



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

Date: **JAN 20 2011**

Boyd Campbell  
General Counsel  
America's Center for Foreign Investment, LLC  
RSA Union Building  
100 North Union Street, Suite 682  
Montgomery, AL 36104

Application: Request to Amend Designation as a Regional Center  
Applicant(s): Boyd Campbell

Re: America's Center for Foreign Investment  
RCW1031910261/W09002670

Pursuant to Section 610 of the Appropriations Act of 1993, on June 11, 2007, America's Center for Foreign Investment Regional Center (formerly Alabama Center for Foreign Investment), was approved and designated as a regional center to participate in the Immigrant Investor Pilot Program. Further, an amendment to extend the geographic scope of the regional center was approved on October 22, 2009 to include the States of Alabama and Tennessee and certain counties in the States of Georgia, Florida and Mississippi. In a written request dated October 7, 2010, America's Center for Foreign Investment Regional Center sought to amend its initial Regional Center designation as follows:

To include a capital investment project by "CP Homes (Alabama) I, LP" (the new commercial enterprise) to make a (b) (4) loan to the job-creating entity, "CP 1 (AL) Inc." for the funding, development and operation of a 15,700 square foot assisted living facility with support services in the City of Foley, Alabama. This project will allow immigrant investors in this project to proceed with the filing of their respective Forms I-526, Immigration Petition by Alien Entrepreneur with the appropriate fee. Investors must include evidence of any changes or updates to the project such as changes to the estimated start and completion dates.

Based on its review and analysis of the request to amend the previous America's Center for Foreign Investment Regional Center, business plan, and supplementary evidence, the U.S. Citizenship and Immigration Services (USCIS) amends the designation of the Regional Center as described below. In accepting the amendment, USCIS has updated its records of your Regional Center approval, designation, and business plan to encompass this amendment relative to the investment.

**FOCUS OF INVESTMENT ACTIVITY:**

As depicted in the economic model, the general proposal and the economic analysis and the amendment to the Regional Center Proposal, the Regional Center will engage in the following economic activities: the financing and development of projects and commercial enterprises in the five (5) target clusters of economic activity within the approved ACFI-RC's geographic area.

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

1. Heavy and light manufacturing; agriculture;
2. High technology; construction;
3. Hospitality, resort and service industries (hotels, restaurants, resorts, golf courses, entertainment, and the like);
4. Schools, health care facilities, and infrastructure; and
5. Cruise line support services.

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

**GEOGRAPHIC AREA:**

The America's Center for Foreign Investment Regional Center shall have a geographic scope to include the States of Alabama and Tennessee; the Mississippi counties of Coahoma, Tunica, Desoto, Marshall, Benton, Tippah, Alcorn, Tishomingo, Prentiss, Union, Lafayette, Panola, Quitman, Tate, Lee, Pontotoc, Itawamba, Monroe, Lowndes, Clay, Noxubee, Kemper, Lauderdale, Clarke, Jasper, Jones, Wayne, Greene, Perry, Forrest, Lamar, Pearl River, Stone, George, Jackson, Harrison, Stone, and Hancock; the Georgia counties of Polk, Bartow, Pickens, Dawson, Hall, Jackson, Oconee, Barrow, Gwinnett, Rockdale, Forsyth, Cherokee, Paulding, Cobb, Haralson, Carroll, Douglas, Fulton, DeKalb, Newton, Morgan, Walton, Putnam, Jasper, Butts, Henry, Clayton, Fayette, Coweta, Heard, Troup, Meriwether, Pike, Lamar, Monroe, Jones, Bibb, Crawford, Upson, Talbot, Harris, Muscogee, Chattahoochee, Marion, Schley, Macon, Peach, Sumter, Webster, Stewart, Quitman, and Spalding; and the Florida counties of Escambia, Santa Rosa, Okaloosa, Walton, Holmes, Washington, Bay, Jackson, Calhoun, Gulf, Liberty, Franklin, Gadsden, Leon, Wakulla, Jefferson, Madison, Taylor, Hamilton, Suwannee, Lafayette, Dixie, Gilchrist, Levy, Columbia, Baker, Lincoln, Bradford, Alachua, Marion, Nassau, Duval, Clay, St. Johns, Putnam, Flagler, Volusia, Seminole and Alachua.

Aliens seeking immigrant visas through the Immigrant Investor Pilot Program may file individual petitions with USCIS for these commercial enterprises located within the approved Regional Center area. The geographic focus of this area may contain some High Unemployment Targeted Employment Areas (TEAs) as designated by State of Alabama, the State of Florida, the State of Georgia, the State of Mississippi, the State of Tennessee, and rural TEAs as defined in 8 CFR 204.6(e). Therefore, the minimum capital investment threshold for any individual immigrant investment into an approved commercial enterprise throughout the Regional Center shall be not less than \$500,000, if the investment target is located within a TEA or \$1,000,000 if it is located outside of a TEA. No debt arrangement will be acceptable unless it is secured by assets owned by the alien entrepreneur. A full capital investment must be made and placed at risk.

