugs.com as a preferred and trusted supplier
2004 March	New Hampshire approves CanadaDrugs.com as a trusted pharmacy
2004 April	North Dakota names CanadaDrugs.com safe and reliable
2004 May	Implemented an Integrated, Paperless, Pharmacy System
2004 June	Minnesota lists CanadaDrugs.com as an approved pharmacy
2004 June	750,000 prescriptions filled
2004 June	Began providing prescription services to Canada Care pharmacy's patients
2004 August	Sigma Medical Announces Joint Venture with CanadaDrugs.com
2004 August	100,000 patients
2004 September	Staff total reaches 250
2004 September	1,000,000 prescriptions filled
2005 May	Confirmed as the largest International Pharmacy in Canada
2005 June	Added Spanish speaking Patient Service Representatives and Order Forms
2005 June	Began providing prescription services to CanUSAMedExpress.com patients
2005 July	First pharmacy re-accredited by IMPAC
2005 August	1,500,000 prescriptions filled
2005 August	175,000 patients
2005 August	Began providing prescription services to ShopCanadaRx.com patients
2005 September	Expansion of an additional 2,000 sq. ft. to a total of 26,000 sq. ft.

**Download this page:**

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(CanadaDrugs\_Timeline.doc, 38KB)
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-  Rich Text Format  
(CanadaDrugs\_Timeline.rtf, 78KB)

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To provide a secure and safe shopping experience for all of our customers, CanadaDrugs.com is committed to meeting and exceeding all standards outlined by the leading pharmacy accreditation organizations. [Click to read more...](#)



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**Mailing Address:**

24 Terracon Place  
Winnipeg, Manitoba, Canada  
R2J 4G7

**Phone Numbers:**

**Toll-Free Phone: 1-800-226-3784**  
International Phone: 1-204-949-1394  
Hearing Impaired TTY Service: 1-877-258-7006

**Hours of Operation:**

Call Centre (sales, refill and order information): **24 hours, 7 days a week**

*Exceptions:*

*Closed 6:00 pm, December 24<sup>th</sup> - 7:00 am, December 26<sup>th</sup>*

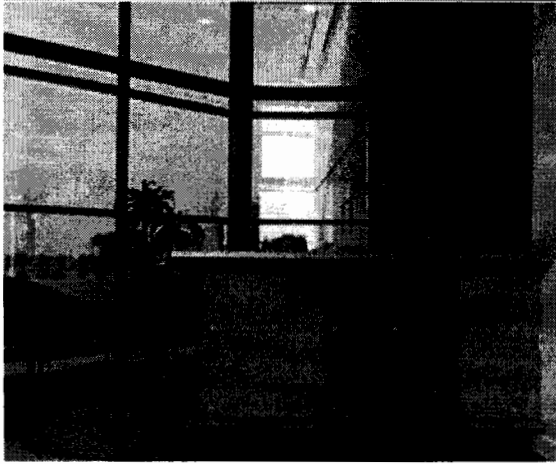
*Closed 6:00 pm, December 31<sup>st</sup> - 7:00 am, January 1<sup>st</sup>*

**Fax Numbers:**

**Toll Free Fax: 1-800-988-5440**  
International Fax: 1-204-224-2736

Pharmacy: Monday to Friday 8:00 am to 4:30 pm

Please report spam and other email abuse to [abuse@canadadrugs.com](mailto:abuse@canadadrugs.com)



**Projects and Clients**

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**Robert DeGrasse AIA**

**The Staff**

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## Projects and Clients

### HAEGER MANUFACTURING COMPANY:

30,000 Sq. Ft. building with offices, manufacturing and warehouses on a 3.5 acre lot in Oakdale, California.

### OAK VALLEY COMMUNITY BANK

60,000 Sq. Ft. mid-rise office tower in Manteca, SEC of HWY 120 and 99. This project is currently under design and city approvals ready for tenant planning and design.

### DIRKSEN TRANSPORTATION INC:

14,000 Sq. Ft. Office Building and 12,000 Sq. Ft. Shop Building for trucking company in Manteca, California.

### TACO BELL RESTAURANTS:

Over 35 Taco Bell Restaurants, new and remodeled projects located throughout the State of California.

### BURGER KING RESTAURANTS:

Over 70 Burger King Restaurants, new and remodeled projects located throughout the State of California.

### CARL'S JR. RESTAURANTS:

Currently four Carl's Jr. Restaurants in Stanislaus County with two additional restaurants in planning stages.

### BEARD INDUSTRIAL:

Twin 30,000 Sq. Ft. Buildings, Modesto, California

### DELTA BRANDS:

\$1.25 million remodel and expansion of Anheuser Busch Beer Distributorship, Modesto, California.

AIA Sierra Valley Award for Excellence in Design.

MAACO AUTO BODY & PAINT:

8,500 Sq. Ft. full service auto body and pain for national client. Complete compliance with "H" occupancy and hazardous material handling.

MIKE'S ROADHOUSE:

3,000 Sq. Ft. upscale restaurant located in Modesto, California

VETERINARY SERVICES, INC.:

45,000 Sq. Ft. warehouse with 12,000 Sq. Ft. office, metal frame with concrete block wall to 10' and metal panels above.

WARDS FERRY OFFICES:

16,000 Sq. Ft. two-story office building in Sonora, California with masonry accents and metal awning features.

MILLER BROTHERS BUILDINGS:

Two 20,000 Sq. Ft. office buildings in an upscale format covered parking below building; marble accents and entry highlight this project in Modesto, California.

JOE'S TRAVEL PLAZA:

Full-Service and automotive fueling center with mini-mart and full truck wash, Westley, California.

GRIMBLEBY COLEMAN OFFICE:

20,000 Sq. Ft. professional accounting office with wood frame design-build delivery process.

O'DELL ENGINEERING:

Three building office site, plaster exterior with stone wainscot and copper accent features, Modesto, California.

HENSLEY OFFICE:

31,000 Sq. Ft. two-story office building with steel structural frame and steel exterior wall system,

Manteca, California.

