

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Administrative Appeals Office (AAO)
20 Massachusetts Ave., N.W., MS 2090
Washington, DC 20529-2090



U.S. Citizenship
and Immigration
Services

AMERICAN LIFE ENTERPRISES, LLC
ATTN: HENRY LIEBMAN
270 SOUTH HANFORD ST., SUITE 100
SEATTLE, WA 98134

DATE: **MAY 02 2011** Office: CALIFORNIA SERVICE CENTER FILE: RCW1031910008
W09001570

IN RE: Applicant: AMERICAN LIFE ENTERPRISES, LLC

PETITION: Proposal for Designation as a Regional Center Pursuant to Section 610(c) of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993, Pub. L. No. 103-121, 106 Stat. 1874 (1992).

ON BEHALF OF PETITIONER:

LINCOLN STONE
STONE & GRZEGOREK LLP
800 WILSHIRE BLVD., SUITE 900
LOS ANGELES, CA 90017

INSTRUCTIONS:

Enclosed please find the decision of the Administrative Appeals Office in your case. All of the documents related to this matter have been returned to the office that originally decided your case. Please be advised that any further inquiry that you might have concerning your case must be made to that office.

If you believe the law was inappropriately applied by us in reaching our decision, or you have additional information that you wish to have considered, you may file a motion to reconsider or a motion to reopen. The specific requirements for filing such a request can be found at 8 C.F.R. § 103.5. All motions must be submitted to the office that originally decided your case by filing a Form I-290B, Notice of Appeal or Motion, with a fee of \$630. Please be aware that 8 C.F.R. § 103.5(a)(1)(i) requires that any motion must be filed within 30 days of the decision that the motion seeks to reconsider or reopen.

Thank you,

A handwritten signature in black ink, appearing to read "Perry Rhew".

SR Perry Rhew
Chief, Administrative Appeals Office

DISCUSSION: The Director, California Service Center, denied the proposal for designation as a regional center. The matter is now before the Administrative Appeals Office (AAO) on appeal. The appeal will be dismissed.

The applicant seeks designation as a regional center pursuant to section 610(c) of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993, Pub. L. No. 102-395, 106 Stat. 1874 (1992), as amended by section 116 of Pub. L. No. 105-119, 111 Stat. 2440 (1997); section 402 of Pub. L. No. 106-396, 114 Stat. 1637 (2000) and section 11037 of Pub. L. No. 107-273, 116 Stat. 1758 (2002). (b) (4)

(b) (4)

I. Relevant Statute and Regulations

Section 203(b)(5) of the Immigration and Nationality Act (the Act), 8 U.S.C. § 1153(b)(5), as amended by Pub. L. No. 107-273, 116 Stat. 1758 (2002), provides classification to qualified immigrants seeking to enter the United States for the purpose of engaging in a new commercial enterprise:

- (i) in which such alien has invested (after the date of the enactment of the Immigration Act of 1990) or, is actively in the process of investing, capital in an amount not less than the amount specified in subparagraph (C), and
- (ii) which will benefit the United States economy and create full-time employment for not fewer than 10 United States citizens or aliens lawfully admitted for permanent residence or other immigrants lawfully authorized to be employed in the United States (other than the immigrant and the immigrant's spouse, sons, or daughters).

Section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993, as amended, provides:

(a) Of the visas otherwise available under section 203(b)(5) of the Immigration and Nationality Act (8 U.S.C. 1153(b)(5)), the Secretary of State, together with the Attorney General, shall set aside visas for a pilot program to implement the provisions of such section. Such pilot program shall involve a regional center in the United States, designated by the Attorney General on the basis of a general proposal, for the promotion of economic growth, including increased export sales, improved regional productivity, job creation, or increased domestic capital investment. A regional center shall have jurisdiction over a limited geographic area, which shall be described in the proposal and consistent with the purpose of concentrating pooled investment in defined economic zones. The establishment of a regional center may be based on general predictions, contained in the proposal, concerning the kinds of commercial enterprises that will receive capital from aliens, the jobs that will be created directly or indirectly as a result of such capital investments, and the other positive economic effects such capital investments will have.

* * *

(c) In determining compliance with section 203(b)(5)(A)(iii) of the Immigration and Nationality Act, and notwithstanding the requirements of 8 CFR 204.6, the Attorney General shall permit aliens admitted under the pilot program described in this section to establish reasonable methodologies for determining the number of jobs created by the pilot program, including such jobs which are estimated to have been created indirectly through revenues generated from increased exports, improved regional productivity, job creation, or increased domestic capital investment resulting from the pilot program.

The regulation at 8 C.F.R. § 204.6(m) provides, in pertinent part:

(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 C.F.R. § 204.6(m)(3) provides:

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.

The regulation at 8 C.F.R. § 204.6(m)(3)(ii) requires the applicant to provide “verifiable” detail as to how the jobs will be created.

II. Analysis

USCIS is under pressure to accept any projections previously submitted at the regional center stage when adjudicating the Form I-526 petitions filed by individual alien investors provided that there has been no material change and absent fraud.¹ USCIS will not abdicate its authority to verify that the regional center proposals are reasonable.

(b) (4)



¹ See the March 28, 2009 Employment Creation Immigrant Visa (EB-5) Program Recommendations prepared by the USCIS Office of the Ombudsman, incorporated into the record of proceeding.

A. Types of Projects

The initial submission indicated that the regional center proposed to invest in the following types of projects:

1. Commercial/industrial developments, including but not limited to hospitality, retail, industrial, flex, office, and transportation facilities;
2. Public/private arrangements with governmental agencies, non-profits, or other entities to develop civic/public facilities and infrastructure;
3. Renovation of functionally obsolete buildings preserving historical features where appropriate, within a modern facility;
4. Mixed use or residential developments with or without ground floor retail, including apartments and condominiums;
5. The provision of capital, loans, or investment in businesses wishing to locate in the regional center area;
6. Establish or invest in lending institutions such as community banks; and
7. Establish or invest in agricultural or agricultural-related endeavors, including, but not limited to vineyards and wineries.

Dr. Sommers then analyzes five scenarios:

1. Renovation and conversion of an abandoned warehouse to space for architecture/engineering firms, restaurants, or those requiring warehouse or light manufacturing space;
2. Renovation and conversion of an abandoned office building to a hotel;
3. Construction of a four-story mixed use building with a bank, two small retail shops and 20 apartment units;
4. Direct investment in a company developing online computer games; and
5. Investment in a 65 acre farm for development of a vineyard and winery.

(b) (4)



(b) (4)



(b) (4)



C. Targeted Employment Areas

The regulation at 8 C.F.R. § 204.6(e) states, in pertinent part, that:

Rural area means any area not within either a metropolitan statistical area (as designated by the Office of Management and Budget) or the outer boundary of any city or town having a population of 20,000 or more.

Targeted employment area means an area which, at the time of investment, is a rural area or an area which has experienced unemployment of at least 150 percent of the national average rate.

The regulation at 8 C.F.R. § 204.6(j)(6) states that:

If applicable, to show that the new commercial enterprise has created or will create employment in a targeted employment area, the petition must be accompanied by:

- (i) In the case of a rural area, evidence that the new commercial enterprise is principally doing business within a civil jurisdiction not located within any standard metropolitan statistical area as designated by the Office of Management and Budget, or within any city or town having a population of 20,000 or more as based on the most recent decennial census of the United States; or

(ii) In the case of a high unemployment area:

(A) Evidence that the metropolitan statistical area, the specific county within a metropolitan statistical area, or the county in which a city or town with a population of 20,000 or more is located, in which the new commercial enterprise is principally doing business has experienced an average unemployment rate of 150 percent of the national average rate; or

(B) A letter from an authorized body of the government of the state in which the new commercial enterprise is located which certifies that the geographic or political subdivision of the metropolitan statistical area or of the city or town with a population of 20,000 or more in which the enterprise is principally doing business has been designated a high unemployment area. The letter must meet the requirements of 8 C.F.R. § 204.6(i).

Initially, the applicant asserted that “certain census tracts within the regional center territory will qualify as targeted employment areas.” The applicant indicated that immigrant investors would invest \$500,000 in TEAs and \$1,000,000 in non-TEAs. The remaining examples in the applicant’s statement, however, all involve an investment of \$500,000, suggesting that the proposal contemplates investments in TEAs.

(b) (4)



² See <http://www.whitehouse.gov/sites/default/files/omb/assets/bulletins/b10-02.pdf>.

(b) (4)



For the above stated reasons, considered both in sum and as separate grounds for denial, the proposal may not be approved.

ORDER: The appeal is dismissed.

*COEXM:LBRUUN:llb:3/31/2011
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**Homeland
Security**

EMPLOYMENT CREATION IMMIGRANT VISA (EB-5) PROGRAM RECOMMENDATIONS

March 18, 2009

The Citizenship and Immigration Services Ombudsman, established by the Homeland Security Act of 2002, provides independent analysis of problems encountered by individuals and employers interacting with U.S. Citizenship and Immigration Services, and proposes changes to mitigate those problems.

I. EXECUTIVE SUMMARY

The Citizenship and Immigration Services Ombudsman (Ombudsman) has reviewed the United States Citizenship and Immigration Services (USCIS) policies and processes concerning the Employment Creation EB-5 immigrant visa,¹ and formed several recommendations that USCIS should implement to stabilize and energize the program.

In passing employment creation legislation, Congress sought to attract entrepreneurial immigrants to the United States who would invest capital to create jobs for U.S. workers, and thereby stimulate the economy.²

Congress allocates approximately 10,000 immigrant visas per year to the EB-5 category (including derivative visas for the spouses and minor children of investors), although less than 1,000 visas are used annually.³ This underutilization is caused by a confluence of factors, including program instability, the changing economic environment, and more inviting immigrant investor programs offered by other countries.

In recognition of the present turmoil in the U.S. economy, it is incumbent upon USCIS to take all necessary and appropriate steps to facilitate a healthy, vigorous, and smooth-running employment creation immigrant visa program.

¹ Immigration and Nationality Act (INA) § 203(b)(5); 8 U.S.C. § 1153(b)(5).

² Immigration Act of 1990, Pub. L. No. 101-649 (Nov. 29, 1990).

³ Between 1992 and 2004, 6,024 EB-5s were issued, which averaged approximately 500 per year. Government Accountability Office, *Immigrant Investors: Small Number of Participants Attributed to Pending Regulations and Other Factors*, p. 2 (Apr. 2005) (GAO-05-256). "The bill's supporters predicted that about 4,000 millionaire investors, along with family members, would sign up, bringing in \$4 billion in new investments and creating 40,000 jobs [annually]." See Al Kamen, "An Investment in American Citizenship; Immigration Program Invites Millionaires to Buy Their Way In," *Washington Post*, (Sept. 29, 1991).

Recommendation from the CIS Ombudsman to the Director, USCIS

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The Ombudsman met with EB-5 product line managers and adjudicators at the TSC and CSC in August 2008 regarding the scheduled consolidation of EB-5 adjudications at the CSC. At that time, there were two EB-5 adjudicators at the TSC, each with over ten years of experience. The Ombudsman learned that neither of these seasoned TSC EB-5 adjudicators would relocate to the CSC to continue work on EB-5 filings. However, these seasoned adjudicators trained ten CSC adjudicators who now supplement the EB-5 unit.

The CSC advised the Ombudsman that it expects the new complement of CSC EB-5 adjudicators to reduce processing times. Final transition of all EB-5 related adjudications and oversight to the CSC, including IRCU functions, occurred in January 2009.

Recent EB-5 Stakeholder Meetings and Feedback

Stakeholders advised the Ombudsman that they are concerned about delays in EB-5 processing times and the impact on existing investors. Specifically, some expressed concern³⁸ that adjudicators who are new to the complex EB-5 product line may seek to review previously settled guidance, or request new types of evidence from investors.³⁹

USCIS met with an EB-5 regional center trade association group in Washington on September 22, 2008. There were four themes highlighted by EB-5 stakeholders at this meeting: program institutionalization, program enforcement, minimization of program risk, and a need to increase program predictability.

Stakeholders believe that USCIS should not re-adjudicate the indirect job creation methodology when reviewing individual Form I-526 and I-829 petitions. Since that meeting, USCIS advised the Ombudsman in December 2008 that the agency is continuing to review I-829s to determine if the originally presented methodology is valid and appropriate, and whether the projected jobs were created or will be created within two years.⁴⁰

³⁸ These concerns were raised by individual stakeholders with the Ombudsman in informal discussions in the fall of 2008, and in an Ombudsman-hosted a public teleconference on September 26, 2008, "EB-5 Investor Visas: Opportunities and Challenges."

³⁹ In the past, the AAO has endorsed a "hypertechnical" review of certain issues, including source and path of funds. See Matter of [Redacted], EAC 98 229 50661, Vermont Service Center (AAO Jan. 18, 2005) ("hypertechnical" requirements for establishing the lawful source of an investor's funds serve a valid government interest...") citing a Ninth Circuit decision, Spencer Enterprises, Inc., v. United States, 229 F. Supp. 2d 1025, 1040 (E.D. Cal. 2001), *aff'd* 345 F. 3d 683 (9th Cir. 2003).

⁴⁰ USCIS has sent mixed messages on the question of whether and when an EB-5 investor must prove that the qualifying Regional Center investment satisfied the law's job creation requirement. In an October 22, 2008, letter to Senator Patrick J. Leahy (D-VT), Chairman of the Senate Committee on the Judiciary, USCIS stated that a business plan that relies on an indirect job creation methodology, but does not forecast the generation of the jobs within the two-year period that an investor is afforded conditional LPR status, is insufficient. Yet the same letter, citing 8 C.F.R. § 216.6(a)(4)(iv) (2008), states that the regulations do allow some flexibility for USCIS to remove the conditions on an investor's LPR status based upon a showing that the forecasted "jobs will be created within a reasonable time." Note that the cited regulation concerns the adjudication of Form I-829 and in fact does not

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III. ANALYSIS

Based upon the foregoing discussion, EB-5 program administration has historically lacked continuity. For the EB-5 program to realize its full potential, it is essential that USCIS establish a regulatory and administrative environment to promote investor confidence that the program can be relied upon.

Accordingly, the Ombudsman makes the following recommendations to USCIS:

1. Quickly Finalize the Special Legislation Regulations.

USCIS drafted proposed regulations to implement the EB-5 special legislation in 2002,⁴¹ but these proposed rules remain in internal rulemaking review processes with the USCIS Office of Chief Counsel.⁴² Adjudicators in the field indicate that they are ready to address these long-pending I-829 petitions to remove condition cases, but need final action on the regulations to move forward. Continued delay negatively impacts adjudicators and USCIS as a whole, as hours of customer service time are spent addressing congressional and direct customer inquiries on these cases. Finalization of these proposed regulations is overdue.

For these reasons, the Ombudsman recommends that USCIS finalize regulations to implement the special 2002 EB-5 legislation which offers a certain subgroup⁴³ of EB-5 investors a pathway to cure deficiencies in their previously submitted petitions.

2. Do Not Re-adjudicate the Job Creation Methodology Question.

USCIS should issue Standard Operating Procedures (SOPs) for Form I-526 and Form I-829 adjudications that specifically instruct adjudicators that they are not to reexamine the job methodology issue. Repeat questioning, debate, and re-adjudication of complex economic models and analyses used to prove the ten full-time job creation requirement unnecessarily uses USCIS resources and results in adjudication delays. Eliminating this re-examination may result in increased speed and predictability in adjudications, and allow adjudicators more time to focus on other factual matters. The adoption of SOPs should yield greater regularity in process, and consequently, build confidence in EB-5 project developers and attract potential foreign national entrepreneurs.

specifically state that the investor must prove that the required jobs be created and filled within the two-year conditional LPR period initially granted to the EB-5 investor.

⁴¹ *Supra* note 27.

⁴² Information provided by USCIS to the Ombudsman (Jan. 30, 2008).

⁴³ This subgroup includes only those EB-5 investors whose Form I-526 petition was filed and/or approved between January 1, 1995 and August 31, 1998.

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Developers and investors should be able to rely on the rules applicable at the time they make their investments and expect the government not to revisit those rules when it adjudicates their cases. Accordingly, once the agency reviews the indirect job methodology presented by a developer in its submission seeking USCIS designation as an approved Regional Center, the issue should be considered conclusively established, absent clear error or fraud.

For these reasons, the Ombudsman recommends that USCIS issue Standard Operating Procedures (SOPs) for Form I-526 and Form I-829 that specifically direct EB-5 adjudicators to not reconsider or re-adjudicate the indirect job creation methodology in Regional Center cases, absent clear error or evidence of fraud.

3. Issue More EB-5 Precedent/Adopted⁴⁴ Decisions.

Although the EB-5 visa category and the Regional Center pilot program have been in existence for over 15 years, many key terms have not been clearly defined by USCIS. Such ambiguity contributes to entrepreneur anxiety and uncertainty about the program, and ultimately to underutilization of this visa category. AAO issuance of additional precedent/adopted decisions would clarify USCIS' interpretation of key EB-5 terms and policies within specific fact patterns, and assist the business community, investors, and EB-5 adjudicators. For example:

- **Definition of Restructuring.** Current regulations do not define what level of restructuring or reorganization is required to render the purchase of an existing business a "new enterprise" under the EB-5 provisions. The AAO has held that simply buying and changing the legal name and/or the legal form of the business entity alone is insufficient to qualify the business as a "new enterprise."
- **Designation of High Unemployment Area and Effect of Later Changes in Unemployment Rate.** Clarification is needed on which government office(s) is/are appropriate to designate an area as a qualified "high unemployment area." The EB-5 legislation permits a lower (\$500,000) threshold investment in areas so defined. In addition, clarification is needed on what impact an improvement in the unemployment rate would subsequently have on an investor who invested in a formerly designated "high unemployment area." The lack of clarity in these matters might cause investors to avoid investing in areas which could otherwise benefit from an infusion of foreign capital and related job creation.

For these reasons, the Ombudsman recommends that USCIS designate more EB-5 Administrative Appeals Office (AAO) decisions as precedent/adopted decisions to provide

⁴⁴ USCIS adopted decisions are AAO decisions that the USCIS Director proactively identifies and considers binding policy guidance on USCIS personnel, and must be followed in all cases involving similar issues. See generally Ombudsman Recommendation #20 (FR2005-20).



THE DIRECTOR

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

December 1, 2009

OMB BULLETIN NO. 10-02

TO THE HEADS OF EXECUTIVE DEPARTMENTS AND ESTABLISHMENTS

SUBJECT: Update of Statistical Area Definitions and Guidance on Their Uses

- 1. Purpose:** This bulletin, which includes an attachment and an appendix, updates and supersedes OMB Bulletin No. 09-01, issued on November 20, 2008. The attachment to the bulletin provides detailed information on the update of statistical areas since that time. The bulletin also provides guidance to Federal agencies that use the definitions of these statistical areas for program administrative and fund allocation purposes.
- 2. Background:** Pursuant to 44 U.S.C. 3504(e)(3) and 31 U.S.C. 1104(d) and Executive Order No. 10253 (June 11, 1951), the Office of Management and Budget (OMB) defines Metropolitan Statistical Areas, Micropolitan Statistical Areas, Combined Statistical Areas, and New England City and Town Areas for use in Federal statistical activities.
- 3. Update of Statistical Areas:** This bulletin provides the definitions of all Metropolitan Statistical Areas, Metropolitan Divisions, Micropolitan Statistical Areas, Combined Statistical Areas, and New England City and Town Areas in the United States and Puerto Rico based on the standards published on December 27, 2000, in the *Federal Register* (65 FR 82228 - 82238) and Census 2000 data as well as Census Bureau population estimates for 2007 and 2008. The attachment provides details on the updates to the statistical areas, principal cities, and area titles to reflect changes in population estimates. The appendix to this bulletin provides complete lists of all statistical areas that are recognized under the standards. This will be the final update of the statistical areas prior to the 2010 Census of Population and Housing.
- 4. Effective Date:** The changes to the statistical areas contained in the attachment take effect immediately.
- 5. Guidance on Uses of Statistical Area Definitions:** All agencies that conduct statistical activities to collect and publish data for Metropolitan, Micropolitan, and Combined Statistical Areas, and New England City and Town Areas should use the most recent definitions of these areas established by OMB.

OMB establishes and maintains the definitions of Metropolitan and Micropolitan Statistical Areas, Combined Statistical Areas, and New England City and Town Areas solely for statistical purposes. This classification is intended to provide nationally consistent definitions for collecting, tabulating, and publishing Federal statistics for a set of geographic areas. The Metropolitan and Micropolitan Statistical Area Standards do not equate to an urban-rural classification; many counties included in Metropolitan and Micropolitan

- 29420 Lake Havasu City-Kingman, AZ Metropolitan Statistical Area
Principal Cities: Lake Havasu City, Kingman
Mohave County
- 29460 Lakeland-Winter Haven, FL Metropolitan Statistical Area
Principal Cities: Lakeland, Winter Haven
Polk County
- 29540 Lancaster, PA Metropolitan Statistical Area
Principal City: Lancaster
Lancaster County
- 29620 Lansing-East Lansing, MI Metropolitan Statistical Area
Principal Cities: Lansing, East Lansing
Clinton County, Eaton County, Ingham County
- 29700 Laredo, TX Metropolitan Statistical Area
Principal City: Laredo
Webb County
- 29740 Las Cruces, NM Metropolitan Statistical Area
Principal City: Las Cruces
Dona Ana County
- 29820 Las Vegas-Paradise, NV Metropolitan Statistical Area
Principal Cities: Las Vegas, Paradise
Clark County
- 29940 Lawrence, KS Metropolitan Statistical Area
Principal City: Lawrence
Douglas County
- 30020 Lawton, OK Metropolitan Statistical Area
Principal City: Lawton
Comanche County
- 30140 Lebanon, PA Metropolitan Statistical Area
Principal City: Lebanon
Lebanon County
- 30300 Lewiston, ID-WA Metropolitan Statistical Area
Principal City: Lewiston, ID
Nez Perce County, ID; Asotin County, WA
- 30340 Lewiston-Auburn, ME Metropolitan Statistical Area
Principal Cities: Lewiston, Auburn
Androscoggin County
- 30460 Lexington-Fayette, KY Metropolitan Statistical Area
Principal City: Lexington-Fayette
Bourbon County, Clark County, Fayette County, Jessamine County, Scott County, Woodford County
- 30620 Lima, OH Metropolitan Statistical Area
Principal City: Lima
Allen County

- 30700 Lincoln, NE Metropolitan Statistical Area
Principal City: Lincoln
Lancaster County, Seward County
- 30780 Little Rock-North Little Rock-Conway, AR Metropolitan Statistical Area
Principal Cities: Little Rock, North Little Rock, Conway
Faulkner County, Grant County, Lonoke County, Perry County, Pulaski County, Saline County
- 30860 Logan, UT-ID Metropolitan Statistical Area
Principal City: Logan, UT
Franklin County, ID; Cache County, UT
- 30980 Longview, TX Metropolitan Statistical Area
Principal City: Longview
Gregg County, Rusk County, Upshur County
- 31020 Longview, WA Metropolitan Statistical Area
Principal City: Longview
Cowlitz County
- 31100 Los Angeles-Long Beach-Santa Ana, CA Metropolitan Statistical Area
Principal Cities: Los Angeles, Long Beach, Santa Ana, Anaheim, Irvine, Glendale, Pomona, Pasadena, Torrance, Orange, Fullerton, Costa Mesa, Burbank, Compton, Carson, Santa Monica, Newport Beach, Tustin, Montebello, Monterey Park, Gardena, Arcadia, Paramount, Fountain Valley, Cerritos
- 31084 Los Angeles-Long Beach-Glendale, CA Metropolitan Division
Los Angeles County
- 42044 Santa Ana-Anaheim-Irvine, CA Metropolitan Division
Orange County
- 31140 Louisville/Jefferson County, KY-IN Metropolitan Statistical Area
Principal City: Louisville/Jefferson County (balance), KY*
Clark County, IN; Floyd County, IN; Harrison County, IN; Washington County, IN; Bullitt County, KY; Henry County, KY; Jefferson County, KY; Meade County, KY; Nelson County, KY; Oldham County, KY; Shelby County, KY; Spencer County, KY; Trimble County, KY
- 31180 Lubbock, TX Metropolitan Statistical Area
Principal City: Lubbock
Crosby County, Lubbock County

* Louisville/Jefferson County (balance) refers to the portion of the consolidated government of Louisville city and Jefferson County minus the separately incorporated places of Anchorage, Audubon Park, Bancroft, Barbourmeade, Beechwood Village, Bellemeade, Bellewood, Blue Ridge Manor, Briarwood, Broeck Pointe, Brownsboro Farm, Brownsboro Village, Cambridge, Coldstream, Creekside, Crossgate, Douglas Hills, Druid Hills, Fincastle, Forest Hills, Glenview, Glenview Hills, Glenview Manor, Goose Creek, Graymoor-Devondale, Green Spring, Heritage Creek, Hickory Hill, Hills and Dales, Hollow Creek, Hollyvilla, Houston Acres, Hurstbourne, Hurstbourne Acres, Indian Hills, Jeffersontown, Kingsley, Langdon Place, Lincolnshire, Lyndon, Lynnview, Manor Creek, Maryhill Estates, Meadowbrook Farm, Meadow Vale, Meadowview Estates, Middletown, Mockingbird Valley, Moorland city, Murray Hill, Norbourne Estates, Northfield, Norwood, Old Brownsboro Place, Parkway Village, Plantation, Poplar Hills, Prospect, Richlawn, Riverwood, Rolling Fields, Rolling Hills, Seneca Gardens, Shively, South Park View, Spring Mill, Spring Valley, St. Matthews, St. Regis Park, Strathmoor Manor, Strathmoor Village, Sycamore, Ten Broeck, Thornhill, Watterson Park, Wellington, West Buechel, Westwood, Wildwood, Windy Hills, Woodland Hills, Woodlawn Park, and Worthington Hills.

- 38060 Phoenix-Mesa-Glendale, AZ Metropolitan Statistical Area
Principal Cities: Phoenix, Mesa, Glendale, Scottsdale, Tempe
Maricopa County, Pinal County
- 38220 Pine Bluff, AR Metropolitan Statistical Area
Principal City: Pine Bluff
Cleveland County, Jefferson County, Lincoln County
- 38300 Pittsburgh, PA Metropolitan Statistical Area
Principal City: Pittsburgh
Allegheny County, Armstrong County, Beaver County, Butler County, Fayette County, Washington County, Westmoreland County
- 38340 Pittsfield, MA Metropolitan Statistical Area
Principal City: Pittsfield
Berkshire County
- 38540 Pocatello, ID Metropolitan Statistical Area
Principal City: Pocatello
Bannock County, Power County
- 38660 Ponce, PR Metropolitan Statistical Area
Principal City: Ponce
Juana Díaz Municipio, Ponce Municipio, Villalba Municipio
- 38860 Portland-South Portland-Biddeford, ME Metropolitan Statistical Area
Principal Cities: Portland, South Portland, Biddeford
Cumberland County, Sagadahoc County, York County
- 38900 Portland-Vancouver-Hillsboro, OR-WA Metropolitan Statistical Area
Principal Cities: Portland, OR; Vancouver, WA; Hillsboro, OR; Beaverton, OR
Clackamas County, OR; Columbia County, OR; Multnomah County, OR; Washington County, OR; Yamhill County, OR; Clark County, WA; Skamania County, WA
- 38940 Port St. Lucie, FL Metropolitan Statistical Area
Principal City: Port St. Lucie
Martin County, St. Lucie County
- 39100 Poughkeepsie-Newburgh-Middletown, NY Metropolitan Statistical Area
Principal Cities: Poughkeepsie, Newburgh, Middletown, Arlington
Dutchess County, Orange County
- 39140 Prescott, AZ Metropolitan Statistical Area
Principal City: Prescott
Yavapai County
- 39300 Providence-New Bedford-Fall River, RI-MA Metropolitan Statistical Area
Principal Cities: Providence, RI; New Bedford, MA; Fall River, MA; Warwick, RI; Cranston, RI
Bristol County, MA; Bristol County, RI; Kent County, RI; Newport County, RI; Providence County, RI; Washington County, RI
- 39340 Provo-Orem, UT Metropolitan Statistical Area
Principal Cities: Provo, Orem
Juab County, Utah County

- 43300 Sherman-Denison, TX Metropolitan Statistical Area
Principal Cities: Sherman, Denison
Grayson County
- 43340 Shreveport-Bossier City, LA Metropolitan Statistical Area
Principal Cities: Shreveport, Bossier City
Bossier Parish, Caddo Parish, De Soto Parish
- 43580 Sioux City, IA-NE-SD Metropolitan Statistical Area
Principal City: Sioux City, IA
Woodbury County, IA; Dakota County, NE; Dixon County, NE; Union County, SD
- 43620 Sioux Falls, SD Metropolitan Statistical Area
Principal City: Sioux Falls
Lincoln County, McCook County, Minnehaha County, Turner County
- 43780 South Bend-Mishawaka, IN-MI Metropolitan Statistical Area
Principal Cities: South Bend, IN; Mishawaka, IN
St. Joseph County, IN; Cass County, MI
- 43900 Spartanburg, SC Metropolitan Statistical Area
Principal City: Spartanburg
Spartanburg County
- 44060 Spokane, WA Metropolitan Statistical Area
Principal City: Spokane
Spokane County
- 44100 Springfield, IL Metropolitan Statistical Area
Principal City: Springfield
Menard County, Sangamon County
- 44140 Springfield, MA Metropolitan Statistical Area
Principal City: Springfield
Franklin County, Hampden County, Hampshire County
- 44180 Springfield, MO Metropolitan Statistical Area
Principal City: Springfield
Christian County, Dallas County, Greene County, Polk County, Webster County
- 44220 Springfield, OH Metropolitan Statistical Area
Principal City: Springfield
Clark County
- 44300 State College, PA Metropolitan Statistical Area
Principal City: State College
Centre County
- 44600 Steubenville-Weirton, OH-WV Metropolitan Statistical Area
Principal Cities: Steubenville, OH; Weirton, WV
Jefferson County, OH; Brooke County, WV; Hancock County, WV
- 44700 Stockton, CA Metropolitan Statistical Area
Principal City: Stockton
San Joaquin County

- 48300 Wenatchee-East Wenatchee, WA Metropolitan Statistical Area
Principal Cities: Wenatchee, East Wenatchee
Chelan County, Douglas County
- 48540 Wheeling, WV-OH Metropolitan Statistical Area
Principal City: Wheeling, WV
Belmont County, OH; Marshall County, WV; Ohio County, WV
- 48620 Wichita, KS Metropolitan Statistical Area*
Principal City: Wichita
Butler County, Harvey County, *Sedgwick County, Sumner County*
- 48660 Wichita Falls, TX Metropolitan Statistical Area
Principal City: Wichita Falls
Archer County, Clay County, Wichita County
- 48700 Williamsport, PA Metropolitan Statistical Area
Principal City: Williamsport
Lycoming County
- 48900 Wilmington, NC Metropolitan Statistical Area
Principal City: Wilmington
Brunswick County, New Hanover County, Pender County
- 49020 Winchester, VA-WV Metropolitan Statistical Area
Principal City: Winchester, VA
Frederick County, VA; Winchester city, VA; Hampshire County, WV
- 49180 Winston-Salem, NC Metropolitan Statistical Area
Principal City: Winston-Salem
Davie County, Forsyth County, Stokes County, Yadkin County
- 49340 Worcester, MA Metropolitan Statistical Area
Principal City: Worcester
Worcester County
- 49420 Yakima, WA Metropolitan Statistical Area
Principal City: Yakima
Yakima County
- 49500 Yauco, PR Metropolitan Statistical Area
Principal City: Yauco
Guánica Municipio, Guayanilla Municipio, Peñuelas Municipio, Yauco Municipio
- 49620 York-Hanover, PA Metropolitan Statistical Area
Principal Cities: York, Hanover
York County
- 49660 Youngstown-Warren-Boardman, OH-PA Metropolitan Statistical Area
Principal Cities: Youngstown, OH; Warren, OH; Boardman, OH
Mahoning County, OH; Trumbull County, OH; Mercer County, PA

* Pursuant to Section 526 of P.L. 99-500, Harvey County, KS was added to the Wichita, KS Metropolitan Statistical Area effective October 18, 1986.

Form I-290B, Notice of Appeal or Motion

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

In the Matter of: Eastern Washington Reg. Ctr.

File Number: A - RCW1031910008/W09001570

START HERE - Please Type or Print (Use black ink)

For USCIS Use Only

Part 1. Information About Petitioner/Applicant (Individual/Business/Organization/Attorney/Representative filing appeal or motion)

Family Name Given Name Middle Name
AMERICAN LIFE ENTERPRISES LLC

Name of Business/Organization (if applicable)

AMERICAN LIFE ENTERPRISES LLC

Mailing Address - Street Number and Name Apt. #

STONE & GRZEGOREK LLP, 800 Wilshire Blvd. 900

C/O (in care of):

Lincoln Stone, Esq.

City State or Province Zip/Postal Code

Los Angeles CA 90017

Country Daytime Phone # (Area/Country Code)

USA (213) 627-8997

Fax # (Area/Country Code) E-Mail Address (if any)

(213) 627-8998 LINCOLN@LSKGLAW.COM

I am an attorney or representative. If you check this box, you must provide the following information about the person or organization for whom you are appearing. (NOTE: You must attach a Form G-28, Notice of Entry of Appearance as Attorney or Representative.)

Family Name Given Name Middle Name

Complete Name of Business/Organization/School (if applicable)

AMERICAN LIFE ENTERPRISES LLC

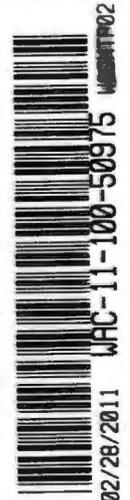
A # (if any) Daytime Phone # (Area/Country Code)

None (213) 627-8997

Fax # (Area/Country Code) E-mail Address (if any)

(213) 627-8998 LINCOLN@LSKGLAW.COM

Table with columns: Returned, Receipt. Rows: Date, Date, Resubmitted, Date, Date, Reloc Sent, Date, Date, Reloc Rec'd, Date, Date.



Remarks
AAD DISMISSAL
5-2-2011
(DENIAL)

Part 2. Information About the Appeal or Motion (Check one box below that best describes your request)

NOTE: If you indicate that you are filing an appeal, it may be considered by USCIS as a motion before it is forwarded to the AAO.

- A. [X] I am filing an appeal. My brief and/or additional evidence is attached.
B. [] I am filing an appeal. My brief and/or additional evidence will be submitted to the AAO within 30 days.
C. [] I am filing an appeal. No supplemental brief and/or additional evidence will be submitted.
D. [] I am filing a motion to reopen a decision. My brief and/or additional evidence is attached.
E. [] I am filing a motion to reconsider a decision. My brief is attached.
F. [] I am filing a motion to reopen and a motion to reconsider a decision. My brief and/or additional evidence is attached.



REC'D USCIS FEB 22 1 33
SP000389

In the Matter of: **Eastern Washington Reg. Ctr.**

File Number: **A -**

Part 2. Information About the Appeal or Motion (Continued)

Information on the relating application/petition.

Application/Petition Form #	Receipt #	Date of Denial (mm/dd/yyyy)	USCIS Office Where Decision Issued
RC Proposal	W09001570	01/19/2011	CA Service Center

Part 3. Basis for the Appeal or Motion

Motion to Reopen: The motion must state new facts and must be supported by affidavits and/or documentary evidence.

Motion to Reconsider: The motion must be supported by citations to appropriate statutes, regulations, or precedent decisions.

Appeal: Provide a statement explaining any erroneous conclusion of law or fact in the decision being appealed.

Applicant American Life Enterprises LLC submits an appeal for the following reasons:

(b) (4)

These contentions and additional evidence in support of this appeal are more fully discussed in the accompanying documents submitted herewith.

Part 4. Signature of Person Filing the Appeal/Motion or His or Her Authorized Representative

Signature	Printed Name	Date (mm/dd/yyyy)
<i>Lincoln Stone</i>	Lincoln Stone	02/22/2011

Make sure your appeal or motion is complete before filing.





