

Summary of December 4, 2008 USCIS Stakeholders Conference Call with Invest In the USA (IIUSA) and American Immigration Lawyers Association (AILA)

Summary approved by USCIS December 12, 2008

USCIS officials on the call: Robert Kruszka, Deputy Chief, USCIS Service Center Operations; Kevin Cummings, Chief, EB-5 Investor Program at USCIS; and Joseph Whalen of the USCIS HQ EB-5 Investor Program

Moderator: Steve Yale-Loehr, IIUSA executive director and AILA EB-5 committee chair

IIUSA and AILA members listening on the call: 146

General update from USCIS:

All I-526 and I-829 petitions filed after October 1 are being adjudicated at the California Service Center (CSC). Most EB-5 petitions pending at the Texas Service Center (TSC) as of October 1 have been transferred to CSC. USCIS hopes to publish a Federal Register notice about this soon. USCIS now has 10 trained EB-5 adjudicators and one supervisor at CSC.

USCIS is drafting a memo that will provide guidance on many EB-5 issues. USCIS is also drafting a regional center application form. USCIS will conduct a fee study to determine how much to charge for regional center applications.

Starting January 1, 2009, CSC will adjudicate new regional center applications. Any regional center applications filed at USCIS headquarters between January 1 and 31, 2009 will be forwarded to CSC. Starting February 1, 2009, any regional center applications filed at USCIS headquarters will be returned. Regional center applications should be sent to:

USCIS
California Service Center
P.O. Box 10526
Laguna Niguel, CA 92607-0526

General Questions:

1. Will USCIS consider allowing regional centers to submit documents relating to a new project to the EB-5 headquarters staff for a "pre-approval" review? Allowing regional centers and USCIS to discuss and resolve key issues in a new project such as economic methodology, timetables, etc. will smooth I-526 processing and provide more certainty for regional centers, USCIS, and investors.

USCIS response: USCIS is considering this as part of the general EB-5 guidance memo discussed above.

2. What is USCIS' position on whether and when jobs have to be created for regional center projects at either the I-526 stage or the I-829 stage? What is USCIS' specific legal basis for these positions?

USCIS response: This issue is under review.

3. Neither the EB-5 statute nor the regulations explicitly exclude construction jobs from consideration as the type of employment creation allowed under the EB-5 program. The regulations define "full-time employment" as working at least 35 hours a week.¹ That definition also allows indirect job creation as long as the indirect job also requires 35 hours per week.² Thus, just reading the regulations alone, one would think that construction jobs should count. The AAO has held in at least one nonprecedent decision, however, that construction jobs do not count for direct job creation purposes for the EB-5 program.³ Nevertheless, USCIS is willing to allow the indirect and induced job creation from construction jobs in EB-5 regional center-affiliated cases. The USCIS interpretation may make sense in a short-term project such as building a single home. However, many regional center projects are of a long-term nature, and plan to use the same construction crews for multiple years. This is particularly true for large projects such as building a planned community. EB-5 stakeholders urge USCIS to count construction jobs as direct jobs in such long-term projects.

USCIS response: This issue is under review. See *Spencer Enterprises v. United States*, 229 F. Supp. 2d 1025, 1039 (E.D. Cal. 2001), *aff'd*, 345 F.3d 683 (9th Cir. 2003), for discussion of "continuous, permanent employment."

4. Practitioners are concerned that there is little certainty on which investors can rely in assessing job creation. After a regional center's job creation methodology is accepted in deciding the regional center's charter and recent reaffirmation and approval of I-526s, RFEs on I-829s question the same methodology and economist reports repeatedly. People are frustrated that they have to repeatedly prove the same methodology for indirect job creation. For example, a regional center's economic model is accepted for I-526s for numerous projects and then it is questioned again in I-829s, long after it was accepted for other I-526s in the same project. Can Headquarters help with creating more consistency in adjudications?