PRIME SHINE CAR WASH:

Drive-through carwash with self-service vacuum system, state of the art computer-driven wash system, Riverbank, California.

NJT OFFICE COMPLEX:

15,000 Sq. Ft. office with full brick and stone exteriors, advanced steel joists and panelized roof system.

VALLEY TOWER:

12 story mixed use project featuring 90,000 Sq. Ft. office, retail and over 300 parking stalls- design and construction drawings only, Modesto, California.

511 TACTICAL:

66,545 Sq. Ft. warehouse and office featuring a 45' high clearance in the warehouse with complete natural lighting, Modesto, California.

CROW'S LANDING RETAIL CENTER:

64,660 Sq. Ft. shopping center with anchor tenant, incline retail and two pad sites for future development.

VELTHOEN OFFICES:

10,700 Sq. Ft. two building complexes for professional offices with full tenant improvements.

GLOBAL VALLEY NETWORKS CORPORATE OFFICES:

16,000 Sq. Ft. corporate office building for a local telecommunications service provider in Patterson, California.

4712 STODDARD ROAD:

60,420 Sq. Ft. remodel and transformation of an existing concrete tilt-up warehouse into a two story office complex, Modesto, California. AIA Sierra Valley Award Design for Adaptive Re-Use.

GOLDEN BEAR PHYSICAL THERAPY:

6,523 Sq. Ft. office and treatment building for a physical therapy company in the Summit Corporate Center, Modesto, California.

PRUDENTIAL CALIFORNIA REALTY:

16,000 Sq. Ft. office building in Turlock, California

CANAL STREET GRILLE:

8,000 Sq. Ft. full service restaurant in Ripon, California

DINUBA SHOPPING CENTER:

11,000 Sq. Ft. retail center with star bucks and other shops

MOUNTAIN HOUSE FLEX BUILDINGS:

2 - 20,000 Sq. Ft. shell building in Mountain House, California

TWAIN HARTE PROFESSIONAL OFFICES:

2 - 3,000 Sq. Ft. Office buildings on a sloping site with rustic exterior elevations and down hill storage.

FUDDRUCKERS:

Tenant improvement for a national food chain with full service kitchen and highly detailed millwork and finishes, Modesto, California.

QDOBA:

3 - Tenant improvements for in-line and end-cap fast food outlets. Coordination of kitchen equipment and décor packages

CUSTOM SPRAY:

20,000 Sq. Ft. Two story office building and attached shop, Salida, California

KAISER:

30,000 Sq. Ft. single store concrete tilt-up building in Salida, California currently with Kaiser Permanente as a tenant, Salida, California

SALTER LAW FIRM:

Small law office with a prairie style exterior featuring curved glass front office and stone with trellis covered entry - AIA Sierra Valley Award for Excellence in Design

1414 L Street ~ Modesto CA 95354 ~ fax 209.575.4374 ~ phone 209.575.1415  
info@lstreetarchitects.com





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The Cyburbia Forums is the oldest and most active English language urban planning message board on the Internet, and one of the small number of online communities where members enjoy intelligent, spam-free and troll-free discussion about practically every subject under the sun. Cyburbia has hundreds of active members, yet is a strong community full of creative, friendly, and occasionally offbeat planners, architects, students, urbanists and other like-minded people who care about and/or help shape the built environment. Cyburbia Forums members enjoy a sense of community and camaraderie that is unmatched by a listserv or any other planning-related web site. **We'd love to have you join us as another Cyurbian.**

**Register to the Cyburbia Forums instantly! We will not spam you or give your information to others.**

Username:  Password:  Confirm password:  Email:  Confirm email:   
 Real name (will not be visible to the public, or given to other)  Location (City/municipality, state/province/region)

Human verification: random question

3 - 2 = ?

I agree to [forum rules](#)



Thread tools ▾

2006-08-03, 03:44 PM

#1

**SSC**  
Cyurbian



I have a very basic question, but I am hoping someone can help me out. I need to estimate the number of jobs that will be created by a new development in a downtown area. The uses will include high-end office, hi-tech industrial and "boutique-style commercial/retail". I know I have seen avg. sf per employee numbers, but I can't seem to find them now. Could someone point me in the right direction? You will have my eternal gratitude!

Oh - I also would like to estimate the number of construction jobs that would be created for the duration of the construction of the project. Any idea where I can find those numbers as well?

*Last edited by NHPlanner; 2009-11-17 at 03:56 PM. Reason: double reply*

Registered: Sep 2005  
Location: Upstate NY  
Posts: 118



2006-08-03, 04:28 PM

#2

**Senior Jefe**

Cyurbian

Registered: Aug 2005  
Location: Funky Town, CO.  
Posts: 432

I seem to recall some numbers like these in some of those Urban Land Institute development handbooks. However, its been about 10 years since I looked at them and they seemed dated at the time. They may have some newer material by now.



2006-08-23, 12:13 PM

#3

**reaper09**

Member

Registered: Aug 2006  
Location: Manchvegas, NH  
Posts: 9

**SF Per Employee**

Retail is generally 300 to 700 SF per employee. Office is more in the range of 150 to 300 SF per employee.

Construction - Determine the portion of the budget that is labor (vs. Materials), and use the average weekly construction wage from the Dept of Labor in your area to determine the number of person-years of construction employment.

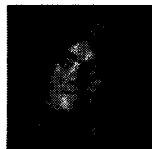


2006-08-24, 02:46 PM

#4

**Wildono**

Cyurbian



Registered: Aug 2006  
Location: Running with the Proverbial Dark Lord  
Posts: 92

**Bunch o' Numbers**

I pulled these numbers out of a file used to analyze development impacts for a subarea plan in our downtown. Some of the initial numbers were drawn from the old DeChiara Planning & Design Criteria book, but I recall 'adjusting' those numbers with someone who does quite a bit of regional analysis on buildable lands. Use at your peril! 🌐

- Office Employees 300 sqft/employee
- Retail/Service Employees 450 sqft/employee
- Grocery Employees 700 sqft/employee
- Cinema Employees 1500 sqft/employee
- Restaurant Employees 300 sqft/employee
- College Employees 300 sqft/employee
- Hotel Employees 1800 sqft/employee



2009-05-17, 11:51 AM

#5

**Sam Parker**

Member

Registered: May 2009  
Location: Alexandria, Virginia  
Posts: 2

Question for Wildono: Would you happen to have the bibliographic citation for the DeChiara Planning & Design Criteria book that you cite for the square feet per employee statistics? I would like to purchase this book. Thank you.