STONE & GRZEGOREK LLP

800 Wilshire Boulevard, Suite 900
Los Angeles CA 90017
tel 213 627 8997 | fax 213 627 8998
www.lskglaw.com

Our File: 3958.01

February 22, 2011

Delivered via Courier

U.S. Citizenship and Immigration Services
California Service Center
24000 Avila Road, Second Floor
Laguna Niguel, CA 92677

Re: **Proposal For Regional Center**
Applicant: American Life Enterprises LLC - (RCW1031910008/W09001570)
Territory: Eastern Washington
Form I-290B – Notice of Appeal or Motion

Dear Examiner:

Please find enclosed our filing fee check of \$630 and our Appeal from your Notice of Decision dated January 19, 2011:

- Notice of Decision
- Notice of Entry of Appearance as Attorney or Representative, Form G-28
- Notice of Appeal or Motion, Form I-290B
- Memorandum in Support of Appeal
- Review of USCIS Decision of January 19, 2011: Eastern Washington Regional Center Application, dated February 17, 2011, by Dr. Paul Sommers, Regional Economist
- Supplementary Report of Eastern Washington Regional Center, December 2010 (Corrected February 2011)

We respectfully submit that based upon the additional evidence submitted herewith, and for the reasons discussed in the accompanying documents, the Proposal for Regional Center of American Life Enterprises LLC for the Eastern Washington Regional Center should be approved.

Please note the timely filing of this Form I-290B, as the 33rd day is a holiday and the filing is due thereafter on the first available business day which is Tuesday, February 22, 2011. Thank you for your prompt consideration of the enclosed.

Sincerely,

STONE & GRZEGOREK LLP

LINCOLN STONE
LS/AP:cdr
Enclosures



U.S. Citizenship
and Immigration
Services

JAN 19 2011

TO:

American Life Enterprises, LLC
C/O Henry Liebman, President
270 South Hanford Street, Suite 100
Seattle, Washington 98134

DATE:

Petition: Regional Center Proposal

File: RCW1031910008/W09001570

DECISION

Your Regional Center Proposal, filed in behalf of Eastern Washington Regional Center has been denied for the following reason(s):

See Attachment

If you desire to appeal this decision, you may do so. Your notice of appeal must be filed with this office at the address at the top of this page within 30 days of the date of this notice. Your appeal must be filed on Form I-290B. A fee of \$630.00 is required, payable to U. S. Citizenship and Immigration Services with a check or money order from a bank or other institution located in the United States. If no appeal is filed within the time allowed, this decision will be the final decision in this matter.

In support of your appeal, you may submit a brief or other written statement for consideration by the reviewing authority. You may, if necessary, request additional time to submit a brief. Any brief, written statement, or other evidence not filed with Form I-290B, or any request for additional time for the submission of a brief or other material must be sent directly to:

U. S. Citizenship and Immigration Services
Administrative Appeals Office MS 2090
Washington, D.C. 20529-2090.

Any request for additional time for the submission of a brief or other statement must be made directly to the Administrative Appeals Office (AAO), and must be accompanied by a written explanation for the need for additional time. An extension of time to file the appeal may not be granted. **The appeal may not be filed directly with the AAO. The appeal must be filed at the address at the top of this page.**

Sincerely,

Rosemary Langley Melville
Director, California Service Center

cc: Lincoln Stone, Esq.

Enclosure: Form I-290B

This Notice is in reference to the Regional Center Proposal that was filed with the Director, California Service Center, on March 12, 2010, seeking designation as a Regional Center pursuant to Pilot Immigration Program under Section 610 of P.L. 102-395 and as amended by P.L. 107-273.

On October 12, 2010, 2010 the USCIS issued Form I-797 Notice of Action requesting evidence in support of the Regional Center Proposal filed on March 12, 2010. The USCIS noted the request did not contain sufficient evidence showing that the proposed regional center would meet the regulatory requirements as a Regional Center. Multiple issues were addressed in the request for evidence and the evidentiary requirements for each of these issues were explained in detail. However, the evidence provided in response to the USCIS request did not establish eligibility under the Pilot Immigrant Investor Program.

The Eastern Washington Regional Center has requested designation as a Regional Center to be located within twenty-six (26) counties in Eastern and Southwestern Washington. Capital investment will be used to invest in real estate development or construction of mixed-use opportunities. The specific job industries identified in the business proposal are: architecture/engineering, restaurant, warehousing, light industrial manufacturing, arts, recreation and accommodation, apartments, bank, retail shops, software publishing, vineyard and winery.

Promotion of Economic Growth within the selected Geographic Area

8 CFR 204.6(m)(3) states, 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; (emphasis added).

* * *

(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. (emphasis added).

(b) (4)



(b) (4)



The Regional or National Impact of the Regional Center

Under 8 CFR § 204.6(m)(3)(iv), a regional center proposal must contain a 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 outside of the regional center. This requirement means that the proposal must analyze the impact of regional center activities.

(b) (4)



Therefore, the regional or national impact of the regional center has not been demonstrated.

(b) (4)



For these reasons, this Regional Center Proposal is denied.

MEMORANDUM IN SUPPORT OF APPEAL

**Proposal for Regional Center Designation: Eastern Washington
American Life Enterprises LLC
RCW1031910008
W09001570**

I. INTRODUCTION

Accompanying this Appeal is the expert economic review and critique entitled *Review of USCIS Decision of January 19, 2011: Eastern Washington Regional Center Application*, dated February 17, 2011, by Dr. Paul Sommers ("Review"). Dr. Sommers maintains in his Review that the Decision is not based on accepted principles of analysis in the field of regional economics. This Memorandum in Support of Appeal, on the other hand, is intended to identify the incorrect legal standards used in the Decision.

II. THE DECISION IS BASED ON INCORRECT LEGAL STANDARDS

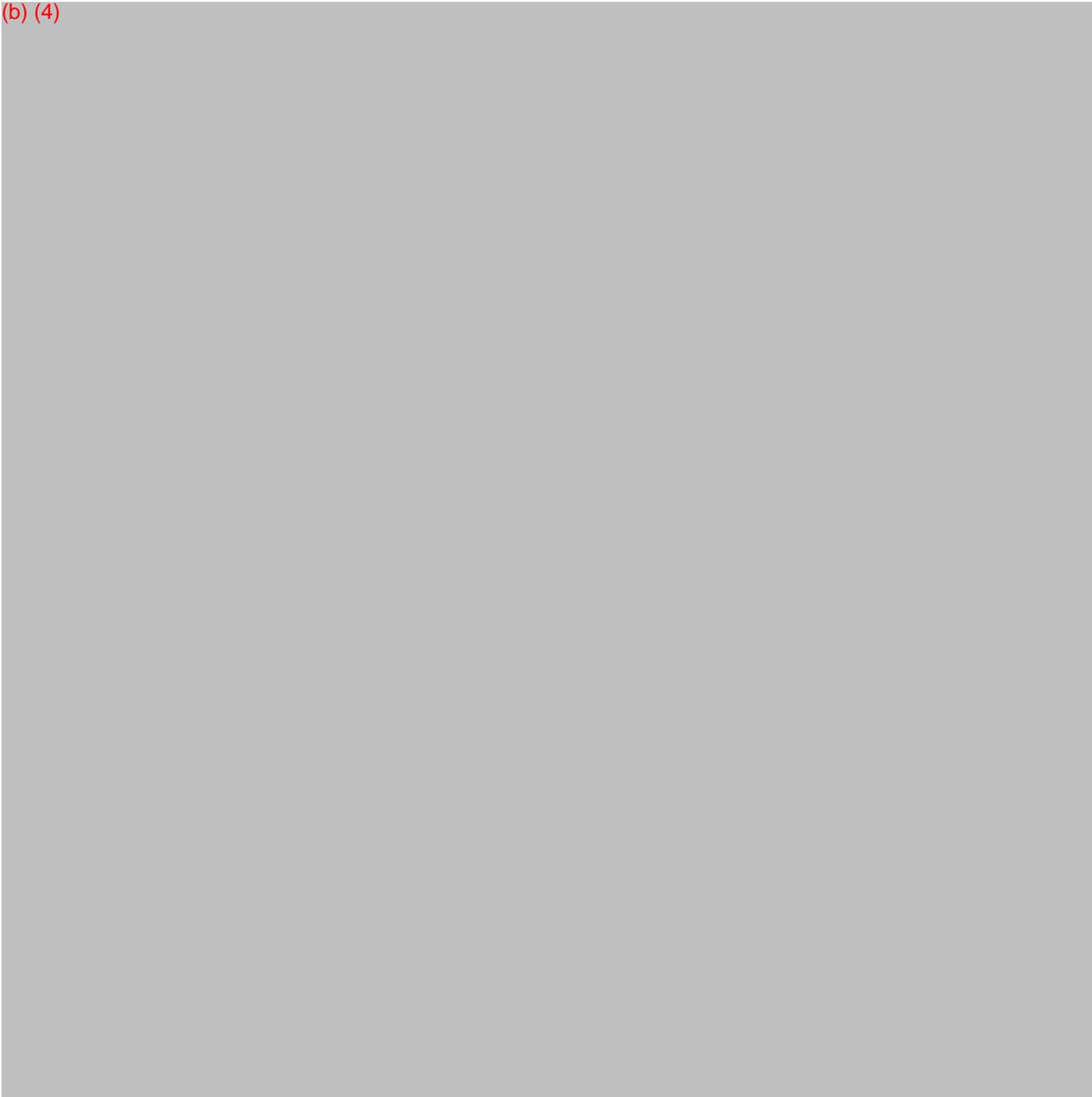
The Decision, at page 3, states that the proposal for regional center designation ("Regional Center Proposal") cannot be approved because:

(b) (4)



A. The Regional Center Proposal Meets the Standard of a “General Proposal” for the Promotion of Economic Growth

(b) (4)



¹ Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (“Appropriations Act”), Pub. L. No. 102-395, §610, 106 Stat. 1828; S. Rep. No. 102-918 (1992).

² See S. Rep. No. 102-331 (1992); Immigrant Investor Pilot Program, Final Rule, 59 Fed. Reg. 17920-21 (Apr. 14, 1994).

³ Pub. L. No. 102-395, Title VI, sec. 610, Oct. 6, 1992, 106 Stat. 1874 (1992).

⁴ 8 CFR §204.6(m).

⁵ Further background is presented at Stone, “INS Decisions Cloud Future of Investor Pilot Program,” 6 Bender’s Immigr. Bull. 233 (Mar. 1, 2001).

⁶ Pub. L. No. 107-273, 116 Stat. 1758, Title I, Subtit. B. Ch. 1 §11037 (2002), amending sec. 610(c).

(b) (4)



B. The Decision Applies a Legal Standard that has been Superseded by Statute

(b) (4)



III. CONCLUSION

In addition to the reasons set forth in the *Review of USCIS Decision of January 19, 2011: Eastern Washington Regional Center Application*, dated February 17, 2011, by Dr. Paul Sommers, American Life Enterprises LLC respectfully requests approval of its Regional Center Proposal on the ground that it satisfies the correct legal standards for adjudication.

⁷ *Id.* at §11037 (a)(2), amending sec. 610(a).

**Review of USCIS Decision of January 19, 2011:
Eastern Washington Regional Center Application**

Paul Sommers, Ph.D., Economist

February 17, 2011

USCIS has issued a Decision of January 19, 2011, denying the application of American Life Enterprises LLC to become a regional center that would embrace the area of Eastern Washington. I have read the Decision, which is based on perceived inadequacies concerning the documentation submitted to demonstrate (i) *Promotion of Economic Growth*, and (ii) *Regional or National Impacts*. I had submitted two earlier economic reports to support the application, and it is the purpose of this writing to shed further light on my earlier economic reports with specific reference to the points made by USCIS in the Decision.

Promotion of Economic Growth

(b) (4)



¹ The task of deriving such ratios would require a highly specialized analysis that is far beyond the scope, as far as I know, of anything ever required of a regional economist working in the EB-5 field.

(b) (4)



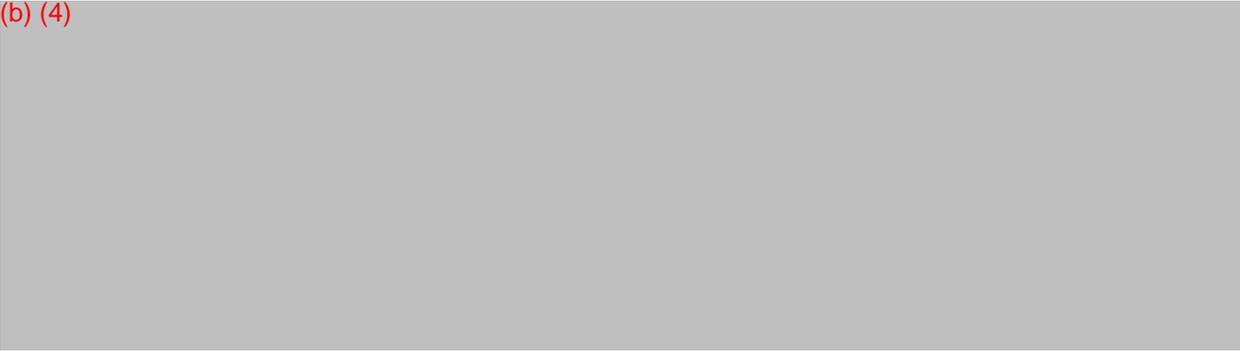
Regional or National Impacts

(b) (4)



² The Southeastern wine cluster: <http://www.wvcc.edu/CMS/index.php?id=1759>; Yakima Valley and six economic clusters: <http://www.ycda.com/target-industries/overview/>; and Spokane: <http://www.greaterspokane.org/community-overview/76-economic-development-strategy.html>, calling for growth in jobs and wages, and focus on a mix of clusters that will require the kind of infrastructure development proposed in the regional center application.

(b) (4)



Throughout the February 2010 and December 2010 reports I have used the terminology of the Washington Input-Output model to describe impacts as that set of terms, including labor earnings and output, are standard terms used in economic impact studies, including literature based on studies using RIMS II or IMPLAN as well as the Washington Input-Output Model. The USCIS uses other terminology that has not been precisely defined, and it is not apparent from the Decision that the terms used by USCIS connote anything substantively different from the information and economic analysis I have provided. Therefore, I contend that the requirement to show how the regional center would promote growth both within the regional center and nationally was in fact met in the December 2010 Supplementary Report.

Review prepared by Paul Sommers, Ph.D., P.O. Box 269, Vashon, WA 98070

Paul Sommers 2-18-11

Paul Sommers

³ http://www.bls.gov/emp/ep_data_occupational_data.htm

Corrected February 2011

Supplementary Report of Eastern Washington Regional Center

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

This supplementary report responds to an RFE from US Citizens and Immigration Service in regard to a report dated February 2010 dealing with a proposed Eastern Washington Regional Center. The RFE mentions reliance on outdated economic data, and requests additional information on the following topics:

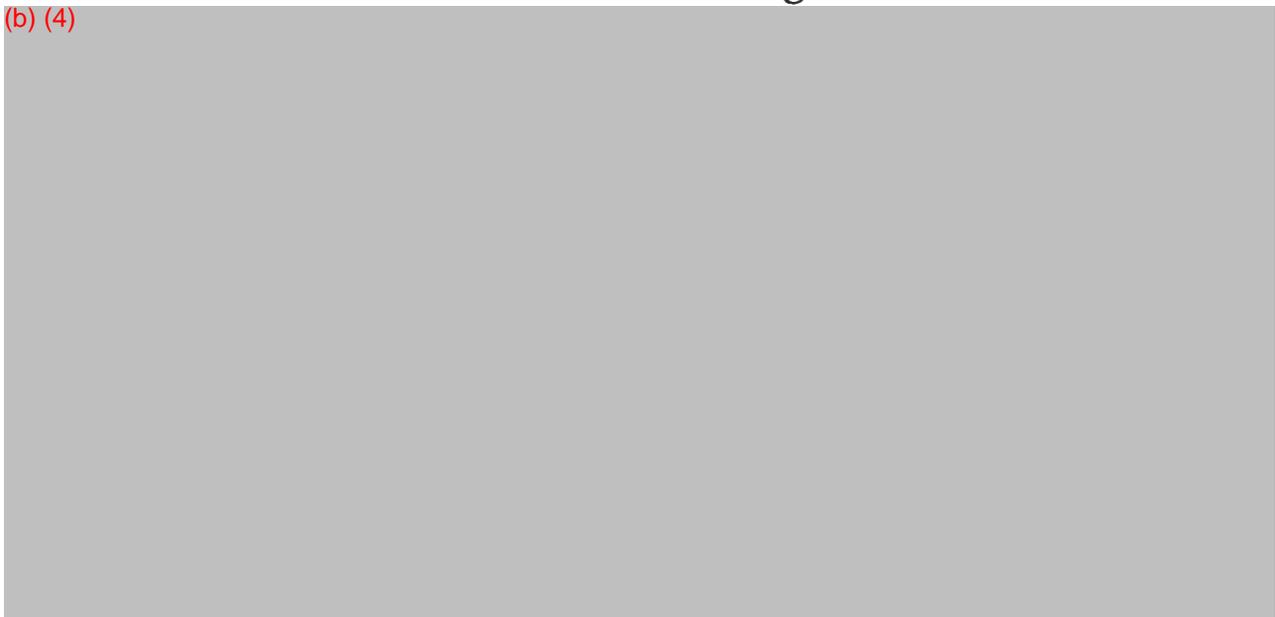
(b) (4)



This supplementary report responds to these requests.

Economic Conditions in Eastern Washington

(b) (4)



Stone & Grzegorek, LLP
800 Wilshire Blvd
Suite 900
Los Angeles, CA 90017

Matter No : 3958.01

USCIS-California Service Center
Attention: EB-5 Processing Unit
24000 Avila Rd, 2nd Floor
Laguna Niguel, CA 92677

SP000311

RECD CSC*11FEB28 11:00

LOG NUMBER
1193 328



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U.S. Citizenship and Immigration Services

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



U.S. Citizenship
and Immigration
Services

JAN 19 2011

TO:

American Life Enterprises, LLC
C/O Henry Liebman, President
270 South Hanford Street, Suite 100
Seattle, Washington 98134

DATE:

Petition: Regional Center Proposal

File: RCW1031910008/W09001570

DECISION

Your Regional Center Proposal, filed in behalf of Eastern Washington Regional Center has been denied for the following reason(s):

See Attachment

If you desire to appeal this decision, you may do so. Your notice of appeal must be filed with this office at the address at the top of this page within 30 days of the date of this notice. Your appeal must be filed on Form I-290B. A fee of \$630.00 is required, payable to U. S. Citizenship and Immigration Services with a check or money order from a bank or other institution located in the United States. If no appeal is filed within the time allowed, this decision will be the final decision in this matter.

In support of your appeal, you may submit a brief or other written statement for consideration by the reviewing authority. You may, if necessary, request additional time to submit a brief. Any brief, written statement, or other evidence not filed with Form I-290B, or any request for additional time for the submission of a brief or other material must be sent directly to:

U. S. Citizenship and Immigration Services
Administrative Appeals Office MS 2090
Washington, D.C. 20529-2090.

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Sincerely,

A handwritten signature in black ink, appearing to read "R. Melville".

Rosemary Langley Melville
Director, California Service Center

cc: Lincoln Stone, Esq.

Enclosure: Form I-290B

This Notice is in reference to the Regional Center Proposal that was filed with the Director, California Service Center, on March 12, 2010, seeking designation as a Regional Center pursuant to Pilot Immigration Program under Section 610 of P.L. 102-395 and as amended by P.L. 107-273.

On October 12, 2010, 2010 the USCIS issued Form I-797 Notice of Action requesting evidence in support of the Regional Center Proposal filed on March 12, 2010. The USCIS noted the request did not contain sufficient evidence showing that the proposed regional center would meet the regulatory requirements as a Regional Center. Multiple issues were addressed in the request for evidence and the evidentiary requirements for each of these issues were explained in detail. However, the evidence provided in response to the USCIS request did not establish eligibility under the Pilot Immigrant Investor Program.

The Eastern Washington Regional Center has requested designation as a Regional Center to be located within twenty-six (26) counties in Eastern and Southwestern Washington. Capital investment will be used to invest in real estate development or construction of mixed-use opportunities. The specific job industries identified in the business proposal are: architecture/engineering, restaurant, warehousing, light industrial manufacturing, arts, recreation and accommodation, apartments, bank, retail shops, software publishing, vineyard and winery.

Promotion of Economic Growth within the selected Geographic Area

8 CFR 204.6(m)(3) states, 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; (emphasis added).

* * *

(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. (emphasis added).

(b) (4)



(b) (4)

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The Regional or National Impact of the Regional Center

Under 8 CFR § 204.6(m)(3)(iv), a regional center proposal must contain a 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 outside of the regional center. This requirement means that the proposal must analyze the impact of regional center activities.

(b) (4)

A large rectangular area of the document is redacted with a solid grey fill.

Therefore, the regional or national impact of the regional center has not been demonstrated.

(b) (4)

A large rectangular area of the document is redacted with a solid grey fill.

For these reasons, this Regional Center Proposal is denied.

CALIFORNIA SERVICE CENTER ROUTING SLIP

Receipt # _____

A # _____

Rev. 11/12/10

USCIS Director (AA003)
 Deputy Director (AA002)
 Special Assistant (AA007)
 Duty Officer

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<input type="checkbox"/> AST Incoming: XB800	<input type="checkbox"/> Incoming: AD477	<input type="checkbox"/> Incoming: XA925	<input type="checkbox"/> Incoming: AD477
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<input type="checkbox"/> W/S: _____	ATTN: _____	ATTN: _____	<input checked="" type="checkbox"/> W/S: 24064
ATTN: _____			ATTN: _____

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<input type="checkbox"/> W/S: _____	<input type="checkbox"/> CFF Incoming: RS902		<input type="checkbox"/> Incoming: SZ131
ATTN: _____	<input type="checkbox"/> RRU BIA: RS339	<input type="checkbox"/> CSC Counsel	<input type="checkbox"/> BCU/Top 4: SZ714
	<input type="checkbox"/> Incoming: _____	ATTN: _____	
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<input type="checkbox"/> Incoming: XB641	<input type="checkbox"/> RRU Ponds: W/S 24201		
<input type="checkbox"/> W/S: _____	<input type="checkbox"/> CIS Review: RC464		
ATTN: _____	<input type="checkbox"/> Incoming: _____		
	<input type="checkbox"/> W/S: _____		
	ATTN: _____	ATTN: _____	ATTN: _____

DIVISION VI	DIVISION XII	DIVISION XI/CFDO	SCOSS
<input type="checkbox"/> Incoming: XO036	<input type="checkbox"/> Incoming: XB919	<input type="checkbox"/> CFDO: DU000	<input type="checkbox"/> NTA Shelf <small>(TPS / I-485 / I-751 / I-539 B1/B2 / I-360 / Misc.)</small> RC445
<input type="checkbox"/> W/S: _____	<input type="checkbox"/> W/S: _____	<input type="checkbox"/> H1B ASVVP Incoming: AD701	
	ATTN: _____	<input type="checkbox"/> Religious Worker Incoming: AD700	
ATTN: _____		<input type="checkbox"/> W/S: _____	
		ATTN: _____	<input type="checkbox"/> Non-EPS Incoming <small>(I-485 / I-130 / Misc.)</small> RC448

SCOSS ATTN: _____ W/S: _____ RPC: _____

<input type="checkbox"/> NRC Hold Approved: _____ <input type="checkbox"/> NRC Hold Denied: RC417 <input type="checkbox"/> HBG Hold Approved: _____ <input type="checkbox"/> HBG Hold Denied: RC418	<input type="checkbox"/> Return to JIT * RC419 * Specify application / petition type in Comments field below SCAN CR I-89 / 698 / 829: RC318 <input type="checkbox"/> FR Backend Appeal Pod: RC410	<input type="checkbox"/> Routing Hub: RC422 ATTN: _____ <input type="checkbox"/> CIS FTR Review Complete * RC442 * Attach sheet and / or file	<input type="checkbox"/> EDMS PRINTS: RC321 ATTN: _____ <input type="checkbox"/> I-612 DOS COPY: RC472
<input type="checkbox"/> Interfiling: WS23222 <input type="checkbox"/> Front End Request: RC427	<input type="checkbox"/> Backend Scan: RC307 <input type="checkbox"/> SNAP Incoming: RC302 <input type="checkbox"/> 103 Hold (RFE / ITD): RC420 <input type="checkbox"/> I-512 Incoming: RC313	<input type="checkbox"/> Transfer to FCO: RC421 <input type="checkbox"/> TPS Haitian (RDF): RC465 <input type="checkbox"/> Transfer to NVC: RC438 <input type="checkbox"/> FTC Incoming: RC437 <input type="checkbox"/> I-130 Upgrades: RC055	<input type="checkbox"/> F/R A-File Create: RC413 <input type="checkbox"/> File Consolidate: RC423 <input type="checkbox"/> I-485 File Consolidate: RC439 <input type="checkbox"/> Approved Awaiting I-89: RC428

EBS (RFE)

Comments Below: _____

REV. 11/12/10

Note: The current printable format can be found @ O:Common/Forms/CSC Routing Slip. Incomplete or outdated routing slip

From: **SCOSS CORR UNIT** Date: **12/22/10** Ext: **3030** RPC: **256** DIV: **AL3100621**

		Application/Petition REGIONAL CENTER PROPOSAL
Receipt # W09001570		
Notice Date October 12, 2010	Page 1 of 6	Regional Center Eastern Washington Regional Center

7-44
1-22-001-1570-0338

AL3100621

Lincoln Stone, Esq.
Stone & Grzegorek LLP
800 Wilshire Blvd., Suite 900
Los Angeles, CA 90017

Request for Evidence

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

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WS 24064/CSC3700 DIV III

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

Note: You are given until JANUARY 4 2010 in which to submit the information requested.

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

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

U.S. CITIZENSHIP AND IMMIGRATION SERVICES CALIFORNIA SERVICE CENTER Attn: EB 5 RC Proposal P.O. BOX 10590 LAGUNA NIGUEL CA 92607-0526	 W09001575 S
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Please see additional information on the back.

Additional Information for Applicants and Petitioners.

General.

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Inquiries.

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RT E (Res)



STONE & GRZEGOREK LLP

800 Wilshire Boulevard, Suite 900
Los Angeles CA 90017
tel 213 627 8997 | fax 213 627 8998
www.lskglaw.com

S&G File: 3958.01

December 20, 2010

Sent via Federal Express

U.S. Citizenship and Immigration Services
California Service Center
Attention: EB-5 RC Proposal
24000 Avila Road, 2nd Floor
Laguna Niguel, CA 92677

Re: **Application:** Proposal for Designation as Regional Center
Immigrant Investor Pilot Program, 8 CFR 204.6(m)
Applicant: American Life Enterprises LLC
Territory: Eastern Washington
Receipt: W09001570

Dear Officer:

Enclosed please find the items listed below in response to the Request for Evidence received in connection with this matter.

- Request for Evidence, dated October 12, 2010
- Memorandum re Response to Request for Evidence
 - Supplementary Report of Eastern Washington Regional Center, December 2010, by Dr. Paul Sommers, Regional Economist
 - Eastern Washington Regional Center: Economic Characteristics of the Region and Methodology for Projecting Job Creation, February 2010, by Dr. Paul Sommers, Regional Economist
 - Second Declaration of Henry Liebman, enclosing sample Comprehensive Business Plans

We urge your prompt action on the proposal for designation as a Regional Center in the Immigrant Investor Pilot Program, 8 CFR § 204.6(m). Thank you for your attention to this request.

Sincerely,

STONE & GRZEGOREK LLP

LINCOLN STONE
LS:AP:cdr
Enclosures

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

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

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

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

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

Mandatory Evidence for the Basic General Proposal

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

8 CFR 204.6(m)(3)(i) requires that a proposal be submitted which:

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

(b) (4)



Regional or National impact of the Regional Center (8 CFR 204.6 (m)(3)(iv)):

Regulations at 8 CFR 204.6(m)(3)(iv) require that the proposal contain:

...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;

(b) (4)

A large rectangular area of the document is redacted with a solid grey fill. The text "(b) (4)" is written in red at the top left corner of this redacted area.

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

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

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

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

Provide in verifiable detail how jobs will be created indirectly;

(b) (4)

A large rectangular area of the document is redacted with a solid grey fill. The text "(b) (4)" is written in red at the top left corner of this redacted area.

(b) (4)



(b) (4)



¹ USCIS does not accept or credit creation of direct temporary “construction jobs” within a business plan or economic job creation forecasts activities which involve a limited duration construction phase of less than 2 years unless the scope, complexity, and the ongoing construction phase must be fully sustained for all the construction phase jobs for 2 years or more with respect to the size, scope, nature, engineering/technology challenges and breadth of the project--for example a massive-scale nuclear power facility, or major Dam or a giant oil refinery, or similar type of massive and expansive and major engineering project. Shorter term construction jobs less than three years in duration have been determined to be of such a short term in nature as to not be sustained and to decrease and disappear as the initial construction activities wind down to completion. Such shorter term construction jobs in many locations are seasonal at best. Nevertheless, for all capital investment expenditures for the construction phase, all capital-induced “down-stream” support activities and “indirect” jobs impacted and associated with the construction activities such as suppliers, transportation, engineering and architectural services, maintenance and repair services, interior design services, manufacturing of components and materials, etc., may be factored into the calculations for creation of indirect jobs.

General issues related to Regional Centers

Posting of Regional Center information on the USCIS Web site:

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

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

Translations:

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

Copies:

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

MEMORANDUM RE RESPONSE TO REQUEST FOR EVIDENCE

AMERICAN LIFE ENTERPRISES LLC EASTERN WASHINGTON REGIONAL CENTER

INTRODUCTION

American Life Enterprises LLC ("the Company") seeks approval of a Regional Center that would include 26 economically disadvantaged counties in the State of Washington, primarily in the Eastern area of the state.

Among other things, in support of the Regional Center designation request the Company submitted a Proposal and Business Plan ("Proposal") that was supported by numerous exhibits, including in pertinent part a February 2010 Report by economist Paul Sommers entitled "Eastern Washington Regional Center: Economic Characteristics of the Region and Methodology for Projecting Job Creation" ("Sommers Report"), as well as a Declaration of Henry Liebman, President of one of the principals of the Company ("Liebman Declaration").

USCIS issued a Request for Evidence dated October 12, 2010 ("RFE") seeking further information concerning the Proposal.

RESPONSES TO SPECIFIC REQUESTS

In material part the RFE asks the Company to provide further economic analysis and deal structure details concerning investments to be undertaken by the Company. Dr. Sommers provides in support of this response a December 2010 Supplementary Report of Eastern Washington Regional Center ("Supplementary Report"). Both the Sommers Report and the Supplementary Report are attached to this Memorandum for ease of reference, as Exhibits 1 and 2, respectively. Mr. Liebman provides further information concerning investments to be undertaken by the Company in the Second Declaration of Henry Liebman, attached hereto as Exhibit 3. Additional responses to the RFE requests are provided below.

1. *Economic Characteristics of Regional Center Area*

(b) (4)



2. *Total Economic Impacts*

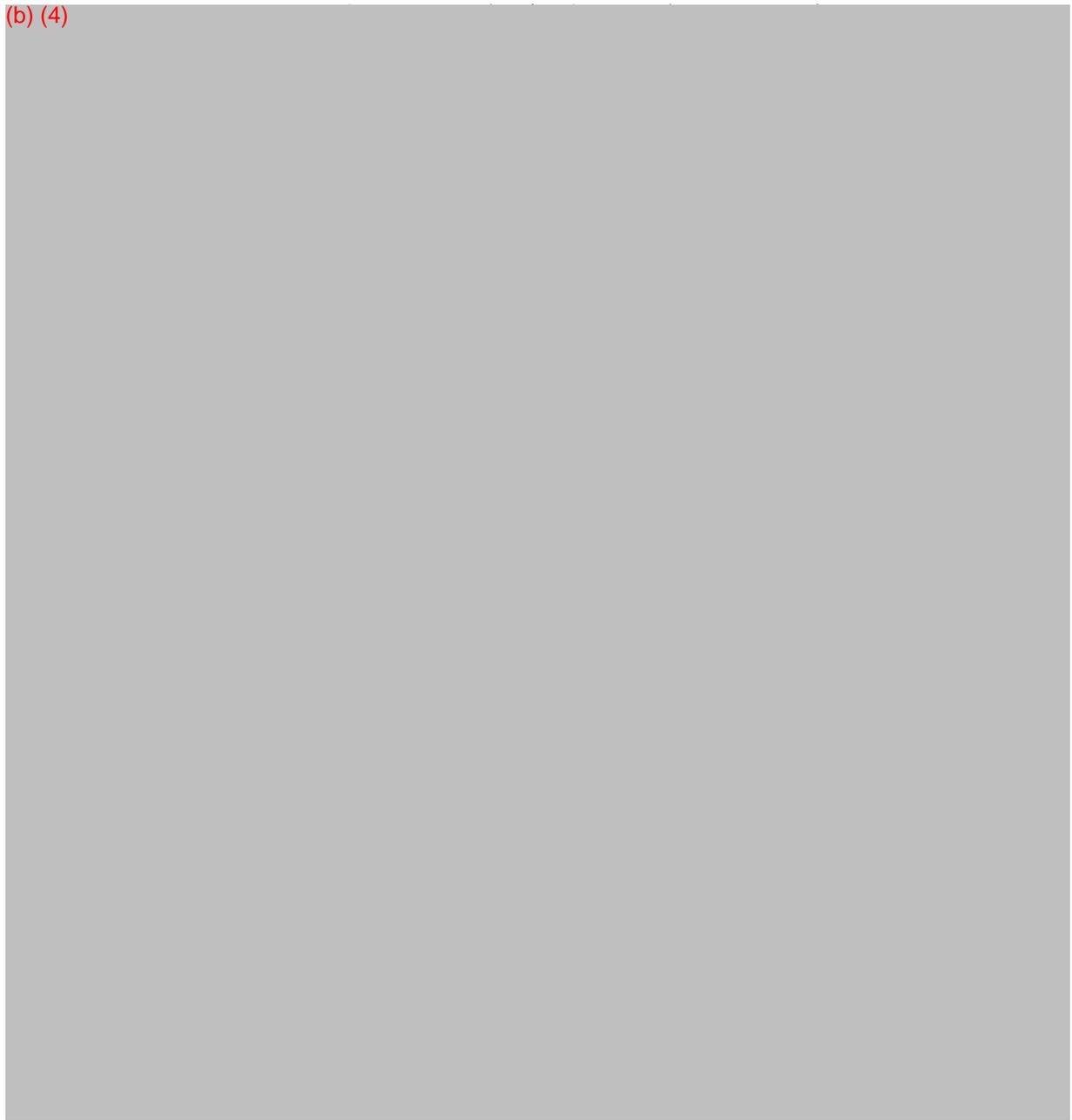
The RFE requests more information on "how the Regional Center will promote economic growth." (RFE, page 2) It also requests more information regarding the positive impact the Regional Center will have on the regional or national economy. (RFE, page 3)

(b) (4)

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3. *Job Creation Methodology*

(b) (4)

A very large rectangular area of the document is redacted with a solid grey fill, covering the entire lower half of the page.

(b) (4)



CONCLUSION

The above responses and the enclosed documentation should satisfy the requests of the RFE, and the substantial documentation provided should support approval of the Proposal. The Proposal for a Regional Center filed by American Life Enterprises LLC for the area of Eastern Washington should be approved.

Supplementary Report of Eastern Washington Regional Center

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

This supplementary report responds to an RFE from US Citizens and Immigration Service in regard to a report dated February 2010 dealing with a proposed Eastern Washington Regional Center. The RFE mentions reliance on outdated economic data, and requests additional information on the following topics:

(b) (4)



This supplementary report responds to these requests.