USCIS response: USCIS is considering this as part of the general EB-5 guidance memo discussed above.

¹ 8 C.F.R. § 204.6(e).

² *Id.*

³ See, e.g., Matter of [name not provided], File No. WAC-98-201-52237, 26 Immigr. Rep. B2-124 (AAO May 22, 2002).

5. *What is the status of the idea of instituting premium processing for I-526s that USCIS floated a few months ago?*

USCIS response: USCIS will first determine how the transition to CSC goes and then will decide whether to offer premium processing for I-526 cases.

6. *Will USCIS consider instituting concurrent processing of I-526 and I-485 adjustment petitions, at least in regional center-affiliated cases? Doing so would allow the faster infusion of EB-5 money into regional center projects. Such money is especially needed now to ease the credit crisis.*

USCIS response: It is unlikely that the agency will consider concurrent processing of I-526 and I-485 adjustment petitions. Premium processing is more likely.

7. *What are the current processing times for I-526 and I-829 petitions?*

USCIS response: As of October 31, 2008, the average processing time for I-526 petitions at CSC was about 7.5 months and 10.5 months for I-829 petitions.

8. *Is there a successor-in-interest concept (as exists in the labor certification context) for EB-5 cases where a job-creating entity merges into or is bought out by another entity, so that as long as the jobs are created, the I-829 can be approved?*

Rationale: In the context of labor certification, DOL will permit the substitution of a successor employer if it occurs before a final determination where the particular job opportunity is preserved in the same area of intended employment consistent with 20 C.F.R. § 656.30(c)(2).

In the H-1B context, an amended H-1B petition is not required where the petitioning employer is involved in a corporate restructuring, including but not limited to a merger, acquisition, or consolidation, where a new corporate entity succeeds to the interests and obligations of the original petitioning employer and where the terms and conditions of employment remain the same but for the identity of the petitioner. INA § 214(c)(10).

Change in employer's corporate structure or identity. (1) Where an employer corporation changes its corporate structure as the result of an acquisition, merger, "spin-off," or other such action, the new employing entity is not required to file new LCAs and H-1B petitions with respect to the H-1B nonimmigrants transferred to the employ of the new employing entity (regardless of whether there is a change in the Employer Identification Number (EIN)), provided that the new employing entity maintains in its records a list of the H-1B nonimmigrants transferred to the employ of the new employing entity, and maintains in the public access file(s). 20 C.F.R. § 655.730(e).

The same question can arise in the context of EB-5 cases:

A new commercial enterprise creates jobs and then before an I-829 is filed, the new commercial enterprise is merged within a new company entity through either merger or purchase. Can the new company be considered a new commercial enterprise and/or can a new company create additional jobs for I-829 purposes? In other words, will an I-829 be approved even if the new commercial enterprise gets bought or merged into another new company, assuming the investment remains in the enterprise and job creation criteria are satisfied?

USCIS response: USCIS is considering this issue. For now, an EB-5 petitioner should not assume that such a case will automatically be denied. USCIS will decide such cases on a case-by-case basis.

9. In the context of a “troubled business,” please clarify whether 10 jobs (direct, indirect and induced for a regional center) must be saved or preserved for each EB-5 investor who invests in the troubled business. If so, please provide the legal justification for that interpretation, since the statute only speaks to 10 jobs (which could be shared by multiple investors) and the troubled business regulations do not mention a need to have each investor save 10 separate jobs. If, for example, an investor saves a troubled business with eight workers, is this sufficient?

USCIS response: USCIS interprets the statute and regulations to mean that 10 jobs must be preserved per each EB-5 investor. The legal basis for this interpretation is as follows:

8 C.F.R. § 216.6(a)(4)(iv) states that “[i]n the case of a ‘troubled business’ as defined in 8 C.F.R. § 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.” 8 C.F.R. § 204.6(j)(4)(ii) in turn states that “[t]o 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.” That regulation refers to the “statutory employment creation requirement,” which is in INA § 203(b)(5)(A)(ii). The statute requires at least 10 jobs per investor.