### **EMPLOYMENT CREATION**

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

In addition, where job creation or preservation of existing jobs is claimed based on a multiplier rooted in underlying new "direct jobs", the immigrant investor's individual I-526 petition affiliated with your Regional Center, should include as supporting evidence:

- To be credited for preserving/maintaining pre-existing direct jobs for "qualified employees" with the Regional Center for a "troubled business" as defined by the regulation at Part 204.6(e), the individual I-526 petition must be supported by probative evidence of the number of full time (35 hours per week) qualified employees, whose positions shall be preserved/maintained throughout the alien's period of conditional residency. Such evidence should include copies of quarterly state employment tax reports, Forms W-2, Forms I-9, and any other pertinent employment records sufficient to demonstrate the number of qualified employees whose jobs were created directly.
- To be credited with projected creation of new "direct" jobs for "qualifying employees" upon filing the I-526 petition, then the petition must be supported by a comprehensive detailed business plan and supporting financial, marketing and related data and analysis providing a reasonable basis for projecting creation of any new direct jobs for "qualifying employees" to be achieved/realized within two years pursuant to 8 CFR 204.6(j)(4)(B).

An alien investor's I-829 petition to remove the conditions which was based on an I-526 petition approval that involved the creation of new direct jobs or the creation of new indirect jobs based on a multiplier tied to underlying new direct jobs needs to be properly supported by evidence of job creation. To support the full number of direct and indirect new jobs being claimed in connection with removal of conditions, the petition will need to be supported by probative evidence of the number of new direct full time (35 hours per week) jobs for qualified employees whose positions have been created as a result of the alien's investment. Such evidence may include copies of quarterly state employment tax reports, Forms W-2, Forms I-9, and any other pertinent employment records sufficient to demonstrate the number of qualified employees whose jobs were created directly.

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

Based upon the review of your proposal, the project (consisting of a new assisted living facility in City of Foley, Alabama), is approved as a Capital Investment Project for your regional center. To demonstrate that an individual alien investor is associated with this project and your regional center, each alien entrepreneur petition, in conjunction with addressing all the requirements for that petition, shall contain supporting evidence relating to this project and the regional center designation, as follows:

1. A copy of this letter, the Regional Center approval and designation.
2. A copy of the USCIS approved Regional Center narrative proposal and business plan.
3. A copy of the job creation methodology required in 8 CFR 204.6(j)(4)(iii), as contained in the final Regional Center economic analysis which has been approved by USCIS, which reflects that investment by an individual immigrant investor will create not fewer than ten (10) full-time employment positions, either directly or indirectly, per immigrant investor.
4. A legally executed copy of the USCIS approved documents:
  - a. Confidential Information Memorandum                      Samples/Drafts dated March 2, 2007
  - b. Subscription Agreement    Samples/Drafts dated March 2, 2007
  - c. Actual Offering Memorandum                                      Samples/Drafts dated March 2, 2007
  - d. Limited Partnership Agreement                                      Samples/Drafts dated October 7, 2010
  - e. Private Placement Memorandum                                      Samples/Drafts dated October 7, 2010
  - f. Escrow Agreement    Samples/Drafts dated October 7, 2010

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

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

Effective November 23, 2010, the failure to timely file a Form I-924A Supplement for each fiscal years in which the regional center has been designated for participation in the Immigrant Investor Pilot Program will result in the issuance of an intent to terminate the participation of the regional center in the Pilot Program, which may ultimately result in the termination of the approval and designation of the regional center.

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

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

Sincerely,



Rosemary Langley Melville  
Director  
California Service Center

cc: Brandon Meyer, Esq.

# CALIFORNIA SERVICE CENTER ROUTING SLIP

Receipt # \_\_\_\_\_

A # \_\_\_\_\_

Rev 11/12/10

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

DIVISION IX	DIVISION I	DIVISION II	DIVISION III
<input type="checkbox"/> AST Incoming: <u>XB800</u>	<input type="checkbox"/> Incoming: <u>AD477</u>	<input type="checkbox"/> Incoming: <u>XA925</u>	<input type="checkbox"/> Incoming: <u>AD477</u>
<input type="checkbox"/> MR Returns: _____	<input type="checkbox"/> W/S: _____	<input type="checkbox"/> W/S: _____	<input type="checkbox"/> QA Corrections: <u>ET116</u>
<input type="checkbox"/> W/S: _____	ATTN: _____	ATTN: _____	<input checked="" type="checkbox"/> W/S: <u>24064</u>
ATTN: _____			ATTN: _____