Economic Conditions in Eastern Washington

(b) (4)



Second Declaration of Henry Liebman

I, Henry Liebman, declare as follows:

1. I am the President of American Life, Inc. ("AmLife"), a (b) (4) owner of American Life Enterprises LLC, the "Company" proposed for designation as a regional center for the area of Eastern Washington under the Immigrant Investor Pilot Program. This declaration is written in response to the issues raised in the USCIS Request for Evidence ("RFE") dated October 12, 2010.
2. (b) (4)

3. Our proposal requests regional center designation for investments in a 26 county area in the State of Washington. Certain census tracts within the regional center territory are expected to qualify as targeted employment areas (TEAs), and related data from the U.S. Bureau of Labor Statistics was submitted with our proposal. Thus, it is anticipated that the minimum capital investment threshold for any individual immigrant investment through the Regional Center shall be not less than \$500,000 if located within a TEA or not less than \$1 million if located outside a TEA. Please note that the Regional Center plans to direct investment into TEAs, which will be determined based on data existing closer to the time of the actual investment. Also, if investment occurs in a non-TEA, we are prepared to require \$1 million capital investment per investor. Either way, Dr. Sommers' job creation estimates hold true. We have not yet identified any specific target investments. Furthermore, we are not seeking approval of an "exemplar" petition.
4. In our proposal we explain how the future EB5 investment would focus on real estate development or construction of mixed-use opportunities within the Regional Center. Examples of such investment and business activities include:
 - i. Commercial/industrial developments, including but not limited to hospitality, retail, industrial, flex, office, and transportation facilities;
 - ii. Public/private arrangements with governmental agencies, non-profits, or other entities to develop civic/public facilities and infrastructure;
 - iii. Renovation of functionally obsolete buildings preserving historical features, where appropriate, within a modern facility;
 - iv. Mixed use or residential developments with or without ground floor retail, including apartments and condominiums;
 - v. The provision of capital, loans or investment to businesses wishing to locate in the regional center area;

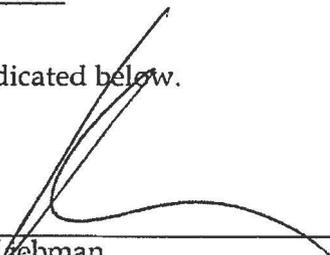
- vi. Establish or invest in lending institutions such as community banks; and
- vii. Establish or invest in agricultural or agricultural-related endeavors, including, but not limited to vineyards and wineries.

5. These investment and business activities would be focused in the following industry sectors: (1) Real estate development; (2) Construction and related industries; (3) Loans to job creating entities; (4) Banking; and (5) Agriculture and related industries. Also, the tenant businesses of the developed or rehabilitated real estate may consist of retail sales, hotel and hospitality, food services, industrial, financial services, professional services, and other types of job-creating enterprises. Correspondingly, the same latitude would also apply in the range of job-creating entities which borrow money from a lending institution such as a bank.
6. Our business plan for operation of the Regional Center was already included with our initial Proposal, entitled "Proposal and Business Plan of Eastern Washington Regional Center." The business plan document presents the goals of the Regional Center; specifics on the proposed boundaries of the regional center; an assessment of the geographic region and the project focus of the Regional Center; a summary reference to the economic analysis by Dr. Paul Sommers, which includes substantial demographic and industry data as well an economic methodology for estimating job creation and economic impacts; the management of the Regional Center; a description of the proposed investment structure for individual EB5 projects; a description of the funding of the Regional Center; and details concerning the plans for promotion of the Regional Center. This business plan document is a general proposal that is on a par in terms of scope and details with any of the business plans I have prepared for dozens of different businesses and projects during my 30 year career in business. Furthermore, this business plan has the same general content that was approved for AmLife-managed regional centers in Everett, Lakewood, Seattle, and Tacoma in Washington State, in Los Angeles, California, and in Buffalo, New York. Nonetheless, attached is a sampling of business plans for AmLife-affiliated commercial enterprises that in fact were capitalized with EB5 investor funds. These particular commercial enterprises are similar in nature and scope to the kind of commercial enterprise that is contemplated by the Eastern Washington Regional Center, and therefore provide an excellent roadmap for USCIS in terms of grasping what the Company may be doing with the regional center following approval of the Eastern Washington Regional Center.
7. The RFE asks for contact information

Name:	American Life Enterprises LLC
Address:	270 S. Hanford Street, Suite 100, Seattle, WA 98134
Contact:	Henry Liebman
Phone/Fax:	206.381.1690 / 206.381.3376
E-mail:	Henry@americanlifeinc.com
Web:	www.americanlifeinc.com

All of the foregoing is true and correct as of the date indicated below.

Date: 12/20/10


Henry Liebman

Courtyard Management Corporation Management Agreement

(b) (4)



Property Analysis and Valuation

Job No. A6544

Table 1
Competitive Market Profile - Facilities and Room Rates

Property Name	Built	Corridors	Std Rooms	Bldg SF	Mtg SF	Summer	Amenities
Address	Renov	Height	Total Rooms	Per Room	Per Room	Winter	AAA
H1 Red Lion Hotel	1973	Interior	291	272,787	13,715	\$290	A B D E
1415 Fifth Avenue	1996	20 stories	297	918	46	\$290	◆◆◆
H2 Crowne Plaza Hotel	1980	Interior	389	258,352	10,310	\$99-\$300	A B D E
1113 Sixth Avenue	2006	34 stories	415	623	25	\$99-\$300	◆◆◆
H3 Hilton Hotel	1970	Interior	237	126,240	4,307	\$189-\$378	A B D E
1301 Sixth Avenue	1995	29 stories	237	533	18	\$159-\$348	◆◆◆
H4 Warwick Hotel	1981	Interior	226	119,890	1,310	\$260-\$290	A B D E F
401 Lenora Street	2006	19 stories	230	521	6	\$240-\$270	◆◆◆
H5 Best Western Pioneer Square	1914	Interior	75	34,780	300	\$189-\$299	B D
77 Yesler Way	1990	4 stories	75	464	4	\$149-\$259	◆◆◆
H6 Hotel Monaco	1969	Interior	187	133,884	6,040	\$175-\$309	A B D E
1101 Fourth Avenue	1997	11 stories	189	708	32	\$175-\$309	◆◆◆◆
H7 Hotel Vintage Park	1922	Interior	125	67,390	700	\$135-\$260	A D E
1100 Fifth Avenue	1992	11 stories	126	535	6	\$135-\$260	◆◆◆◆
H8 Hotel Andra	1926	Interior	118	104,000	3,450	\$209-\$349	A B D E
2000 Fourth Avenue	2004	10 stories	119	874	29	\$209-\$349	Not Rated

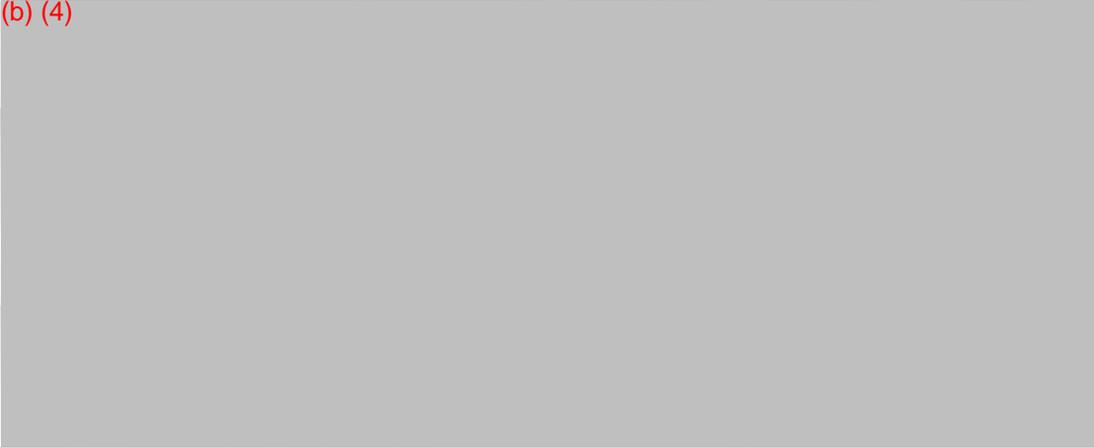
Source: Property Management
County Assessor
AAA TourBook

A = Restaurant
B = Meeting Rooms
C = Refrig/MW

D = Data Ports
E = Exercise Room
F = Swimming Pool

1st Amendment to 618 Second Avenue Limited Partnership Business Plan

(b) (4)



**618 Second Avenue Limited Partnership,
A State of Washington Limited Partnership**

**By: American Life Inc., a Washington
Corporation, Managing General Partner**



Henry Liebman, Its President



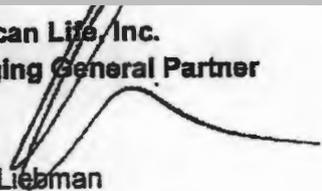
Date

**AMENDMENT TO
COMPREHENSIVE BUSINESS PLAN
618 Second Avenue Limited Partnership**

(b) (4)



**American Life, Inc.
Managing General Partner**



Henry Liebman

Date: January 18, 2010

COMPREHENSIVE BUSINESS PLAN
4746 Ohio Avenue South Limited Partnership

1. Overview

(b) (4)



**AMENDMENT TO
COMPREHENSIVE BUSINESS PLAN**

4746 Ohio Avenue South, L.P.

Overview

(b) (4)



From: Origin ID: EMTA (213) 627-8997
Amanda Paquet
Stone & Grzegorek LLP
800 WILSHIRE BLVD STE 900
LOS ANGELES, CA 90017



Ship Date: 20DEC10
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CAD: 9061460/INET3090

Delivery Address Bar Code



Ref # 3958.01 - AmLife/ Eastern Wash
Invoice #
PO #
Dept #

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AM DEC 21 2010

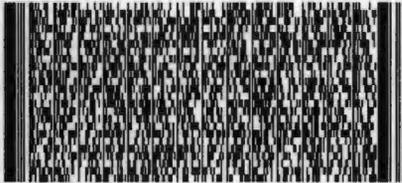
STAMP#109

SHIP TO: (213) 627-8997 BILL SENDER
Attn: EB-5 RC Proposal
USCIS - California Service Center
24000 AVILA RD FL 2

LAGUNA NIGUEL, CA 92677

TRK# 7965 7952 6901
0201

TUE - 21 DEC A2
STANDARD OVERNIGHT



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After printing this label:

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2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

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

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

		Application/Petition REGIONAL CENTER PROPOSAL
Receipt # W09001570		
Notice Date October 12, 2010	Page 1 of 6	Regional Center Eastern Washington Regional Center

Lincoln Stone, Esq.
Stone & Grzegorek LLP
800 Wilshire Blvd., Suite 900
Los Angeles, CA 90017

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WS 24064/CSC3700 DIV III

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Laguna Niguel, CA 92677

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



W09001575

Additional Information for Applicants and Petitioners.

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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.

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

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

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

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

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

Mandatory Evidence for the Basic General Proposal

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

8 CFR 204.6(m)(3)(i) requires that a proposal be submitted which:

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

(b) (4)



Regional or National impact of the Regional Center (8 CFR 204.6 (m)(3)(iv)):

Regulations at 8 CFR 204.6(m)(3)(iv) require that the proposal contain:

...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;

(b) (4)



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

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

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

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

Provide in verifiable detail how jobs will be created indirectly;

(b) (4)



(b) (4)



(b) (4)



¹ USCIS does not accept or credit creation of direct temporary “construction jobs” within a business plan or economic job creation forecasts activities which involve a limited duration construction phase of less than 2 years unless the scope, complexity, and the ongoing construction phase must be fully sustained for all the construction phase jobs for 2 years or more with respect to the size, scope, nature, engineering/technology challenges and breadth of the project—for example a massive-scale nuclear power facility, or major Dam or a giant oil refinery, or similar type of massive and expansive and major engineering project. Shorter term construction jobs less than three years in duration have been determined to be of such a short term in nature as to not be sustained and to decrease and disappear as the initial construction activities wind down to completion. Such shorter term construction jobs in many locations are seasonal at best. Nevertheless, for all capital investment expenditures for the construction phase, all capital-induced “down-stream” support activities and “indirect” jobs impacted and associated with the construction activities such as suppliers, transportation, engineering and architectural services, maintenance and repair services, interior design services, manufacturing of components and materials, etc., may be factored into the calculations for creation of indirect jobs.

General issues related to Regional Centers

Posting of Regional Center information on the USCIS Web site:

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

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

Translations:

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

Copies:

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



STONE & GRZEGOREK LLP

800 Wilshire Boulevard, Suite 900
Los Angeles CA 90017
tel 213 627 8997 | fax 213 627 8998
www.lskglaw.com

S&G File: 3958.01

March 9, 2010

Sent via Federal Express

U.S. Citizenship and Immigration Services
California Service Center
Attention: EB-5 RC Proposal
24000 Avila Road, 2nd Floor, Room 2326
Laguna Niguel, CA 92677

Re: **Application:** **Proposal for Regional Center**
 Immigrant Investor Pilot Program, 8 CFR 204.6(m)
 Applicant: **American Life Enterprises LLC**
 Territory: **Eastern Washington**

Dear Officer:

Enclosed please find the following in connection with the Proposal for Regional Center pursuant to the Immigrant Investor Pilot Program, 8 CFR § 204.6(m):

- Form G-28
- Proposal and Business Plan
- Exhibits

Please advise us if you have any questions or require further information or documentation. At your earliest opportunity, please confirm receipt of this proposal.

Sincerely,

STONE & GRZEGOREK LLP


LINCOLN STONE

LS:AH/:cdr
Enclosures

AL3100605REC CSC10MAR12 5:15

**Proposal and Business Plan
Eastern Washington Regional Center
American Life Enterprises LLC**

Overview

(b) (4)



**Proposal and Business Plan
Eastern Washington Regional Center
American Life Enterprises LLC**

EXHIBITS

1. Letter of Cathy McMorris Rodgers, Member of Congress; Letter of Doc Hastings, Member of Congress
2. Eastern Washington Maps
 - Regional Center Counties in Washington State
 - Congressional district maps
3. United States Department of Labor, Bureau of Labor Statistics unemployment data
4. Sampling of Media articles regarding Eastern Washington economy
5. Eastern Washington Regional Center: Economic Characteristics of the Region and Methodology for Projecting Job Creation - Paul Sommers, Ph.D. (February 2010)
6. American Life Enterprises LLC
 - Certificate of Formation
 - IRS Employer Identification Number
 - Limited Liability Company Agreement
7. About the Members
 - American Life, Inc.
 - Charles LeFevre
 - Blue Water LLC (Nina Collier and Tony Williams)
8. American Life Experience in Seattle Regional Center
 - Company Introduction - History and Operations
 - Executive Summary; Our Partners
 - American Life Real Estate Investments, with recent news items
 - Sample Comprehensive Business Plan - 1501 First Avenue South Limited Partnership; related Design Review Documents
 - Map of Port of Seattle depicting American Life, Inc. property locations
 - American Life, Inc. Properties Data
 - Partnership Investment Data-Rentroll
 - SODO Real Estate Market
 - Seattle Economic Trends
9. Declaration of Henry Liebman, with attachments
10. Sample documents of Enterprises Limited Partnership
 - Partnership Agreement
 - Subscription Agreement

CATHY McMORRIS RODGERS
5TH DISTRICT, WASHINGTON
ASSISTANT WHIP

COMMITTEES:
NATURAL RESOURCES
RANKING MEMBER, WATER & POWER
ARMED SERVICES
EDUCATION AND LABOR

WOMEN'S CAUCUS
CO-CHAIR

Congress of the United States
House of Representatives

March 2, 2009

COUNTIES:
ADAMS
ASOTIN
COLUMBIA
FERRY
GARFIELD
LINCOLN
OKANOGAN
PEND OREILLE
SPOKANE
STEVENS
WALLA WALLA
WHITMAN

Maurice R. Berez, Sr. Adjudications Officer
Investor and Regional Center Unit
Office of Program and Regulations Development
U.S. Citizenship and Immigration Services
111 Massachusetts Avenue, NW, Suite 300
Washington, DC 20529

Dear Mr. Berez,

I am pleased to write a letter in support of American Life Enterprises' efforts to obtain regional center status for Eastern and Southwest Washington. Established by Congress in 1993, the Immigrant Investor Pilot Program is aimed at stimulating economic activity and creating jobs for U.S. workers, while simultaneously affording eligible aliens the opportunity to become lawful permanent residents.

While serving Washington State's Fifth Congressional District, expanding economic opportunities for Eastern is a top priority for me. I grew up working on a family farm and orchard and recognize the important role agriculture plays for families and communities across Eastern Washington. Agriculture is vital to the economic stability of Eastern Washington, but can also present challenges.

As traditional farming communities move to build and diversify within the agriculture sector, these difficult economic times present a further challenge. American Life Enterprises would help provide solutions to some of these challenges through agriculture and real estate development, residential development, commercial and light industrial development, civic and public facilities development, and historical preservation.

I believe the US Immigration Investor Pilot Program can be a vehicle for attracting much needed capital to many areas of my district. I respectfully request that you strongly consider American Life Enterprises' application for regional center status.

Best Wishes,



Cathy McMorris Rodgers
Member of Congress

1708 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-2006
FAX: (202) 225-3392

10 NORTH POST STREET, SUITE 625
SPOKANE, WA 99201
(509) 353-2374
FAX: (509) 353-2412

555 SOUTH MAIN
COLVILLE, WA 99114
(509) 684-3481
FAX: (509) 684-3482

29 SOUTH PALOUSE STREET
WALLA WALLA, WA 99362
(509) 529-9358
FAX: (509) 529-9379

Visit: www.mcmorrisrodgers.house.gov

DOC HASTINGS
4TH DISTRICT, WASHINGTON

COMMITTEE ON
NATURAL RESOURCES
RANKING REPUBLICAN MEMBER



1203 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20516
(202) 225-6816

2715 SAINT ANDREWS LOOP, SUITE D
PASCO, WA 99301
(509) 543-8386

105 SOUTH 3RD STREET, SUITE 107
YAKIMA, WA 98901
(509) 462-3243

www.hastings.house.gov

Congress of the United States
House of Representatives
July 7, 2009

Mr. Kevin Cummings, Chief
EB-5 Investor Program
Service Center Operations
U.S. Citizenship and Immigration Services
111 Massachusetts Avenue NW, Suite 300
Washington, DC 20529

Dear Mr. Cummings:

I am writing in support of the application submitted by American Life Enterprises for the designation of a Regional Center for Central, Eastern and Southwest Washington state.

Expanding economic opportunities in my rural Central Washington district is a top priority of mine, and I believe the Immigrant Investor Program offers an opportunity to support local economic diversification efforts that are already underway. Access to credit and investment capital is a particularly difficult hurdle in rural communities, where these investments are perceived as less liquid than in urban areas. Regional Center designation will help to address this issue and create permanent jobs for U.S. workers in these communities.

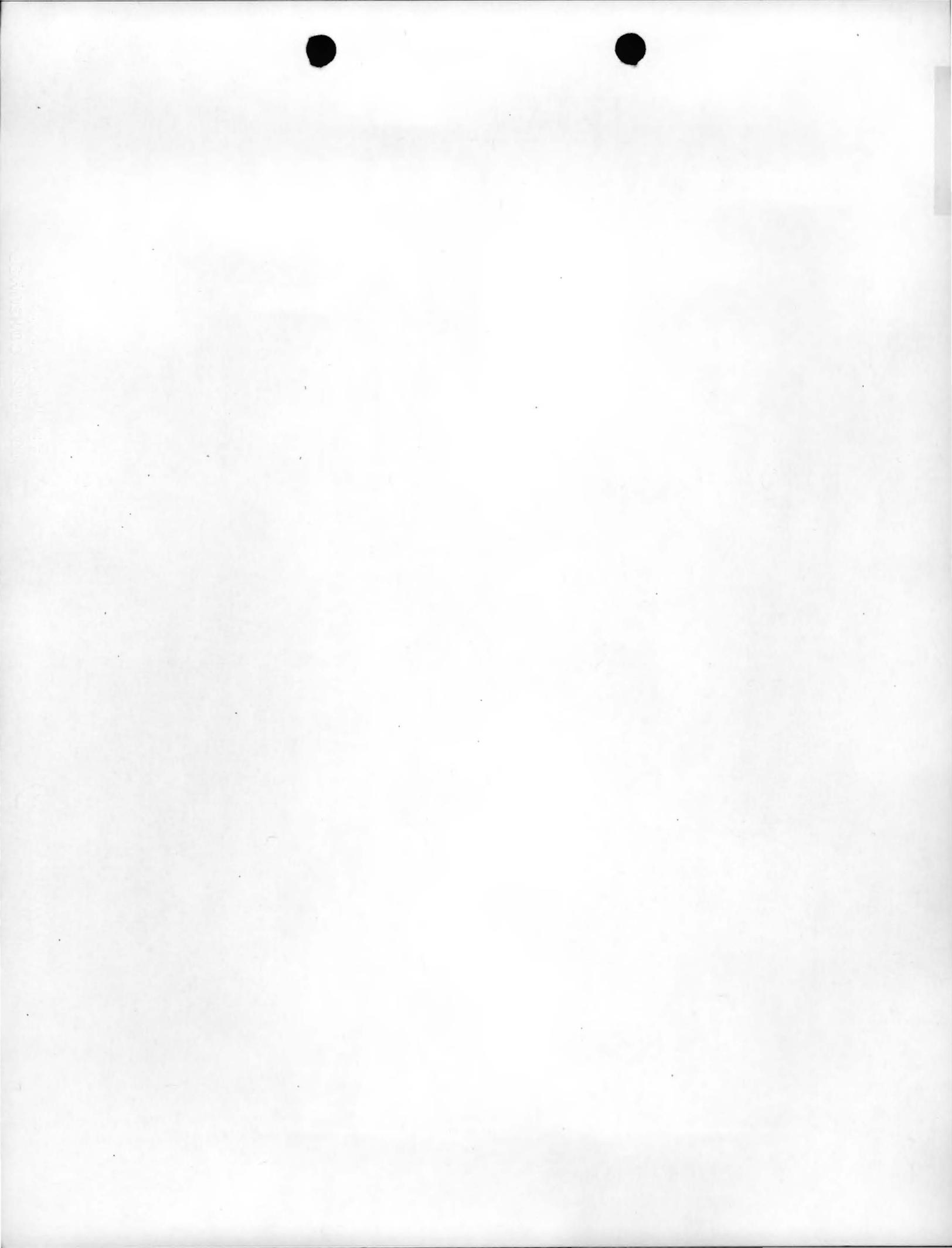
I urge you to keep the economic development and job creation needs of rural Central Washington state in mind, and to give American Life Enterprises' application your careful consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Doc Hastings", written over a horizontal line.

Doc Hastings
Member of Congress

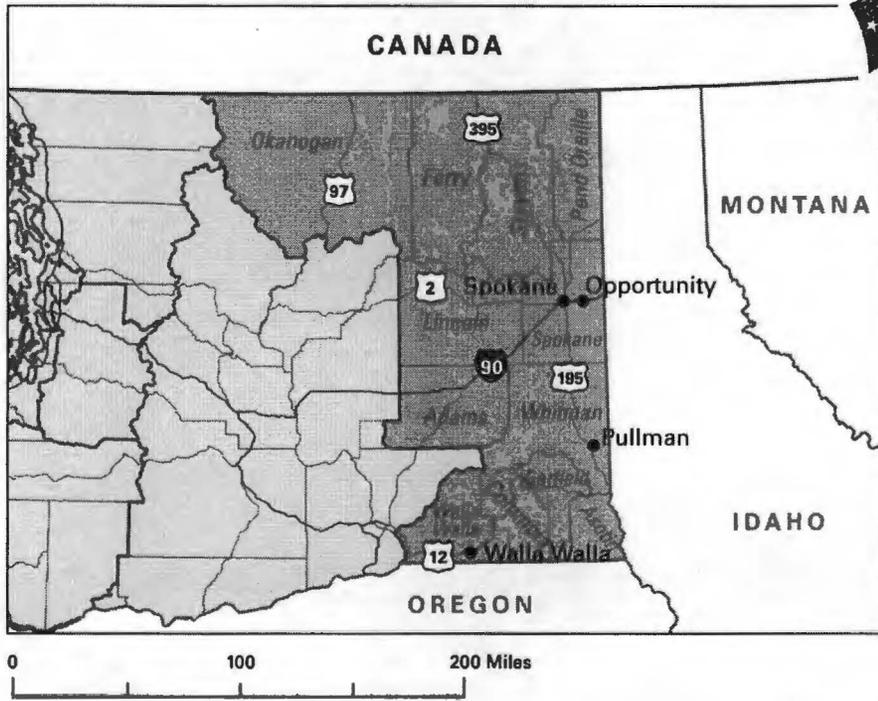
DH:jd



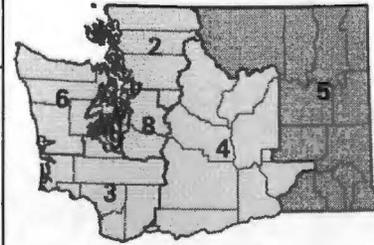
Regional Center Counties in Washington State



Congressional District 5



5 Congressional District
Ferry County

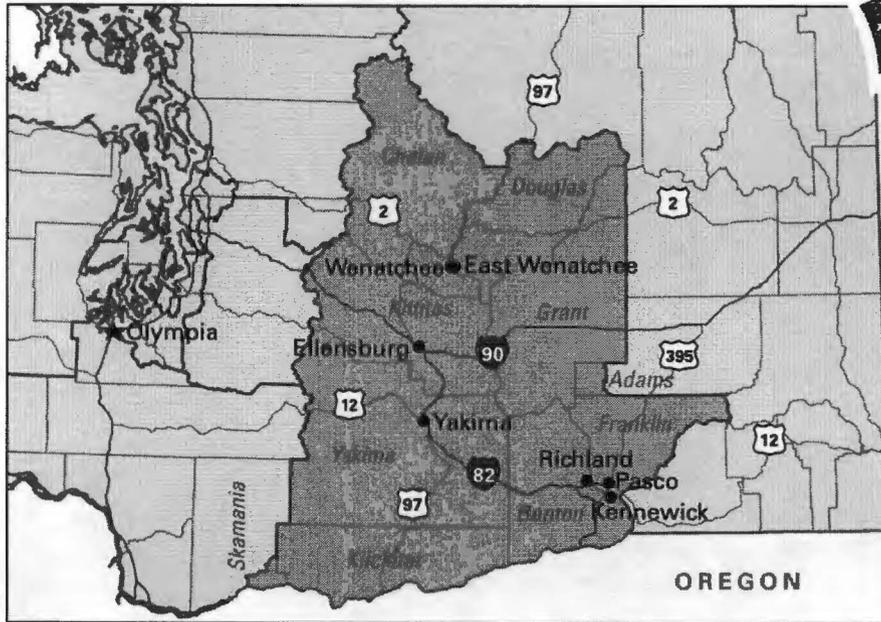


Washington (9 Districts)

Congressional District 4

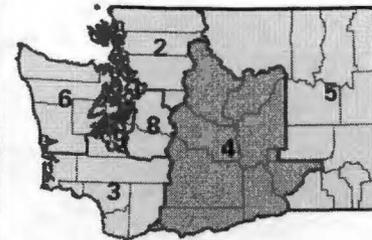
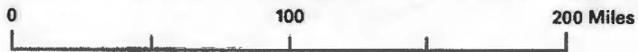


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4 Congressional District

Chelan County



Washington (9 Districts)

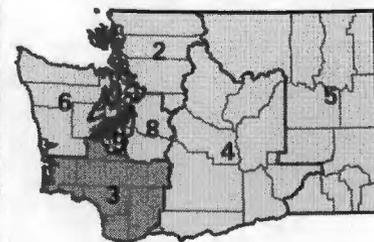
Congressional District 3



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3 Congressional District
Lewis County



Washington (9 Districts)



States (seasonally adjusted)
 States (not seasonally adjusted)
 Counties
 MSAs

select a state:
Washington

Select dataview type:
 Unemployment Rate
 12 Month Net Change

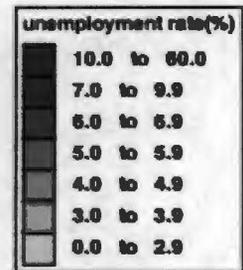
Select Year:
2009

Select Month:
December

Not Seasonally Adjusted

Draw Map

Unemployment rates by county, not seasonally adjusted, Washington December 2009



When you place your cursor on a county, its name will appear along with the statistic for that county.

Map Title: Unemployment rates by county, not seasonally adjusted	
Map Type: Washington county Map	
Month/Year: December/2009	
County	December 2009
Adams County	11.7
Asotin County	7.4
Benton County	7.4
Chelan County	9.5
Clallam County	10.1
Clark County	13.8
Columbia County	10.9
Cowlitz County	13.3
Douglas County	9.3

Ferry County	14.2
Franklin County	10.0
Garfield County	9.1
Grant County	12.5
Grays Harbor County	13.4
Island County	8.8
Jefferson County	8.9
King County	8.5
Kitsap County	7.6
Kittitas County	9.4
Klickitat County	10.5
Lewis County	14.1
Lincoln County	8.9
Mason County	10.7
Okanogan County	12.5
Pacific County	12.1
Pend Oreille County	14.0
Pierce County	9.5
San Juan County	7.4
Skagit County	10.8
Skamania County	12.4
Snohomish County	10.3
Spokane County	9.3
Stevens County	13.5
Thurston County	7.6
Wahkiakum County	14.2
Walla Walla County	6.8
Whatcom County	8.3
Whitman County	4.7
Yakima County	11.0

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Mild winter takes toll on Kittitas County economy

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Snowmobiles sit idle on the dirt at Cascade Playtime Rentals north of Roslyn on Tuesday. <i> Brian Myrick / Daily Record </i>

Posted: Wednesday, February 3, 2010 12:00 am

By **MARY SWIFT**
staff writer | [0 comments](#)

CLE ELUM — Judy Tokarsyck, executive director of the Cle Elum-Roslyn Chamber of Commerce, was marveling Monday about how fast she and her husband got across Snoqualmie Pass last Sunday night.

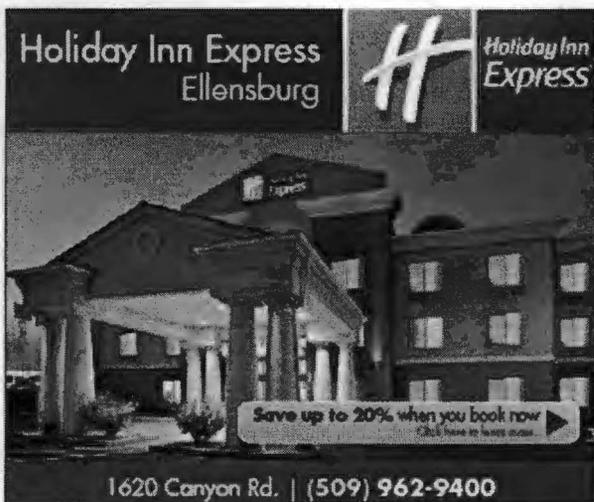
"I said to my husband, 'I can't believe we're going 70 miles per hour up Snoqualmie Pass at the end of January,'" she said. "Nobody gets across the pass that fast in January."

At least, not in what Upper County locals term "a good snow year."

As it happens, the winter of 2009-2010 is proving to be anything but for many whose employment or business depends on cold weather and ample snow.

Washington State Department of Transportation (WSDOT) snow plows, which usually move regularly up and down Interstate 90 during the snow season are idle.

So is the fleet of muscular-looking tow trucks that sit — at the ready but unneeded — at Willette's Shell in downtown Cle Elum. In a normal winter their drivers are plying their trade along the icy interstate, pulling unlucky — or sometimes simply inept — drivers out of snow banks or away from accidents.



Not this year.

"We've had to cut everybody's hours. We've just had no customers at all," says Wayne Willette, the manager. "I've never seen this particular scenario and I've been here since 1974. Usually when we have an 'off' winter it's just through December and then, all of a sudden, winter comes back. This winter is completely different.

"We've had to cut everybody's hours. We've just had no customers at all."

As a result, Willette's 10 employees are on six-hour shifts.

"Right now we're in a limbo state," he says. "If everybody decides it's already spring, they'll take their snow tires off and we'll get some work. The way it is right now people don't want to risk that but there's no towing because there's no winter. We're like in a three-month 'nothingness.'"

Willette knows it's not just his business that is suffering.

"We've had guys order chains for their Bobcats and now they don't show up for them because they're going broke," he says.

Up the road at the Sunset Cafe, manager and owner Joey Carter feels the pain. Last weekend, he arrived at 4 a.m. each morning to clean the restrooms before the start of the business day.

It's the price he's paying since slow business forced him to lay off his manager.

"I have some people working two-hour shifts. Between six and eight hours would be a normal shift," he says. "I understand that people are hurting. There's nothing we can do. Nobody's getting 40-hour weeks."

But he's reluctant to lay all the blame at Mother Nature's feet.

"I don't know if it's just the weather," he says. "I think it's the economy in general.

"When it's snowing like crazy we have all the snowmobilers over here and it's wonderful but nobody else goes everywhere. Now the snowmobiles aren't here. The roads are all good but nobody's going places.

"The weather is a double-edged sword. But the economy is killing everyone. I was in Chelan last week and they're saying the same thing."

In a typical winter, Upper Kittitas County draws huge numbers of snowmobile enthusiasts, its proximity to the Puget Sound area a big part of the draw.

While there appeared to be fewer than usual trucks or RVs towing trailers loaded with snowmobiles in the Safeway parking lot this weekend, Carter says he has seen "quite a few snowmobiles this week, up in the Blewett Pass area. Maybe people are just making their own sandwiches," he says.

Howard Briggs, a snowmobiler who chairs the Kittitas County Snowmobile Council, says it's true "there are people out riding — but not to the extent we've seen in other years. There is snow above 4,000 feet or so but it's not easy to get up there. You're talking about higher power sleds.

"I think family riding has suffered most. There definitely are fewer people coming over, in my estimation."

Until recently, Briggs said, a number of people who own houses in Sky Meadows, a snowmobiling community, "weren't coming over because of lack of snow."

The community's snowmobile club, the SkyRiders, had planned its annual play day, which includes a vintage snowmobile race, for this coming weekend, Briggs said. "Now they've moved that back a week. They're hoping for more snow."

Briggs says he thinks the lack of snowfall this year has dampened the ardor of recreationists who come from locations outside Kittitas County.

"I think people, when they have quite a ways to travel, say, 'There's not enough snow to make it worthwhile to come over and take part in things,'" he says. "So there are fewer people coming over to the county. It has to be affecting tourism and the motels and other businesses. I don't see a lot of vehicles with snowmobiles on their trailers like you do in a normal year."

There's no question that the lack of snow makes an impact on local business, says Mary Pittis, owner of the Iron Horse Inn Bed and Breakfast in South Cle Elum.

Pittis tracks her business carefully.

"We've seen a 40 to 50 percent decline over last year — and last year wasn't a good year," she says. "I'm hearing that generally across the board when I talk to others in the food and service industry in town."

Is it just the weather — or also the economy?

She calls it a "50-50 whammy."

"We've been through years where there was low snow but the vacancies weren't as bad then," says Pittis. Still, she says, there are days when there are obvious "spikes" in hotel and restaurant business.

"It's very sporadic," she says. "I hear that from other hotel people. Several talked about ups and downs. There will be a weekend with lots of activity — and then three weekends with hardly anything."

Pittis, who is instrumental in organizing the annual Rails to Ales Brewfest held each summer at the historic rail yard in South Cle Elum, said that complaint was a common refrain when she went out recently to talk with other motel operators about this year's event.

But if the winter hasn't delivered as much snow as normal, Holly Lippert, communications manager for The Summit at Snoqualmie ski areas says it hasn't been as bad for business — and skiers — as it might have been.

"Business has been pretty decent thanks in large part to the fact we opened on Nov. 14 about a month earlier than last season," she says. "Last year we didn't open until Dec. 19. So we've been open quite awhile. Business hasn't been record-setting by any means but we're not struggling. We always like more snow, but this snow has been pretty good."

Traditionally, she says, January hasn't seen "the best snow dumps of the season. But we've seen healthy snowfall in February and March. So it's definitely not time to throw in the towel yet."

The last four years, she notes, the Summit has been open into May.