10. Please provide statistics for I-526 and I-829 approvals and denials for FY 2007 and FY 2008, broken down by individual and regional center cases.

USCIS response: USCIS statistics do not distinguish between regional center-based and individual EB-5 cases. The requested statistics are:

FY 2007 (I-526): 473 approvals, 148 denials.
FY 2007 (I-829): 111 approvals, 49 denials.
FY 2008 (I-526): 640 approvals, 120 denials.
FY 2008 (I-829): 158 approvals, 58 denials.

As of October 31, 2008, 853 I-526 petitions were pending; 489 I-829 petitions were pending.

11. Please provide and maintain an updated list at the USCIS web site of all approved regional centers and all pending regional center applications (including how long they have been pending and what geographic areas they cover). Pending cases may be assigned a pseudonym such as "Proposed Denver RC."

USCIS response: A list of approved and active regional centers as of December 11, 2008 is attached. People can also email uscis.immigrantinvestorprogram@dhs.gov for an updated list. Eventually USCIS plans to post this information on the USCIS web site. For privacy reasons USCIS will not release a list of pending regional center applications. Right now there are about 32 approved regional centers and about 12-15 pending applications.

12. Does the CSC have an adjudicator's checklist for documents for I-526s and I-829 petitions? If so, will you provide a copy?

USCIS response: CSC does not have a standard adjudicator's checklist for EB-5 cases.

13. Given that the EB-5 regional center pilot program is expiring on March 6, 2009, will the CSC give priority to these cases? In the past when statutes are expiring, there have been task forces to decide cases. Will there be a task force assigned to I-526s before March 6?

USCIS response: CSC will try to adjudicate as many I-526 cases as possible before March 6 if it appears Congress may not renew the pilot program by that date.

14. Will pending I-485s for EB-5 cases be decided before March 6, 2009? Can we send Headquarters a list of I-485s so they may be pulled and decided before the regional center pilot program expires?

USCIS response: The USCIS computer system does not separate EB-5-based I-485 adjustment of status applications from other I-485 applications. If people are worried that their EB-5-based I-485 application won't be decided by March 6, email the A numbers and receipt numbers to uscis.immigrantinvestorprogram@dhs.gov and USCIS will see what it can do.

15. Does USCIS still intend to transfer adjudication of regional center applications from USCIS headquarters to CSC? If so, when is that expected to occur? Why is USCIS planning such a move?

USCIS response: USCIS has trained six people at CSC to adjudicate EB-5 regional center applications. USCIS believes that this will result in faster processing and more consistency. EB-5 staff at USCIS headquarters will continue work on general EB-5

policy issues. Regional centers that have general questions or want to request a meeting should email uscis.immigrantinvestorprogram@dhs.gov.

16. Regional center I-526 cases sometimes are not adjudicated in the order they are received. For example, an I-526 for a case submitted three weeks ago was adjudicated earlier than I-526 petitions submitted five months ago for the same regional center project. Is it policy to adjudicate cases in the order they are received? More generally, does USCIS adjudicate EB-5 petitions filed through regional centers faster than non-regional center cases?

USCIS response: USCIS policy is to adjudicate EB-5 petitions in the order they are received (first in, first out). If you have specific examples of cases that you believe have been pending too long, email uscis.immigrantinvestorprogram@dhs.gov. USCIS has seven criteria for expediting any case, including EB-5 cases. They are:

1. severe financial loss to company or individual;
2. extreme emergency
3. humanitarian situation
4. Nonprofit status of requesting organization in furtherance of the cultural and social interests of the United States
5. national interest or Department of Defense interest
6. USCIS error
7. compelling interest of the government

To request expedited processing on an EB-5 case, email uscis.immigrantinvestorprogram@dhs.gov. USCIS headquarters will forward that request to CSC.