DIVISION IV	DIVISION VII	DIVISION VIII/ COUNSEL	DIVISION X-Background Check Unit
<input type="checkbox"/> Incoming: <u>XB641</u>	<input type="checkbox"/> CPAU Incoming: <u>RS601</u>	<input type="checkbox"/> Incoming: <u>WR000</u>	<input type="checkbox"/> Rap Sheets/ EPS Incoming: <u>SZ132</u>
<input type="checkbox"/> W/S: _____	<input type="checkbox"/> CFF Incoming: <u>RS902</u>	<input type="checkbox"/> CSC Counsel	<input type="checkbox"/> Incoming: <u>SZ131</u>
ATTN: _____	<input type="checkbox"/> RRU BIA <u>RS339</u>	<input type="checkbox"/> ATTN: _____	<input type="checkbox"/> BCU/Top 4: <u>SZ714</u>
DIVISION V	<input type="checkbox"/> RRU Incoming: <u>RS554</u>	<input type="checkbox"/> WS: _____	<input type="checkbox"/> WS: _____
<input type="checkbox"/> Incoming: <u>XB641</u>	<input type="checkbox"/> RRU Ponds : <u>W/S 24201</u>	ATTN: _____	ATTN: _____
<input type="checkbox"/> W/S: _____	<input type="checkbox"/> CIS Review <u>RC464</u>		
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	<input type="checkbox"/> W/S: _____		
	ATTN: _____		

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

**SCOSS**      ATTN: \_\_\_\_\_      W/S: \_\_\_\_\_      RPC: \_\_\_\_\_

<input type="checkbox"/> NRC Hold Approved: _____	<input type="checkbox"/> Return to JIT * <u>RC419</u>	<input type="checkbox"/> Routing Hub: <u>RC422</u>	<input type="checkbox"/> EDMS PRINTS: <u>RC321</u>
<input type="checkbox"/> NRC Hold Denied: <u>RC417</u>	* Specify application / petition type in Comments field below	ATTN: _____	
<input type="checkbox"/> HBG Hold Approved: _____	SCAN CR	<input type="checkbox"/> CIS FTR Review Complete * <u>RC442</u>	ATTN: _____
<input type="checkbox"/> HBG Hold Denied: <u>RC418</u>	1-89 / 698 / 829: <u>RC318</u>	* Attach sheet and / or file	<input type="checkbox"/> I-612 DOS COPY: <u>RC472</u>
<input type="checkbox"/> Interfiling: <u>WS23222</u>	<input type="checkbox"/> FR Backend Appeal Pod: <u>RC410</u>	<input type="checkbox"/> Transfer to FCO: <u>RC421</u>	<input type="checkbox"/> F/R A-File Create: <u>RC413</u>
<input type="checkbox"/> Front End Request: <u>RC427</u>	<input type="checkbox"/> Backend Scan: <u>RC307</u>	<input type="checkbox"/> TPS Haitian (RDF): <u>RC465</u>	<input type="checkbox"/> File Consolidate: <u>RC423</u>
	<input type="checkbox"/> SNAP Incoming: <u>RC302</u>	<input type="checkbox"/> Transfer to NVC: <u>RC438</u>	<input type="checkbox"/> I-485 File Consolidate: <u>RC439</u>
	<input type="checkbox"/> 103 Hold (RFE / ITD): <u>RC420</u>	<input type="checkbox"/> FTC Incoming: <u>RC437</u>	<input type="checkbox"/> Approved Awaiting I-89: <u>RC428</u>
	<input type="checkbox"/> I-512 Incoming: <u>RC313</u>	<input type="checkbox"/> I-130 Upgrades: <u>RC055</u>	

*EBS CRFE*

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

		Application/Petition REGIONAL CENTER PROPOSAL
Receipt # W09002670		
Notice Date December 14, 2010	Page 1 of 2	Regional Center America's Center for Foreign Investment Regional Center

Brandon Meyer, Esq.  
America's Center for Foreign Investment, RC  
5440 Morehouse Drive, Suite 4400  
San Diego, CA 92121

Request for Evidence

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

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

WS 24064/CSC3700 DIV III

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

**Note: You are given until March 8, 2011 in which to submit the information requested.**

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

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

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

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



W09002675

9-97 2 10/11/09 0028 AL3100621

## Additional Information for Applicants and Petitioners.

### General.

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

### Inquiries.

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

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

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

### Requests for Evidence.

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

### Reply Period.

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

### Approval for a Petition.

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

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

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

### Denials.

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

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

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

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

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.

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

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

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

In the instant proposal, a form G-28 was not submitted or signed by the regional center principal. If the Regional Center wishes to be represented by an outside attorney, that is, an attorney that is neither an employee nor principal of the Regional Center, that attorney must submit a properly executed form G-28, signed by a principal of the Regional Center.

##### **Letter signed by Regional Center Managing Principal**

Although managing principal Boyd Campbell submitted a letter to Brandon Meyer, a cover letter was not provided by the managing principal (Ron Drinkard or Boyd Campbell) of the Regional Center to USCIS. Provide a cover letter from the managing principal of the Regional Center.

##### **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.

**MEYER LAW GROUP**

**BRANDON MEYER, ATTORNEY AT LAW**

**- LICENSED IN CONNECTICUT, PRACTICE LIMITED TO IMMIGRATION & NATIONALITY LAW -  
5440 MOREHOUSE DRIVE, SUITE 4400  
SAN DIEGO, CA 92121  
brandon@meyerlawgroup.us  
858-558-1001 FAX 858-558-1122**

December 31, 2010

USCIS California Service Center  
ATTN: EB-5 RC Proposal  
PO Box 10590  
Laguna Niguel, CA 90267-0526

**Re: CP 1 I-526 Exemplar Filing**  
**Regional Center: America's Center for Foreign Investment, Inc.**  
**Case Number: W09002670**

Dear Madam/Sir:

This brief is in response to your Request for Evidence dated December 14, 2010. Per your request, we include the following documents:

- 1) Fully executed Form G-28, provided by ACFI principal Boyd Campbell.
- 2) Cover letter provided by Boyd Campbell to USCIS reiterating ACFI's acceptance of CP 1 as a Regional Center project under their management.