While snowfall is a major economic factor in the winter in the Upper County, it also has an effect — albeit less dramatic — in the Lower County.

Eric Haugland, parts manager for R and R AutoBody, says business has been "a bit slower since it's a mild winter." But no snow means more drivers are out on the road, which is also good for business, he says.

"We're in a situation where we either want to see it snow real good or get weather where people start traveling," he says. "The worst conditions the better — or the more driving the better."

Debbie Richards, office assistant at McIntosh's Auto Body in Ellensburg, said when she took the job she was told that winter "was the busiest time. Actually, it's really been kind of slow."

Marshall Madsen, general manager of the Quality Inn, a full-service hotel that includes banquet facilities, a restaurant and a bar, says there's no question the mild winter weather has had an impact.

"Normally in winter time, the pass will close six or eight times during a winter," Madsen says. "That means every hotel from Cle Elum down to Ellensburg fills up. That's not happened."

Even when the pass doesn't close, "sometimes during a good snowstorm people are tired and want to pull off so that drives a certain amount of one-night stays. So yes, (the lack of snowfall) does have an impact."

Madsen says it's hard to quantify the impact in terms of dollars, but "it's a challenge. It's tough, yes."

The Sunset's Carter says he thinks it's a question of not just waiting out the weather, but the economy.

"It's going to heal itself," he says. "It's just going to take time."

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Posted in News on Wednesday, February 3, 2010 12:00 am

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POSTED ON Wednesday, April 22, 2009 AT 11:00PM

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Economy weak, Army strong

Money, worsening job market are driving military recruiting by Melissa Sánchez

Yakima Herald-Republic

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SARA GETTYS/Yakima Herald-Republic

Sgt. First Class David Kerby, left, talks with brothers Lucio Guerrero, center and Roger Guerrero as they begin their paperwork as Army recruits on Thursday, March 26, 2009. Before they enter basic training, Sgt. Kerby will help guide the brothers through a process that includes background checks, physical assessments, and vocational testing.

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YAKIMA, Wash. — There were many reasons why John Tadlock decided to join the Army Reserve: He's always enjoyed war movies. He'd like to travel. His friends talked with recruiters.

And money was a factor.

"I knew my parents couldn't pay for college," said Tadlock, a Sunnyside High School senior with a mechanic and bail bondswoman for parents. "And I don't exactly have the grades for scholarships."

Like many rural areas, the Yakima Valley has long been fertile ground for military recruitment. Recruiters cite small-town and patriotic values.

By mid-April, 82 people from the Yakima region had enlisted in all branches of military -- that's about half of last year's total. And while statistics are still too early to prove a trend, local recruiters say they're hearing more now from young people who complain of dim job prospects and increased college costs.

Nationwide, that seems to be the case. Last month, the Army had enough enlistees to tighten up its recruitment standards. Felons and recent drug users, who were previously granted waivers as the Army sought to fill its ranks, were banned. For the first time in two years, the Army is on track to meet a goal ensuring that 90 percent of its soldiers are high school graduates.

Yakima-based Army recruiter Sgt. First Class William Robb credits the increase in enlistees to economy and military incentives -- which can go up to \$70,000 for college and enlistment bonuses up to \$40,000, depending on education, technical skills and foreign language abilities.

"Someone who might not go to college right out of high school is going to have to save money to pay for it," said Robb, who keeps tabs on the county's monthly unemployment statistics at his office in the Yakima Valley Mall. "But for younger people there are a lot fewer options."

Last year, 162 people were recruited into active military service from the Yakima Valley area, placing it about in the middle statewide on a per capita basis.

And while Yakima's economy is more stable than many other places, the unemployment rate is still rising -- reaching 10.6 percent in March. That means high school graduates have to compete with more experienced but out-of-work adults for entry-level jobs.

At least, that's what Robb hears from teenagers like Tadlock, who explained his decision to join one recent afternoon in the recruiting office with his parents.

"Nobody will hire me," the 17-year-old says matter-of-factly, listing off the tire shops and restaurant where he's applied to work in Sunnyside.

With a \$20,000 signing bonus, plus a potential \$20,000 for college from the Army Reserve, Tadlock says he'll be able to study computer programming in college.

Tadlock also will learn how to operate heavy construction equipment while in training. That's a major selling point for his parents -- Darrell and Sarah Tadlock -- who believe that will give their son more options and job security when his eight-year commitment is over.

"If he's going to spend his time in the military, when he walks out the door at the end of his term he needs to be able to go out and have something to do," says Darrell Tadlock. He calls his own mechanic job a "dirty, filthy back-breaking job with little advancement."

About three years ago, Robb said, the Army changed its recruiting strategy to mentor young people as they transition out of high school.

Recruiters still visit with students and faculty at high schools and colleges -- and have a presence at community gatherings, such as an upcoming rodeo in Ellensburg.

But now they spend more time simply hanging out with potential recruits. Sgt. First Class David Kerby, for example, sends text messages most days to Tadlock and has even gone motorcycle riding with the family.

"Whether a person decides to join the Army or not, we help them figure out what their goals are," Robb said. "We'll introduce them to college recruiters or people who can help them find financial aid.

"And if they ever decide they do need help or are interested, they have someone here that they know."

The new strategy helped convince the Guerrero brothers, who recently found themselves in the Army office, where a pile of promotional Army skateboards lay against a wall and hip-hop played from speakers.

Roger and Lucio had each spoken with military recruiters a few years earlier, as they prepared to graduate from high school. Some relatives served in the military, and they were intrigued.

But back then recruiters seemed pushy, and instead the Selah brothers entered colleges instead.

Now the combination of money to pay off college loans and the opportunity to represent their country are motivating the Guerreros to seriously consider joining over the past few months.

Roger said he wants to study digital filmmaking at an arts institution, but the cost is too high.

"I wouldn't be able to do it without loans," said the 20-year-old, who currently takes classes at Yakima Valley Community College. "The recruiters are a lot less pushy."

His brother, 21, will complete his associate's degree in automotive technology from YVCC this summer.

"What a good way to start in life right after college," Lucio said, adding that the Army seems like a secure and lucrative lifelong career.

Local military recruitment (all branches)

2009 (through April 17) -- 82

2008 -- 162

WD9001570

EA

**Eastern Washington Regional Center:
Economic Characteristics of the Region and Methodology for Projecting Job
Creation**

Report by Paul Sommers, Ph.D., Regional Economist
February 2010

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ALUC

UNITED STATES OF AMERICA

The State of  Washington

Secretary of State

I, SAM REED, Secretary of State of the State of Washington and custodian of its seal,
hereby issue this

CERTIFICATE OF FORMATION

to

**AMERICAN LIFE ENTERPRISES LIMITED LIABILITY
COMPANY**

a/an WA Limited Liability Company. Charter documents are effective on the date
indicated below.

Date: 2/3/2009

UBI Number: 602-896-818

APPID: 1353595



Given under my hand and the Seal of the State
of Washington at Olympia, the State Capital

Sam Reed, Secretary of State

 DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
CINCINNATI OH 45999-0023

Date of this notice: 02-11-2009

Employer Identification Number:

(b) (3) (A)

Form: SS-4

Number of this notice: CP 575 B

AMERICAN LIFE ENTERPRISES LLC
% AMERICAN LIFE INC MBR
270 S HANFORD ST STE 100
SEATTLE, WA 98134

For assistance you may call us at:
1-800-829-4933

IF YOU WRITE, ATTACH THE
STUB AT THE END OF THIS NOTICE.

WE ASSIGNED YOU AN EMPLOYER IDENTIFICATION NUMBER

Thank you for applying for an Employer Identification Number (EIN). We assigned you (b) (3) (A). This EIN will identify you, your business accounts, tax returns, and documents, even if you have no employees. Please keep this notice in your permanent records.

When filing tax documents, payments, and related correspondence, it is very important that you use your EIN and complete name and address exactly as shown above. Any variation may cause a delay in processing, result in incorrect information in your account, or even cause you to be assigned more than one EIN. If the information is not correct as shown above, please make the correction using the attached tear off stub and return it to us.

Based on the information received from you or your representative, you must file the following form(s) by the date(s) shown.

Form 1065

04/15/2010

If you have questions about the form(s) or the due date(s) shown, you can call us at the phone number or write to us at the address shown at the top of this notice. If you need help in determining your annual accounting period (tax year), see Publication 538, *Accounting Periods and Methods*.

We assigned you a tax classification based on information obtained from you or your representative. It is not a legal determination of your tax classification, and is not binding on the IRS. If you want a legal determination of your tax classification, you may request a private letter ruling from the IRS under the guidelines in Revenue Procedure 2004-1, 2004-1 I.R.B. 1 (or superseding Revenue Procedure for the year at issue). Note: Certain tax classification elections can be requested by filing Form 8832, *Entity Classification Election*. See Form 8832 and its instructions for additional information.

A limited liability company (LLC) may file Form 8832, *Entity Classification Election*, and elect to be classified as an association taxable as a corporation. If the LLC is eligible to be treated as a corporation that meets certain tests and it will be electing S corporation status, it must timely file Form 2553, *Election by a Small Business Corporation*. The LLC will be treated as a corporation as of the effective date of the S corporation election and does not need to file Form 8832.

To obtain tax forms and publications, including those referenced in this notice, visit our Web site at www.irs.gov. If you do not have access to the Internet, call 1-800-829-3676 (TTY/TDD 1-800-829-4059) or visit your local IRS office.

LIMITED LIABILITY COMPANY AGREEMENT OF
American Life Enterprises LLC

THIS AGREEMENT entered into as of this 20th day of January 2009, by and among American Life, Inc., Charles L. LeFevre, and Blue Water LLC, the Members and has been stated in its entirety as of this date.

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Who We Are – Management



Henry Liebman — President and Co-Founder

henry@americanlifeinc.com

Mr. Liebman graduated from the University of Washington in 1973, receiving a BA in Political Science. Since receiving his JD from the Puget Sound School of Law in 1980, Mr. Liebman has had over twenty years' experience in immigration and real estate law as Managing Partner of Coe Nordwall Liebman LLC and at Liebman-Mimbu PLLC. Mr. Liebman was a founder of Northwest International Bank which was sold in 2006, serving as the bank's first Board Chairman. Mr. Liebman now serves on the Board of Directors of Regal Financial Bank also based in Seattle, Washington. Mr. Liebman co-founded *American Life Inc.* in 1996. *American Life Inc.* is the oldest continuously operating Regional Center in the United States.

In addition to his professional activities, during the past 20 years, Mr. Liebman has been actively involved in commercial real estate management and investment. Mr. Liebman's unique business and legal background provides particular value to *American Life Inc.* and its investors.



Ray Klein — Vice President and Co-Founder

ray@americanlifeinc.com

Mr. Klein graduated from Rensselaer Polytechnic Institute in 1985 with a BS in Computer Science. He received his MS in Computer Science from Michigan State University in 1987. Three years later in Tokyo, Japan, Mr. Klein established a strategic consulting firm specializing in funding Japanese hi-tech companies. Through this firm, TekInvest KK, Mr. Klein successfully funded several US and Japanese firms. He has served as a Board Member or advisor to several technology firms, including NetRatings Japan, Inc. (now a part of Nielsen), Watchfire, Inc. (now a part of IBM) and software firm McAfee.

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In the late 1990s, Mr. Klein turned his attention to real estate investment, focusing on raising capital from international investors. He is based in Tokyo, Japan, and is fluent in Japanese.



Gregory L. Steinhauer — Chief Operating Officer

greg@americanlifeinc.com

Mr. Steinhauer is a graduate of the Wharton School, University of Pennsylvania with a Bachelor of Science Degree in Economics 1984. He has spent his entire working career in Construction and Real Estate Development.

A lifelong resident of Seattle, he was President of a Construction and Residential Development Company for 15 years that specialized in Urban Infill Mid-rise projects. Prior to joining *American Life*, he was mostly recently a Vice President of Development at a \$1 billion dollar institutional Real Estate Investment Firm where he was active in acquiring and entitling several projects.

Mr. Steinhauer is an active board member of Mercer Island Boys and Girls Club and he and his wife are active longtime supporters of the Fred Hutchinson Cancer Research Center.



Jo Hwang — Administrative/Marketing Director

jo@americanlifeinc.com

Ms. Hwang, a long-time resident of Seattle, attended the University of Washington receiving a BA in Business Administration. Prior to joining *American Life Inc.*, Ms. Hwang successfully managed her own businesses for over seven years. She also worked for eight years as a paralegal specializing in immigration, personal injury, and other areas of law with the Herrmann Law Firm. At *American Life Inc.*, along with administrative duties, Ms. Hwang assists non-U.S. persons who wish to invest in projects qualifying them for either a U.S. immigrant visa or a non-immigrant visa.



Donald R. Ayres — Property Manager

don@americanlifeinc.com

Don brings 30 years of management and development experience to *American Life Inc.* Prior to *American Life Inc.*, he was with HealthForce Partners as a founding member and Senior VP of 12 physical therapy clinics and 4 Regional Occupational Medicine Clinics in King and Snohomish Counties. He has been working in the Seattle business community for 30 years and was a founding partner in Eagle Rehab in 1992, a 40-office group of clinics through Washington State where he served as regional manager in charge of operations, facility development, and property management as well holding responsibility for budgeting and business development for 17 clinics. Prior to that he founded Therapy Network Services, a 175 member IPA in 3 states that contracted with Insurance Companies to provide rehabilitation.

Don received his BS in Athletic Training from Washington State University and post-graduate degree in Physical Therapy in 1976 from Children's Hospital in Los Angeles. He has served as Board Chair for Washington State Private Practice and Socioeconomic Chairman for The Washington State Physical Therapy Association. He has also served as President of Everett Golf and Country Club in 2001 and currently serves on the BOD and is Vice Chair of the Providence Everett Medical Center Foundation.



Jim Christensen — CFO Consultant

jim@americanlifeinc.com

Mr. Christensen graduated from Minnesota State University in 1972 with a BS degree in Accounting. Mr. Christensen has 30 years of increasingly responsible positions in accounting and finance, both in public accounting and in industry. Mr. Christensen obtained his CPA in 1974 while employed six years with KPMG Peat Marwick in Minneapolis, a large international public accounting firm. While there he performed audit services for a variety of publicly held industries, both medium and large.

During the mid 1980s, Mr. Christensen was the Corporate Controller & CAO for Food Services of America, a large (formerly publicly owned) wholesale distributor/retail food company. Since then he has 16 years of experience as the Chief Financial Officer for small to medium and rapidly growing and privately owned wholesale distribution companies. This includes NutraSource Inc., a leading Northwest natural food wholesaler, successfully sold in 1995. More recently, he was the CFO for Pacific Rim Import Corp., one of the largest independent wholesale gift and houseware import distributors in the nation. Mr. Christensen has a strong background in managing accounting, finance and administration functions.



James Dillon — Construction and Design Manager

Mr. Dillon graduated in 1974 from the Philadelphia College of Art receiving a BS in Environmental Design. He later received his Master of Architecture degree from Carnegie Mellon University in 1978. Mr. Dillon has over 28 years of experience in architectural design and construction as senior designer at DMJM, one of top ten architectural and engineering firms in the world, and currently as the President of Dillon Design and Constructions, Inc. Mr. Dillon manages, builds and designs all *American Life Inc.*'s construction projects and remodels.

**Shari Hollinger — Account Manager**

shari@americanlifeinc.com

Ms. Hollinger is a 1981 graduate of the University of Alaska, having receiving a Bachelor of Business Administration with an emphasis in Accounting. Ms. Hollinger spent five years with Atlantic Richfield early in her career. For the past 15 years, she has devoted her efforts to working with a variety of small businesses including her family's trucking firm. She brings to *American Life Inc.* her experience gained in the areas of cash management, project accounting, finance, and commercial property management. Ms. Hollinger has been with *American Life Inc.* since 1998.

**Mark Ivener — Immigration Consultant**

For more than 30 years, Mark A. Ivener has exclusively practiced immigration law. He has lectured on immigration law for organizations such as the World Trade Institute, the International Bar Association, and the American Immigration Lawyers Association (AILA). His books include *Handbook of Immigration Law, Volumes I and II; Doing Business in the U.S.A. Under Free Trade; Get The Right Visa; A Complete Guide To Getting An American Visa (in Japanese); and Have You Thought About Immigrating To The U.S.? (in Spanish)*. In addition, he has authored many articles for such publications as the *International Law Journal, the Canadian-American Bar Association Newsletter, Business and the Law, and World Trade Trends*. Mr. Ivener is listed in the *Martindale-Hubbell Bar Register of Preeminent Lawyers (Immigration and Naturalization)* and the *International Who's Who of Corporate Immigration Lawyers*.

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Charles LeFevre
2700 Fourth Avenue South
Seattle, Washington 98134
Email: Chuck@Esquin.com
Tel: 206-682-7374
Cell: 206-459-0485

Mr. Charles LeFevre is the owner of Esquin Wine Merchants and partner with Mr. Liebman in Esquin Wine Storage in Seattle, Washington. He is also a partner with the principals of American Life, Inc. in several real estate projects in Seattle's SODO area.

Prior to buying Esquin Wine Merchants in 1997, Mr. LeFevre was President and CEO of NutraSource, the Northwest's largest natural food distributor. NutraSource was a public/private partnership which was partially funded by the Economic Development arm of the National Cooperative Bank.

Prior to starting NutraSource in 1985, he was a senior executive with Alaska Commercial Company, a large Alaskan retailer, which was owned by the Community Development Corporation of Alaska, another successful public/private partnership.

Mr. LeFevre is a successful entrepreneur with deep public/private economic roots. He attended the University of California at Santa Barbara.

NINA COLLIER

Nina Collier, is the Managing Partner of Washington² Advocates, a strategic government affairs and public communications consulting company that specializes in solving issues impacting the Pacific Northwest. Washington² Advocates is dedicated to helping businesses and organizations achieve success in the public arena in the State of Washington, the region, and at the federal level in Washington, DC. Based in Bellevue, WA with an office in Washington, DC, Washington² Advocates' clients include the University of Washington, Russell Investments, Sound Transit, TriWest Health Care Alliance, Chelan and Grant PUDs, the Weyerhaeuser Company, and many other Northwest companies and entities.

Prior to working in government affairs consulting, Nina worked for Senator Slade Gorton as the lead Legislative Assistant in the areas of federal budget, tax, general government, appropriations, and Indian Affairs. She also served in local government as a Legislative Analyst to the King County Council Budget Committee.

Nina holds several leadership positions including serving as a board member of the National Asian Pacific Center on Aging, the Bellevue Downtown Association, and the Gorton Legacy Group and she is a member of Bellevue Rotary. She was a member of the President's Advisory Commission on Asian American and Pacific Islanders from 2005 – 2007. She served on the Board of Governors of the City Club of Seattle for six years, including serving as CityClub's Board President. She was a fellow of the Marshall Memorial Fund in 2002 and was a member of the Junior League of Seattle and a volunteer advisor to the Bellevue YMCA Youth and Government Program.

Nina has a Masters Degree in International Affairs from George Washington University and a Bachelor's Degree in International Studies from the University of Washington.

Nina's husband Dave is a partner in the public accounting firm of Ernst & Young. Nina, Dave, and their daughter live in Issaquah.



Tony Williams, Partner

A veteran of Capitol Hill and the Pacific Northwest political scene for over 20 years, Tony is a founding partner and Chairman of W2A. He and his family moved to the Pacific Northwest from Washington, DC two years ago. He continues to be involved in projects that require him to make monthly trips to Washington, DC, but his practice has expanded to include a number of local and regional projects.

The focus of Tony's work is problem-solving – a skill he learned from being U.S. Senator Slade Gorton's Chief of Staff for six years. In that position, Tony served as the Senator's top advisor, decision maker, and chief problem-solver on a wide range of issues that impacted Washington state, the Pacific Northwest, and the nation. When Gorton assumed his Senate leadership role as Counsel to the Majority Leader in 1997, Tony served as lead staff member on all matters related to this position, which focused on the creation and execution of the Senate Republican legislative agenda in the 105th and 106th sessions of Congress.

Tony's remarkable combination of political and strategic legislative experience has not gone unnoticed. Roll Call, a newspaper devoted to covering Capitol Hill, twice named him as one of the Hill's elite "Fabulous Fifty" staffers.

Tony also directed Gorton's 2000 re-election campaign and advised the George W. Bush for President campaign on strategies for winning Washington state. A veteran of campaigns, he was also communications director for Gorton's successful re-election bid in 1994 and press secretary for Congressman Rod Chandler's Senate campaign.

Tony's political ties to the Pacific Northwest extend to Oregon where he served as a consultant Senator Gordon Smith's first two Senate campaigns. After Senator Smith's election, Tony served as the co-transition director for Smith's Senate office.

The journalism graduate remains an active supporter of his alma mater (including its football team), serving on the Oregon State University Foundation's Board of Trustees.

Tony and his wife, Cindi, live in Clyde Hill, WA, with their sons, Joshua (a special needs student at Clyde Hill Elementary) and Jacob. Cindi works at the Bill and Melinda Gates Foundation in Seattle. Tony and Cindi are both involved in a number of community-based charitable activities devoted to education improvements and providing opportunities for those with special needs and disabilities. Tony is a member of the National Council on Disability.



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Who We Are

Company Introduction – History and Operations

American Life Inc., established in 1996, began by assembling contiguous and near-by properties in SODO within the Duwamish industrial area, a section bordering the south end of downtown Seattle, extending south to Spokane Street. Management believes SODO will grow significantly in importance and value in the mid to long-term. In particular, due to Seattle's geography that severely limits available land near-downtown, management sees that Seattle's historically steady growth will force SODO, presently Seattle's only centrally located industrial area, to transform to a district serving Seattle's growth and changing needs.

The management of *American Life Inc.* began investing in the Seattle area in 1974. Since its formation in 1996, the Company and its affiliates purchased over 40 prime warehouse properties in or nearby SODO and added significant value by converting what were low yielding warehouses into higher return, flexible office, hi-tech, shop and storage space. The Company and its principals now control approximately 50 acres within SODO. This makes *American Life Inc.* one of the largest private holders of SODO real estate.

Initially, *American Life Inc.* and its principals relied on their own capital, borrowed funds, and earnings to make acquisitions and property improvements. Soon thereafter they began seeking U.S. and international investment, developing in the process a standard limited partnership format. Under this format, *American Life Inc.* acts as general partner with investors entering as legally protected limited partners. Investors earn regular monthly income from their partnership's rent roll as well as future appreciation.

For the safety and security of the investors, *American Life Inc.* does not attempt to increase yield to investors by maintaining debt. To the contrary, *American Life Inc.* strives to reduce existing mortgage balances to zero. *American Life Inc.* applies the proceeds of sales of limited partnership interests to investors to pay down debt on the related property. *American Life Inc.* closes off further investment in a partnership once the debt on that property had been fully repaid and a reasonable reserve fund established.

American Life Inc. pays the mortgage on each property from its own funds until the mortgage is paid in full. The Company guarantees all debt and no debt is cross-collateralized among the properties and partnerships.

The Company runs a lean operation to minimize any direct expenses charged against the partnerships' earnings. To produce a stable income stream, all tenant leases are on a triple-net basis. *American Life Inc.* does not charge separate asset management fees to the limited partnerships.

American Life Inc. formed American Life Ventures LLC in 2006 to implement the SODO business model in USCIS designated Regional Centers encompassing downtown Everett, Washington and downtown Tacoma, Washington. The Regional Centers were approved by the USCIS in June of 2008 and are managed by *American Life Inc.*

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Executive Summary

Business Strategy

American Life Inc. offers investors a secure investment in prime real estate. The investment offers superior monthly income and a significant capital gain opportunity. The proven strategy developed over the past decade is to:

1. **Acquire aging properties** in older industrial areas near the central business district of selected cities in Washington State (Seattle, Everett, and Tacoma) to benefit from urban infill.
2. **Create a footprint of contiguous or nearby properties** which, at a future date, could be sold to or developed for a corporate user as a site for a corporate campus, and which benefit from each other's development or renovation; so that the whole becomes greater than the sum of the parts.
3. **Make improvements** to allow rental at reasonable rates to commercial tenants, while providing investors with a meaningful income return.
4. **Operate with the lowest possible risk** by remaining free of debt, and owning all properties unencumbered by bank loans. (Note: by avoiding mortgage interest costs, American Life Inc. will maximize current income to its investors while patiently awaiting the exit strategy that maximizes investor profits.)

While the Seattle, Tacoma and Everett Regional Centers were selected to develop areas of high unemployment, the region as a whole is well endowed with resources, growing, and prosperous. Simply put, the Pacific Northwest is one of the better investment opportunities in the world.

Regional Overview

With over 20 million people and over US \$700 billion in gross regional product, the US Pacific Northwest (Alaska, Idaho, Montana, Oregon and Washington) and Western Canada (Alberta, British Columbia and Yukon) is one of fastest growing regions of North America. International trade, resource extraction, technology, and agriculture underpin the economy. It is one of one of North America's most important gateways to East Asia, the host of the 2010 Winter Olympics and the site of several major infrastructure projects and internationally known businesses. The Seattle metropolitan area, together with Everett to the north and Tacoma to the south, form the commercial hub of this prosperous region.

In economic terms the Pacific Northwest is a relatively new addition to the world scene. Europeans arrived in the later half of the 18th century, most notably with the expeditions of Captain Cook UK, Malaspina — Spanish and Bering — Russian. These expeditions mapped the area and catalogued its natural resources. Captain Vancouver, part of Cook's expedition, highly recommended Puget Sound as a suitable place for European colonization but thought it was too far from population centers. European settlement trickled in soon after, primarily in search of furs. In the first half of the 19th century a steady stream of immigrants from the Eastern part of the US arrived on foot and covered wagons by way of the Oregon Trail. The stream of people increased with the opening of the transcontinental railroad. The arrival of the jet plane further increased this migration from all over the world. Modern transportation made a once remote, yet bountiful, part of the world accessible and, for better or worse, exploitable.

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Our Partners

US Business Partners

Colliers International (Seattle Office)



Marketing Partners in Europe

Buyse Immigration:

Your American Life agent in The Netherlands, Belgium

Your American Life agent in Germany and Switzerland



The UK agent for American Life Inc.



USA Immigration Service -
Deutschland -
79104 Freiburg



Marketing Partners in Asia

ALBS Japan



Chow King & Associates

CHOW KING & ASSOCIATES

U.S. & International Immigration Consultancy

Club Emigration



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Eureka International Business

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Eureka International Business Company
专业美国投资移民

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Visas Consulting Group



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American Life Inc. Real Estate Investments

Secure Real Estate Investment: Immediate Income and Future Growth

Our proven strategy since 1995 is to:

1. Secure superior monthly cash flow for investors through operations.
2. Obtain capital appreciation resulting from excellent location, superior cash flow, and growth in the area.

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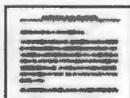
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Tideflats to Tomorrow

"Tideflats to Tomorrow: The History of Seattle's SoDo" is [now in print](#).

[Purchase from Amazon.com](#)



[Marriott to open new Seattle Courtyard hotel in May](#)
Puget Sound Business Journal, March 2, 2010

[Graham \(Alaska Building\) takes top honors in Historical Restoration](#)
Associated Builders and Contractors, Inc., Feb. 5, 2010

[The 5 best markets for 2010 — Tacoma & Seattle](#)
MSN real estate, Feb. 4, 2010

[Large SoDo landowner pays \\$17M for parcel near Safeco Field](#)

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"It's the tough times that really show what we're made of."

Susan Roberts, Vice President, Business Development Officer, Citibank

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Tuesday, March 2, 2010

Marriott to open new Seattle Courtyard hotel in May

Puget Sound Business Journal (Seattle)

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Marriott International Inc. said it will open its new Courtyard by Marriott hotel at 612 Second Ave. in downtown Seattle in May.

The 15-story, 262-unit hotel will open in the 106-year-old Alaska Building. The new hotel will include a new Bistro bar and restaurant and nine meeting rooms with 4,600 square feet of space. The Alaska Building was the city's first steel-framed skyscraper and tallest building in 1904.

Marriott International (NYSE: MAR) is based in Bethesda, Md.



Photo: Matt Hagen
The Alaska Building (taller, mostly white, on left) at 612 Second Ave. in Seattle will reopen in May as a Courtyard by Marriott hotel.

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Do you believe customers should be allowed to bring guns into Starbucks?

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- No
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Home >> Newsroom >> News Releases >> 2010 News Releases >> ABC Honors America's Top Construction Projects

ABC HONORS AMERICA'S TOP CONSTRUCTION PROJECTS (02/05/2010)

Contact: Gail Raiman, (703) 812-2073
Gerry Fritz, (703) 812-2062

For Immediate Release
February 5, 2010

San Diego, Calif. – Associated Builders and Contractors (ABC) February 4 recognized the nation's top 2009 construction projects during its Excellence in Construction and National Safety Excellence awards celebration at the Hilton San Diego Bayfront Hotel and Convention Center in San Diego, Calif.

"ABC is pleased to present these industry-leading construction projects with our Excellence in Construction awards," said Kirk Pickerel, ABC president and CEO. "This year's winners were exceptional examples of the outstanding craftsmanship and professionalism that embody merit shop construction. ABC members continue to be the driving force behind some of the nation's highest-profile projects."

The Excellence in Construction awards program is the industry's leading competition, developed to honor innovative and high-quality merit shop construction projects and safety programs. The award honors all construction team members, including the contractor, owner, architect and engineer. The winning projects, selected from entries submitted from across the nation, were judged on complexity, attractiveness, unique challenges overcome, completion time, workmanship, innovation, safety and cost.

A panel of industry experts served as the competition's judges. This year's panel included representatives from the Design-Build Institute of America, the U.S. Army Corps of Engineers, the Surety & Fidelity Association of America, The American Institute of Architects and representatives from higher education, among others.

2009 Award of Excellence Winners: Specialty Contractor Categories

Electrical - Commercial – Less than \$2 Million
Contractor: Duro Electric Company
Project: Northrop Grumman
Client/Owner: Northrop Grumman
Architect/Engineer: Oz Architecture

Electrical - Commercial - \$2-\$10 million
Contractor: Adams Electric Company
Project: Inspiration Network "City of Light"
Client/Owner: Inspiration Network
Architect/Engineer: Little Diversified Architectural Consultants

Electrical - Industrial – Less than \$2 million
Contractor: MKD Electric
Project: Wells Manufacturing Melt Furnace Upgrade
Client/Owner: Wells Manufacturing

Electrical – Industrial - \$2 - \$10 million
Contractor: ISC
Project: ExxonMobil U.S. Non-Road Diesel Underground Project
Client/Owner: ExxonMobil Corporation
Architect/Engineer: Jacobs Field Services of North America

Electrical – More than \$10 million
Contractor: Denier Electric Co., Inc.
Project: West Chester Medical Center
Client/Owner: The Health Alliance of Greater Cincinnati
Architect/Engineer: RTKL Associates / Fosdick & Hilmer, Inc.

Exteriors – Masonry, Precast, Stone

Contractor: Chamberlin Roofing & Waterproofing
Project: TWU Weatherproofing
Client/Owner: Texas Women's University

Interiors - Acoustical, Drywall, Millwork, Plaster
Contractor: Lasco Acoustics & Drywall, Inc.
Project: Union Station Renovation
Client/Owner: City of Dallas/Woodbine Development Corp.
Architect/Engineer: McCall Design Group / EDG

Mechanical - Commercial - Less than \$2 million
Contractor: WAT-KEM Mechanical, Inc.
Project: University of Dayton Stuart Hall Phase I
Client/Owner: University of Dayton
Architect/Engineer: Heapy Engineering

Mechanical - Commercial - \$2 - \$10 million
Contractor: Brockway Mechanical & Roofing Company, Inc.
Project: Jefferson County Health Center
Client/Owner: Jefferson County Health Center
Architect/Engineer: Hammel & Green Architects & Engineers

Mechanical - Industrial - Less than \$2 million
Contractor: Excel Contractors
Project: IMTT VGO Six Oil Piping and Thermal Heat Boiler Replacement
Client/Owner: IMTT
Architect/Engineer: Wink Companies, LLC

Mechanical - Industrial - \$2-\$10 million
Contractor: MSI Mechanical Systems, Inc.
Project: 2008 Lab Upgrade
Client/Owner: EMC Corporation
Architect/Engineer: WSP Flack+Kurtz

Mechanical - More than \$10 million
Contractor: Dynaten Corporation
Project: One Arts Plaza
Client/Owner: Billingsley Company
Architect/Engineer: Corgan Associates, Inc. / Blum Consulting Engineers, Inc.

Other Specialty Construction - More than \$1 million
Contractor: Haley-Greer, Inc.
Project: BP Project Rodeo
Client/Owner: Bovis Lend Lease Inc. / British Petroleum
Architect/Engineer: Gensler

Sitework/Landscape
Contractor: Saiia Construction, LLC
Project: The Grove
Client/Owner: Kimco Realty
Architect/Engineer: Gonzalez-Strength & Associates, Inc.

General Contractor / Construction Management Categories

Commercial - \$2-\$5 million
Contractor: Hensel Phelps Construction Co.
Project: Southeast District Office
Client/Owner: Hensel Phelps Construction, Co.
Architect/Engineer: Baker Barrios Architects, Inc.

Commercial - \$5-\$10 million
Contractor: Stronghold Engineering, Inc.

Project: Design Build Golf Clubhouse Complex
Client/Owner: United States Department of the Navy Architect/Engineer: AKS, Inc.

Commercial - \$10-\$25 million
Contractor: Middleman Construction Company, LLC
Project: Plaza Las Campanas
Client/Owner: REOC Development LLC
Architect/Engineer: Luna Design Associates, Inc. / MDN Architects

Commercial - \$25-\$100 Million
Contractor: Hardin Construction Company, LLC
Project: Westin Tampa Bay Airport Hotel
Client/Owner: Impact Properties II, LLC
Architect/Engineer: Bessolo Design Group

Industrial - Less than \$5 million
Contractor: Grimm Construction Company, Inc.
Project: BNSF New Wheel Truing Facility
Client/Owner: BNSF Railway
Architect/Engineer: Bartlett & West

Industrial - \$5-\$15 million
Contractor: Turner Industries Group, L.L.C.
Project: Recovery Boiler Rebuild
Client/Owner: International Paper

Industrial - \$15-\$25 million
Contractor: Turner Industries Group, L.L.C.
Project: 120MM SCFD H2 Facility
Client/Owner: Air Products and Chemicals, Inc.
Architect/Engineer: Technip / Air Products

Industrial - \$25-\$100 million
Contractor: Cajun Contractors, Inc.
Project: Marathon Petroleum Company - Garyville Major Expansion Project - Civil Construction Services
Client/Owner: Marathon Petroleum Company
Architect/Engineer: Fluor Corporation

Industrial - Less than \$5 million
Contractor: Pinkard Construction Company
Project: Brighton Learning and Resource Campus
Client/Owner: Community Reach Center Foundation / Brighton Urban Renewal Authority
Architect/Engineer: BURKETTDESIGN, Inc.

Institutional - \$10-\$25 million
Contractor: Shingobee Builders, Inc.
Project: Dakotah! Ice Center
Client/Owner: Shakopee Mdewakanton Sioux Community
Architect/Engineer: HTG Architects

Institutional - \$25-\$100 million
Contractor: B.L. Harbert International, LLC
Project: New U.S. Embassy Compound
Client/Owner: U.S. Department of State
Architect/Engineer: Page Southerland Page

Healthcare - Less than \$10 million
Contractor: H.A. Dorsten, Inc.
Project: Heart Institute of Northwest Ohio
Client/Owner: Health Building Group, LLC
Architect/Engineer: Garmann-Miller & Associates

Healthcare - \$10-\$25 million

Contractor: Benchmark Construction Company, Inc.
Project: Hospice of Lancaster County Mount Joy Facility
Client/Owner: Hospice of Lancaster County
Architect/Engineer: Reese, Lower, Patrick and Scott Architects

Healthcare - \$25-\$100 million

Contractor: Hensel Phelps Construction Co.
Project: The Dell Pediatric Research Institute, The University of Texas
Client/Owner: The University of Texas at Austin
Architect/Engineer: Hellmuth, Obata + Kassabaum, L.P.