Transition of EB-5 cases from TSC to CSC:

17. We understand that all I-526 and I-829 cases have been or will be transferred to CSC, except for cases that have already been started to be processed at TSC. Is this true? If so, how many cases remain open at TSC?

USCIS response: As stated above, USCIS began shifting all EB-5 adjudications to CSC as of October 1, 2008. 333 I-526 petitions and 57 I-829 petitions remain pending at TSC. I-526 and I-829 petitions that are transferred from TSC to CSC will be processed in priority date order; they will not fall back to the end of the CSC processing line.

18. Upon centralization of EB-5 cases at CSC, will this mean that I-526-based I-485 cases will also be moved to CSC? If so, will EB-5 based I-485 applications pending at TSC as of October 1 be adjudicated there or transferred to CSC?

USCIS response: If TSC started adjudicating an I-526-based I-485 application before October 1, TSC will continue to process that case. If TSC had not reviewed the file by October 1, it should have been transferred to CSC.

I-829 Questions:

19. Could you instruct officers not to RFE for the full amount of the original investment when, at the I-829 stage, normal depreciation has resulted in reports to investors that their capital has decreased, reflected in the investor's tax returns as well? What evidence can be systematically provided with I-829 petitions to avoid this kind of RFE?

USCIS response: The issue is whether the investor has sustained the investment when the balance sheet shows less than the required amount of equity. Evidence should be submitted that the lack of equity is due to losses. If so, the petitioner should submit evidence such as company tax returns to explain the loss.

20. Does current policy require I-829 applications to include a copy of the complete I-526 petition? Some I-526 and I-829 submissions will not even fit in a regular courier package and necessitate special boxes. Moreover, the USCIS should have a copy of the I-526 petition already from the prior adjudication. Will a truncated version of the I-526 (approval notice, letter, list of exhibits) suffice?

USCIS response: CSC should not require I-829 applications to include a copy of the I-526 petition. If you have a specific case where this has occurred, email uscis.immigrantinvestorprogram@dhs.gov and headquarters will look into this.

21. Currently, I-829 receipt notices for dependents contain the principal's name and A# at the top. Can separate I-829 receipt notices be issued for principals and dependents? Some USCIS field offices ask why there is no separate I-829 receipt notice for the principal and each dependent, and find it "unusual" why the principal applicant is not given a separate I-829 receipt notice.

USCIS response: USCIS believes separate I-829 receipt notices are issued for principals and dependents. If people have examples where this is not happening, email uscis.immigrantinvestorprogram@dhs.gov.

22. Where a dependent's conditional permanent resident (CPR) status expires more than 90 days after the CPR expiration date of the principal applicant, that dependent must submit his own I-829 application separately and pay the additional fee. Since the approvability of the dependent's I-829 case would depend SOLELY on the approvability of the principal applicant's already-submitted I-829 application, it appears logical that there is no need to submit a copy of all documents associated with the program and the particular project. Is this understanding accurate? For example, consider the situation where an H-4 spouse files an I-539 after an H-1B spouse already filed the H-1B petition. In this instance, USCIS does not require the H-4 dependent to include a copy of the entire H-1B petition. Rather, a copy of the H-1B receipt notice or approval notice is sufficient along with proof of marital or child relationship and status. Since USCIS does this in the H-4 context, could USCIS amend the I-829 instructions to allow the same for I-829 dependents filing after the principal applicant?

USCIS response: This suggestion seems to have merit. USCIS will consider this suggestion when it amends the I-829 petition form in the next few months. Any suggestions for improving the I-829 form should be emailed to uscis.immigrantinvestorprogram@dhs.gov.

23. Currently, there is no way to check the status of I-829 applications via the USCIS Online Case Status Check System. This leaves clients and attorneys with no way to check the status. When is it expected that this problem will be corrected?