Thank you in advance for your assistance in this matter. Please feel free to contact us with any questions.

With kindest regards.

MEYER LAW GROUP



Brandon Meyer  
Attorney at Law

BM  
Enclosures





**ACFI**

December 31, 2010

USCIS  
California Service Center  
P.O. Box 10130  
Laguna Niguel, CA 92607-0130

Re: CP Homes (AL), L.L.C.

Dear Sir or Madam:

This letter is written to your Service Center, at your written request, in order to identify CP Homes (AL), L.L.C., as a regional center investment project under services provided by America's Center for Foreign Investment, L.L.C., in accordance with the Immigrant Investor Pilot Program, also called the EB-5 Program.

CP Homes has informed ACFI that its assisted living facilities will be located in rural areas and its investors may make the lower minimum investment amount of \$500,000.00. ACFI acknowledges its responsibility to closely monitor the activities of CP Homes to insure compliance with the EB-5 Program.

ACFI has served as a regional center since June 11, 2007, and underwent a geographic expansion on October 29, 2009. If you have any questions about ACFI's Advisory Agreement with CP Homes, please call me at (334) 954-3111, or send your email message to [boyd.campbell@acfi-usa.com](mailto:boyd.campbell@acfi-usa.com).

Sincerely,  
America's Center for Foreign Investment, L.L.C.

Boyd Campbell  
Vice President and General Counsel

America's Center for Foreign Investment, L.L.C.  
Post Office Box 5079  
RSA Union, 100 North Union Street, Suite 682  
Montgomery, Alabama 36103-5079  
Tel +334.954.3111 • [www.acfi-usa.com](http://www.acfi-usa.com)

Express

ORIGIN ID: CLDA (858) 259-6020  
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99 LOMAS SANTA FE DR. STE C  
SOLANA BEACH, CA 92075  
UNITED STATES US

SHIP DATE: 31DEC10  
ACTWGT: 0.2 LB  
CAD: 9743311/WBUS0200

BILL SENDER

USCIS, CALIFORNIA SERVICE CENTER  
24000 AVILA RD.  
2ND FLOOR  
LAGUNA NIGUEL CA 92677

Att: EB-5 RC Proposal

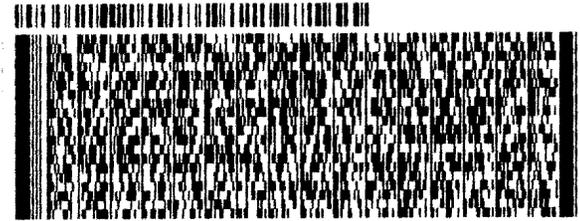
(555) 000-0000 REF: (PCS) MEYER  
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CSC

JAN 03 2011

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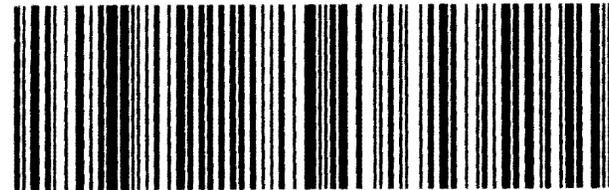
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International Shipping Notice - Carriage /airmail may be subject to the rules relating to liability and other terms and/or conditions established by the Convention for the Unification of Certain Rules Relating to International Carriage by Air (the "Warsaw Convention") or the Convention on the Contract for the International Carriage of Goods by Road (the "CMR Convention"). These conventions, secretary of achesaw were sponsored from the U.S. in accordance with the Export Administration Regulations, Division contrary to U.S. law prohibited. For shipping please, call 1-800-750-7522. United Parcel Service, Louisville, KY

		Application/Petition REGIONAL CENTER PROPOSAL
Receipt # W09002670		
Notice Date December 14, 2010	Page 1 of 2	Regional Center America's Center for Foreign Investment Regional Center

Brandon Meyer, Esq.  
America's Center for Foreign Investment, RC  
5440 Morehouse Drive, Suite 4400  
San Diego, CA 92121

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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



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

### Inquiries.

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

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

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

### Requests for Evidence.

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

### Reply Period.

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

### Approval for a Petition.

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

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

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

### Denials.

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

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

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

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

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.

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

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

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

In the instant proposal, a form G-28 was not submitted or signed by the regional center principal. If the Regional Center wishes to be represented by an outside attorney, that is, an attorney that is neither an employee nor principal of the Regional Center, that attorney must submit a properly executed form G-28, signed by a principal of the Regional Center.

##### **Letter signed by Regional Center Managing Principal**

Although managing principal Boyd Campbell submitted a letter to Brandon Meyer, a cover letter was not provided by the managing principal (Ron Drinkard or Boyd Campbell) of the Regional Center to USCIS. Provide a cover letter from the managing principal of the Regional Center.