Historical Restoration - \$2-\$10 million

Contractor: Graham Contracting Ltd.
Project: Alaska Building Historical Renovation and Addition
Client/Owner: 618 Second Avenue LP (Kauri Investments, Ltd.)
Architect/Engineer: Clark Design Group

Historical Restoration - \$10-\$100 million

Contractor: Lund-Ross Constructors
Project: The Omaha Building
Client/Owner: Kutak Rock LLP
Architect/Engineer: Alley Poyner Macchietto Architecture

Infrastructure / Heavy

Contractor: Barriere Construction Company, L.L.C.
Project: Route 1-10, Paris Rd to CSLM 12.24
Client/Owner: Louisiana DOTD
Architect/Engineer: Louisiana DOTD

Public Works / Environmental

Contractor: W.D.S. Construction, Inc.
Project: City of Beaver Dam Demolition
Client/Owner: The City of Beaver Dam
Architect/Engineer: MSA Professional Services

Renovation - Less than \$4 million

Contractor: Ferguson Construction Company
Project: Surgical Suite Renovation - Wilson Memorial Hospital
Client/Owner: Wilson Memorial Hospital
Architect/Engineer: App Architecture

Renovation - \$4-\$10 million

Contractor: Brasfield & Gorrie, LLC
Project: Mountain Brook High School Additions and Renovations
Client/Owner: Mountain Brook Board of Education
Architect/Engineer: Krebs Architecture & Engineering, Inc.

Renovation - \$10-\$100 million

Contractor: Hoar Construction, LLC
Project: West Florida Hospital Exterior Re-skin, Phase II
Client/Owner: HCA
Architect/Engineer: Gresham Smith & Partners

Pre-Engineered Building

Contractor: Wohlsen Construction Company
Project: Transfer Station Improvement Project
Client/Owner: Lancaster County Solid Waste Management Authority
Architect/Engineer: RLPS Architects, Ltd.

Residential - Multi-Family and Condominium Projects

Contractor: Osborne Construction Company

Project: Denali Village Multi-Family Housing Replacement
Client/Owner: United States Army Corps of Engineers
Architect/Engineer: ORB Architects

Residential - Single Family Projects
Contractor: Nor-Son, Inc.
Project: Pelican Kale Retreat
Client/Owner: Confidential
Architect/Engineer: Pearson Design Group

Other Construction
Contractor: Spawglass
Project: Texas A&M University McFerrin Athletic Center
Client/Owner: Texas A&M University
Architect/Engineer: O'Connell Robertson

Mega-Projects - More than \$100 million
Contractor: BE&K Building Group
Project: Cherokee Central Schools Building Program
Client/Owner: Eastern Band of Cherokee Indian
Architect/Engineer: Padgett & Freeman Architects, PA

#####

Associated Builders and Contractors (ABC) is a national association with 77 chapters representing 25,000 merit shop construction and construction-related firms with 2 million employees. Visit us at www.abc.org.

 PDF Format



**1501 First Avenue South Limited Partnership
Comprehensive Business Plan
270 SOUTH HANFORD STREET, SUITE 100
SEATTLE, WASHINGTON 98134**

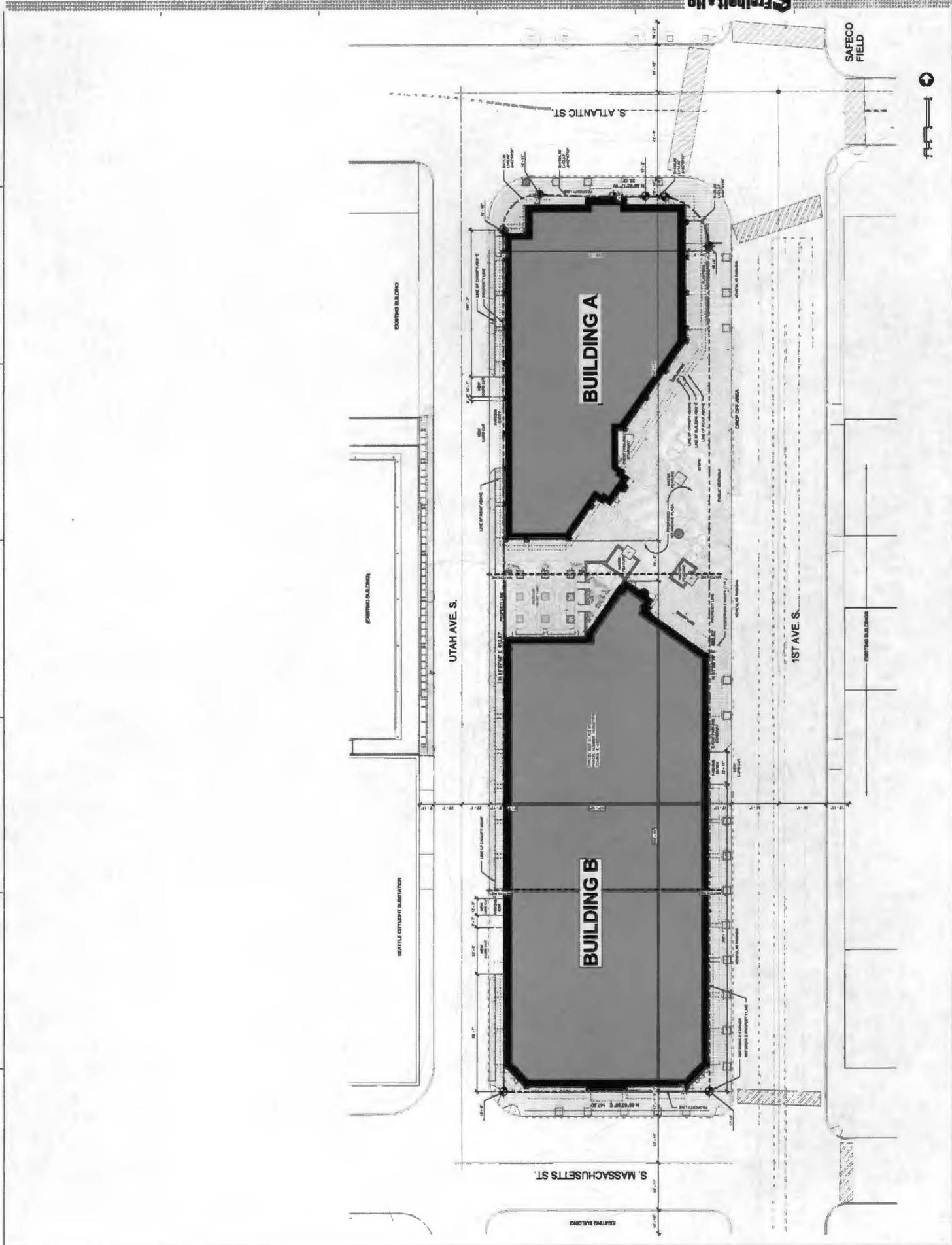
COMPREHENSIVE BUSINESS PLAN

1501 FIRST AVENUE SOUTH LIMITED PARTNERSHIP

OVERVIEW

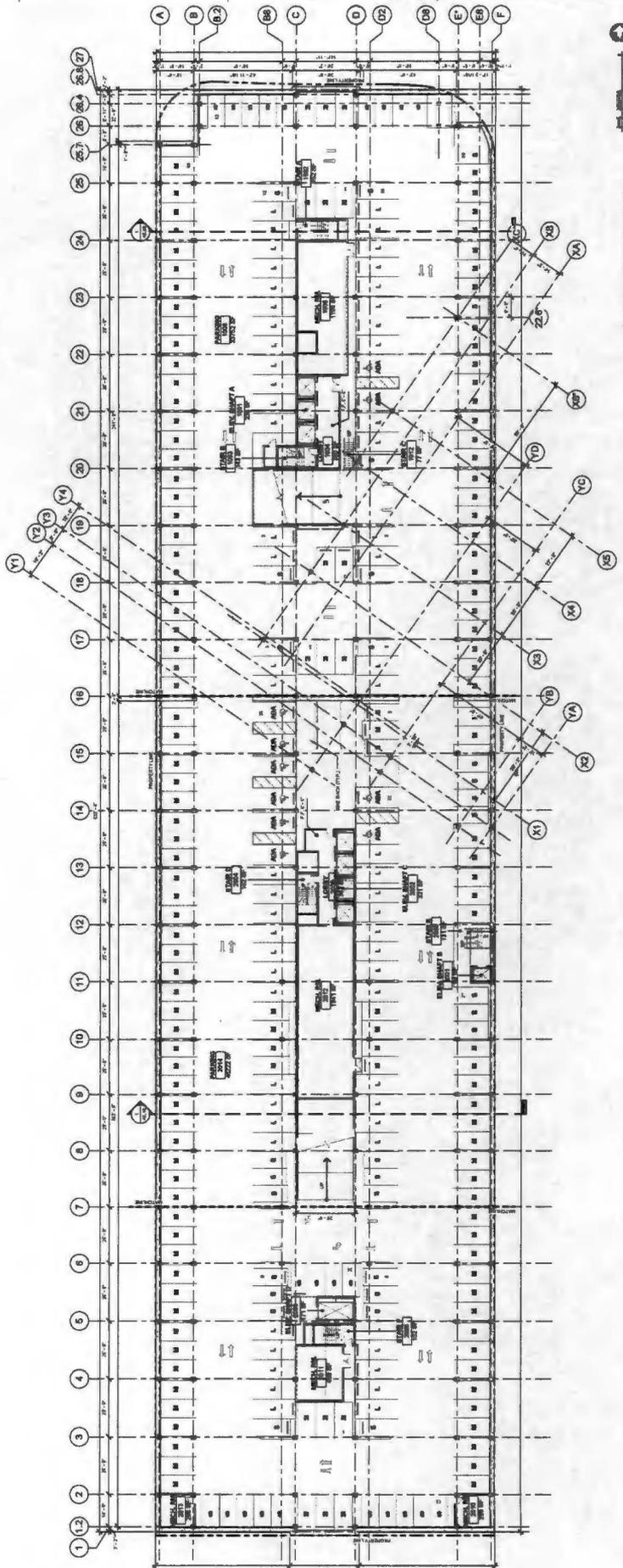
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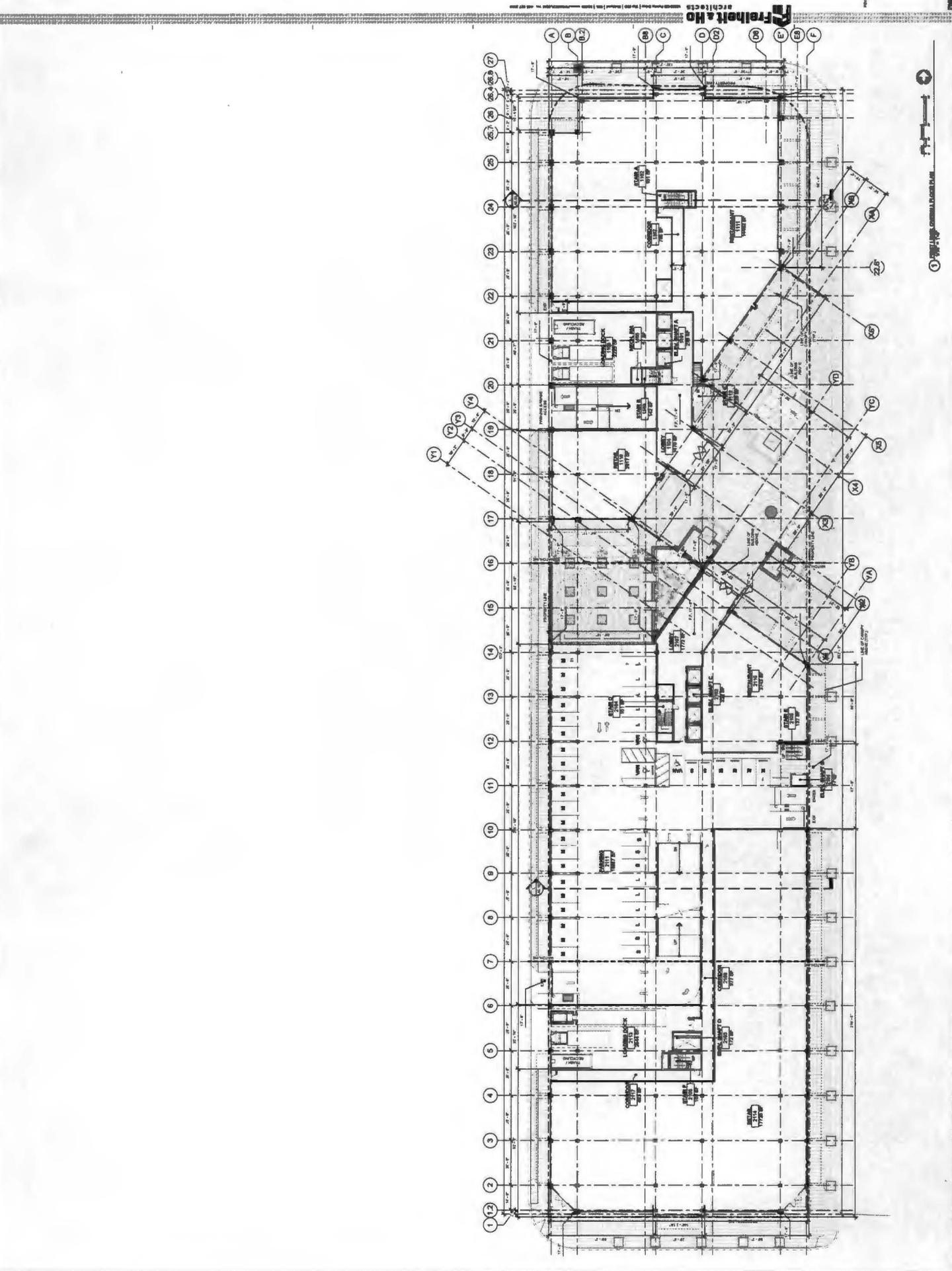




Architects
Frohne & Ho

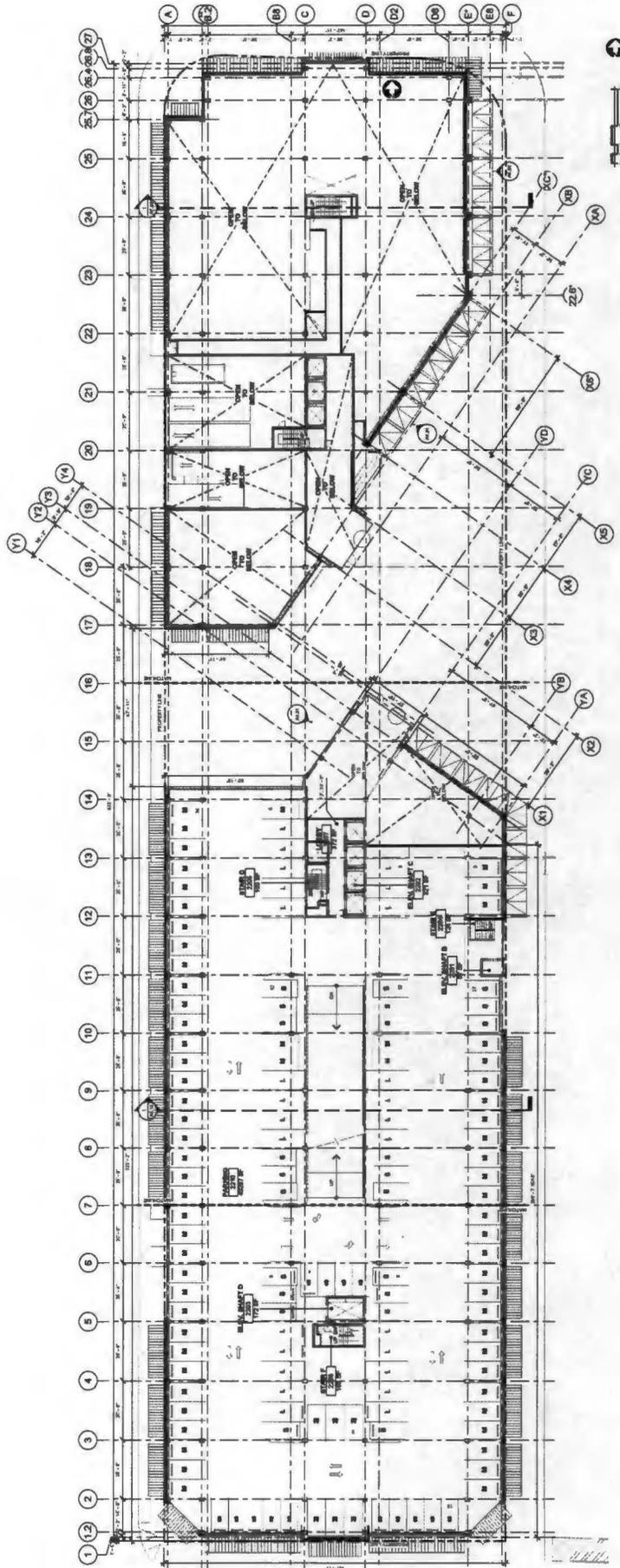
1600 1ST AVENUE NORTH
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HOME PLATE CENTER
WALTER AND PEGGY



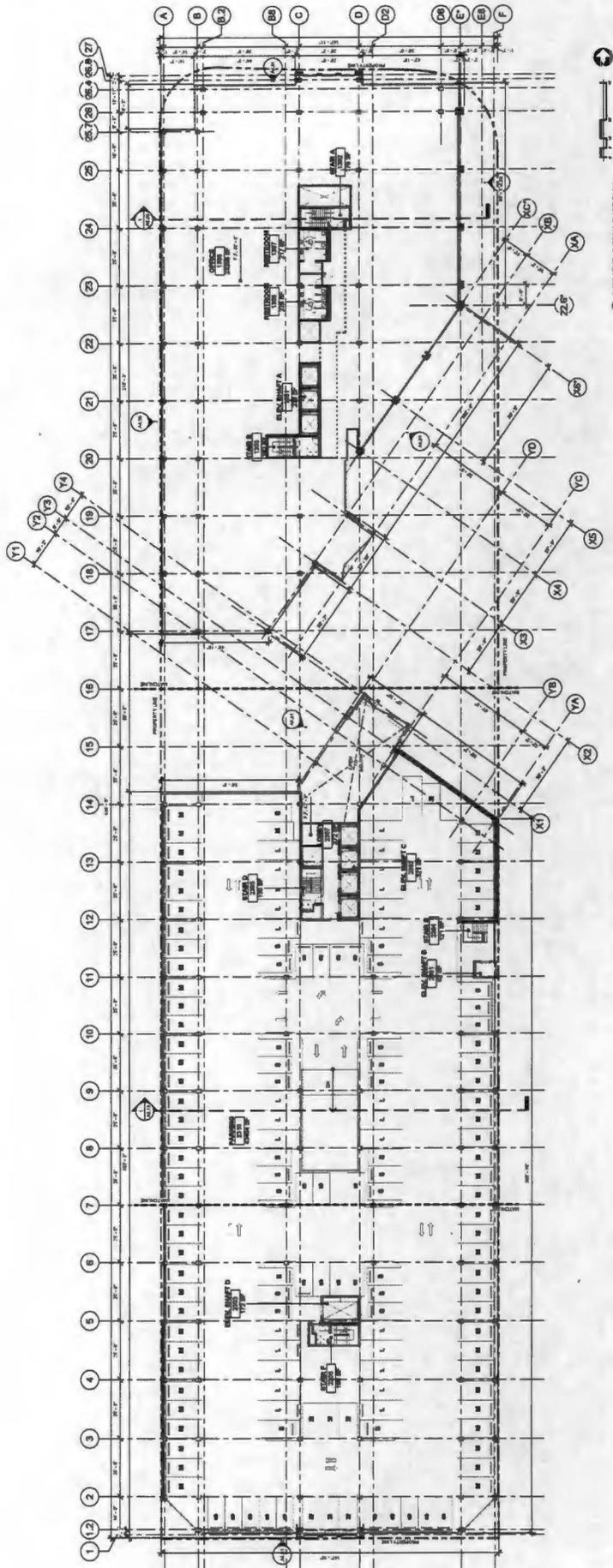


Freiheit & Ho
Architects

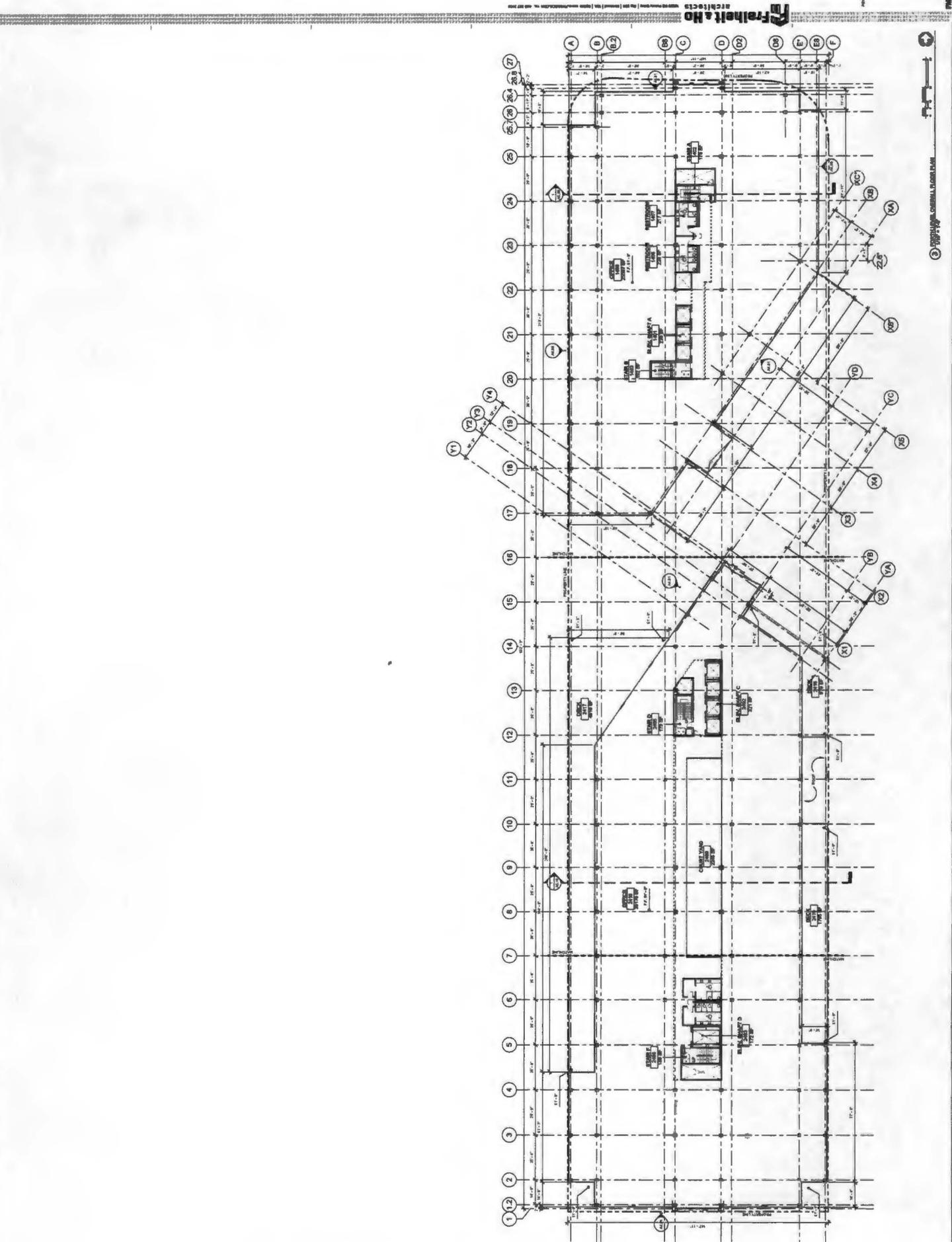
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2.0000/01.0000 ORIGINAL FLOOR PLAN

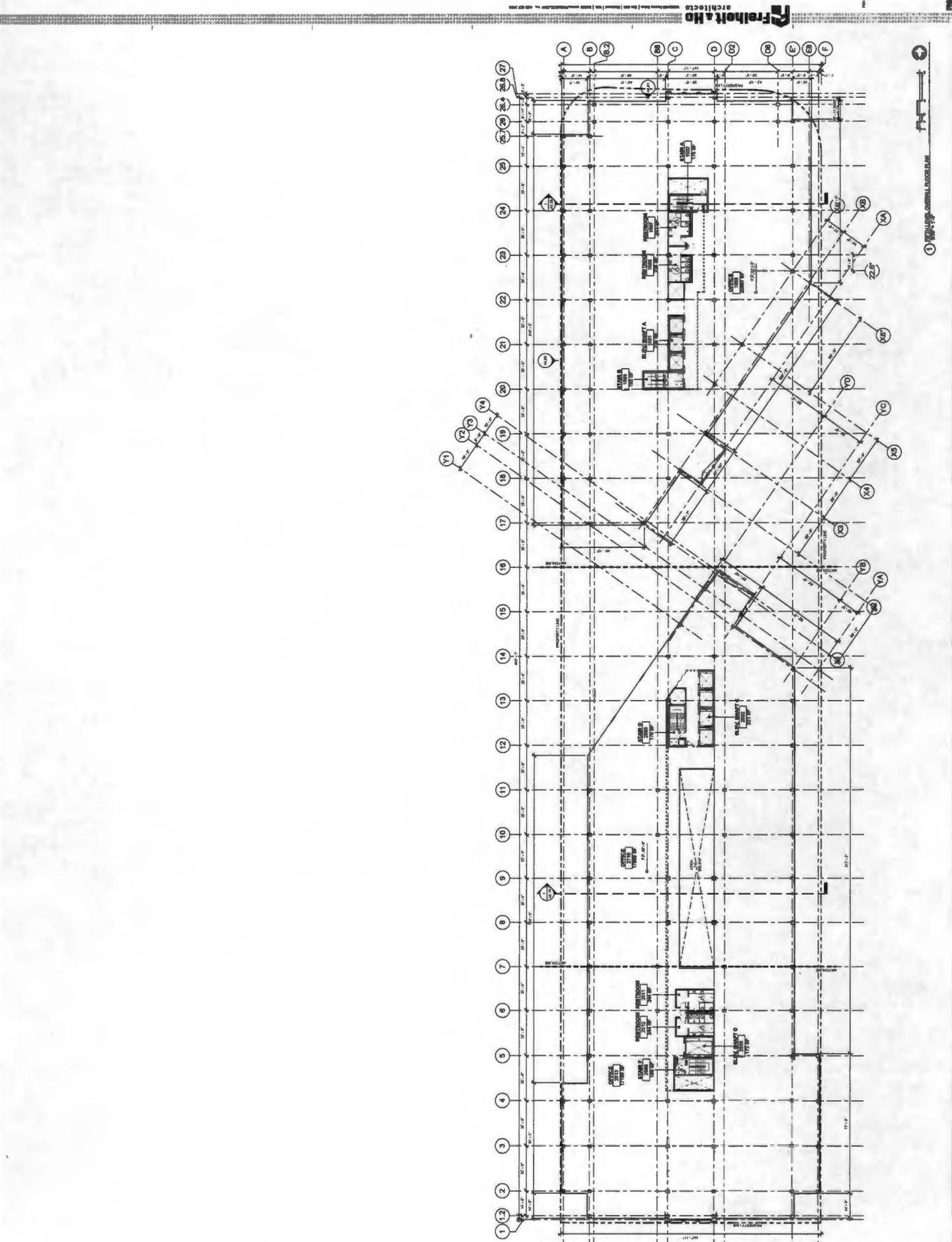


1. 1801 1ST AVENUE NORTH - GENERAL FLOOR PLAN

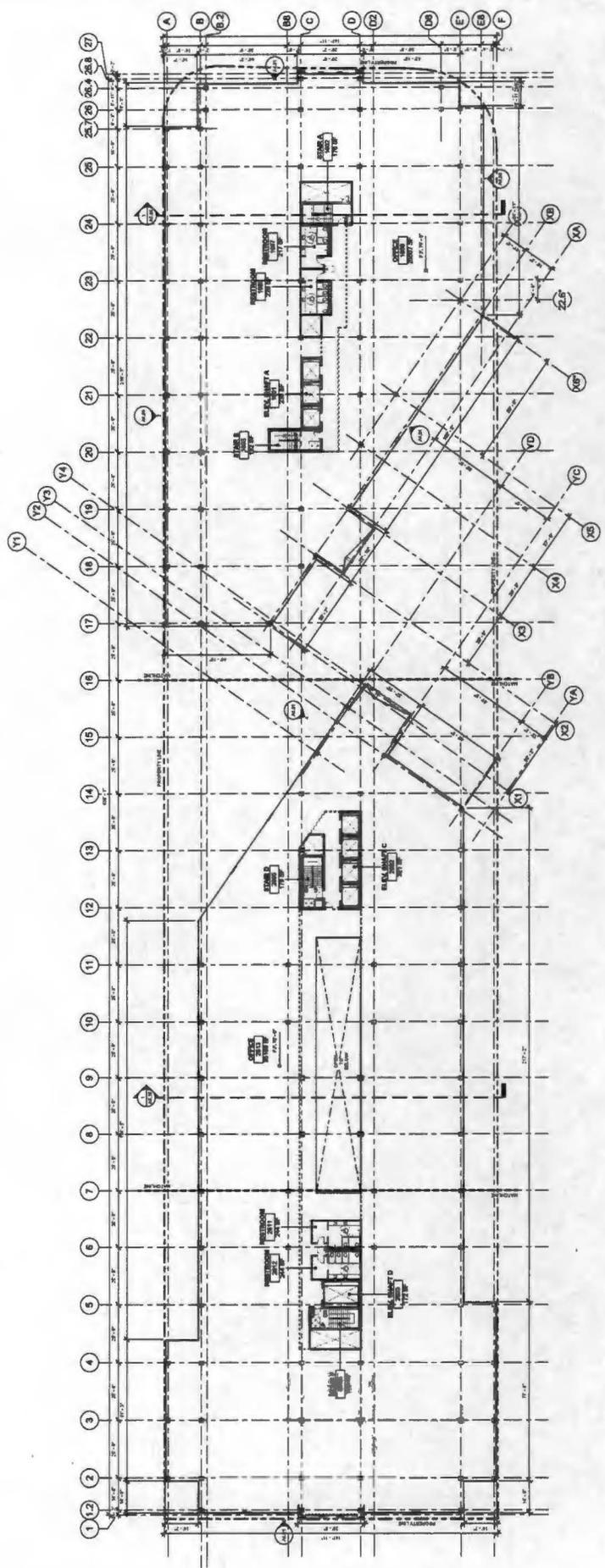


Frehelt & Ho
Architects

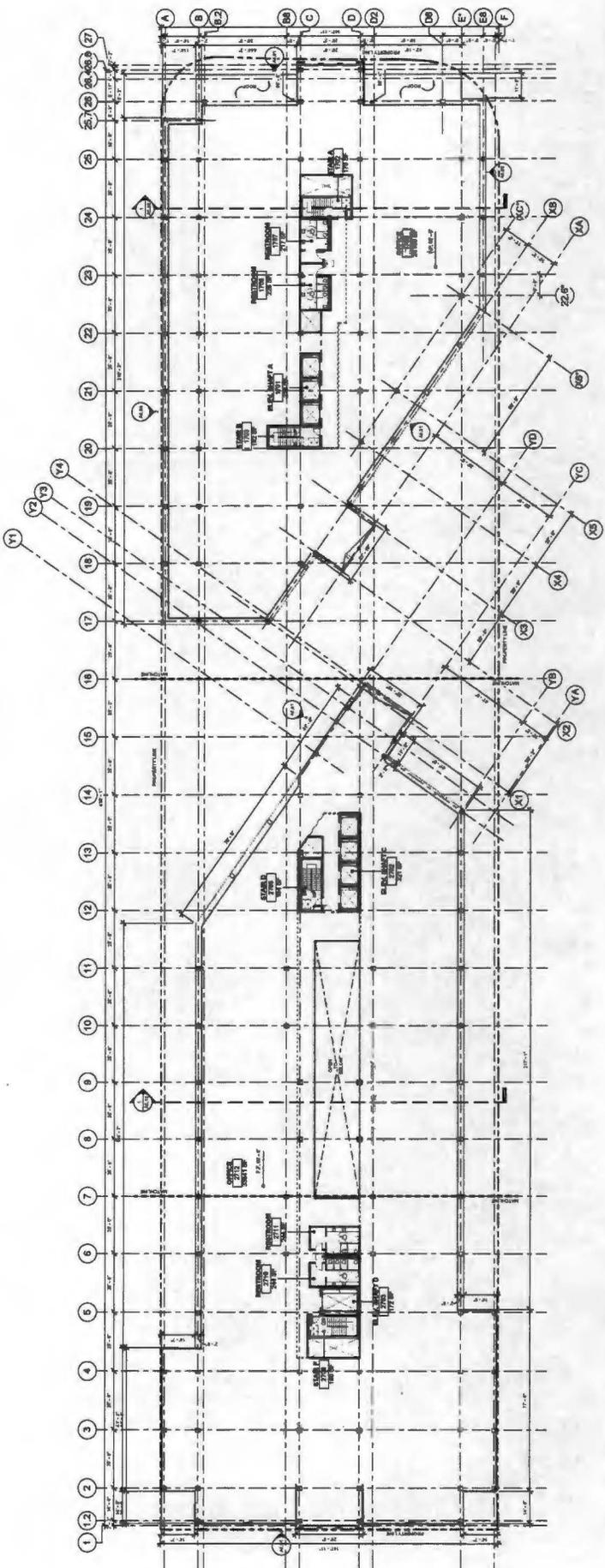
SECTION 05050 - CONCRETE FLOOR SLAB



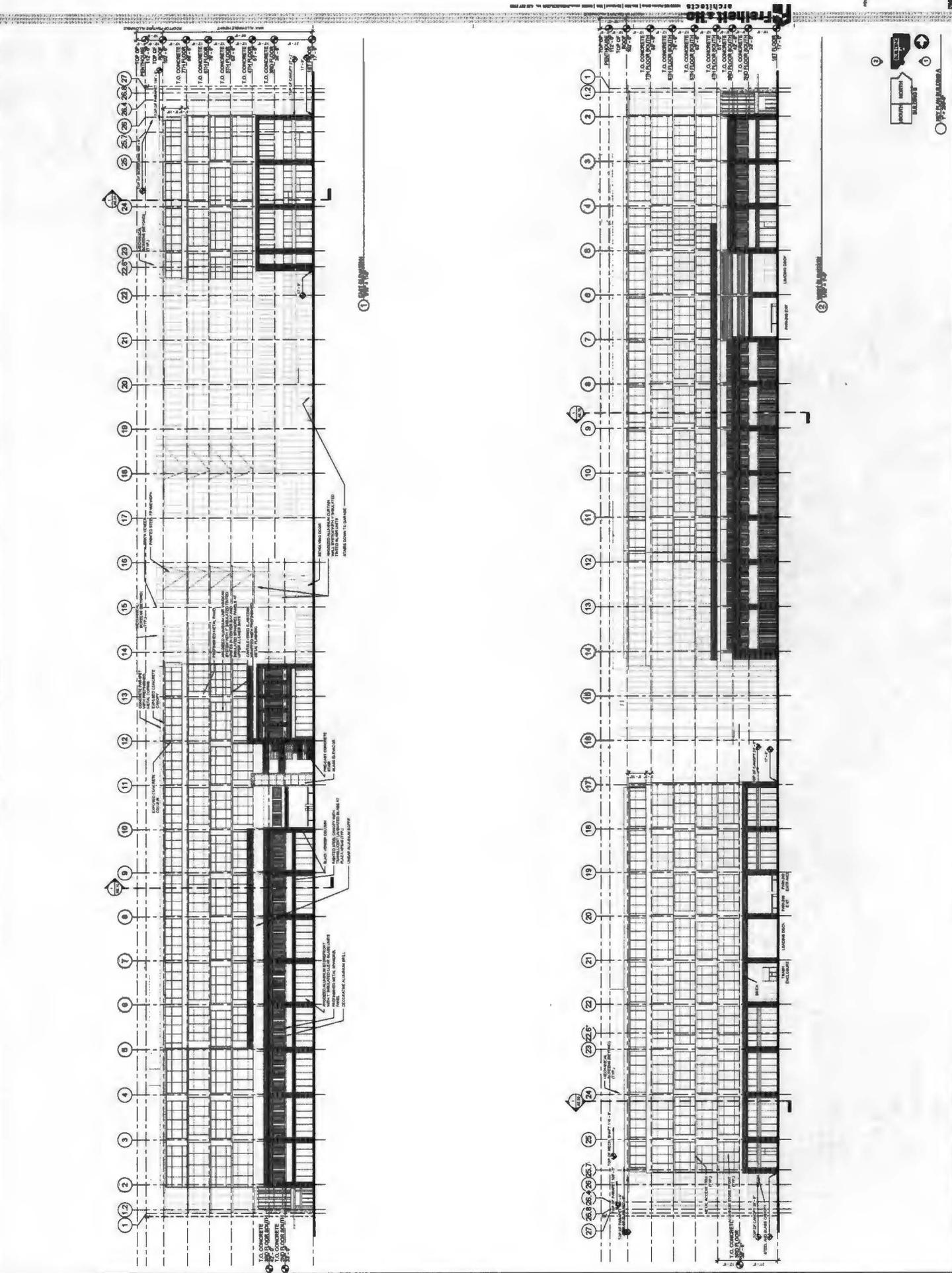
① GENERAL NOTE: GENERAL ELEVATION PLAN

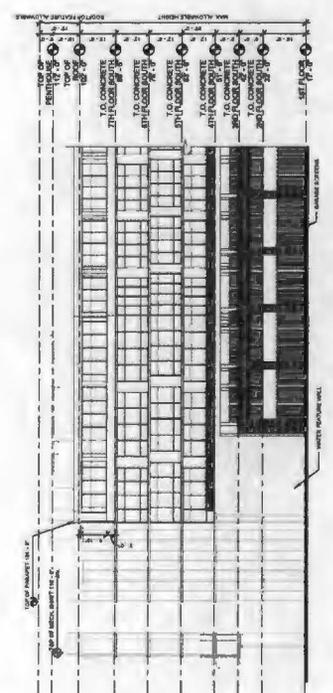
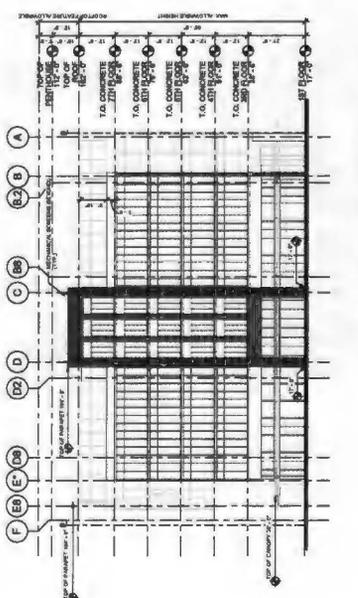
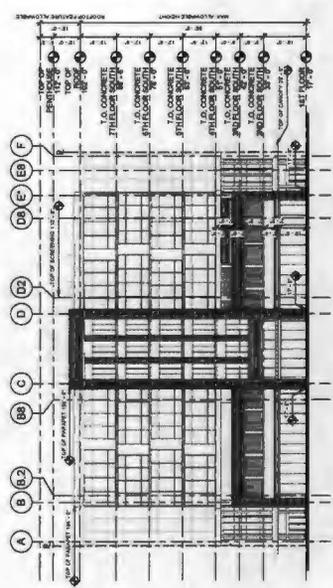
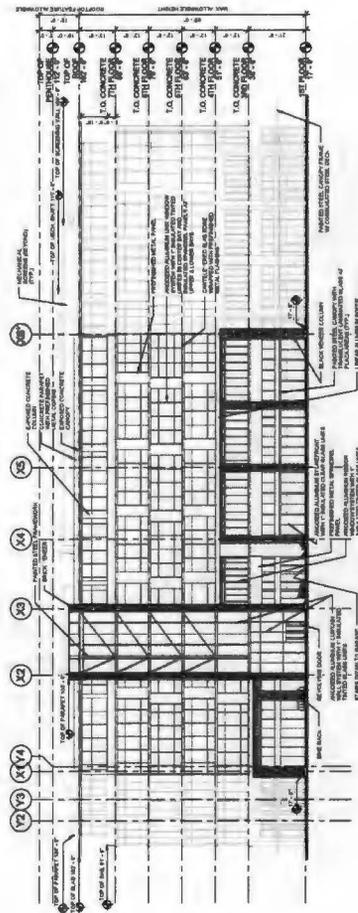