USCIS response: The computer system that tracks I-829 and I-751 petitions does not interface with the USCIS case status online system. USCIS is working on this issue.

24. Certain USCIS field offices refuse to stamp 1-year stamps on passports for I-829 applicants. Investors are told they do not need stamps because the I-829 receipt notice gives them work and travel authorization. Other field offices insist that only a 6-month stamp can be given. It should be noted that having stamps on the passports are always more convenient, and some POEs and airlines ask why traveling investors do not have the stamps in their passports. Due to the relative lack of knowledge about I-829s on the part of USCIS field offices, updated field guidance would be helpful.

USCIS response: USCIS field offices should issue 1-year stamps. Anyone with problems should email uscis.immigrantinvestorprogram@dhs.gov with specifics on the case, including the A# and the name of the field office.

25. Recently an I-829 RFE asked for “audited” financial reports. Most regional centers do not commission or provide its investors with audited reports. The regulations say that such “may” be submitted but that other evidence is acceptable. See 8 C.F.R. § 216.6(a)(4)(ii). Are “audited” financial reports required? If not, please instruct officers to acknowledge in RFEs that other evidence may be sufficient to show that money was spent. And please consider as a policy matter when any such evidence should be required.

USCIS response: USCIS does not routinely ask for audited financial statements. However, if an adjudicator feels it is necessary they may ask for it. People who believe that they have unnecessarily been asked to provide an audited financial statement can email uscis.immigrantinvestorprogram@dhs.gov.

26. What is required for I-829s to show the investor still has an investment in the enterprise? Is a statement from the regional center’s general partner sufficient?

USCIS response: The regulations do not exclude or require any particular evidence. Balance sheets and tax returns are often helpful.

Attachment: December 11, 2008 USCIS list of approved EB-5 regional centers

Name of Regional Center	Address of Regional Center	Name and Address of Primary Contact	Email / Web Page
Aero-Space Port International (ASPI)	1600 Lind Ave. SW Suite 220 Renton, WA 98055	Andy Chin / President - 1600 Lind Ave. SW Suite4 220 Renton,WA 98055	Achen@aspicgroup.com
Alabama Center for Foreign Investment, LLC	RSA Union, 100 N. Union St., Suite 682 Montgomery AL 36104	Boyd Campbell / General Counsel or Ron Drinkard/Director100 N. Union St., Ste. 682 Montgomery , AL 36104	director@acfi-alabama.com or gc@acfi-alabama.com
American Life Seattle RC / Golden Rainbow / Freedom Fund	American Life Inc. 270 S, Hanford St., Ste. 100 Seattle, WA 98134	Henry Liebman / President - American Life Inc. 270 S. Hanford St., Ste. 100 Seattle, WA 98134	www.AmLife.us jo@americanlifeinc.com henry@americanlifeinc.com
American Life Ventures Everett, Washington	American Life Inc. 270 South Hanford Street, Suite 100 Seattle., WA 98134	Henry Liebman / President - American Life Inc. 270 South Hanford Street, Suite 100 Seattle, WA 98134	www.amlife.us
American Life Ventures, Tacoma, Washington	American Life Inc. 3223 Third Ave. South, Ste. 200 Seattle, WA 98134	Henry Liebman / President - American Life Inc. 3223 Third Ave. South, Ste. 200 Seattle, WA 98134	www.AmLife.us