2009-05-17, 12:08 PM

#6

**Gedunker**

Mod

Quote:

[Empty quote box]



Originally posted by **Sam Parker**  
*Question for Wildono: Would you happen to have the bibliographic citation for the DeChiara Planning & Design Criteria book that you cite for the square feet per employee statistics? I would like to purchase this book. Thank you.*

Registered: Aug 2003  
Location: 38 N  
Posts: 7,355

There are many places to purchase the book: here's a link to [Amazon.com](http://Amazon.com).

Hall of Fame pitcher Sandy Koufax: "In my rookie year, I got my first chance to face Stan Musial. I also gave up my first home run. The two events are not unrelated."

2009-05-17, 05:59 PM

**Sam Parker**  
Member

Thank you very much.

Registered: May 2009  
Location: Alexandria, Virginia  
Posts: 2

2009-05-18, 09:32 AM

**Captain Worley**  
Cyurbian

Per 2006 International Building Code:

Business-100 gross square foot

Retail-30 gross square feet, basement and grade, 60 gross square feet other floors, 300 gross square feet shipping, storage, and stock areas

Industrial-100 gross square feet

That's how the buildings are designed, so it is probably a pretty close guess.

Navy collier  
USS Cyclops

Registered: Sep 2007  
Location: Columbia, SC  
Posts: 275

2009-05-19, 11:10 AM

**JimPlans**  
Cyurbian Plus

My 2 cents:

These numbers were estimated by Fishkind & Associates of Orlando, FL for the Fiscal Impact Analysis Model (FIAM) that was created for the Florida Department of Community Affairs (DCA) under Jeb Bush. A version of the model with these assumptions is available at <http://www.sfrpc.com/fiam.htm>. I have used these assumptions in a few analyses:

Employment Assumptions - New Development

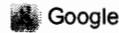
- Office 1-Story: 300 sq. ft. per employee (range: 275-450 sq. ft. per employee)
- Office Class A: 350 sq. ft. per employee (range: 275-450 sq. ft. per employee)
- Office Medical: 250 sq. ft. per employee (range: 225-275 sq. ft. per employee)
- Retail - Neighborhood: 600 sq. ft. per employee (range: 450-650 sq. ft. per employee)
- Retail - Community: 600 sq. ft. per employee (range: 450-650 sq. ft. per employee)
- Retail - Regional: 600 sq. ft. per employee (range: 450-650 sq. ft. per employee)
- Restaurant-Sit Down: 450 sq. ft. per employee

Registered: Aug 2006  
Location: Gone to a better place (in my mind)  
Posts: 372

Restaurant-Fast Food: 100 sq. ft. per employee  
 Hotel: 0.5 employees per room (range: 0.5-1.0 employees per room)  
 Industrial: 2,500 sq. ft. per employee (range: 10,000 sq. ft. per employee)  
 Warehouse: 5,000 sq. ft. per employee (range: 1,000-7,500 sq. ft. per employee)  
 Golf Course: 40 per 18-hole course (range: 35-45 per 18-hole course)  
 Clubhouse: 800 sq. ft. per employee (range: 800-1,000 sq. ft. per employee)  
 ACLF/Nursing Home beds: 1 per bed  
 Institutional: 300 sq. ft. per employee (range: 225-1,000 sq. ft. per employee)  
 Government: 500 sq. ft. per employee  
 Agriculture/Forestry: 25 per 1,000 acres  
 Parks & Recreation: 1 per acre



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Economic and Community Development



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<b>RECEIPT NUMBER</b> W09002630		<b>CASE TYPE</b> Regional Center Proposal	
<b>RECEIPT DATE</b> October 06, 2010		<b>REGIONAL CENTER NAME</b> Home Paradise Regional Center	
		<b>PAGE</b> 1 of 1	
Linda Lau Esq Global Law Group 350 South Figueroa St., Suite 760 Los Angeles, CA 90071		<b>Notice Type:</b>  <b>Receipt Notice</b>	
<p><b>Receipt Notice</b> - This notice confirms that USCIS received your Regional Center Proposal. If any of the above information is incorrect, send an e-mail to: <a href="mailto:USCIS.ImmigrantInvestorProgram@dhs.gov">USCIS.ImmigrantInvestorProgram@dhs.gov</a>. This notice does not grant any immigration status or benefit. It is not even evidence that this case is still pending. It only shows that the application or petition was filed on the date shown.</p> <p><b>Processing Time</b> - The current processing time for this case is estimated at 120 days. Unlike other case types, verification or tracking of this case is not available electronically or on our website. We will notify you by mail when we make a decision on this case or if we need something from you. If you do not receive an initial decision or update from us within our current processing time, you may send an e-mail to: <a href="mailto:USCIS.ImmigrantInvestorProgram@dhs.gov">USCIS.ImmigrantInvestorProgram@dhs.gov</a>. or contact us at the address below.</p> <p><b>Address Change</b> - If your mailing address changes while your case is pending, you may send an e-mail to: <a href="mailto:USCIS.ImmigrantInvestorProgram@dhs.gov">USCIS.ImmigrantInvestorProgram@dhs.gov</a>. Otherwise, you might not receive notice of our action on this case.</p> <p>Please save this notice and a copy of any papers that you send to us along with proof of delivery.</p>			
U.S. CITIZENSHIP & IMMIGRATION SVC CALIFORNIA SERVICE CENTER Attn: EB-5 RC Proposal P.O. BOX 10526 LAGUNA NIGUEL CA 92607-10526			

- Please save this notice for your records. Please enclose a copy if you have to write us or a U. S. Consulate about this case, or if you file another application based on this decision.
- You will be notified separately about any other applications or petitions you have filed.