1 GENERAL LAYOUT



1. REFER TO GENERAL NOTES FOR ALL





SEE PLAN SHEET A4.02

SEE PLAN SHEET A4.03

SEE PLAN SHEET A4.04



- ① Lonestar Bldg - 8335 1st Ave. S.
- 2963 Utah Avenue South
- 2959 Utah Avenue South
- Mendelson Land - 2nd & Hinds St.
- Close Electric Bldg - 3317 3rd Ave. S.
- Pipe Bldg - 3223 3rd Ave. S.
- 2962 1st Ave. S.
- Hullin Transfer Bldg - 270 S. Hanford St.
- Esquin Bldg - 2700 4th Ave. S.
- Industrial Transfer Bldg - 624 S. Lander St.
- 2440 1st Ave. S.
- Peat Supply - 2430 1st Ave. S.
- 2418-20 1st Ave. S.
- Coast Crane Bldg - 1500 blk S. Utah St.
- Owl Transfer Bldg - 3623 6th Ave. S.
- Gorlick Supply - 2944 1st Ave. S.
- Rivers West Bldg. - 2900 4th Ave. S.
- Ederer Bldg. - 2925 & 2931 1st Ave. S., 2936 Utah Ave. S.
- 66 South Hanford Street
- 2945 1st Avenue S.
- 3601 W. Marginal Way S.W.
- 3100 Airport Way S.
- 1018 1st Ave. S.
- 4746 Ohio Ave. S.
- 2960 4th Avenue South
- 2444, 2450, 2458, 2482 1st Ave. S.
- 1000 1st Ave. S.
- 2764 1st Ave. S.
- 2702 6th Ave. S.
- 1762 8th Ave. S.
- 618 2nd Ave.
- 2520 Airport Way S.
- 2730 4th Ave. S.
- 1501 1st Ave. S.

Blue Line - Central Link (Commuter rail)
 Purple Lines - Interstate 5/Interstate 90 Expansion
 Gray Line - Spokane Street Viaduct Expansion
 Green & Pinks - Government owned properties and land

SCALE IN FEET
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Real Estate Development Company

AMERICAN LIFE PROPERTIES DATA

Land area north of Spokane Street to the Stadiums at Royal Brougham

Total area +/-550 acres.
Government owned land +/-approximately 230 acres

- 1. Lone Star Cement Warehouse**
Address 6335 1st Avenue South, Seattle, WA 98108
Land Area 112,000 sq ft
Built out Area 57,960 sq ft
Number of tenants 6
Usage Warehouse/showroom/office
- 2. St. Vincent Building**
Address 2963 Utah Ave South, Seattle, WA 98134
Land Area 10,000 sq ft
Built out Area 10,000 sq ft
Number of tenants 0
Usage Parking
2959 Utah Ave.
Address 2959 Utah Avenue South, Seattle, WA 98134
Land Area 19,800 sq ft
Built out Area 7,400 sq ft
Number of tenants 0
Usage: Industrial/showroom/flex
- 3. Mendelson Land**
Address 2nd and Hinds St., Seattle, WA 98134
Land Area 22,000 sq ft
Number of tenants 2
Usage Yard Space
- 4. Close Electric Building**
Address 3317 3rd Ave South, Seattle, WA 98134
Land Area 30,000 sq ft
Built out Area 37,000 sq ft
Number of tenants; 4
Usage: Warehouse/showroom/office
- 5. Pipe Building**
Address 3223 3rd Avenue South, Seattle, WA 98134
Land Area 70,000 sq ft
Built out Area 48,057 sq ft
Number of tenants; 2
Usage: Office/warehouse
- 6. 2962 1st Avenue South**
Address 2962 1st Avenue South, Seattle, WA 98134
Land Area 9,000 sq ft
Built out Area 8,000 sq ft - Under Renovation
Number of tenants 2
Usage Showroom/retail

American Life Properties Data

- 7. Hullin Transfer Building**
Address 270 South Hanford, Seattle, WA 98134
Land Area 128,500 sq ft
Built out Area 100,913 sq ft
Number of tenants 22
Usage Warehouse/office/industrial
- 8. Esquin Building**
Address 2700 4th Avenue S., Seattle, WA 98134
Land Area 67,315 sq ft
Built out Area 60,315 sq ft
Number of tenants 4
Usage Retail/showroom
- 9. Industrial Transfer Building**
Address 624 South Lander Street, Seattle, WA 98134
Land Area 160,000 sq ft
Built out Area 113,000 sq ft; divided into 1500-5000 square foot industrial suites
Number of tenants +/- 60
Usage: Office/warehouse/Industrial
- 10. 2440 1st Avenue South**
Address 2440 1st Avenue South Seattle, WA 98134
Land Area 22,662 sq ft
Built out Area 22,662 sq ft
Number of tenants 1
Usage Retail/showroom
- 11. 2430 1st Avenue South**
Address 2430 1st Avenue South Seattle, WA 98134
Land area 9,000 sq ft
Number of tenants 0
Usage Parking Lot
- 12. 2418-20 1st Avenue South**
Address 2400 Block 1st Avenue South Seattle, WA 98134
Land Area 27,000 sq ft
Built out Area 27,000 sq ft
Number of tenants 6
Usage: Retail/warehouse strip
- 13. Coast Cranes Building**
Address 1500 block South Utah Street, Seattle, WA 98134
Land Area 70,000 sq ft
Built out Area 23,500 sq ft
Number of tenants 0
Usage: Office/light industrial/flex/parking
- 14. Owl Transfer Building**
Address 3623 6th Ave South, Seattle, WA 98134
Land Area 140,000 sq ft
Built out Area 73,335 sq ft
Number of Tenants 9
Usage Industrial/showroom/distribution/flex
- 15. Gorlick Supply**
Address 2944 1st Ave S, Seattle, WA 98134
Land Area 36,000 sq ft
Built out Area 28,000 sq ft, including mezzanine
Number of Tenants 3
Usage Retail/showroom/office/Signage

- 16. Rivers West Building**
 Address 2900 4th Ave South, Seattle, WA 98134
 Land Area 60,000 sq ft
 Built out Area 48,000 sq ft
 Number of tenants 3
 Usage: Industrial/showroom/distribution
- 17. Ederer Cranes Building**
 Address 2925, 2931 1st Avenue South and 2936 Utah Avenue South, Seattle, WA 98134
 Land Area 64,380 sq ft
 Built out Area 74,680 sq ft
 Number of tenants 0
 Usage: Industrial/warehouse
- 18. Ederer Annex Building**
 Address 66 South Horton Street, Seattle, WA 98134
 Land Area 30,000 sq ft
 Built out Area 29,700 sq ft
 Number of tenants 0
 Usage: Warehouse/office/industrial
- 19. 2945 1st Avenue South**
 Address 2945 1st Avenue South, Seattle, WA 98134
 Land Area 9,000 sq ft
 Built out Area 9,000 sq ft
 Number of tenants 0
- 20. 3601 W. Marginal Way S.W.**
 Address 3601 W. Marginal Way S.W., Seattle, WA 98106
 Land Area 20,000 sq ft
 Built out Area 17,000 sq ft
 Number of tenants 0
 Usage: Light industrial/showroom
- 21. 3100 Airport Way South**
 Address 3100 Airport Way South, Seattle, WA 98134
 Land Area 18,000 sq ft
 Built out Area 150,000 sq ft
 Number of tenants 1
 Usage: Storage facility/office/parking
- 22. 1016 1st Avenue South**
 Address 1016 1st Avenue South, Seattle, WA 98104
 Land Area 10,000 sq ft
 Built out Area 51,250 sq ft
 Number of tenants 2
 Usage: Retail/office/parking/signage
- 23. 4746 Ohio Avenue South**
 Address 4746 Ohio Avenue South, Seattle, WA 98134
 Land Area 455,037 sq ft (10.22 acres)
 Built out Area 283,000 sq ft
 Number of tenants 17
 Usage: Warehouse/showroom/industrial
- 24. 2960 4th Avenue South**
 Address 2960 4th Avenue South, Seattle, WA 98134
 Land Area 163,000 sq ft
 Built out Area 85,000 sq ft
 Number of tenants 1
 Usage: industrial/retail/showroom

- 25. 2444 1st Avenue South**
 Address 2444, 2450, 2456 & 2462 1st Avenue South, Seattle, WA 98134
 Land Area 19,500 sq ft
 Built out Area 31,500 sq ft
 Number of tenants 3
 Usage: Retail/showroom/office
- 26. 1000 1st Avenue South**
 Address 1000 1st Avenue South, Seattle, WA 98104
 Land Area 22,338 sq ft
 Built out Area 76,000 sq ft
 Number of tenants 0
 Usage: Retail/showroom/office
- 27. 2764 1st Avenue South**
 Address 2764 1st Avenue South, Seattle, WA 98134
 Land Area 27,000 sq ft
 Built out Area 6,000 sq ft
 Number of tenants 3
 Usage: Retail/office/flex/parking
- 28. 2702 6th Avenue South (Canal Boiler)**
 Address 2702 6th Avenue South, Seattle, WA 98134
 Land Area 16,000 sq ft
 Built out Area 21,000 sq ft
 Number of tenants 1
 Usage: Retail/showroom/office
- 29. 1762 8th Avenue South (McMillan)**
 Address 1762 8th Avenue South, WA 98134
 Land Area 227,000 sq ft
 Built out Area 108,000 sq ft
 Number of tenants 1
 Usage: Industrial
- 30. 618 2nd Avenue (Alaska Bldg)**
 Address 618 2nd Avenue, Seattle, WA 98134
 Land Area 12,960 sq ft
 Built out Area 164,084 sq ft
 Number of tenants 1
 Usage: Hotel
- 31. 2520 Airport Way South**
 Address 2520 Airport Way South, WA 98134
 Land Area 80,000 sq ft
 Built out Area 19,000 sq ft
 Number of tenants 1
 Usage: Industrial
- 32. 2730 4th Avenue South**
 Address 2730 4th Avenue South, WA 98134
 Land Area 48000
 Built out Area 0 sq ft
 Number of tenants 2
 Usage: Industrial/parking
- 33. 1501 1st Avenue South**
 Address 1501 1st Avenue South, WA 98134
 Land Area 93,680
 Built out Area 304,000 sq ft
 Number of tenants 0
 Usage: Retail/Office/Parking

American Life Properties Data

Map Color Key

Green, Light Pink, Rose, and Orange Government owned properties and land
Blue Line: Central Link (Commuter rail)
Purple Lines: Interstate 5/Interstate 90 Expansions
Gray Lines: Spokane Street Viaduct Expansion



American Life Inc.: Property Investment & Management

[Background](#) | [Dynamics](#) | [Infrastructure](#) | [Future expectations](#) | [Outlook](#)

Planned Area Infrastructure:

[SODO Land Use Districts \(PDF\)](#)

Market Research:

[2005_Q4 Report](#)

SODO Real Estate Market

Background and Description of SODO

Major freeway and transportation access projects, coupled with the recent completion of a convention center and two new sports stadiums, drive SODO's transition from primarily industrial uses to higher yielding evolving uses. SODO's growth pattern reflects a national trend. Similar development patterns apply to aging, centrally located, industrial areas in Cleveland, San Francisco, and Denver.

The SODO district, a roughly rectangular area directly south of downtown, encompasses 550 acres. Its northern edge lies against Seattle's downtown while its eastern edge borders Interstate 5. Puget Sound borders the west, while Spokane Street forms the southern border.

Seattle's first settlers in the last half of the 19th Century initially built up what is now downtown, Belltown, and First Hill. The area's abundant timber was cut and shipped to San Francisco to supply gold rush stimulated construction. In the 1890s industry started to spill over into what is now SODO, a one square mile area located between Puget Sound and the first range of coastal hills, immediately south of Seattle's present downtown area.

With the extensive rail lines that were built within the area, the draining of the Duwamish River delta, and the development of the immediately adjacent port facilities on the western edge of SODO, warehousing and wholesale trade, spurred by the Klondike, Alaska gold rush, grew alongside with manufacturing.

By the 1920s, much of Seattle's heavy industry was located in SODO. During World War II, SODO factories built airplanes, ships, components, and munitions. Between the end of the Korean War and 1990, warehousing and light industrial activities slowly replaced heavy industry. Since these early days, SODO has been a primarily manufacturing/warehousing area with little change until relatively recently.

In the early 1990's, businesses that primarily served the downtown core started to move into SODO to take advantage of the proximity to customers and the lower rents. These businesses included office supplies, distribution, furniture, building supplies, art supplies, high tech, banks and professional offices. In addition major retailers like Home Depot, Office Max, and Costco opened major sales outlets within SODO. By 1998, with the major renewal of the northern section of SODO due to the two newly constructed stadiums, downtown's central business district itself began moving into SODO and revitalizing SODO's importance as an urban hub.

New transportation infrastructure drives current growth. New freeway accesses and the light-rail, all under construction, mean that Puget Sound's regional transportation infrastructure ties together within SODO's one square mile. This will make SODO one of the most convenient locations in the Seattle metropolitan area.

Various governmental agencies own or utilize approximately 60% of SODO acreage. These uses include post office transfer facilities; waste recycling facilities, school district office space, social

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American Life Inc.: Property Investment & Management

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Seattle Economic Trends

Economic Analysis

The strength of the real estate market is directly affected by the overall economic vitality of the city or region in which the project is located. A region's economic health, in turn, is strongly tied to the underlying economic base. This section presents a general overview of the Seattle metropolitan area. The information presented in this section forms the basis of the assumptions used in the economic and financial analyses presented later in this report.

Area Analysis

Seattle, Washington is the economic and cultural capital of the northwestern United States. The Seattle metropolitan area/Puget Sound region is the largest concentration of population north of San Francisco and west of Chicago. Seattle is the leading financial center of the Pacific Northwest and several major corporations base their headquarters in or near the city. Seattle possesses a modern port located on an excellent deep-water harbor and has good transportation connections to the outside world. The growth of the Pacific Northwest helped propel Seattle to its current stature, and the economic expansion of the Pacific Rim is likely to sustain Seattle's growth well into the future.

This section describes the Seattle metropolitan area, its historical development and its future growth prospects. The section focuses upon general economic and population trends and emphasizes the relationship between these forces and real estate development in the Seattle market.

Location and Geography

The Seattle metropolitan area lies in the northwest corner of the continental U.S., on Puget Sound in western Washington state. Puget Sound is a saltwater arm of the Pacific Ocean, 110 miles to the west.

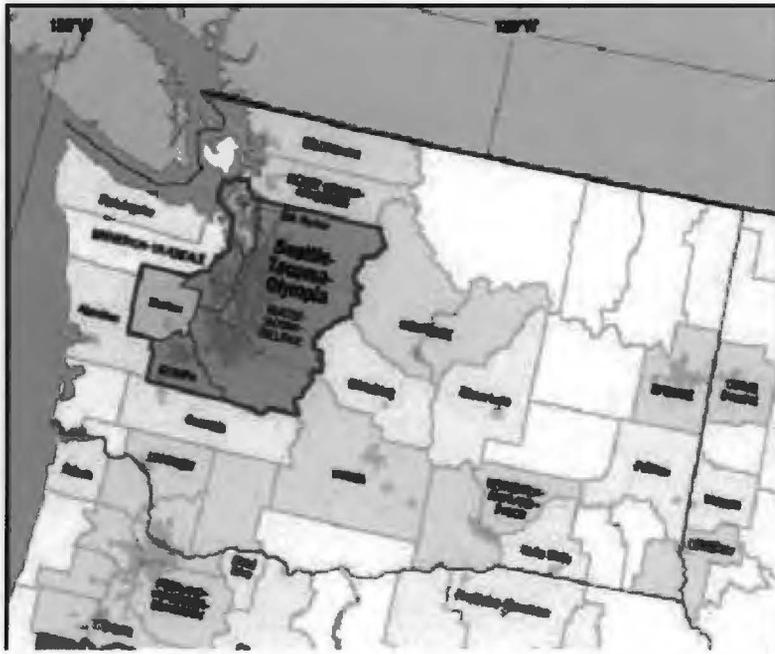
In 2003, the U.S. Census Bureau changed the definitions of metropolitan areas around the country. The Puget Sound region is now divided among three Census-defined metropolitan areas.

- The Seattle-Tacoma-Bellevue MSA (Metropolitan Statistical Area) which consists of King, Snohomish, and Pierce counties. This MSA is divided into two Metropolitan Divisions: Seattle-Bellevue- Everett (King and Snohomish counties) and Tacoma (Pierce County).
- The Bremerton-Silverdale MSA, which coincides with Kitsap County;
- The Olympia MSA, which corresponds to Thurston County;

These three metropolitan areas, along with Island and Mason counties, comprise the Seattle-Tacoma-Olympia Combined Statistical Area (CSA), which is shown in green on the following map.

Metropolitan Areas of Washington State

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The bulk of this chapter is concerned with the Seattle-Bellevue-Everett Metropolitan Division (King and Snohomish counties). When applicable, the larger MSA and CSA are discussed.

Because the Puget Sound basin was glaciated during the last Ice Age, the region's topography has a pronounced north-south orientation which has greatly affected the manner in which the Seattle area has developed. Hills, valleys, lakes, rivers, and Puget Sound generally trend in a north-south direction. As a result, the Seattle-Tacoma urban area is long and slender, extending 100 miles from north to south but little more than 15 miles wide in the east-west direction. The city of Seattle lies near the center of this ribbon of urban development.

The city of Seattle occupies a narrow isthmus that divides Puget Sound to the west from 17-mile-long Lake Washington to the east. The lake presents a barrier to east-west travel, which has allowed the Eastside suburbs (which occupy a second isthmus, between Lake Washington and Lake Sammamish) to develop an autonomous identity as a "miniature metropolis" in their own right. Similarly, distinct commercial and industrial centers have emerged elsewhere in Seattle's suburbs. Despite the growth of suburban residential and commercial areas, Seattle itself remains viable as a center of business, commerce, and industry. Seattle's residential and business districts have not experienced the blight and decay found in many other big cities around the United States.

Transportation

Seattle built its prosperity by taking advantage of its strategic location. The city is situated on an excellent deep-water harbor in the center of the Puget Sound basin. This location gave Seattle an advantage in the competition for regional and international trade. Seattle serves as the gateway to both the Pacific Northwest and Alaska. Trade with Asia has grown considerably in importance over the past 20 years, a trend that is expected to continue well into the future.

The Puget Sound Region



Today, the city's modern port facility handles approximately 1.75 million cargo containers a year. The highly automated container-handling system allows cargo to be quickly transferred between ships and trucks or trains. Two container terminals were recently expanded in the south harbor area and expansion of a third terminal is in planning. The port faces stiff competition from Tacoma and other West Coast ports (chiefly Los Angeles-Long Beach).

Seattle is situated at the junction of two Interstate highways: 5 and 90. Interstate 5 is the north-south route that connects the major cities of the Pacific coast. Interstate 90 is Seattle's link with the east; it extends to Spokane, Minneapolis-St. Paul, Chicago and, ultimately, Boston. Interstate 405 is the main beltway around Seattle and serves as the central artery for the Eastside suburbs. Two floating bridges connect Seattle with the Eastside. Additional freeways include the Valley Freeway (State Route 167) which serves the industrial areas of the Green River Valley; State Route 520, which connects Seattle, Bellevue, and Redmond via the Evergreen Point Floating Bridge; and State Routes 99/509, which provide a direct link between downtown Seattle and the airport.

Several ferry routes cross Puget Sound and connect Seattle and other cities on the east side of the Sound with the Kitsap Peninsula and the Olympic Peninsula on the west.

Seattle-Tacoma International Airport is located mid-way between the cities of Seattle and Tacoma. It serves as the principal air passenger hub for the region and is currently undergoing a billion-dollar expansion to accommodate future growth in traffic. Other major airports are located at Boeing Field in south Seattle and Paine Field south of Everett.

In 1996, voters approved a \$3.9 billion regional mass-transit system to serve King, Snohomish, and Pierce counties. When fully built out by 2009, the Sound Transit system is to include a 14-mile light-rail transit system between the downtown Seattle and Seattle-Tacoma International Airport; a 1.6-mile light-rail line in downtown Tacoma; 81 miles of commuter rail service linking Everett, Seattle, Tacoma, and Lakewood; and bus/carpool ramps serving 100+ miles of HOV (high-occupancy vehicle) lanes on the region's freeway network.

In 2002, Seattle voters approved a 14-mile monorail line which will connect downtown Seattle with Ballard and West Seattle. This monorail system is currently in planning and is set to open in phases between late 2007 and the middle of 2009.

Seattle has excellent intercity rail connections to the outside world. Passenger rail service is provided at the King Street Station, which is situated on the south edge of downtown Seattle.

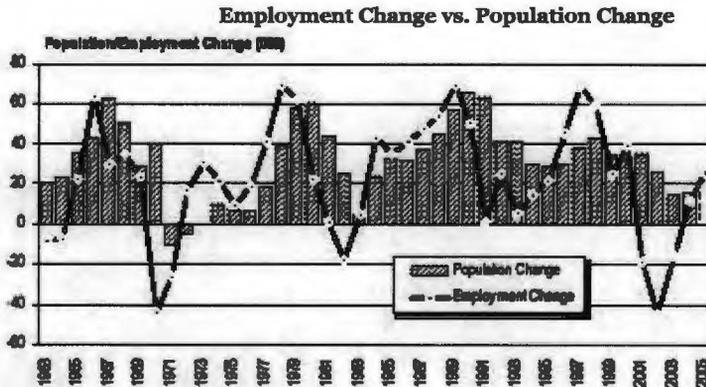
Freight marshaling yards are located in the port area and in the Duwamish and Interbay industrial districts south and north of downtown, respectively. Because of frequent conflicts between vehicular and train traffic throughout the region, the FAST Corridor plan is being implemented. This plan involves constructing overpasses or underpasses at 11 major railroad grade crossings between Seattle and Tacoma, as well as truck access improvements at the ports of Seattle, Tacoma and Everett.

Economy

The Puget Sound region is the economic heartland of Washington State and the Pacific Northwest. Seattle dominates this region, which contains approximately two-thirds of the state's total employment.

The economic base of a city or region consists of those industries that bring income into the city/region by selling their products or services outside the area. Historically, the aerospace, forest products, and shipping industries, along with the military, have formed the economic base of the Puget Sound region, and these activities are still the most important. Emerging industries include software, retail, biotechnology, tourism, Internet services, and telecommunications.

Economic and employment growth drives the expansion of population, incomes, and the demand for real estate. This relationship applies to the Seattle metropolitan area, as shown in the following graph.



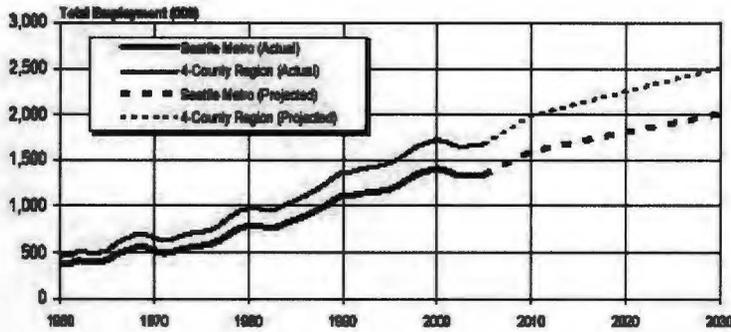
Note: 2005 population growth estimate is based on historical population and employment growth
 Sources: US Census; Washington Office of Financial Management; Washington Employment Security Department; Integra Realty Resources

As the graph shows, population changes tend to lag one to two years behind changes in employment. Total employment fell in metropolitan Seattle fell in 2001 and 2002 and stayed flat during 2003 before job growth resumed in 2004. Over the past 40 years, the Seattle region's economy has exhibited several notable characteristics:

- **Above-average growth.** The recent recession aside, the Seattle/Puget Sound economy has expanded faster than the national economy over the long run. Between 1980 and 2000, the Puget Sound region accounted for nearly 70 percent of the net new jobs gained in Washington State, with more than half going to the Seattle MSA alone. Seattle's economic growth has also exceeded that of most other West Coast cities. This faster-than-average growth is a long-run trend that transcends business cycles and is projected to continue throughout the foreseeable future.

Total employment in metropolitan Seattle more than doubled between 1960 and 1980, from 370,000 to 780,000. By 2000, total employment had increased to more than 1.4 million. The Puget Sound Regional Council (PSRC) projects that metropolitan Seattle will contain 1.6 million jobs by 2010, 1.81 million jobs by 2020, and more than 2 million jobs by 2030.

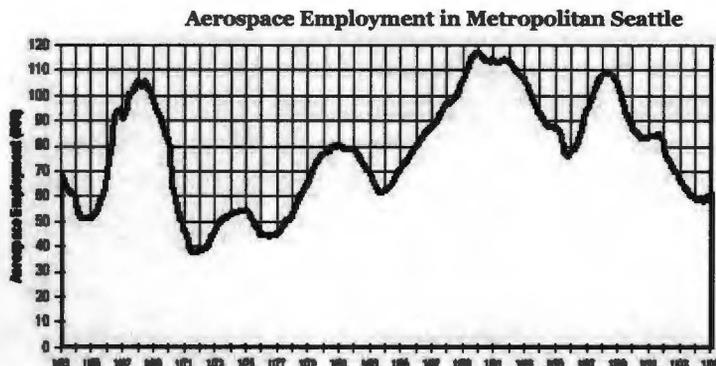
Historical and Projected Employment



Sources: Washington Employment Security Department; Integra Realty Resources-Seattle

- **Dominance of Boeing.** Seattle has long had a reputation of being a one-industry town, and Boeing is still its most important single employer. In 2005, aerospace alone comprised 40.6 percent of all manufacturing jobs in the Seattle Metropolitan Division. However, this industry constituted only about 4.4 percent of total non-agricultural employment, down significantly from 18.8 percent in 1968.

In mid-1998, the aerospace industry reached the peak of its most recent expansion, and employment began to decline, as can be seen in the *Aerospace Employment* graph. This decline appeared to have bottomed out in late 2000; however the September 11 terrorist attacks and the national economic recession led to a protracted downturn in airline travel. By mid-2004, Boeing had shed 50,800 jobs in the region.



Sources: Washington Employment Security Department; Integra Realty Resources-Seattle

In September 2001, Boeing relocated its corporate headquarters from Seattle to Chicago, resulting in the loss of 1,000 top-level executive positions. While the blow is more psychological than economic, it could have serious implications for the company's long-run future in the Puget Sound region.

The commercial airplane division accounts for roughly two-thirds of Boeing's revenues, but it is a comparatively mature product line. While technological improvements have been made, commercial airliners have not changed substantially since the 1960s. Traditionally, manufacturers of products in the mature stage of their life-cycles seek low-cost locations for production. This appears to be happening with Boeing, which is shifting an increasing share of its airliner production (mainly parts and components) to non-Boeing producers and to other parts of the U.S. and overseas. In the meantime, the segments of Boeing's business with high future growth potential (chiefly space and military technology) are located in California and the southeastern United States.

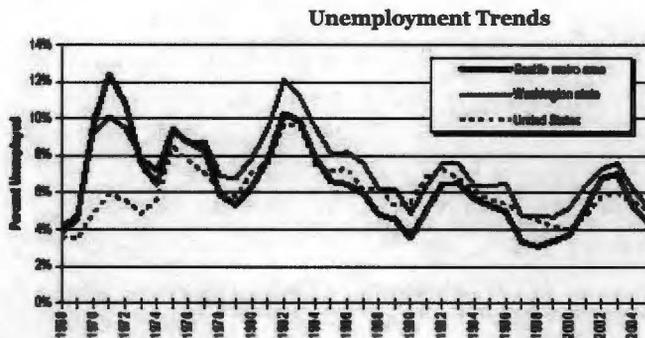
Boeing stated that commercial airliner production will remain centered in the Puget Sound region, and in 2003 announced that its next-generation jetliner, the 787, will be assembled in Everett. Boeing has begun hiring again and, since the bottom of the most recent trough was hit in

August 2004, the company has added 3,200 jobs locally.

Boeing has also been redeploying assets within the Puget Sound region. It is expected to cut back production operations in Renton and shift them to its Everett facility. In 2004, Boeing ceased producing its slow-selling 757 jetliner which was assembled in Renton. Boeing has also greatly reduced operations in south Seattle and Kent, and has divested itself of millions of square feet of company-owned space throughout the region, though the majority of these give-backs appear to have taken place.

- **Strongly cyclical.** Because of Boeing, the Seattle area has grown in periodic surges associated with economic cycles which last roughly a decade. This pattern has repeated itself during each of the last four decades. Each decade began with a recession or comparatively slow growth, followed by economic booms and rapid expansion of employment and population in the closing years of each decade. This pattern appears to be repeating itself in the first decade of the 21st century. The current economic slowdown appears to have bottomed out as the regional economy is being pulled out of the doldrums by an expanding national economy.

Business cycles in the Puget Sound area tend to exhibit greater amplitude than the nation as a whole. This pattern is partly due to the fact that Seattle is a relatively young city that still retains vestiges of its frontier economy. The economy still is closely tied to resource industries, and large size of the volatile aerospace sector has also contributed to instability in the local economy. However, as the Seattle economy has expanded and diversified, fluctuations in employment and unemployment have tended to more closely follow the national economy, as is shown in the *Unemployment Trends* graph.



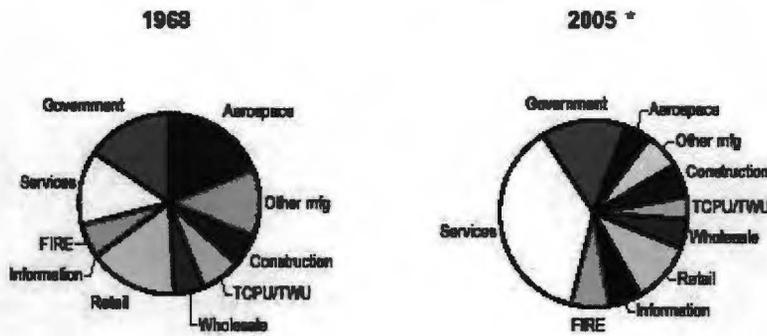
Sources: Washington Employment Security Department; Integra Realty Resources-Seattle

Seattle usually has a lower unemployment rate than the state as a whole. This pattern occurs because the state's economy is even more dependent on a limited number of industries than Seattle's. During boom periods, Seattle's unemployment rate tends to be lower than the national rate. The recent period of Boeing layoffs represented a break with this long-run historical pattern (as it did during the so-called "Boeing Bust" of the early 1970s).

If Boeing does substantially reduce its presence in the region in the long run, the cyclical nature of the Seattle economy should become less pronounced, since so much of the fluctuations were due to the ups and downs in Boeing employment.

- **Shift to Services.** Like other cities nationwide, Seattle's economy is shifting from a manufacturing base to dominance by service and office industries. The graph below displays historical trends in regional employment by major industrial group.

Changing Employment Distribution



* For the 12 months ending 28 February 2005
 FIRE = Finance, insurance and real estate; TCPU = Transportation, communications and public utilities
 TWU = Transportation, warehousing and utilities
 Sources: Washington Employment Security Department; Integra Realty Resources-Seattle

The traditional goods-producing activities are declining in relative importance while services, wholesale trade, and retail trade are growing. Tourism is another important component of the region's service sector and, unlike many service industries, brings money into the region from the outside world.