California Consortium for Agricultural Export (CCAIE)	333 South Grand Avenue, 25th Floor Los Angeles, CA. 90071	Susan Spencer/ President - 333 South Grand Avenue, 258th Floor Los Angeles, CA, 90071	sspencer@ccax.com
California Investment Immigration Fund, LLC	12688 Chapman Ave, #3313, Garden Grove, CA 92840	Tat Chan	china@great-nation.com
California Military Bases (CMB)	CMB Export, LLC Midwest executive offices 4507 49th ave., Moline, Illinois 61265	Patrick Hogan / President - Corona Professional Center 400 S. Ramona Ave., Suite 212 AA Corona, California 9287	Pat@CMBEB5Visa.com / www.cmbeb5visa.com
Capital Area RC (CARC)	1801 K. Street NW. Suite 201-L Washington, DC 20006	John Tung - 1801 K. Street NW. Suite 201-L Washington, DC 20006	www.cornerstoneia.com
Carolina Center for Foreign Investment RC	P.O. Box 2487, 101 N. main St. #1400, Greenville, SC 29602	Allen Ballew/ Jay Rogers	Aballew@furmanco.com / jay.rogers@smithm.com
DBEDT Hawaii Regional Center		ATTN: Tom Rosenfeld CanAm Enterprises, LLC 32 Court Street, Ste 1501 Brooklyn, NY 11201	
		Tel. 718-624-7850	Info@hawaiifund.com
EB-5 America	1806 11th Street, NW. Washington DC 20001	David Morris, Esq. 1806 11th Street NW Washington, DC 20001	Morris@EB5America.com

<p>El Monte Regional Center</p>	<p>10501 Valley Blvd., # 1888 El Monte, CA 91731</p>	<p>Jean Lang / Exec. V.P. - 10501 Valley Blvd., # 1888 El Monte, CA 91731</p>	<p>www.InvestmentImmigrationLaw.com</p>
<p>Global Century (Houston)</p>	<p>Global Century Development, LLC 11205 Bellaire Blvd., Suite B-33 Houston, TX 77072-2545</p>	<p>Dan Nip / Global Century Dev. LLC 11205 Bellaire Blvd., Suite B33 Houston, TX 77072</p>	<p>dnip888@sbcglobal.net</p>
<p>Gulf Coast Funds Management , LLC</p>	<p>202 East State Street, Suite 700 Ithaca, New York 14850</p>	<p>Stephen Yale-Loehr / Taylor Berry 202 East State Street, Suite 700 Ithaca, New York 14850</p>	<p>www.millermayer.com</p>
<p>Imperial Regional Center</p>	<p>150 N. Santa Ana Ave, STE 300, Arcadia, CA 91006</p>	<p>James Lo/Pacificland International Development Inc c/o Linda Lau, Esq.</p>	<p>linda@lindalau.net</p>
<p>Iowa Department of Economic Development (IDED)</p>	<p>200 East Grand Ave. Des Moines, Iowa 50309</p>	<p>Mike Tramontina / Director - 200 East Grand Ave. Desw Moines, Iowa 50309</p>	<p>www.iowalifechanging.com</p>
<p>Kansas Bio-Fuel RC, LLC</p>	<p>915 Wilshire Blvd. Suite 2050 Los Angeles, CA 90017</p>	<p>Justin Lee / President - 915 Wilshire Blvd. Suite 2050 Los Angeles, CA 90017</p>	

<p>Lake Buena Vista RC</p>	<p>1725 University Dr. # 450, Coral Springs, FL 33071</p>	<p>Samuel Sutton</p>	
<p>Los Angeles Regional Center California Film Commission</p>	<p>Can Am Enterprises, LLC 32 Court Street, Suite 1501, Brooklyn, NY 11201</p>	<p>Thomas Rosenfeld, C.P.A., J.D./President Can Am Enterprises, LLC 32 Court Street, Suite 1501 Brooklyn, NY 11201</p>	<p>tom@canamenters.com / www.CanAmenters.com</p>
<p>Mayors Office RC</p>	<p>3421 N. Causeway Boulevard, Suite 301 New Orleans, LA 70002</p>	<p>William B.Hungerford Jr. / President or Timothy O. Milbrath / V.P. - 3421 N. Causeway Boulevard, Suite 301 New Orleans, LA 70002</p>	<p>www.nobleoutreach.com</p>
<p>Metropolitan Milwaukee Association of Commerce (MMAC)</p>	<p>756 North Milwaukee Street, Suite 400 Milwaukee, Wisconsin 53202</p>	<p>Timothy R. Sheehy / President - 756 North Milwaukee Street, Suite 400 Milwaukee, Wisconsin 53202</p>	<p>Tsheehy@mmac.org</p>
<p>New York City Regional Center, LLC</p>	<p>299 Broadway Ste 1518 New York, NY 10007</p>	<p>Paul Levinsohn</p>	
<p>Noble Coastal Ventures-- Louisiana Mississippi Regional Center</p>	<p>20203 Goshen Rd, Ste 302 Gaithersburg, MD 20879</p>	<p>William B.Hungerford Jr. / President or Timothy O. Milbrath / V.P. - 3421 N. Causeway Boulevard, Suite 301 New Orleans, LA 70002</p>	<p>Bhungerford@NobleOutReach.com Tmilbrath@NobleOutReach.com</p>