---

### ***Additional Information***

#### **GENERAL.**

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

#### **INQUIRIES.**

You should contact the office listed on the reverse side of this notice if you have questions about the notice, or questions about the status of your application or petition. *We recommend you call.* However, if you write us, please enclose a copy of this notice with your letter.

#### **APPROVAL OF NONIMMIGRANT PETITION.**

Approval of a nonimmigrant petition means that the person for whom it was filed has been found eligible for the requested classification. If this notice indicated we are notifying a U.S. Consulate about the approval for the purpose of visa issuance, and you or the person you filed for have questions about visa issuance, please contact the appropriate U.S. Consulate directly.

#### **APPROVAL OF AN IMMIGRANT PETITION.**

Approval of an immigrant petition does not convey any right or status. The approved petition simply establishes a basis upon which the person you filed for can apply for an immigrant or fiance(e) visa or for adjustment of status.

A person is not guaranteed issuance of a visa or a grant of adjustment simply because this petition is approved. Those processes look at additional criteria.

If this notice indicates we have approved the immigrant petition you filed, and have forwarded it to the Department of State Immigrant Visa Processing Center, that office will contact the person you filed the petition for directly with information about visa issuance.

In addition to the information on the reverse of this notice, the instructions for the petition you filed provide additional information about processing after approval of the petition.

For more information about whether a person who is already in the U.S. can apply for adjustment of status, please see Form I-485, *Application to Register Permanent Residence or Adjust Status.*



**Form I-924A,  
Supplement to Form I-924**

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

C30060

**Part 1. Information About Principal of the Regional Center**

Name: Last CHEN	First EDWARD	Middle
--------------------	-----------------	--------

In Care Of: HOME PARADISE INVESTMENT CENTER, LLC

Street Address/P.O. Box: 7000 EAST SLAUSON AVE

City: COMMERCE	State: CA	Zip Code: 90040
----------------	-----------	-----------------

Date of Birth (mm/dd/yyyy): (b) (6)	Fax Number (include area code): (626) 458-9888	Telephone Number (include area code): (626) 284-9999
----------------------------------------	---------------------------------------------------	---------------------------------------------------------

Web site address: WWW.USHPIC.COM

USCIS-assigned number for the Designated Regional Center (attach the  
Regional Center's most recently issued approval notice) RCW1031910071 (Formerly W09002630)

**Part 2. Application Type (Check one)**

- a. Supplement for the Fiscal Year Ending September 30, 2011 (YYYY)
- b. Supplement for a Series of Fiscal Years Beginning on October 1, \_\_\_\_\_ (YYYY) and Ending on September 30, \_\_\_\_\_ (YYYY)

**Part 3. Information About the Regional Center**

(Use a continuation sheet, if needed, to provide information for additional management companies/agencies, regional center principals, agents, individuals, or entities who are or will be involved in the management, oversight, and administration of the regional center.)

A. Name of Regional Center: HOME PARADISE REGIONAL CENTER, FICTITIOUS BUSINESS NAME OF \*

Street Address/P.O. Box: 7000 EAST SLAUSON AVE		
City: COMMERCE	State: CA	Zip Code: 90040
Web site Address: WWW.USHPIC.COM	Fax Number (include area code): (626) 458-9888	Telephone (include area code): (626) 284-9999

B. Name of Managing Company/Agency: \* HOME PARADISE INVESTMENT CENTER, LLC

Street Address/P.O. Box:		
City:	State: CA	Zip Code:
Web site Address:	Fax Number (include area code):	Telephone (include area code):

C. Name of Other Agent:

Street Address/P.O. Box:		
City:	State:	Zip Code:
Web site Address:	Fax Number (include area code):	Telephone (include area code):



**RCW1135750431**  
maginger 1924A 12/23/2011





**RCW1135750431**

maginger I924A 12/23/2011



**RCW1135750431**

maginger I924A 12/23/2011

LINDA LAU  
RE: EDWARD CHEN  
909 EL CENTRO ST STE 1  
SOUTH PASADENA CA 91030

LINDA LAU  
RE: EDWARD CHEN  
909 EL CENTRO ST STE 1  
SOUTH PASADENA CA 91030

**Part 3. Information About the Regional Center (Continued)**

Answer the following questions for the time period identified in **Part 2** of this form. **Note:** If extra space is needed to complete any item, attach a continuation sheet, indicate the item number, and provide the response.

1. Identify the aggregate EB-5 capital investment and job creation has been the focus of EB-5 capital investments sponsored through the regional center. (**Note:** Separately identify jobs maintained through investments in “troubled businesses.”)

Aggregate EB-5 Capital Investment 0	Aggregate Direct and Indirect Job Creation 0	Aggregate Jobs Maintained N/A
----------------------------------------	-------------------------------------------------	----------------------------------

2. Identify each industry that has been the focus of EB-5 capital investments sponsored through the Regional Center, and the resulting aggregate EB-5 capital investment and job creation. (**Note:** Separately identify jobs maintained through investments in “troubled businesses”.)

a. Industry Category Title: BUILDING MATERIALS, GARDEN EQUIPMENT, SUPPLIES DEALERS		NAICS Code for the Industry Category 4 4 4
Aggregate EB-5 Capital Investment: 0	Aggregate Direct and Indirect Job Creation: 0	Aggregate Jobs Maintained: N/A
b. Industry Category Title: FOOD AND BEVERAGE STORES		NAICS Code for the Industry Category 4 4 5
Aggregate EB-5 Capital Investment: 0	Aggregate Direct and Indirect Job Creation: 0	Aggregate Jobs Maintained: N/A
c. Industry Category Title: Continue on Page 8		NAICS Code for the Industry Category _____
Aggregate EB-5 Capital Investment:	Aggregate Direct and Indirect Job Creation:	Aggregate Jobs Maintained:

3. Provide the following information for each job creating commercial enterprise located within the geographic scope of your regional center that has received EB-5 investor capital:

a. Name of Commercial Enterprise:		Industry Category Title:	
Address (Street Number and Name):	City:	State: CA	Zip Code:
Aggregate EB-5 Capital Investment: 0	Aggregate Direct and Indirect Job Creation: 0	Aggregate Jobs Maintained:	
Does this EB-5 commercial enterprise serve as a vehicle for investment into other business entities that have or will create or maintain jobs for EB-5 purposes? <input type="checkbox"/> No <input type="checkbox"/> Yes			



ATTACHMENT TO I-924A, PART 3, ITEM 2

Identify each industry that has been the focus of EB-5 capital investments sponsored through the Regional Center, and the resulting aggregate EB-5 capital investment and job creation. (Note: Separately identify jobs maintained through investments in "troubled businesses".)

c. Industry Category Title: Pharmacies and Drug Stores		NAICS Code for the Industry Category 4 4 6 1 1
Aggregate EB-5 Capital investment: 0	Aggregate Direct and Indirect Job Creation: 0	Aggregate Jobs Maintained: N/A
d. Industry Category Title: Clothing and Clothing Accessories Stores		NAICS Code for the Industry Category 4 4 8
Aggregate EB-5 Capital investment: 0	Aggregate Direct and Indirect Job Creation: 0	Aggregate Jobs Maintained: N/A
e. Industry Category Title: Sporting Goods Stores		NAICS Code for the Industry Category 4 5 1
Aggregate EB-5 Capital investment: 0	Aggregate Direct and Indirect Job Creation: 0	Aggregate Jobs Maintained: N/A
f. Industry Category Title: Miscellaneous Store Retailers		NAICS Code for the Industry Category 4 5 3
Aggregate EB-5 Capital investment: 0	Aggregate Direct and Indirect Job Creation: 0	Aggregate Jobs Maintained: N/A
g. Industry Category Title: Traveler Accommodation		NAICS Code for the Industry Category 7 2 1 1
Aggregate EB-5 Capital investment: 0	Aggregate Direct and Indirect Job Creation: 0	Aggregate Jobs Maintained: N/A
h. Industry Category Title: Full-Service Restaurants		NAICS Code for the Industry Category 7 2 2 1
Aggregate EB-5 Capital investment: 0	Aggregate Direct and Indirect Job Creation: 0	Aggregate Jobs Maintained: N/A
i. Industry Category Title: Limited-Service Eating Places		NAICS Code for the Industry Category 7 2 2 2
Aggregate EB-5 Capital investment: 0	Aggregate Direct and Indirect Job Creation: 0	Aggregate Jobs Maintained: N/A
j. Industry Category Title: Interior Design Services		NAICS Code for the Industry Category 5 4 1 4 1
Aggregate EB-5 Capital investment: 0	Aggregate Direct and Indirect Job Creation: 0	Aggregate Jobs Maintained: N/A

Date: 12/20/2011

Signature: Edward Chen

Edward Chen, CEO

Home Paradise Regional Center

**Part 3. Information About the Regional Center (Continued)**

If yes, then identify the name and address of each job creating business, as well as the amount of EB-5 capital investment and job creation/maintenance associated with each job creating business.

(1) Business Name:		Industry Category Title:	
Address (Street Number and Name):	City:	State: CA	Zip Code:
EB-5 Capital Investment:	Direct and Indirect Job Creation:	Jobs Maintained:	
(2) Business Name		Industry Category Title:	
Address (Street Number and Name):	City:	State:	Zip Code:
EB-5 Capital Investment:	Direct and Indirect Job Creation:	Jobs Maintained:	

b. Name of Commercial Enterprise:		Industry Category Title:	
Address (Street Number and Name):	City:	State: CA	Zip Code:
Aggregate EB-5 Capital Investment:	Aggregate Direct and Indirect Job Creation:	Aggregate Jobs Maintained:	

Does this EB-5 commercial enterprise serve as a vehicle for investment into other business entities that have or will create or maintain jobs for EB-5 purposes?  No  Yes

If yes, then identify the name and address of each job creating business, as well as the amount of EB-5 capital investment and job creation/maintenance associated with each job creating business.

(1) Business Name:		Industry Category Title:	
Address (Street Number and Name):	City:	State: CA	Zip Code
EB-5 Capital Investment	Direct and Indirect Job Creation	Jobs Maintained	



**Part 3. Information About the Regional Center (Continued)**

(2) Business Name:		Industry Category Title:	
Address (Street Number and Name):	City:	State:	Zip Code:
EB-5 Capital Investment:	Direct and Indirect Job Creation:	Jobs Maintained:	

c. Name of Commercial Enterprise:		Industry Category Title:	
Address (Street Number and Name):	City:	State: CA	Zip Code:
Aggregate EB-5 Capital Investment:	Aggregate Direct and Indirect Job Creation:	Aggregate Jobs Maintained:	

Does this EB-5 commercial enterprise serve as a vehicle for investment into other business entities that have or will create or maintain jobs for EB-5 purposes?  No  Yes

If yes, then identify the name and address of each job creating business, as well as the amount of EB-5 capital investment and job creation/maintenance associated with each job creating business.

(1) Business Name:		Industry Category Title:	
Address (Street Number and Name):	City:	State: CA	Zip Code:
EB-5 Capital Investment:	Direct and Indirect Job Creation:	Jobs Maintained:	

(2) Business Name:		Industry Category Title:	
Address (Street Number and Name):	City:	State:	Zip Code:
EB-5 Capital Investment:	Direct and Indirect Job Creation:	Jobs Maintained:	



**Part 3. Information About the Regional Center (Continued)**

d. Name of Commercial Enterprise:		Industry Category Title:	
Address (Street Number and Name):	City:	State: CA	Zip Code:
Aggregate EB-5 Capital Investment:	Aggregate Direct and Indirect Job Creation:	Aggregate Jobs Maintained:	

Does this EB-5 commercial enterprise serve as a vehicle for investment into other business entities that have or will create or maintain jobs for EB-5 purposes?  No  Yes

If yes, then identify the name and address of each job creating business, as well as the amount of EB-5 capital investment and job creation/maintenance associated with each job creating business.