Seattle's Changing Economic Base

Non-Agricultural Wage and Salary Employment by Industry

Year:	1968	1971	1980	1982	1990	1992	1998	2005
Point in business cycle:	Peak	Trough	Peak	Trough	Peak	Trough	Peak	Estimate*
Total Non-Ag Employment	551,200	487,700	779,900	766,100	1,112,300	1,138,600	1,351,200	1,340,442
Goods-Producing	202,000	126,500	214,200	195,700	284,300	274,200	301,300	223,833
Mining/Resources	300	200	400	400	600	600	700	1,283
Construction	29,900	21,700	40,600	33,800	61,600	61,400	72,200	76,600
Manufacturing	171,800	104,600	173,200	161,500	222,100	212,200	228,400	145,950
Durable	145,700	79,900	142,400	131,800	182,300	171,600	183,900	114,583
Aerospace	103,900	37,500	78,800	74,300	114,800	110,000	107,900	59,300
Non-durable	26,100	24,700	30,800	29,700	39,800	40,600	44,500	31,367
Services-Providing	349,200	361,200	565,700	570,400	828,000	864,400	1,049,900	1,116,608
Wholesale trade	30,300	32,000	53,000	53,900	75,200	76,100	90,700	69,575
Retail trade	86,400	81,000	134,100	136,400	189,600	191,500	225,900	141,883
T.W.U.	39,200	38,100	53,200	52,400	69,400	69,600	80,300	49,967
Information								72,250
F.I.R.E.	33,500	34,400	56,500	56,900	72,900	74,500	81,200	89,650
Services	74,600	79,400	148,800	155,100	273,400	290,000	389,400	494,542
Government	85,200	96,300	120,100	115,700	147,500	162,700	182,400	198,742
Labor Force	570,000	597,000	868,100	884,700	1,154,600	1,189,000	1,381,600	1,332,217
Unemployment Rate	4.2%	12.4%	6.4%	10.3%	3.6%	6.5%	3.1%	5.1%
Category	Total Change, 1968-2004		Change/Year, 1968-2004		Percentage Distribution			Location
	Number	Percent	Number	Percent	1968	2005	Change	Quotient
Total Non-Ag Employment	789,242	143.2%	21,331	2.4%	100.0%	100.0%	0.0%	1.000

Goods-Producing	21,833	10.8%	590	0.3%	36.6%	16.7%	-19.9%	1.003
Mining/Resources	983	327.8%	27	4.0%	0.1%	0.1%	0.0%	0.213
Construction	46,700	156.2%	1,262	2.6%	5.4%	5.7%	0.3%	1.079
Manufacturing	-25,850	-15.0%	-699	-0.4%	31.2%	10.9%	-20.3%	0.999
Durable	-31,117	-21.4%	-841	-0.6%	26.4%	8.5%	-17.9%	1.260
Aerospace	-44,600	-42.9%	-1,205	-1.5%	18.8%	4.4%	-14.4%	13.112
Non-durable	5,267	20.2%	142	0.5%	4.7%	2.3%	-2.4%	0.569
Services-Providing	767,408	219.8%	20,741	3.2%	63.4%	83.3%	19.9%	0.999
Wholesale trade	39,275	129.6%	1,061	2.3%	5.5%	5.2%	-0.3%	1.207
Retail trade	55,483	64.2%	1,500	1.3%	15.7%	10.6%	-5.1%	0.926
T.W.U.	10,767	27.5%	291	0.7%	7.1%	3.7%	-3.4%	1.153
Information	72,250	N/A	1,953	N/A	0.0%	5.4%	5.4%	2.258
Financial activities	56,150	167.6%	1,518	2.7%	6.1%	6.7%	0.6%	1.092
Services	419,942	562.9%	11,350	5.2%	13.5%	36.9%	23.4%	0.936
Government	113,542	133.3%	3,069	2.3%	15.5%	14.8%	-0.6%	0.902

T.W.U. = Transportation, warehousing, utilities

Information sector added in 2003 when state switched from SIC codes to NAICS codes in assigning employment to industries

Location Quotient is a sector's share of Seattle employment divided by that same sector's share of U.S. employment

* For the 12 months ending 28 February 2005 ** In thousands

Sources: Washington Employment Security Department; US Bureau of Labor Statistics; Integra Realty Resources-Seattle

The Location Quotient column in the lower-right hand portion of the table shows how the Seattle economy compares with the national economy in terms of employment. Values exceeding 1.0 indicate the Seattle area has proportionately more employment in a particular sector than the national economy, while values less than 1.0 indicate a sector is proportionately less well-represented locally.

The table shows the strong concentration of employment in the aerospace sector (and, as a result, durable manufacturing). Employment is also strongly concentrated in information (which includes the expanding computer software industry), wholesale trade and transportation/warehousing/utilities (because of the port), financial activities and construction. Retail, services, government, and mining/resource employment are under-represented in the local economy.

- **Growth of Advanced Technology.** High technology activities are expanding their role in Seattle's economy. The area has developed into a leading center of software, telecommunications, biotechnology, and medical-technology industries. Microsoft, which is based in the Eastside suburb of Redmond, has grown to become the world's largest software maker and now employs approximately 28,000 workers locally, making it the second-largest private sector employer in the region. Biotechnology — which is centered around the University of Washington, the Fred Hutchinson Cancer Research Institute, and the large complex of medical facilities in Seattle — is another rapidly-expanding industry.

The technology sector was hurt in 2000 and 2001 because of the "dot-com crash," which cooled a white-hot office market and caused many developers to place their projects on hold. Seattle still contains a large number of Internet-related companies, though many are smaller and less ambitious in their growth plans that was the case in the late 1990s.

The slowdown in the Internet economy also affected traditional software makers such as Microsoft, which announced it would reduce its job-growth below the rates seen in the 1990s. Microsoft has also been adding jobs overseas, though it says the Seattle region will remain the center of its operations.

Despite the current slowdown, the central Puget Sound region remains attractive to high technology industries for several reasons. It possesses a highly trained and well-educated labor force. The presence of Boeing has created a large demand for skilled technical workers, while the University of Washington and other local higher education institutions have provided much of the supply. The aerospace and software industries have created numerous spin-off and support activities. The Puget Sound region enjoys excellent access to the high-tech industries in both California and Asia. Finally, the region's environmental and cultural amenities are attractive to entrepreneurs and workers alike.

- **Links to the Pacific Rim.** Economic expansion around the Pacific Rim has had a strong influence on the growth of the Puget Sound region. With Boeing, Microsoft, agriculture, and the forest products industry, the Puget Sound economy is strongly export-oriented. The area's location gives it special advantages as a transshipment point between the U.S. economic heartland and Alaska, Japan, South Korea, Hong Kong, Taiwan, and other points around the Pacific. By ship, the Puget Sound ports are a full day closer to Asia than their competitors in California. Seattle's hosting of the first APEC (Asia-Pacific Economic Cooperation) Summit Conference in 1993 and the WTO (World Trade Organization) ministerial meeting in 1999 symbolize the area's growing importance in the Pacific Rim and global economies.

Seattle's port was one of the first in the nation to develop modern container-handling facilities. The nearby Port of Tacoma has an ample supply of inexpensive waterfront land on which additional container capacity is being developed. The Puget Sound "load center" (including both Seattle and Tacoma) is the second-busiest port on the West Coast after Los Angeles/Long Beach. The ports are facing strong competition from California and British Columbia ports and are attempting to cope with growing conflicts between truck and train traffic throughout the Puget Sound corridor. However, the southern California ports have become clogged and both Seattle and Tacoma handled record container volumes in 2004.

Within the Seattle Metropolitan Division, employment growth is occurring in several locations. Downtown Seattle remains the chief center of financial, administrative, and office activities in the state. An important secondary office center has developed on the Eastside, which also is the leading concentration of advanced technology activities in the region. Light industrial and distribution activities continue to congregate in the Green River Valley south of Seattle and in the Fife/Sumner/Puyallup area east of Tacoma. Other large employment centers are located along freeways, notably the Technology Corridor along Interstate 405 north of Bothell and the Interstate 90 Corridor extending east from Bellevue. Emerging concentrations of office, industrial, and high technology development also can be found in the Lake Union area of Seattle, in Federal Way, the South Everett/Mukilteo area, the corridor north of Marysville, Puyallup/South Hill, DuPont, and east Thurston County.

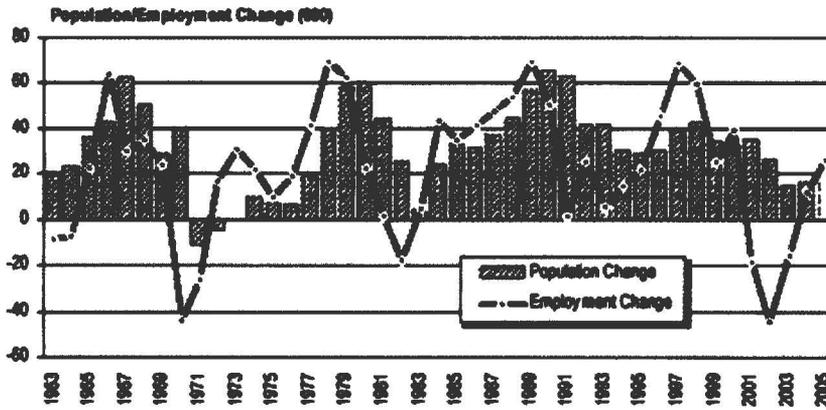
Wetland regulations have removed a sizable share of the region's commercial and industrial land from the inventory of developable sites. Rising land prices and a dwindling supply of sites is pushing industrial development out to successively more peripheral locations, notably the Interstate 5 corridor north of Marysville, the Interstate 90 corridor between Preston and North Bend, and the Frederickson area southeast of Tacoma.

In 1996, the U.S. Navy completed its new home port for an aircraft carrier battle group in Everett; this base has brought 18,000 new jobs to Snohomish County. Most of the other military installations in the region are holding their own in the face of cutbacks in defense spending. Higher defense spending is being pushed by the Bush administration and Congress in the wake of the 9/11 terrorist attacks. However, Congress is preparing another round of base closures nationwide which could affect some installations in the Puget Sound region.

Population Trends

The *Employment Change vs. Population Change* graph shows that population changes tend to lag one to two years behind changes in employment.

Employment Change vs. Population Change



Note: 2004 population growth estimate is based on historical population and employment growth
 Sources: US Census; Washington Office of Financial Management; Washington Employment Security Department; Integra Realty Resources

The Seattle area's population has grown in periodic surges associated with economic cycles. This pattern has repeated itself during each of the last four decades. Each decade began with a recession and comparatively slow population growth, followed by economic booms and rapid expansion of employment and population in the closing years of the decade.

The boom of the 1990s differed from previous expansions in one notable respect. In the previous booms, population growth was of comparable magnitude to employment growth (subject to the one - to two-year lag). In the most recent boom, however, population growth fell well short of employment growth. The pool of new in-migrants shrank because of an aging population and relatively strong regional economies elsewhere in the U.S. (notably California). The shrinkage in total employment in 2001-2003 is caused a slowdown in the rate of population growth, but population did not decline in absolute terms. The resumption of employment growth is expected to trigger larger population increases as the decade progresses.

According to the Washington State Office of Financial Management, the city of Seattle contained 572,600 people in 2004, making it the largest member of the constellation of settlements that surrounds Puget Sound. The total population of the Puget Sound region numbers 3.635 million, which is divided among the three Census-defined metropolitan areas described above. Current and historic population data at the county and metro area level are summarized in the following table.

Populations of Metro Areas					
Metropolitan Area	1970	1980	1990	2000	2004
Seattle-Bellevue-Everett MD	1,424,611	1,607,618	1,972,933	2,343,070	2,433,100
King County	1,159,375	1,269,898	1,507,305	1,737,046	1,788,300
Snohomish County	265,236	337,720	465,628	606,024	644,800
Tacoma MD (Pierce)	412,344	485,667	586,203	700,818	744,000
Seattle-Tacoma-Bellevue MSA	1,836,955	2,093,285	2,559,136	3,043,888	3,177,100
Bremerton MSA (Kitsap)	101,732	147,152	189,731	231,969	239,500
Olympia MSA (Thurston)	76,894	124,264	161,238	207,355	218,500
Seattle-Tacoma-Olympia CSA	2,015,581	2,364,701	2,910,105	3,483,212	3,635,100

MD = Metropolitan Division; MSA = Metropolitan Statistical Area; CSA = Combined Statistical Area
 Sources: Washington Office of Financial Management; Integra Realty Resources-Seattle

Nearly three-fourths of the Seattle Metropolitan Division's population lives within its 60 incorporated cities and towns. The following table lists the largest cities in the metro area.

Largest Cities, 2004							
Rank	City	County	Population	Rank	City	County	Population
1	Seattle	King	572,600	7	Shoreline	King	52,740
2	Bellevue	King	116,500	8	Redmond	King	46,900

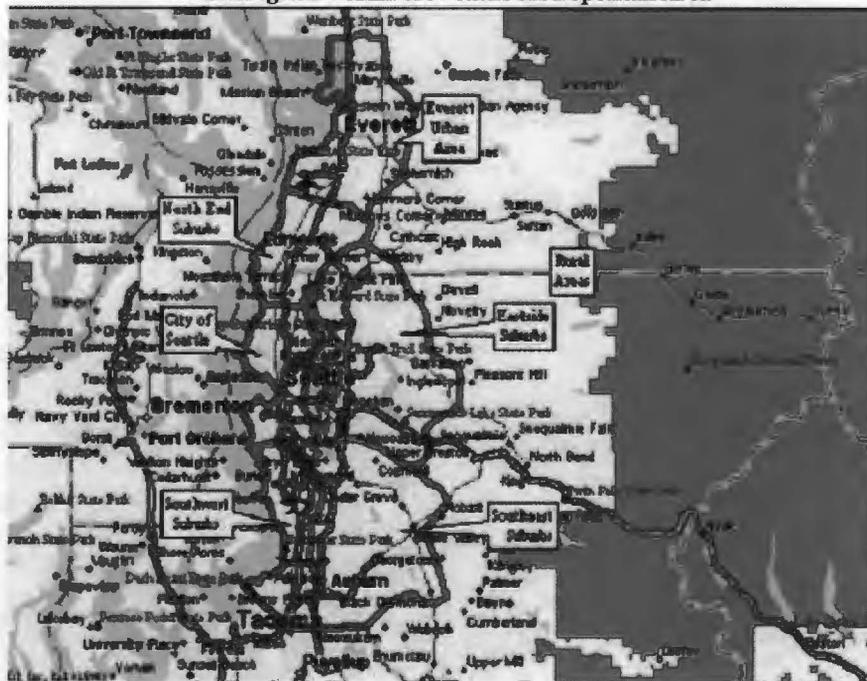
3	Everett	Snohomish	96,840	9	Auburn	King	46,135
4	Kent	King	84,560	10	Kirkland	King	45,800
5	Federal Way	King	83,590	11	Edmonds	Snohomish	39,620
6	Renton	King	55,360	12	Sammamish	King	36,560

Sources: Washington Office of Financial Management; Integra Realty Resources-Seattle

The combined population of all cities and towns in the Seattle Metropolitan Division stood at 1,766,887 in 2004, while unincorporated areas contained 666,213 inhabitants.

Most of the region's growth is taking place in the suburbs. Like other large U.S. urban areas, the central cities (Seattle and Everett) had populations that were stable or declining prior to 1990. In the late 1980s, Seattle reversed a 30-year decline, and its population has since rebounded from 493,846 in 1980 to 572,600 by 2004, the highest ever recorded for the city. This growth came despite no significant annexation of territory by Seattle. Everett has grown considerably due to infill development of suburban territory annexed during the 1970s. In another reversal of historical trends, the downtown areas of Seattle, Bellevue, Tacoma and Everett are among the fastest-growing neighborhoods in the region.

Subregions within the Seattle Metropolitan Area



The city of Seattle contained 23.5 percent of the Metropolitan Division's population in 2004. Among the suburban areas, the Eastside was the most populous with 467,212 inhabitants or 19.2 percent of the metro area's population.

South King County, which includes both the southeast and southwest suburban sub-regions, had a 2004 population of 647,746, while the North End suburbs, which extend from Seattle to Lynnwood, contained more than 348,000 people. The urban area around Everett had a population of nearly 232,500 (refer to the *Historical Population Growth* table below).

Historical Population Growth by Submarket

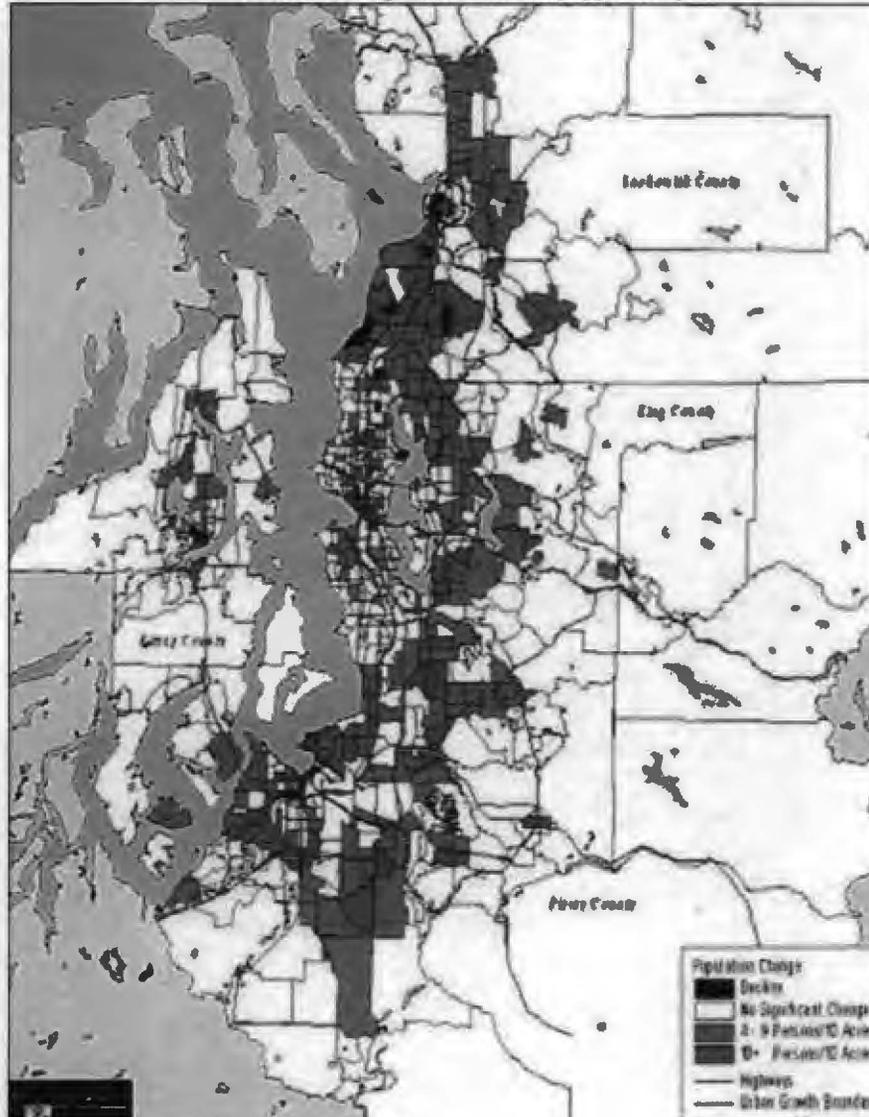
Submarket	Population					Change/Year 1990-2004	
	1970	1980	1990	2000	2004	Number	Percent
Seattle	530,831	493,846	516,259	563,376	572,600	4,024	0.7%
Eastside suburbs	202,022	287,212	379,262	450,646	467,212	6,282	1.5%
North End suburbs	186,421	216,697	281,386	328,941	348,043	4,761	1.5%
Southwest suburbs	189,638	198,714	244,365	282,690	288,226	3,133	1.2%
Southeast suburbs	160,281	214,460	283,189	348,910	359,560	5,455	1.7%

Everett urban area	103,210	120,092	158,803	216,402	232,468	5,262	2.8%
Rural fringe	52,208	76,597	109,669	152,105	164,991	3,952	3.0%
Metro area total	1,424,611	1,607,618	1,972,933	2,343,070	2,433,100	32,869	1.5%

Sources: US Census, Puget Sound Regional Council; Integra Realty Resources-Seattle

In numerical terms, the Eastside, North End, and Southeast King County are the fastest-growing portions of the Metropolitan Division, mainly because they have the largest quantities of available land. Rural areas are experiencing the greatest percentage growth, but this expansion comes on top of a small population base; thus, numerical increases are more modest.

Location of Population Growth, 1990-2004



The Seattle Metropolitan Division is projected to contain more than 2.6 million people by the year 2010 and should approach 3 million by 2020.

Projected Population Growth by Submarket

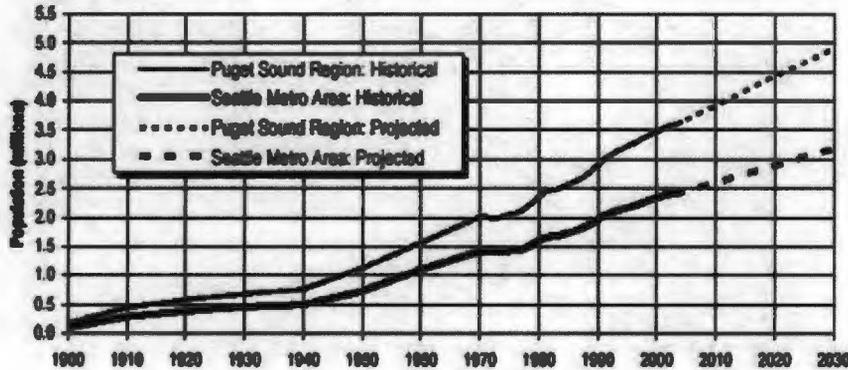
Submarket	Population				Change/Year 2004-2010	
	2004	2010	2020	2030	Number	Percent
Seattle	572,600	594,116	641,790	702,812	3,586	0.6%
Eastside suburbs	467,212	498,128	550,106	591,243	5,153	1.1%
North End suburbs	348,043	382,519	439,453	493,759	5,746	1.6%
Southwest suburbs	288,226	299,369	322,927	342,257	1,857	0.6%

Southeast suburbs	359,560	379,797	420,226	452,876	3,373	0.9%
Everett urban area	232,468	261,095	302,382	346,352	4,771	2.0%
Rural fringe	164,991	187,821	223,293	258,961	3,805	2.2%
Metro area total	2,433,100	2,602,845	2,900,177	3,188,260	28,291	1.1%

Sources: US Census, Puget Sound Regional Council; Integra Realty Resources-Seattle

The population of the entire Puget Sound region is expected to reach 4 million by 2010 and should exceed 4.4 million by 2020. By 2030, nearly 5 million people are expected to call the Puget Sound region home.

Long-Run Population Trends



Sources: US Census, Washington Office of Financial Management, Puget Sound Regional Council

The most rapid growth is expected to be to the east, southeast, and north of Seattle. The Eastside, North End, and Everett urban area are expected to be the fastest-growing markets in absolute numerical terms through 2010. The fastest percentage growth rates are projected to occur around Everett, in the North End, and in the rural fringe.

Modest projected increases in the southwest suburbs are expected to result from a dwindling supply of vacant land and encroachment of commercial and industrial uses on older residential neighborhoods. The inner suburbs (Highline, Burien, Shoreline, Bellevue, Kirkland, and Renton) are expected to grow slowly, as increases in the number of new housing units are offset by declining household sizes. Most residential development in these areas will involve infill construction, renovation, and conversion of non-residential buildings to residential use. The population of Seattle is expected to grow at a steady rate.

Over the next ten years, the most rapid suburban population growth is expected to occur in the following areas:

- the area east of Interstate 405 in south Snohomish County;
- the area east of Silver Lake/Mill Creek and south of Everett;
- the corridor east of Interstate 5 between Marysville and Arlington;
- the Bear Creek area, east of the Sammamish River valley;
- Cougar Mountain and the Interstate 90 corridor from Issaquah to North Bend;
- the plateau to the east of Lake Sammamish;
- the plateau east of the Green River Valley and Maple Valley; and
- the master-planned communities of Trilogy/Redmond Ridge, Issaquah Highlands, Snoqualmie Ridge, and Lakeland Hills.

By 2030, Seattle's share of metro area population is projected to fall to around 22 percent, but Seattle is expected to remain the largest sub-region in the metro area in terms of population throughout the forecast period.

Incomes and Purchasing Power

Household incomes are higher in the Seattle area than elsewhere in Washington State and the U.S. The distributions of disposable household income for the Seattle Metropolitan Division, Washington State, and the U.S. appear in the *Disposable Income* table.

Disposable Income Distributions

2004 Household Disposable Income	City of Seattle	Seattle Suburbs	King County	Seattle MD	Sea-Tac CSA	State of Wash.	United States
Less than \$20,000	20.8%	13.2%	15.9%	15.3%	16.1%	19.0%	22.4%
\$20,000 to \$34,999	21.8%	18.5%	19.4%	19.4%	20.4%	22.0%	23.3%
\$35,000 to \$49,999	18.2%	19.6%	18.8%	19.2%	19.8%	19.7%	19.0%
\$50,000 and over	39.2%	48.7%	45.9%	46.1%	43.7%	39.3%	35.4%
Median household EBI	\$40,921	\$49,143	\$46,666	\$46,906	\$45,177	\$41,862	\$38,201
Average household EBI	\$56,739	\$62,482	\$62,328	\$60,920	\$57,733	\$53,149	\$49,721
Per capita EBI	\$25,972	\$23,790	\$25,499	\$24,308	\$22,624	\$20,473	\$18,662
Aggregate EBI (\$million)	\$14,996	\$44,181	\$45,506	\$59,177	\$85,352	\$126,580	\$5,466,880

MD = Metropolitan Division (King and Snohomish counties)

CSA = Combined Statistical Area (King, Snohomish, Pierce, Kitsap and Thurston counties)

EBI = Effective Buying Income (Disposable Income)

Source: Sales & Marketing Management, 2004 Survey of Buying Power

The table indicates that the Seattle Metropolitan Division has proportionately more households in the over-\$50,000 income group and proportionately fewer households earning less than \$50,000 per year than either Washington or the U.S. These discrepancies result from the high concentration of professional and technical workers in the Seattle area, and the fact that a greater proportion of the Seattle Metropolitan Division's population is in the economically active age groups (20 to 64 years).

Seattle's income advantage over Washington is somewhat less pronounced than for the U.S., but it must be remembered that the Seattle region contains roughly half of the state's population and economic activity and thus the statewide figures are strongly influenced by Seattle's contribution.

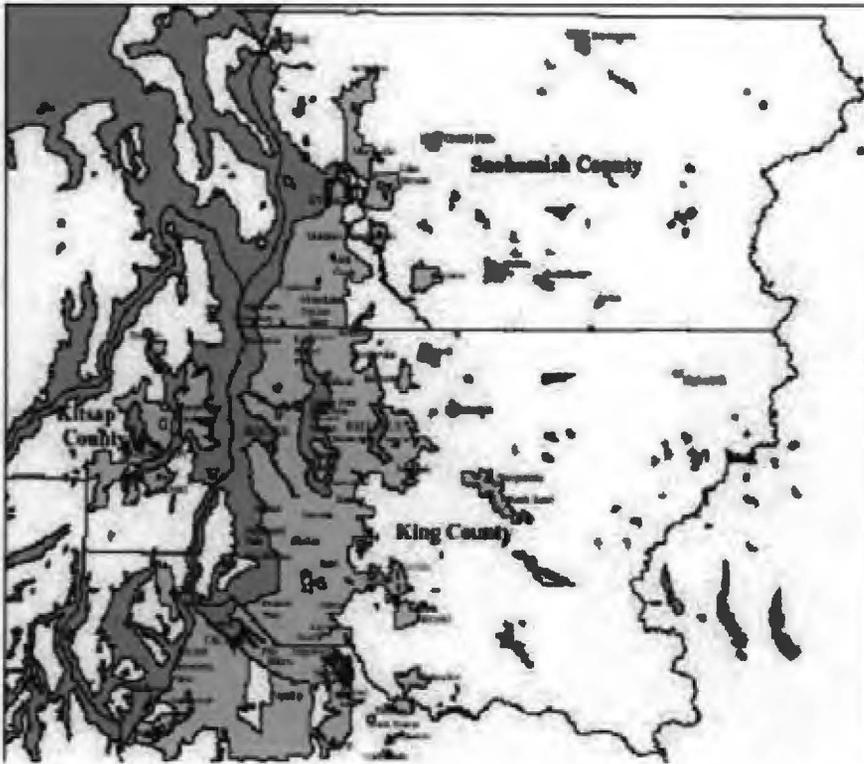
The median disposable income of Seattle Metropolitan Division households is 12 percent higher than the statewide median and 22.8 percent above the national median.

The distribution of incomes within the Metropolitan Division conforms to those of metro areas throughout the U.S.: suburban areas tend to be more affluent than the central city. Among suburban areas, the Eastside has a larger concentration of upper-income households than any other part of the metro area. However, the region's complex topography, combined with its patchwork of waterfront and view neighborhoods, means that high-income districts are scattered throughout the urban area, often in close proximity to low-income neighborhoods.

Regulatory Climate/Policy Issues

The strong economy and rapid growth of the late 1980s and 1990s touched off a series of land-use conflicts that continue to reverberate throughout the region. The Washington State Growth Management Act (GMA) was passed by the Legislature in 1990. The GMA obliged cities and counties to overhaul their comprehensive plans and zoning codes and mandated the delineation of urban growth boundaries. It also mandates concurrent funding of infrastructure and allows local governments to assess impact fees on new development.

Urban Growth Areas



Counties and municipalities adopted comprehensive plans to make them consistent with GMA in 1994. These comprehensive plans attempt to integrate land use and transportation planning by concentrating future growth in existing urban areas and restricting low-density "sprawl" on the fringes of the built-up area. In King County, a number of high-density urban centers were designated as part of the new Comprehensive Plan; these centers are to receive as much as 40 percent of future employment growth. The City of Seattle adopted a similar plan, in which the bulk of new growth will be directed into a hierarchy of "urban centers" and "urban villages." King County has begun implementing transferable development credits which allow higher density in urban centers in exchange for lower rural densities.

Land use issues played a major role in the incorporation of several new cities throughout the region: Federal Way and SeaTac (in 1990), Burien and Woodinville (1993), Newcastle (1994), Shoreline (1995), Covington and Maple Valley (1996), Kenmore (1998), and Sammamish (1999).

Land use issues generally become highly politicized during economic boom periods, when pressure is placed on local housing and transportation resources; the political controversies usually die down during recessions, when economic development and jobs become the priority.

The Sound Transit project has run well over budget, due mainly to cost overruns on the light-rail system, which have jeopardized federal matching funds and eroded local political support. The completion date for the project has been pushed back from 2006 to 2009 and Sound Transit has scaled back the light rail system to run from downtown Seattle to a point one mile north of the airport. Despite these setbacks, construction has begun and enough money has become available to extend the line to the airport terminal. Planning is under way to extend the line north to the University of Washington and Northgate.

In November 2002, voters in Seattle narrowly approved \$1.7 billion to construct a 14-mile monorail system that will connect downtown Seattle with Ballard and West Seattle. Planning for the project is currently under way with completion set for mid-2009. However, tax revenues are running below projections, jeopardizing the project.

Several major public/private highway expansion projects are also under way, including a second Tacoma Narrows Bridge, widening of State Highways 18 and 522, and expansion of heavily used park-and-ride lots throughout the region. In 1999, however, state voters approved an initiative that reduced vehicle license fees, removing billions of dollars for badly-needed highway construction projects. In 2002, state voters resoundingly rejected a measure that would have raised \$7 billion for

major transportation projects throughout the region, forcing transportation planners back to the drawing board. The state legislature restored a portion of the funding in 2003, enabling a few critical projects to move forward.

Construction has begun on a third runway at Sea-Tac International Airport. The runway is one part of a billion-dollar-plus airport expansion that includes enlarged terminals and parking facilities, improved access and circulation roads, a rebuilt people-mover system, and a future connection to the regional light-rail network.

In recent years, water shortages in a number of suburban areas forced local water suppliers to implement moratoria on new development. In 1997, the cities of Seattle and Tacoma agreed to connect their water supply systems, in the hope of forestalling water shortages in King County. However, Seattle backed out of the plan in 2002 because of concerns about the quality of water that would be put into the expanded supply system. Tacoma and various jurisdictions in south and east King County continue to move forward with a scaled-back version of the plan.

Other major infrastructure projects in the region include new branch campuses of the University of Washington in Bothell and Tacoma, the reopening of the Stampede Pass rail line to provide additional freight capacity over the Cascade Mountains, a new baseball park (Safeco Field) for the Seattle Mariners, a new football stadium (Qwest Field) for the Seattle Seahawks, a new exhibition center for large "flat" trade shows, a major expansion of the Washington State Convention and Trade Center in downtown Seattle, a new Special Events Center in Everett, a new convention center in Tacoma, and a new sewage treatment plant to serve the fast-growing areas of north King and south Snohomish counties.

In 1999, the federal government listed the Puget Sound Chinook salmon as a threatened species under the Endangered Species Act (ESA). Later that year, the bull trout was added to the "threatened" list. The salmon/bull trout issue could have far-reaching effects on the development climate in the Puget Sound region because the urban and suburban areas are crisscrossed by a vast network of salmon-bearing waterways.

Chastened by the spotted owl fiasco, state and local governments, environmental groups, and representatives of the timber, agricultural, and development industries have put together a salmon recovery plan for the region. The resulting plan includes wider buffer zones along rivers, streams, lakes, and wetlands, and stricter limits on the amount of impermeable surface area allowed in new developments.

The 6.8-magnitude Nisqually Earthquake of February 2001 has accelerated work on strengthening and upgrading the region's infrastructure and buildings to cope with expected future large temblors.

Finally, recent actions by the Boeing Company have led the region to question how business-friendly it is. A wide range of issues are being examined, including taxation, business and development regulations, traffic congestion, the cost of land, labor, and permitting, and the tendency of local politicians and community groups to treat large employers (and agencies such as Sound Transit) like "milch cows" from which sizable amounts of money can be extracted (or extorted) whenever major projects are attempted in the region.

Outlook

As was discussed in the Economy section above, the Seattle economy increasingly parallels the national economy in terms of employment and unemployment trends.

National Economic Outlook

The Federal Office of Management and Budget announced that the U.S. economy went through a brief recession between March and November of 2001. The economy appears to be slowly emerging from this recession, but financial scandals, ballooning federal budget deficits, and concerns about the aftermath of the U.S. war on Iraq caused the recovery to be less vigorous than would normally be expected.

This conclusion is reflected in the following graph, which shows that the U.S. Index of Leading Economic Indicators has fluctuated over the past several months, not showing a trend up or down. The Index of Leading Indicators is designed to forecast changes in economic activity approximately six months in advance.



Source: The Conference Board

According to *Blue Chip Economic Indicators*, the U.S. economy is projected to grow by 3.5 percent in 2005 and 3.1 percent in 2006. The western portion of the country is expected to grow more rapidly than the nation as a whole.

Local Economic Outlook

Because Seattle is strongly influenced by Boeing, high technology industries, and tourism/travel, the local economy experienced a longer, deeper recession than the nation as a whole. While the national economy has staged a modest recovery, the regional economy has remained stagnant. There are, however, signs that the Seattle economy is finally emerging from the doldrums.

The outlook for the regional economy is supported by a survey of Puget Sound business executives and financial officers conducted by the *Puget Sound Business Journal*, as shown in the graph below. The index dipped to an all-time low in late 2002 following massive Boeing layoffs and fears of war in Iraq. Since then, the index has rebounded steadily and is approaching its all-time high.

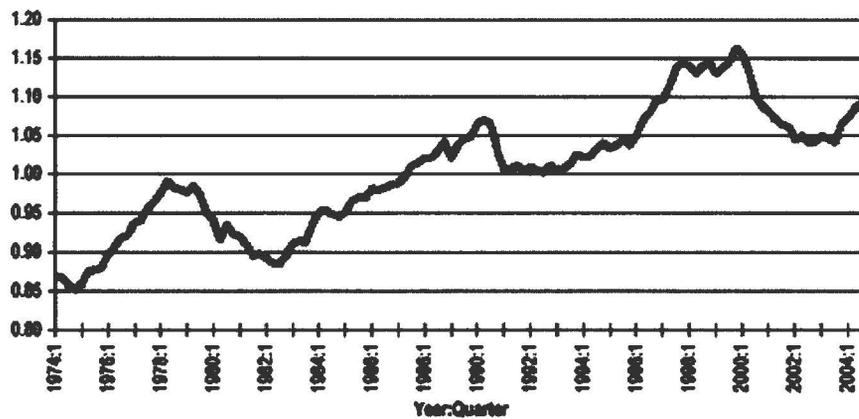


An index value over 50% indicates an expanding economy; below 50% indicates a worsening economy.