##### **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.

A

**BRANDON MEYER, ATTORNEY AT LAW**  
- LICENSED IN CONNECTICUT, PRACTICE LIMITED TO IMMIGRATION & NATIONALITY LAW -

**5440 MOREHOUSE DRIVE, SUITE 4400**  
SAN DIEGO, CA 92121  
BRANDON@MEYERSANDIEGO.COM  
858-558-1001 FAX 858-558-1122

October 3, 2010

USCIS California Service Center  
ATTN: I-526 Regional Center Processing  
PO Box 10526  
Laguna Niguel, CA 90267-0526

**Re: I-526 Immigrant Petition by Alien Entrepreneur**  
**Regional Center: AMERICA'S CENTER FOR FOREIGN INVESTMENT**  
**Commercial Enterprise: CP 1 (AL), Inc.**  
**Petitioner: TO BE DETERMINED.**

**I-526 EXEMPLAR FILING FOR CP 1 (AL), INC.**

Dear Sir/Madam:

**Introduction**

Please accept this submission as the filing of an "exemplar" I-526 petition on behalf of CP 1 (AL), Inc. ("CP 1"), which are permissible per the Adjudicator's Field Manual Chapter 22.4(a)(2)(C) and the December 11, 2009 USCIS memorandum entitled "Adjudication of EB-5 Regional Center Proposals and Affiliated Form I-526 and Form I-829 Petitions; Adjudicators Field Manual (AFM) Update to Chapter 22.4 and 25.2 (AD09-38)." Our office represents CP 1 in this matter. A fully executed Form G-28 is attached.

CP 1 has been accepted into the America's Center for Foreign Investment ("ACFI") approved Regional Center. ACFI will act in an advisory role pursuant to its initial designation as a Regional Center by USCIS on June 11, 2007. CP 1 is within ACFI's approved geographic scope, which includes the entire state of Alabama, and approved industry clusters, which includes health care facilities such as the one envisioned by the CP 1 project. Please see confirmation of acceptance into ACFI's Regional Center umbrella in Exhibit A. CP 1 is submitting this exemplar petition at this time in order to: 1) alert USCIS that it has an active EB-5 project and to educate USCIS about the particulars of this project; 2) gain critical feedback from USCIS on its documentary presentation so that it can proactively address any perceived deficiencies; 3) facilitate the approval of individual I-526 petitions; and, 4) avoid the need to submit redundant documentation for multiple petitions.

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CP 1 is submitting the following documentation for your review.

- Exhibit A. Documentation showing ACFI's acceptance of CP Homes (Alabama) LLC under its Regional Center umbrella, as well as ACFI's Regional Center designation letter issued by USCIS.
- Exhibit B. Business Plan for CP 1.
- Exhibit C. Economic and job creation analysis, prepared by Dr. Judson Edwards.
- Exhibit D. Private Placement Memorandum.
- Exhibit E. Sample Limited Partnership ("LP") agreement, with sample Investors Questionnaire.
- Exhibit F. Sample Escrow Agreement.
- Exhibit G. Agreement of Sale and Purchase for site where CP 1 will be constructed.
- Exhibit H. Incorporation and partnership documents from the State of Alabama.
- Exhibit I. Promotional materials in English and Mandarin Chinese.

We trust that the information provided by CP 1 in this exemplar filing is sufficient to establish the bona fides of the project. The following discussion represents a sample description of CP 1's project that will accompany subsequent I-526 petitions.

**Sample I-526 Discussion for Individual Petitioner**

(b) (4)







(b) (4)



**ISSUES:**

In order to warrant favorable consideration, the petitioner must demonstrate that:

The investment is being made in a “new commercial enterprise” (8 C.F.R. §§204.6(e) and (h));

The investment is being made in a “targeted employment area” for purposes of reducing the threshold investment from one million dollars (\$1,000,000) to five hundred thousand dollars (\$500,000) (8 C.F.R. §§204.6(e), (f)(2) and (j)(6)(ii));

The investment is being made in a designated “regional center” for purposes of allowing “indirect” creation of the requisite number of full-time positions (8 C.F.R. §§204.6(e) and (m)(3));

The investment is creating the requisite number of full-time positions given the fact that there are “multiple investors” in the qualifying investment enterprise (8 C.F.R. §204.6(g));

The investment capital is “at risk for the purpose of generating a return on the capital placed at risk” (8 C.F.R. §204.6(j)(2));

The investor “has invested or is actively in the process of investing the required amount of capital” (8 C.F.R. §§204.6(e) and (j)(2)); and,

The investor “has invested or is actively in the process of investing capital acquired through lawful means” (8 C.F.R. §204.6(j)(3)).

These issues will be discussed with applicable law and regulations seriatim below.

**A. NEW COMMERCIAL ENTERPRISE:**

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

*New* means established after November 29, 1990.