(1) Business Name:		Industry Category Title:	
Address (Street Number and Name):	City:	State: CA	Zip Code:
EB-5 Capital Investment:	Direct and Indirect Job Creation:	Jobs Maintained:	

(2) Business Name:		Industry Category Title:	
Address (Street Number and Name):	City:	State:	Zip Code:
EB-5 Capital Investment:	Direct and Indirect Job Creation:	Jobs Maintained:	

e. Name of Commercial Enterprise:		Industry Category Title:	
Address Street Number and Name:	City:	State:	Zip Code:
Aggregate EB-5 Capital Investment:	Aggregate Direct and Indirect Job Creation:	Aggregate Jobs Maintained:	

Does this EB-5 commercial enterprise serve as a vehicle for investment into other business entities that have or will create or maintain jobs for EB-5 purposes?  No  Yes



**Part 3. Information About the Regional Center** (Continued)

If yes, then identify the name and address of each job creating business, as well as the amount of EB-5 capital investment and job creation/maintenance associated with each job creating business.

(1) Business Name:		Industry Category Title:	
Address (Street Number and Name):	City:	State:	Zip Code:
EB-5 Capital Investment:	Direct and Indirect Job Creation:	Jobs Maintained:	
(2) Business Name:		Industry Category Title:	
Address (Street Number and Name):	City:	State:	Zip Code:
EB-5 Capital Investment:	Direct and Indirect Job Creation:	Jobs Maintained:	

4. Provide the total number of approved, denied and revoked Form I-526 petitions filed by EB-5 investors making capital investments sponsored by the regional center. (Note: If an adverse action was ultimately reversed and the petition was approved, then note the case as approved.)

Form I-526 Petition Final Case Actions		
Approved	Denied	Revoked
0	0	0

5. Provide the total number of approved, denied and revoked Form I-829 petitions filed by EB-5 investors making capital investments sponsored by the regional center. (Note: If an adverse action was ultimately reversed and the petition was approved, then note the case as approved.)

Form I-829 Petition Final Case Actions		
Approved	Denied	Revoked
0	0	0

**NOTE:** USCIS may require case-specific data relating to individual EB-5 petitions and the job creation determination and further information regarding the allocation methodologies utilized by a regional center in certain instances in order to verify the aggregate data provided above.



**Part 4. Applicant Signature** Read the information on penalties in the instructions before completing this section. If someone helped you prepare this petition, he or she must complete **Part 5**.

I certify, under penalty of perjury under the laws of the United States of America, that this supplemental form and the evidence submitted with it are all true and correct. I authorize the release of any information from my records that U.S. Citizenship and Immigration Services needs to determine eligibility for the benefit being sought. I also certify that I have authority to act on behalf of the Regional Center.

<b>Signature of Applicant</b> <i>Edward Chen</i>	<b>Printed Name of Applicant</b> Edward Chen	<b>Date (mm/dd/yyyy)</b> 12/20/2011
<b>Daytime Phone Number</b> (Area/Country Codes) 626-284-9999	<b>E-Mail Address</b> MANAGEMENT@USHPIC.COM	
<b>Relationship to the Regional Center Entity (Managing Member, President, CEO, etc.)</b> CEO		

**Part 5. Signature of Person Preparing This Form, If Other Than Above (Sign Below)**

I declare that I prepared this form using information provided by someone with authority to act on behalf of the Regional Center, and the answers and information are those provided by the Regional Center.

**Attorney or Representative:** In the event of a Request for Evidence (RFE), may the USCIS contact you by Fax or E-mail?  No  Yes

Followed with a hard copy via mail

<b>Signature of Preparer</b> <i>Linda Lau</i>	<b>Printed Name of Preparer</b> Linda Lau	<b>Date (mm/dd/yyyy)</b> 12/21/2011
<b>Firm Name and Address</b>  Global Law Group, 909 El Centro Street Suite 1, South Pasadena, CA 91030		
<b>Daytime Phone Number</b> (Area/Country Codes) 213-830-9933	<b>Fax Number (Area/Country Codes)</b> 213-830-9930	<b>E-Mail Address</b> linda@globallawgroup.net





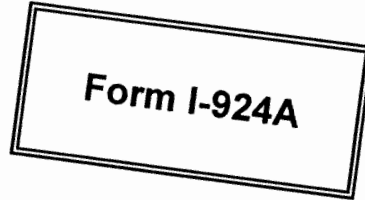


**Global Law Group**  
A Professional Law Corporation

December 21, 2011

**By FedEx (Tracking No: 7930 4028 4991)**

U.S. Citizenship and Immigration Services  
California Service Center  
ATTN: EB-5 Processing Unit  
24000 Avila Road, 2<sup>nd</sup> Floor  
Laguna Niguel, CA. 92677



RE: **Form I-924A Supplement to Form I-924**  
**Regional Center Name: Home Paradise Regional Center**

Dear Sir/ Madam:

Enclosed please find the following documents pertaining to the I-924A of Home Paradise Regional Center.

1. Form G-28, Entry of Appearance as Attorney
2. Form I-924A
3. Form I-924A with Supplement
4. Home Paradise Regional Center's Approval Letter

Thank you for your consideration of this application and your kind assistance.

Sincerely,

Linda Lau, Esq.

closures



U.S. Citizenship  
and Immigration  
Services

Date: **SEP 23 2011**

Edward Chen  
c/o Home Paradise Investment Center, LLC  
7000 E. Slauson Avenue  
Commerce, CA 90040

Application: Request for Designation as a Regional Center  
Applicant(s): Edward Chen

Re: Home Paradise Regional Center  
RCW1031910071/(Formerly W09002630)

Pursuant to Section 610 of the Appropriations Act of 1993, on October 6, 2010, Edward Chen submitted a proposal seeking approval and designation by U.S. Citizenship and Immigration Services (USCIS) of the Home Paradise Regional Center.

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

**GEOGRAPHIC AREA:**

The Home Paradise Regional Center shall have a geographic scope to include the counties of Kern, Los Angeles, Orange, San Bernardino, Riverside, San Diego and Imperial in the State of California.