Source: Puget Sound Business Journal

The Conway/Pedersen index of leading indicators for the Puget Sound region (shown in the following graph) fell by more than 10 percent since its most recent peak and bounced around at a low level for several quarters. Beginning in late 2003, however, the index staged a strong rebound which continued throughout 2004.

Puget Sound Index of Leading Economic Indicators



Source: Puget Sound Economic Forecaster

Their first quarter 2005 economic forecast showed a 1.9 percent increase in region-wide employment for all of 2004, compared with declines of 0.4 percent in 2003, 2.6 percent in 2002, and 1.0 percent in 2001. Employment is projected to rise by 2.6 percent in 2005 and 2.1 percent in 2006. Despite this rebound, total employment region-wide is not expected to surpass the most recent peak until 2006.

The Conway/Pedersen forecast expects population to rise by 1.1 percent in 2005 and 1.2 percent in 2006. Personal income (in current dollars) was estimated to rise by 4.9 percent for all of 2004 and is projected to increase 5.8 percent in 2005 and 5.6 percent in 2006. Housing construction (units permitted) was estimated to rise a whopping 11.7 percent for all of 2004, followed by increases of 2.8 percent in 2005 and 0.2 percent in 2006. Retail sales are expected to rise by 6.1 percent in 2005, and 6.1 percent in 2006.

Boeing has resumed hiring but Microsoft has scaled back its hiring projections, though it continues to add workers. Microsoft has been attempting to refocus its business in the face of growing competition from Linux on the operating-systems front.

Long-Term Outlook

The Seattle metropolitan area is expected to continue expanding more rapidly than the nation over the long run. The region's economy and population have grown unevenly, but the overall trend has been upward at a rate exceeding the national average. An increasingly diverse regional economy should promote a more stable growth pattern in the future.

Seattle is part of the fast-growing Pacific Rim as well as the expanding Pacific Coast region of the United States. The city is solidifying its economic linkages between Washington, Oregon, British Columbia, Alaska, and other parts of northwestern North America. Because of its dependence on international trade, Seattle has profited from the U.S./Canada Free Trade Agreement and the North American Free Trade Agreement (NAFTA). The large presence of cutting-edge technology industries in the region should also pay dividends in future years as these industries grow and mature.

Historical development trends should continue, with somewhat greater concentration of new growth within the cities than would have occurred if the state Growth Management Act had not been enacted. This, in turn, has generated upward pressure on land prices for both residential and commercial development. The growth of the region continues to place demands on its infrastructure, and the expansion and improvement of roads, utilities, airports, and other public facilities will play a prominent role in the region's development over the next 20 years.

Boeing's decision to move its headquarters out of state is not expected to have a significant near-term effect, but the long-range impacts are not expected to be beneficial to the region. The salmon issue will likely have a large impact on future development, depending on the types of regulations ultimately adopted at the federal, state, and local levels.

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Declaration of Henry Liebman

I, Henry Liebman, declare as follows:

1. I am the President of American Life, Inc. ("AmLife"), a 66.66% owner of American Life Enterprises LLC ("AL Enterprises"), the entity proposed for designation as a regional center with respect to the requested area Eastern Washington under the Immigrant Investor Pilot Program. This declaration is written in support of the request for designation as a regional center.
2. The source of funding for creating and obtaining regional center designation of the regional center, and for the promotion of AL Enterprises is from capital contributed by AmLife. AmLife manages approximately \$500,000,000 in assets and has approximately

(b) (4)



3. In terms of our due diligence on investor source of funds, note we will work with only reputable financial institutions – such as Smith Barney and Citigroup – that are held to the highest standards of fiduciary responsibility and regulatory compliance including the Anti-Money Laundering ("AML") program requirements of the Patriot Act. Further, we attempt to confirm that a prospective investor is not (A) a person listed on the Annex to Executive order No. 13224 (2001) issued by the President of the United States (Executive Order Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism) (the "Executive Order"), (B) named on the List of Specially Designated Nationals and Blocked Persons maintained by the U.S. Office of Foreign Assets Control (OFAC) (the "SDN List"), or (C) otherwise prohibited from investing in the United States pursuant to applicable U.S. AML, anti-terrorist and asset control laws, regulations, rules or orders. See the Pro Forma Money Laundering Suspicious Client/Matter Report Form, attached hereto. Finally, assuming we have accepted capital from an investor, for purposes of individual investor I-526 petitions, we are informed and believe that the respective attorneys who prepare and file I-526 petitions on behalf of our investor partners will fully document and support the I-526 petitions with ample evidence of the source of the petitioner's funds.
4. Our business plan for operation is included with this initial proposal, entitled "Proposal and Business Plan, Eastern Washington Regional Center." The business plan document presents the goals of AL Enterprises; specifics on the proposed boundaries of the regional center; an assessment of the geographic region and the AL Enterprises project focus; a summary reference to the economic analysis by Dr. Paul Sommers, which includes substantial demographic and industry data on the requested area of Eastern Washington as well an economic methodology for estimating job creation and economic impacts; profiles on the management of AL Enterprises; a description of the proposed investment

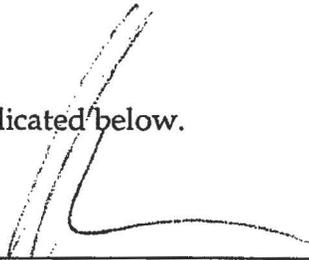
structure for individual EB5 projects; a description of the funding of AL Enterprises; and details concerning the plans for promotion of AL Enterprises. Depending upon market circumstances the business plan may include a provision for escrow at a financial institution whereby funds would be released to the particular project upon I-526 approval. This business plan document is a general proposal that is on a par in terms of scope and details with any of the business plans I have prepared for dozens of different businesses and projects during my 30 year career in business. Furthermore, this business plan has the same general content that was approved for AmLife managed regional centers in Everett, Lakewood, Seattle, and Tacoma in the State of Washington, in Los Angeles, California and in Buffalo, New York.

5. The administration of AL Enterprises will be carried out under my supervision. I am familiar with the monitoring and reporting requirements of a USCIS designated regional center entity. Attached hereto is a copy of an informal notice recently circulated by USCIS concerning the monitoring/reporting obligations. I hereby confirm that AL Enterprises is prepared to comply with such requirements, and that the required work will be carried out under my supervision and the supervision of Charles LeFevre, Nina Collier, and Tony Williams.

All of the foregoing is true and correct as of the date indicated below.

Date:

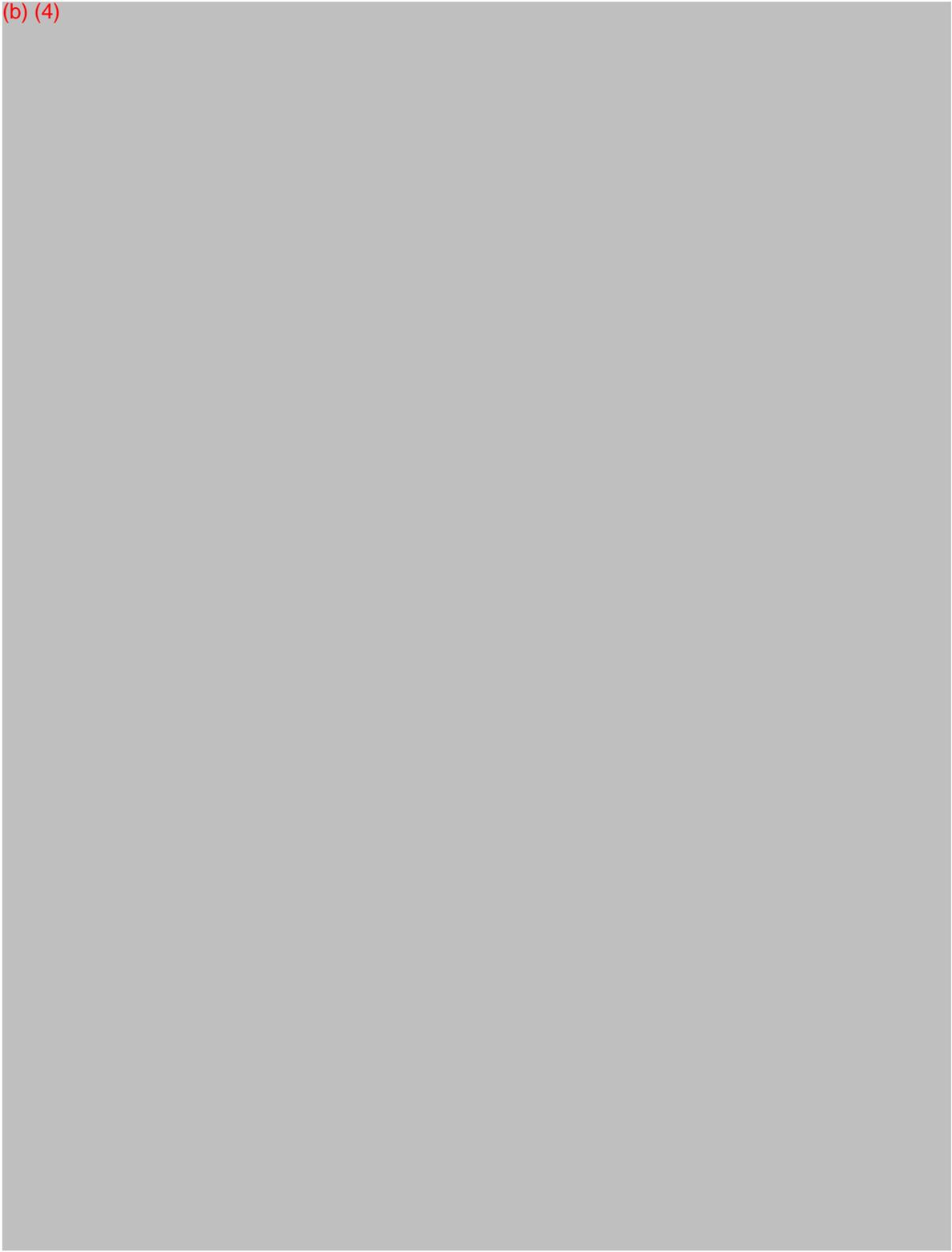
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Henry Liebman

EXAMPLE OF PRO FORMA MONEY LAUNDERING SUSPICIOUS
CLIENT/MATTER REPORT FORM

FOR INTERNAL USE ONLY

(b) (4)



Regional Center Responsibilities Per USCIS Instructions

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

The law, as reflected in the regulations at 8 CFR 204.6(m)(6), requires that an approved Regional Center in order to maintain the validity of its approval and designation must continue to meet the statutory requirements of the Immigrant Investor Pilot Program by serving the purpose of promoting economic growth, including increased export sales (where applicable), improved regional productivity, job creation, and increased domestic capital investment. Therefore, in order for USCIS to determine whether your Regional Center is in compliance with the above cited regulation, and in order to continue to operate as a USCIS approved and designated Regional Center, your administration, oversight, and management of your Regional Center shall be such as to monitor all investment activities under the sponsorship of your Regional Center and to maintain records, data and information on a quarterly basis in order to report to USCIS upon request the following year to date information for each Federal Fiscal Year¹, commencing with the initial year as follows:

1. Provide the principal authorized official and point of contact of the Regional Center responsible for the normal operation, management and administration of the Regional Center.
2. Be prepared to explain how you are administering the Regional Center and how you will be actively engaged in supporting a due diligence screening of its alien investors' lawful source of capital and the alien investor's ability to fully invest the requisite amount of capital.

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

3. Be prepared to explain the following:

- a. How the Regional Center is actively engaged in the evaluation, oversight and follow up on any proposed commercial activities that will be utilized by alien investors.
- b. How the Regional Center is actively engaged in the ongoing monitoring, evaluation, oversight and follow up on any investor commercial activity affiliated through the Regional Center that will be utilized by alien investors in order to create direct and/or indirect jobs through qualifying EB-5 capital investments into commercial enterprises within the Regional Center.

4. Be prepared to provide:

- a. the name, date of birth, petition receipt number, and alien registration number (if one has been assigned by USCIS) of each principal alien investor who has made an investment and has filed an EB-5/I-526 Petition with USCIS, specifying whether:
 - i. the petition was filed,
 - ii. was approved,
 - iii. denied, or
 - iv. withdrawn by the petitioner, together with the date(s) of such event.
- b. The total number of visas represented in each case for the principal alien investor identified in 4.a. above, plus his/her dependents (spouse and children) for whom immigrant status is sought or has been granted.
- c. The country of nationality of each alien investor who has made an investment and filed an EB-5/I-526 petition with USCIS.
- d. The U.S. city and state of residence (or intended residence) of each alien investor who has made an investment and filed an EB-5/I-526 petition with USCIS.
- e. For each alien investor listed in item 4.a., above, identify the following:
 - i. the date(s) of investment in the commercial enterprise;
 - ii. the amount(s) of investment in the commercial enterprise; and
 - iii. the date(s), nature, and amount(s) of any payment/remuneration/profit/return on investment made to the alien investor by the commercial enterprise and/or Regional Center from when the investment was initiated to the present.

5. Be prepared to identify/list each of the target industry categories of business activity within the geographic boundaries of your Regional Center that have:

- a. received alien investors' capital, and in what aggregate amounts;
- b. received non-EB-5 domestic capital that has been combined and invested together, specifying the separate aggregate amounts of the domestic investment capital;
- c. of the total investor capital (alien and domestic) identified above in 5.a and 5.b, identify and list the following:
 - i. The name and address of each "direct" job creating commercial enterprise.
 - ii. The industry category for each indirect job creating investment activity.

6. Be prepared to provide:
 - a. The total aggregate number of approved EB-5 alien investor I-526 petitions per each Federal Fiscal Year to date made through your Regional Center.
 - b. The total aggregate number of approved EB-5 alien investor I-829 petitions per each Federal Fiscal Year to date through your Regional Center.
7. The total aggregate sum of EB-5 alien capital invested through your Regional Center for each Federal Fiscal Year to date since your approval and designation.
8. The combined total aggregate of "new" direct and/or indirect jobs created by EB-5 investors through your Regional Center for each Federal Fiscal Year to date since your approval and designation.
9. If applicable, the total aggregate of "preserved" or saved jobs by EB-5 alien investors into troubled businesses through your Regional Center for each Federal Fiscal Year to date since your approval and designation.
10. If for any given Federal Fiscal Year your Regional Center did or does not have investors to report, then provide:
 - a. a detailed written explanation for the inactivity,
 - b. a specific plan which specifies the budget, timelines, milestones and critical steps to:
 - i. actively promote your Regional Center program,
 - ii. identify and recruit legitimate and viable alien investors, and
 - iii. a strategy to invest into job creating enterprises and/or investment activities within the Regional Center.
11. Regarding your website, if any, please be prepared to provide a hard copy which represents fully what your Regional Center has posted on its website, as well as providing your web address. Additionally, please provide a packet containing all of your Regional Center's hard copy promotional materials such as brochures, flyers, press articles, advertisements, etc.
12. Finally, please be aware that it is incumbent on each USCIS approved and designated Regional Center in order to remain in good standing, to notify the USCIS within 15 business days at USCIS.ImmigrantInvestorProgram@dhs.gov of any change of address or occurrence of any material change in:
 - the name and contact information of the responsible official and/or Point of Contact (POC) for the RC
 - the management and administration of the RC,
 - the RC structure,
 - the RC mailing address, web site address, email address, phone and fax number,
 - the scope of the RC operations and focus,
 - the RC business plan,
 - any new, reduced or expanded delegation of authority , MOU, agreement, contract, etc. with another party to represent or act on behalf of the RC,
 - the economic focus of the RC, or

- any material change relating to your Regional Center's basis for its most recent designation and/or reaffirmation by USCIS.

**FORM OF LIMITED PARTNERSHIP AGREEMENT
OF
ENTERPRISES LIMITED PARTNERSHIP**

**PARTNERSHIP AGREEMENT
OF
ENTERPRISES LIMITED PARTNERSHIP
A WASHINGTON LIMITED PARTNERSHIP**

(b) (4)



EXHIBIT A
Partnership Interests
And
Equity Capital Contributions

(b) (4)



FORM OF SUBSCRIPTION AGREEMENT
OF
ENTERPRISES LIMITED PARTNERSHIP

ENTERPRISES LIMITED PARTNERSHIP
(a Washington limited partnership)

SUBSCRIPTION AGREEMENT

Enterprises Limited Partnership
270 South Hanford Street, Suite 100
Seattle, Washington 98134-1943

Prospective Investor:

(b) (4)



From: Origin ID: EMTA (213) 627-8997
Andrew Hoye
Stone & Grzegorek LLP
800 WILSHIRE BLVD STE 900
LOS ANGELES, CA 90017



Ship Date: 11MAR10
ActWgt: 3.0 LB
CAD: 9061460/NET3010

Delivery Address Bar Code



Ref # 3958.01 - Eastern Wa.
Invoice #
PO #
Dept #

AM MAR 1 2 2010

STAMP #102

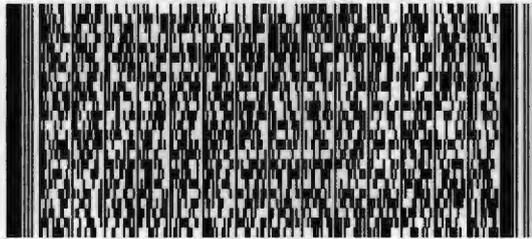
CORR

EB-5
RC-PROPOSAL

SHIP TO: (213) 627-8997 BILL SENDER
Attn: EB-5 RC Proposal
USCIS - California Service Center
24000 AVILA RD
2ND FLOOR, ROOM 2326
LAGUNA NIGUEL, CA 92677

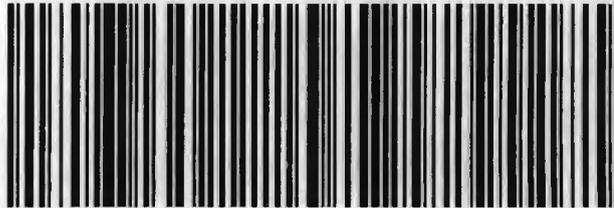
TRK# 7933 4820 0450
0201

FRI - 12 MAR A2
STANDARD OVERNIGHT



92677
CA-US
SNA

WZ JORA



58561796366E5

After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

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

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

Bruun, Lori L

From: Atteberry, Kimberly R
Sent: Tuesday, April 12, 2011 4:00 PM
To: Bruun, Lori L
Cc: Johnson, Mari F
Subject: RE: A couple of questions

I'm sorry for the delay! Below are some comments, in red. In a few cases, I may need more information.

It has taken me two days to type this simple email—ugh! ☹ Too many interruptions.

Kimberly Atteberry
Chief, Investment & Economic Analysis Division
Office of the Chief Financial Officer
Dept Homeland Security

(b) (6)

From: Bruun, Lori L
Sent: Wednesday, March 30, 2011 9:57 AM
To: Atteberry, Kimberly R
Cc: Johnson, Mari F
Subject: A couple of questions

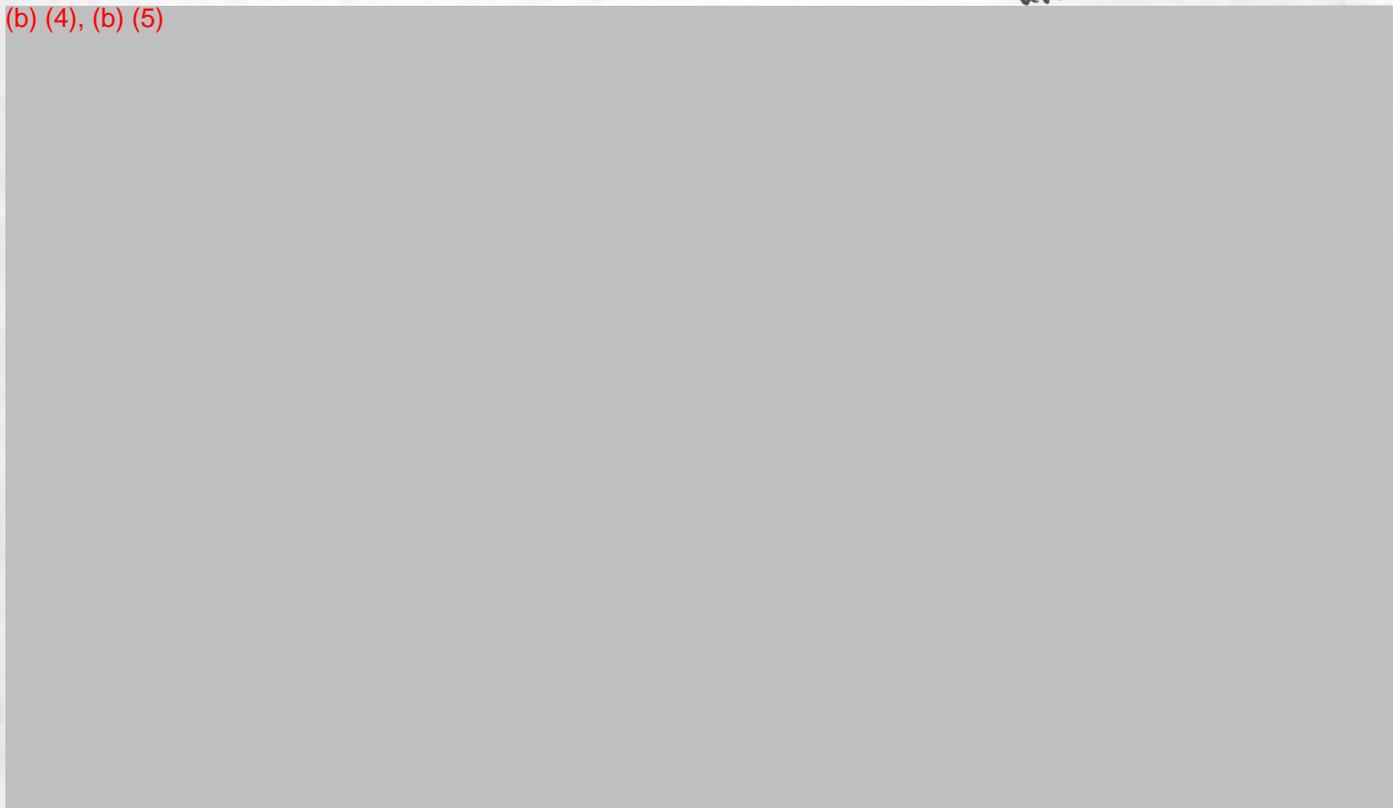
Good morning Kim,

I am working on an American Life regional center proposal – I'm not sure if you've seen this one for Eastern Washington State.

I have a few concerns and I wondered if you agreed.

unanswered

(b) (4), (b) (5)



(b) (4), (b) (5)



Thanks a ton! Your insight is always hugely beneficial to me.

Lori.

THE STATE BAR OF CALIFORNIA

Thursday, March 31, 2011

[State Bar Home](#)[Home](#) > [Attorney Search](#) > [Attorney Profile](#)

ATTORNEY SEARCH

Lincoln Lee Stone - #146597

Current Status: Active

This member is active and may practice law in California.

See below for more details.

Profile Information

Bar Number	146597	Phone Number	(213) 627-8997
Address	Stone & Grzegorek LLP 800 Wilshire Blvd #900 Los Angeles, CA 90017	Fax Number	(213) 627-8998
		e-mail	lincoln@lskglaw.com
District	District 7	Undergraduate School	Loyola Marymount Univ; Los Angeles CA
County	Los Angeles	Law School	Notre Dame Law School; Notre Dame IN
Legal Specialist	Immigration & Nationality Law (State Bar of California)		
Sections	None		

Status History

Effective Date	Status Change
<i>Present</i>	Active
6/11/1990	Admitted to The State Bar of California

Explanation of member status

Actions Affecting Eligibility to Practice Law

Disciplinary and Related Actions

This member has no public record of discipline.

Administrative Actions

This member has no public record of administrative actions.

[Start New Search](#) >

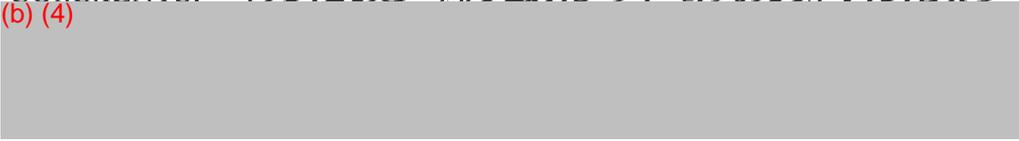
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CALIFORNIA SERVICE CENTER
Appeal/Motion Processing Worksheet

Application/Petition Form I-924

File No: RCW1031910008/W09001570

Appeal/Motion: WAC-11-100-50975

FEE PAID?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
TIMELY APPEAL?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
JURISDICTION?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
RECORD OF PROCEEDINGS IN ORDER?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
PROPER G-28 ON FILE AND SIGNED?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
IBIS CURRENT?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/> N/A
COMMENTS:	<i>Case</i> <i>Denied because the petition</i>	
(b) (4)		
DATE REVIEWED	<i>8 MARCH 2011</i>	
REVIEWER SIGNATURE	<i>George Blawie</i>	
REVIEWER STAMP NUMBER	<i>#3700</i>	
SUPERVISORY REVIEW	_____	
DATE FORWARDED	_____	

Keep this sheet on top of all material in file until initial decision is made.

CLAIMS LAN 6.13

Form: 1290B

Receipt: WAC-11-100-50975

Wednesday March 2, 2011 4:12 pm

ST-LE

Part 1. Information about the person or organization.

Name:

Firm: AMERICAN LIFE ENTERPRISES LLC

C/O: LINCOLN STONE ESQ

Street: 800 WILSHIRE BLVD 900

City: LOS ANGELES

State: CA ZIP: 90017-

Province:

Postal Code:

Country:

DOB: / /

COB:

SSN:

- - A:

IRS: - -

Part 2. Action Requested.

1. I am filing: A an appeal

2. Brief: B I have attached a brief with this appeal/motion

Part 3. Processing Information.

Form #:

Filing Receipt #: RCW1031910008

Date Filed: 03/12/2010

Date of Last Decision: 01/19/2011

Name:

DOB: / /

COB:

A #:

G-28 attached? Y

Fee Info: A

Signature? Y

Concurrent With? N

CLAIMS LAN 6.13

Wednesday March 2, 2011 4:12 pm

Form: I290B

Receipt: WAC-11-100-50975

ST-LE

Part 1. Information about the person or organization.

Name:

Firm: AMERICAN LIFE ENTERPRISES LLC

C/O: LINCOLN STONE ESQ

Street: 800 WILSHIRE BLVD 900

Date	Action - Individual
03/01/2011	DATA CHANGED IN RECORD - ST-PHAM HONG
03/01/2011	RECEIPT NOTICE SENT - BATCH PRINTED
02/28/2011	RECEIVED - ST-PHAM HONG

Form #:

Filing Receipt #: RCW1031910008

Date Filed: 03/12/2010

Date of Last Decision: 01/19/2011

Name:

DOB: / /

COB:

A #:

G-28 attached? Y

Fee Info: A

Signature? Y

Concurrent With? N

SCOSS Contractor

Mail Date:	02/22/2011	Form Type:	I290B	\$ Amount:	630
Employee #:	SP389	# of attached files:	1	Fee Count:	1

All reasons for review: UNABLE TO SEARCH WITH THE RECEIPT PROVIDED, PLEASE ADVICE.

EB-5 CASE

→ RCW 1031910008

CIS / RRU Response

Comments

OK to Process:

Reject:

OK to Process and Mail Reject Letter Attached:

Other:

see attached printout for

*FILE LOCATION:
(A14-58-5-2)*

Reviewer's initials: *GM*

Date / Time Start	Date / Time Finish
	<i>02/25/2011 0950</i>
Contractor Supervisor:	WESLEY

Note: If case is OK to process, place the completed CIS/RRU Cover Sheet inside the file on the non-records side for documentation purposes.

REV

R394

3/12/2010

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

Cover Sheet

Record of Proceeding

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

Instructions

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

Decision Processing Worksheet

Officer Name: George Eberling		Receipt #: W09001570		
Officer Stamp #: 3700		Eastern Washington Regional Center		
Form Type: I-924C	Classification:	Division: 3	Team: 1	WS: 24064
Action:				
<input 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"/> 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 checked="" type="checkbox"/> Denial <input type="checkbox"/> ITD <input type="checkbox"/> ITR
I-924 Expedite Processing:				
Date Received:		# of Un-Named Beneficiaries:		# of Named Beneficiaries:
Officer Received Date:			AST Action Completed:	

I-924 Processing

Officer Prepares or Completes (Notice Ordered) RFE ITD/30 ITR/30 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____ <small>(1st Initial & Last Name)</small> _____ <small>(Date & Time)</small>	Clerical/Officer Completes RFE/ITD/ITR (Notice Sent) _____ <small>(1st Initial & Last Name)</small> _____ <small>(Date & Time)</small>	RFE/ITD/ITR Response Received _____ <small>(1st Initial & Last Name)</small> _____ <small>(Date & Time)</small>	Officer Completes Final Decision (Notice Ordered - Approval/Denial) <div style="text-align: center; font-size: 1.2em;"> <i>G. EBERLING</i> <i>7 JAN 2011</i> </div> _____ <small>(1st Initial & Last Name)</small> _____ <small>(Date & Time)</small>	Clerical/Officer Completes Final Action (Notice Sent) <div style="text-align: center; font-size: 1.2em;"> <i>BA</i> <i>JAN 19 2011</i> </div> _____ <small>(1st Initial & Last Name)</small> _____ <small>(Date & Time)</small>
Mailer Enclosed? Y N SCAO Review:	Final Decision:			

Officer's Comment:
Regular Denial.

Supervisor Review and Comments: *OK*

Initials/Date: <i>Lisa Beach 1/19/11</i>	2 nd Review Initials/Date:	3 rd Review Initials/Date:
---	--	--

Clerical Processing Completed: Initials/Date:

File Room Processing

To: 103 Hold Shelf
Call-Up Date: _____

Decision Processing Worksheet

Officer Name: George Eberling		Receipt #: W09001570		
Officer Stamp #: 3700		East Washington Regional Center		
Form Type: I-924C	Classification:	Division: 3	Team: 1	WS: 24064

Action:

<input 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"/> RFE Initial <input checked="" type="checkbox"/> RFE Additional <input 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
---	---	---	---	---

I-924 Expedite Processing:

Date Received:	# of Un-Named Beneficiaries:	# of Named Beneficiaries:
Officer Received Date:	AST Action Completed:	

I-924 PP Processing

Officer Prepares or Completes (Notice Ordered)	Clerical/Officer Completes RFE/ITD/ITR (Notice Sent)	RFE/ITD/ITR Response Received	Officer Completes Final Decision (Notice Ordered - Approval/Denial)	Clerical/Officer Completes Final Action (Notice Sent)
RFE <input checked="" type="checkbox"/> ITD/30 <input type="checkbox"/> ITR/30 <input type="checkbox"/> <i>G. EBERLING</i> (1 st Initial & Last Name) 09/09/2010 (Date & Time)	_____ (1 st Initial & Last Name) _____ (Date & Time)	_____ (1 st Initial & Last Name) _____ (Date & Time)	_____ (1 st Initial & Last Name) _____ (Date & Time)	_____ (1 st Initial & Last Name) _____ (Date & Time)
Mailer Enclosed? Y N SCAO Review: _____ Final Decision: _____				

Officer's Comment:
Regular RFE.

Supervisor Review and Comments:

Initials/Date: <i>AE</i>	2 nd Review Initials/Date:	3 rd Review Initials/Date:
-----------------------------	--	--

Clerical Processing Completed: Initials/Date: _____

File Room Processing

To: 103 Hold Shelf
Call-Up Date: JANUARY 4, 2010

I-924 Regional Center Proposal

Receipt Number: W09001570 Attorney: Lincoln Stone

Regional Center: Eastern Washington RC X G-28

General Partner: _____ Requester's Name: _____

- Economic Unit-Organizational Documents for Regional Center Certificate of Formation
- Target Non-Target Both
- Geographic Area Delineated: 26 counties in SW & E WASHINGTON
- Economic Growth Analysis
- Regional or National Impact- Economic Analysis
- Indirect Job Creation:
 - Troubled Business Non-Troubled Business
- Econometric Model: WA STATE INPUT-OUTPUT MODEL
- Economic Analysis of Job Creation: WEAK
- Business Plan:
 - Hypothetical Investment Plan Investment Plan
- Industries: _____
- Activities: _____
- 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:

* 2007 & NDT 2009
UNEMPLOYMENT DATA



RECEIPT NUMBER W09001570		CASE TYPE Regional Center Proposal
RECEIPT DATE March 12, 2010		REGIONAL CENTER NAME Eastern Washington Regional Center
	PAGE 1 of 1	

Lincoln Stone, Esq.
Stone & Grzegorek LLP
800 Wilshire Blvd., Suite 900
Los Angeles, California 90017

Notice Type:

Receipt Notice

Receipt Notice - This notice confirms that USCIS received your Regional Center Proposal. If any of the above information is incorrect, send an e-mail to: USCIS.ImmigrantInvestorProgram@dhs.gov. This notice does not grant any immigration status or benefit. It is not even evidence that this case is still pending. It only shows that the application or petition was filed on the date shown.

Processing Time - The current processing time for this case is estimated at 120 days. Unlike other case types, verification or tracking of this case is not available electronically or on our website. We will notify you by mail when we make a decision on this case or if we need something from you. If you do not receive an initial decision or update from us within our current processing time, you may send an e-mail to: USCIS.ImmigrantInvestorProgram@dhs.gov or contact us at the address below.

Address Change - If your mailing address changes while your case is pending, you may send an e-mail to: USCIS.ImmigrantInvestorProgram@dhs.gov. Otherwise, you might not receive notice of our action on this case.

Please save this notice and a copy of any papers that you send to us along with proof of delivery.

U.S. CITIZENSHIP & IMMIGRATION SVC
CALIFORNIA SERVICE CENTER
Attn: EB-5 RC Proposal
P.O. BOX 10526
LAGUNA NIGUEL CA 92607-10526

- Please save this notice for your records. Please enclose a copy if you have to write us or a U. S. Consulate about this case, or if you file another application based on this decision.
- You will be notified separately about any other applications or petitions you have filed.

Additional Information

GENERAL.

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

INQUIRIES.

You should contact the office listed on the reverse side of this notice if you have questions about the notice, or questions about the status of your application or petition. *We recommend you call.* However, if you write us, please enclose a copy of this notice with your letter.

APPROVAL OF NONIMMIGRANT PETITION.

Approval of a nonimmigrant petition means that the person for whom it was filed has been found eligible for the requested classification. If this notice indicated we are notifying a U.S. Consulate about the approval for the purpose of visa issuance, and you or the person you filed for have questions about visa issuance, please contact the appropriate U.S. Consulate directly.

APPROVAL OF AN IMMIGRANT PETITION.

Approval of an immigrant petition does not convey any right or status. The approved petition simply establishes a basis upon which the person you filed for can apply for an immigrant or fiance(e) visa or for adjustment of status.

A person is not guaranteed issuance of a visa or a grant of adjustment simply because this petition is approved. Those processes look at additional criteria.

If this notice indicates we have approved the immigrant petition you filed, and have forwarded it to the Department of State Immigrant Visa Processing Center, that office will contact the person you filed the petition for directly with information about visa issuance.

In addition to the information on the reverse of this notice, the instructions for the petition you filed provide additional information about processing after approval of the petition.

For more information about whether a person who is already in the U.S. can apply for adjustment of status, please see Form I-485, *Application to Register Permanent Residence or Adjust Status.*