8 C.F.R. §204.6(h) reads in relevant part:

(h) *Establishment of a new commercial enterprise.* The establishment of a new commercial enterprise may consist of:

- (1) The creation of an original business;
- (2) The purchase of an existing business and simultaneous or subsequent restructuring or reorganization such that a new commercial enterprise results; or
- (3) The expansion of an existing business through the investment of the required amount, so that a substantial change in the net worth or number of employees results from the investment of capital. Substantial change means a 40 percent increase either in the net worth, or in the number of employees, so that the new net worth, or number of employees amounts to at least 140 percent of the pre-expansion net worth or number of employees. Establishment of a new commercial enterprise in this manner does not exempt the petitioner from the requirements of 8 CFR 204.6(j)(2) and (3) relating to the required amount of capital investment and the creation of full-time employment for ten qualifying employees. In the case of a capital investment in a troubled business, employment creation may meet the criteria set forth in 8 CFR 204.6(j)(4)(ii).

CP 1 was created on September 22, 2010 and immediately began doing business under this name (**Exhibit G, Certificate of Limited Partnership**). This meets the establishment of the new enterprise requirement; that the enterprise be established after November 29, 1990.

Though the Administrative Appeals Office (AAO) in *Matter of Izummi*, 22 I&N Dec. 169 (AAO, July 13, 1998) held that, “a petitioner must show that he is seeking to enter the U.S. for the purpose of engaging in a new commercial enterprise that **he** has established,” the Memorandum of William R. Yates, Acting Director for Operations of the (then) Bureau of Citizenship and Immigration Services dated June 10, 2003 (hereinafter “Yates Memo”) clarifies the point in that any commercial enterprise formed after November 29, 1990 is considered a “new commercial enterprise” and complies with 8 C.F.R. §204.6(e).<sup>1</sup>

## **B. Job Creation/Multiple Investors**

8 C.F.R. § 204.6(g)(1) states:

The establishment of a new commercial enterprise may be used as the basis of a petition for classification as an alien entrepreneur by more than one investor, provided that each petitioning investor has invested or is actively in the process of investing the required amount for the area in which the new commercial enterprise is principally doing business, and provided each individual investment results in the creation of at least ten full-time positions for qualifying employees.

(b) (4)



<sup>1</sup> See also 21<sup>st</sup> Century Department of Justice Appropriations Authorization Act, Pub. L. No. 107-273, 116 Stat. 1758 (2002), §§11031-37.

### **C. Capital at Risk**

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

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

“Commercial enterprise” means any for-profit activity formed for the ongoing conduct of lawful business including, but not limited to, a sole proprietorship, partnership (whether limited or general), holding company, joint venture, corporation, business trust or other entity which may be publicly or privately owned. This definition includes a commercial enterprise consisting of a holding company and its wholly owned subsidiaries, provided that each such subsidiary is engaged in a for-profit activity formed for the ongoing conduct of a lawful business. This definition shall not include a non-commercial activity such as owning and operating a personal residence.

“Invest” means to contribute capital. A contribution of capital in exchange for a note, bond, convertible debt, obligation, of any other debt arrangement between the alien entrepreneur and the new commercial enterprise does not constitute a contribution of capital for the purpose of this part.

8 C.F.R. §204.6(j) states, in pertinent part, that:

(2) To show that the petitioner has invested or is actively in the process of investing the required amount of capital, the petition must be accompanied by evidence that the petitioner has placed the required amount of capital at risk for the purpose of generating a return on the capital at risk. Evidence of mere intent to invest, or prospective investment arrangements entailing no present commitment, will not suffice to show that the petitioner is actively in the process of investing. The alien must show actual commitment of the required amount of capital. Such evidence may include, but need not be limited to:

Bank statement(s) showing amount(s) deposited in United States business account(s) for the enterprise;

Evidence of assets which have been purchased for use in the United States enterprise, including invoices; sales receipts; and purchase contracts containing sufficient information to identify such assets, their purchase costs, date of and purchasing entity;

Evidence of property transferred from abroad for use in the United States enterprise, including United States Custom Service commercial entry documents, bills of lading and transit insurance policies containing ownership information and sufficient information to identify the property and to indicate the fair market value of such property;

Evidence of monies transferred or committed to be transferred to the new commercial enterprise in exchange for shares of stock (voting or nonvoting, common or preferred). Such stock may not include terms requiring the new commercial enterprise to redeem it at the holder's request; or

Evidence of any loan or mortgage agreement, promissory note, security agreement, or other evidence of borrowing which is secured by assets of the petitioner, other than those of the new commercial enterprise, and for which the petitioner is personally and primarily liable.

(b) (4)



In short these cases did not present the AAO with equitable claims. In one decision the AAO stated that the regulations require that "at the time of filing, the petitioner must already have placed the full requisite amount of capital *at risk* in profit-generating, employment-creating activities."<sup>3</sup> The Petitioner meets this standard explicitly.

**D. HAS INVESTED OR IS ACTIVELY IN THE PROCESS OF INVESTING:**

8 C.F.R. §204.6(e) reads, in relevant part:

*Invest* means to contribute capital. A contribution of capital in exchange for a note, bond, convertible debt, obligation, or any other debt arrangement between the alien entrepreneur and

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<sup>2</sup> See generally, Recent AAO Decisions Continue Trend of Limiting Immigrant Visas, 5 Bender's Immigration Bulletin 1031 (Dec. 15, 2000).