**FOCUS OF INVESTMENT ACTIVITY:**

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

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

1. NAICS 444 Building Materials and Garden Equipment and Supplies Dealers
2. NAICS 445 Food and Beverage Stores

3. NAICS 44611 Pharmacies and Drug Stores
4. NAICS 448 Clothing and Clothing Accessories Stores
5. NAICS 451 Sporting Goods Stores
6. NAICS 453 Miscellaneous Store Retailers
7. NAICS 7211 Traveler Accommodation
8. NAICS 7221 Full-Service Restaurants
9. NAICS 7222 Limited-Service Eating Places
10. NAICS 54141 Interior Design Services

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

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

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

### **EMPLOYMENT CREATION**

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

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

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

An alien investor's I-829 petition to remove the conditions which was based on an I-526 petition approval that involved the creation of new indirect jobs based on multipliers tied to job creation inputs such as revenue

generated by businesses occupying space and estimated project expenditures costs, needs to be supported by evidence showing the space is occupied by such businesses and that the funds were expended in the job-creating activity. Such evidence may include reasonable methodologies like multiplier tables, feasibility studies, and other economically or statistically valid forecasting devices which indicate the likelihood that the alien's investment has resulted in increased employment.

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

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

1. A copy of this letter, the Regional Center approval and designation.
2. A copy of the USCIS approved Regional Center narrative proposal and business plan.
3. A copy of the job creation methodology required in 8 CFR 204.6(j)(4)(iii), as contained in the final Regional Center economic analysis which has been approved by USCIS, which reflects that investment by an individual immigrant investor will create not fewer than ten (10) full-time employment positions, either directly or indirectly, per immigrant investor.
4. A legally executed copy of the USCIS approved documents:
  - a. Confidential Private Offering Memorandum      Sample submitted October 6, 2010
  - b. Subscription Agreement                              Sample submitted October 6, 2010
  - c. Escrow Agreement                                      Sample submitted October 6, 2010
  - d. Limited Partnership Agreement                      Sample submitted October 6, 2010

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

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

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

Effective November 23, 2010, the failure to timely file a Form I-924A Supplement for each fiscal years in which the regional center has been designated for participation in the Immigrant Investor Pilot Program will

Home Paradise Regional Center/RCW1031910071/(Formerly W09002630)

Page 4

result in the issuance of an intent to terminate the participation of the regional center in the Pilot Program, which may ultimately result in the termination of the approval and designation of the regional center.

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

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

Sincerely,



Rosemary Langley Melville  
Director  
California Service Center

cc: Linda Lau, Esq.

**4. Home Paradise Regional Center's Approval Letter**

3. Form I-924A with supplement

1. Form G-28, Entry of Appearance as Attorney





2. Form I-924A

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

Origin ID: WI-PA



Ship Date: 20DEC11  
ActWgt: 1.0 LB  
CAD: 3464367/NET3210

Delivery Address Bar Code



Ref # Home Paradise RC #24a  
Invoice #  
PO #  
Dept #

CSC  
DEC 23 2011  
STAMP #18  
924 / P

SHIP TO: (213) 830-9933  
ATTN: EB-5 Processing Unit  
USCIS  
24000 AVILA RD FL 2  
2ND FLOOR  
LAGUNA NIGUEL, CA 92677

BILL SENDER

WED - 21 DEC A2  
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Cortera Company Profile For:

**SUN CO**

7000 E SLAUSON AVE  
 COMMERCE, CA 90040-3621 | view map  
 (510) 232-8515

**COMPANY DETAILS****Location Type:** Single Location**Ownership:** Private

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**CURRENT NEWS**

There is currently no press for this company.

**COMPANY OVERVIEW**

SUN CO in COMMERCE, CA.

**RECENT ALERTS**

<b>Financial News:</b>	No
<b>Growth Clues:</b>	No
<b>Payment Score:</b>	No
<b>Public Records:</b>	No

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### COMPANY DETAILS

**Location Type:** Branch  
**Ownership:** Private  
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### CURRENT NEWS

There is currently no press for this company.

### COMPANY OVERVIEW

CSH GARMENT FINISHING INC in  
 COMMERCE, CA.

### RECENT ALERTS

<b>Financial News:</b>	No
<b>Growth Clues:</b>	No
<b>Payment Score:</b>	No
<b>Public Records:</b>	No

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**First Name \***

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Select your provider...

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Almost there... solve this simple math question so we know you're a real person.

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## Summary Review of Form I-924A

### Home Paradise Regional Center RCW1135750431

#### Filing and Project History:

- The initial Regional Center Proposal was approved on September 23, 2011. No amendment filed. One actual project.

#### Capital Investment:

- No I-526 approved within the fiscal year so there is no capital investment in this fiscal year. Form I-924 A reports no aggregate capital investment.

#### Job Creation:

- Form I-924 A lists no aggregate job creation within the fiscal year.

#### Industry Categories and NAICS Codes:

- The Regional Center was approved for ten industry categories. Form I-924 A reports the same industry categories.

#### Reported Data and iClaims Verification:

- The applicant lists no I-526s approved, denied or revoked and iClaims confirms this report.
- The applicant reported no Form I-829 approvals, denials or revocations. iClaims reflects the same information.

#### Google Search:

- Google Search and info at [www.ushcpic.com](http://www.ushcpic.com) reveal no connection to American Life Regional Center.

#### Conclusion:

(b) (4), (b) (5)



(b) (5)



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美国美丽家园项目优势

美国投资  
EB-5投资

# 美国美丽家园移民中心

## Home Paradise Investment Center

### 主页

Home Paradise Regional Center (美国美丽家园移民公司) 的投资移民项目是隶属美国移民局认可的EB-5项目，现已拿到移民局官方的批准文件。该区域中心的投资移民项目在美国得到了加州政府，在南加得到县政府的高度支持。

美国美丽家园移民公司的主要目标是为中国移民提供优质，准确以及完善的移民服务，更为很多低收入的地方创造新商机，新工作，给当地创造经济效益，也为有限合伙投资人创造了最大的利润，同时提供了2年转换正式绿卡的保障。

友情衔接：美丽家园设计公司网站

美国美丽家园EB-5投资移民批准证：



U.S. Department of Homeland Security  
1400 Avila Road, 2nd Floor  
Laguna Niguel, CA 92677



U.S. Citizenship  
and Immigration  
Services

Date: SEP 23 2011

Edward Chen  
c/o Home Paradise Investment Center, LLC  
7000 E. Slawson Avenue  
Commerence, CA 90040

Application: Request for Designation as a Regional Center  
Applicant(s): Edward Chen

Re: Home Paradise Regional Center  
RCW1031910071/(Formerly W09001630)

Pursuant to Section 610 of the Appropriations Act of 1993, on October 4, 2010, Edward Chen submitted a proposal seeking approval and designation by U.S. Citizenship and Immigration Services (USCIS) of the Home Paradise Regional Center.