<p>Palm Beach RC</p>	<p>Phillips Pt., W. Tower, 777 S. Flagler Dr. #800, W. Palm Beach, FL 33401</p>	<p>Louis Haddad/Alfred Zucaro</p>	<p>hadd5353@bellsouth.net</p>
<p>Pennsylvania Department of Community and Economic Development</p>	<p>Can Am Enterprises, LLC 32 Court Street, # 1501, Brooklyn, NY 11201</p>	<p>Denis Yablonsky / Secretary and James Rowley Deputy Secretary - Can Am Enterprises, LLC 32 Court Street, # 1501, Brooklyn, NY 11201</p>	<p>www.CanAmenterprises.com</p>
<p>Philadelphia Industrial Development Corporation (PIDC)</p>	<p>2600 Centre Square West, 1500 Market St. Philadelphia PA 19102-2126</p>	<p>Peter Longstreth / President - 2600 Centre Square West, 1500 Market St. Philadelphia PA 19102-2126</p>	<p>info@pidc-pa.org / www.CanAmenterprises.com</p>
<p>Regional Center Management Los Angeles</p>	<p>270 S. Hanford St, Ste 100 Seattle, WA 98134</p>	<p>Henry Liebman</p>	
<p>Regional Center Properties, Southern California</p>	<p>Regional Center Properties 5160 Birch Street, Suite 200 New Port Beach, CA 92660</p>	<p>Mamey, Paparell & Yale-Loehr - Regional Center Properties 5160 Birch Street, Suite 200 New Port Beach, CA 92660</p>	
<p>South Dakota International Business Institute (SDIBI)</p>	<p>1200 South Jay Street, Aberdeen South Dakota 57401-7198</p>	<p>Joop Boolen / Director - 1200 South Jay Street Aberdeen, South Dakota 57401-7198</p>	<p>www.SD-Exports.org</p>

**South East Los Angeles RC
(SELARC)**

**SELARC Development, LLC
2440 Hacienda Blvd. # 223
Hacienda HTS, CA 91745**

**David B. Brearly / Manager -
SELARC Development, LLC 2440
Hacienda Blvd., # 223 Hacienda
HTS, CA 91745**

Dbrearly@SELARC.com

**South West Bio-Fuel RC, LLC
(SWBRC)**

**915 Wilshire Blvd. Suite 2050
Los Angeles, CA 90017**

**Justin Lee / President - 915 Wilshire
Blvd. Suite 2050 Los Angeles, CA
90017**

**Vermont Agency of
Community Development EB-5
RC**

**National Life Building, drawer
20 Montpeiler VT 05620-0501**

**Kevin L. Dorn / Secretary - National
Life Building, Drawer 20 Montpeiler,
VT 05620-0501**

Whatcom Opportunities RC

**1305 11th Street Suite 304
Bellingham, WA 98225**

**K. David Anderson / President -
130511th Street Suite 304
Bellingham, WA 98225**

Info@Worc.biz