<sup>3</sup> Id, at 3; AAO Decision Feb 4, 2000.

the new commercial enterprise does not constitute a contribution of capital for the purposes of this part.

8 C.F.R. §204.6(j)(2) reads:

2) To show that the petitioner has invested or is actively in the process of investing the required amount of capital, the petition must be accompanied by evidence that the petitioner has placed the required amount of capital at risk for the purpose of generating a return on the capital placed at risk. Evidence of mere intent to invest, or of prospective investment arrangements entailing no present commitment, will not suffice to show that the petitioner is actively in the process of investing. The alien must show actual commitment of the required amount of capital. Such evidence may include, but need not be limited to:

(i) Bank statement(s) showing amount(s) deposited in United States business account(s) for the enterprise;

(ii) Evidence of assets which have been purchased for use in the United States enterprise, including invoices, sales receipts, and purchase contracts containing sufficient information to identify such assets, their purchase costs, date of purchase, and purchasing entity;

(iii) Evidence of property transferred from abroad for use in the United States enterprise, including United States Customs Service commercial entry documents, bills of lading, and transit insurance policies containing ownership information and sufficient information to identify the property and to indicate the fair market value of such property;

(iv) Evidence of monies transferred or committed to be transferred to the new commercial enterprise in exchange for shares of stock (voting or nonvoting, common or preferred). Such stock may not include terms requiring the new commercial enterprise to redeem it at the holder's request; or

(v) Evidence of any loan or mortgage agreement, promissory note, security agreement, or other evidence of borrowing which is secured by assets of the petitioner, other than those of the new commercial enterprise, and for which the petitioner is personally and primarily liable.

As discussed previously, **Mr. EB-5 Investor commenced investing in CP 1 on INSERT DATE (Exhibit F, Evidence of \$500,000 wire transfer from Mr. EB-5 Investor to CP 1).**

#### **E. CAPITAL ACQUIRED THROUGH LAWFUL MEANS:**

8 C.F.R. §204.6(j)(3) reads:

(3) To show that the petitioner has invested, or is actively in the process of investing, capital obtained through lawful means, the petition must be accompanied, as applicable, by:

(i) Foreign business registration records;

(ii) Corporate, partnership (or any other entity in any form which has filed in any country or subdivision thereof any return described in this subpart), and personal tax returns including income, franchise, property (whether real, personal, or intangible), or any other tax returns of any kind filed within five years, with any taxing jurisdiction in or outside the United States by or on behalf of the petitioner;

(iii) Evidence identifying any other source(s) of capital; or

(iv) Certified copies of any judgments or evidence of all pending governmental civil or criminal actions, governmental administrative proceedings, and any private civil actions (pending or otherwise) involving monetary judgments against the petitioner from any court in or outside the United States within the past fifteen years.

**A review of lawful source of capital will be provided here.**

### CONCLUSION

The one point that should play the largest part in determining this case is the success and positive economic impact that Mr. EB-5 Investor's enterprise and investment will have on the community and the area. This impact is clearly the one common motive behind the legislation that created the EB-5 classification. Positive economic impact of Mr. EB-5 Investor's investment is the strongest of the many equities favoring approval of the Petitioner's case.

Mr. EB-5 Investor has provided sufficient evidence to demonstrate that he meets all of the requirements for the grant of an EB-5 status. Thus we respectfully request that such status be granted at your earliest convenience so that the adjustment to permanent residence status may be filed as soon as possible for Mr. EB-5 Investor.

**The petitioner hereby requests that this petition be adjudicated on an expedited basis to facilitate the growth and development of the enterprise as it continues to build its physical infrastructure and hire additional staff.**

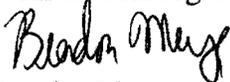
Thank you in advance for your assistance in this matter. Please feel free to contact us with any questions.

### Postscript

We also include in **Exhibit I** sample promotional materials for CP 1 that will be made available to prospective EB-5 investors into CP 1. We trust that you will find the information provided in this exemplar filing to be useful and very helpful in adjudicating subsequent I-526 petitions to be filed by alien entrepreneurs.

We look forward to your feedback on CP 1's I-526 exemplar filing. Shall your office require clarification or additional explanation on their project, please do not hesitate to contact the undersigned and we will work to address your concerns without delay.

With kindest regards.



Brandon Meyer  
Attorney at Law

BM

Enclosures



**Do Not Write in This Block - For USCIS Use Only (Except G-28 Block Below)**

Classification _____	Action Block	Fee Receipt
Priority Date _____		To be completed by Attorney or Representative, if any <input checked="" type="checkbox"/> G-28 is attached 430708 Attorney's State License No. _____

Remarks:

**START HERE - Type or print in black ink.**

**Part 1. Information About You**

Family Name  Given Name  Middle Name

In care of Street Number and Name:

Address:  Apt. Number

City  State or Province  Country  Zip/Postal Code

Date of Birth (mm/dd/yyyy)  Country of Birth  Social Security # (if any)  A # (if any)

If you are in the United States, provide the following information: Date of Arrival (mm/dd/yyyy)  I-94 #

Current Nonimmigrant Status  Date Current Status Expires (mm/dd/yyyy)  Daytime Phone # with Area Code

**Part 2. Application Type (Check one)**

- a.  This petition is based on an investment in a commercial enterprise in a targeted employment area for which the required amount of capital invested has been adjusted downward.
- b.  This petition is based on an investment in a commercial enterprise in an area for which the required amount of capital invested has been adjusted upward.
- c.  This petition is based on an investment in a commercial enterprise that is not in either a targeted area or in an upward adjustment area.