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

**GEOGRAPHIC AREA:**

The Home Paradise Regional Center shall have a geographic scope to include the counties of Kern, Los Angeles, Orange, San Bernardino, Riverside, San Diego and Imperial in the State of California.

**FOCUS OF INVESTMENT ACTIVITY:**

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

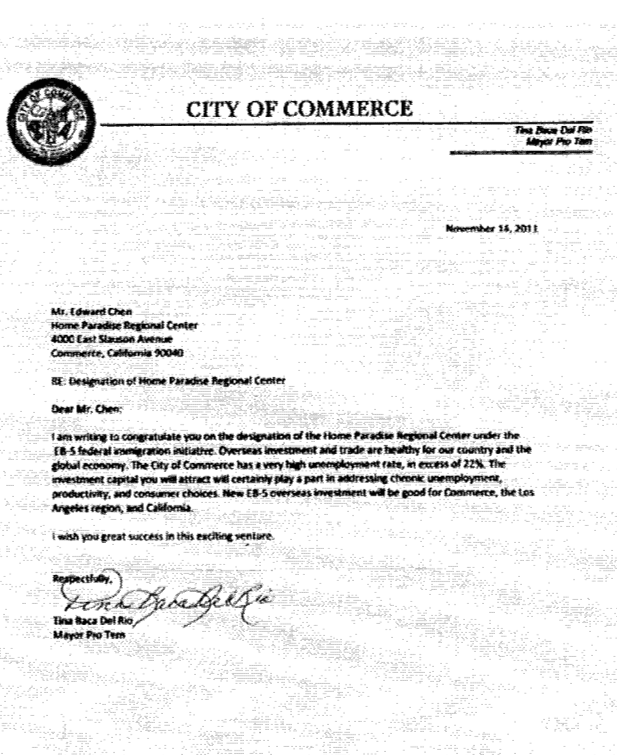
The Regional Center shall focus on offering EB-5 compliant capital investment opportunities into new commercial enterprises or a mix of commercial enterprises in the following target industry economic categories:

1. NAICS 444 Building Material and Garden Equipment and Supplies Dealers.
2. NAICS 445 Food and Beverage Stores.

[www.uscis.gov](http://www.uscis.gov)

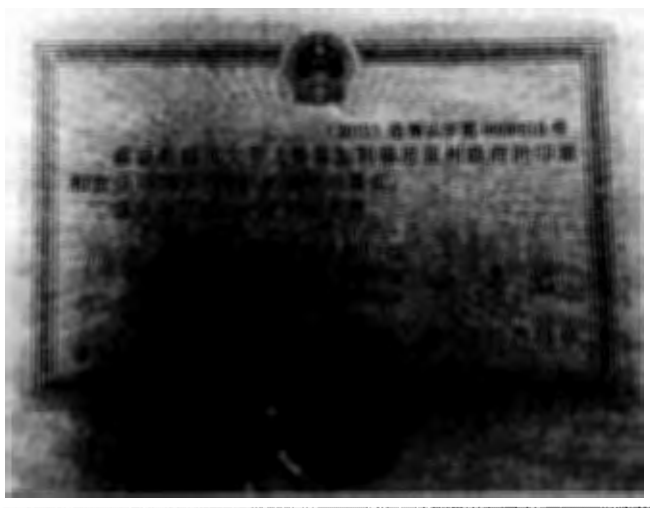


城市市长支持信:





大使馆认证:



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RECEIVED DATE December 23, 2011	APPLICANT CHEN, EDWARD
NOTICE DATE December 23, 2011	PAGE 1 of 1
LINDA LAU RE: HOME PARADISE REGIONAL CENTER FICTITIOUS BUSINESS NAME OF 909 EL CENTRO ST STE 1 SOUTH PASADENA CA 91030	NOTICE TYPE: Receipt Notice

**Receipt Notice** - This notice confirms that USCIS received your application or petition as shown above. Please reference the receipt number, above, on any correspondence with USCIS. If any of the above information is incorrect, please immediately contact us at [USCIS.ImmigrantInvestorProgram@dhs.gov](mailto:USCIS.ImmigrantInvestorProgram@dhs.gov) to let us know. This will help avoid future problems.

This notice does not grant any immigration status or benefit. It is not even evidence that this case is still pending. It only shows that the application or petition was filed on the date shown.

**Processing time** – Processing times vary by kind of case. You can check our website at [www.uscis.gov](http://www.uscis.gov) for our current processing times for this kind of case at the particular office to which this case is or becomes assigned. If you do not receive an initial decision or update from us within our current processing time, email us at [USCIS.ImmigrantInvestorProgram@dhs.gov](mailto:USCIS.ImmigrantInvestorProgram@dhs.gov). Save this notice, and any other notice we send you about this case, and please make and keep a copy of any papers you send us by any means along with any proof of delivery to us. Please have all these papers with you if you contact us about this case.

**If your address changes** – If your mailing address changes while you case is pending, notify us at [USCIS.ImmigrantInvestorProgram@dhs.gov](mailto:USCIS.ImmigrantInvestorProgram@dhs.gov), otherwise you may not receive notice of our action on this case.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

U.S. CITIZENSHIP & IMMIGRATION SVC  
CALIFORNIA SERVICE CENTER  
P.O. BOX 30111  
LAGUNA NIGUEL CA 92607-0111  
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