**Part 3. Information About Your Investment**

Name of commercial enterprise in which funds are invested

Street Address

Phone # with Area Code  Business organized as (corporation, partnership, etc.)

Kind of business (e.g. furniture manufacturer)  Date established (mm/dd/yyyy)  IRS Tax #

RECEIVED: \_\_\_\_\_ RESUBMITTED: \_\_\_\_\_ RELOCATED: SENT \_\_\_\_\_ REC'D \_\_\_\_\_



**Part 3. Information About Your Investment (Continued)**

Date of your initial investment (mm/dd/yyyy)	To be determined	Amount of your initial investment \$	\$500,000.00
Your total capital investment in the enterprise to date \$	\$500,000.00	Percentage of the enterprise you own	10%

If you are not the sole investor in the new commercial enterprise, list on separate paper the names of all other parties (natural and non-natural) who hold a percentage share of ownership of the new enterprise and indicate whether any of these parties is seeking classification as an alien entrepreneur. Include the name, percentage of ownership, and whether or not the person is seeking classification under section 203(b)(5). **NOTE:** A "natural" party would be an individual person, and a "non-natural" party would be an entity such as a corporation, consortium, investment group, partnership, etc.

If you indicated in **Part 2** that the enterprise is in a targeted employment area or in an upward adjustment area, name the county and State:

County	Baldwin	State	Alabama
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**Part 4. Additional Information About the Enterprise**

**Type of Enterprise (check one):**

- New commercial enterprise resulting from the creation of a new business.
- New commercial enterprise resulting from the purchase of an existing business.
- New commercial enterprise resulting from a capital investment in an existing business.

**Composition of the Petitioner's Investment:**

Total amount in U.S. bank account .....	\$	To be determined
Total value of all assets purchased for use in the enterprise.....	\$	500,000.00
Total value of all property transferred from abroad to the new enterprise.....	\$	500,000.00
Total of all debt financing.....	\$	N/A
Total stock purchases.....	\$	N/A
Other (explain on separate paper).....	\$	N/A
<b>Total</b>	\$	500,000.00

**Income:**

When you made the investment.....	Gross	\$	To be determined.	Net	\$	To be determined.
Now.....	Gross	\$	To be determined.	Net	\$	To be determined.

**Net worth:**

When you made investment.....	Gross	\$	To be determined.	Now	\$	To be determined.
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**Part 5. Employment Creation Information**

Number of full-time employees in the enterprise in U.S. (excluding you, your spouse, sons, and daughters)

When you made your initial investment? 0 [ ] Now 27 (est) [ ] Difference 27 (est) [ ]

How many of these new jobs were created by your investment? 4.5 (est) [ ] How many additional new jobs will be created by your additional investment? 5.5 indirect (est) [ ]

What is your position, office, or title with the new commercial enterprise?

Limited Partner in a Limited Partnership.

Briefly describe your duties, activities, and responsibilities.

As Limited Partner, oversee management of enterprise.

What is your salary? \$ 0.00 [ ] What is the cost of your benefits? \$ 0.00 [ ]

**Part 6. Processing Information**

Check One:

- The person named in Part 1 is now in the United States, and an application to adjust status to permanent resident will be filed if this petition is approved.
- If the petition is approved and the person named in Part 1 wishes to apply for an immigrant visa abroad, complete the following for that person:

Country of nationality: To be determined. [ ]

Country of current residence or, if now in the United States, last permanent residence abroad: To be determined. [ ]

If you provided a United States address in Part 1, print the person's foreign address:

[ ]

If the person's native alphabet is other than Roman letters, write the foreign address in the native alphabet:

[ ]

Are you in deportation or removal proceedings?  Yes (Explain on separate paper)  No

Have you ever worked in the United States without permission?  Yes (Explain on separate paper)  No

**Part 7. Signature** Read the information on penalties in the instructions before completing this section.

I certify, under penalty of perjury under the laws of the United States of America, that this petition and the evidence submitted with it is all true and correct. I authorize the release of any information from my records that U.S. Citizenship and Immigration Services needs to determine eligibility for the benefit I am seeking.

Signature Mr. EB-5 Investor [ ] Date 10/03/2010 [ ]

NOTE: If you do not completely fill out this form or fail to submit the required documents listed in the instructions, you may not be found eligible for the immigration benefit you are seeking and this petition may be denied.

**Part 8. Signature of Person Preparing Form, If Other Than Above (Sign below)**

I declare that I prepared this application at the request of the above person, and it is based on all information of which I have knowledge.

Signature [ ] Print Your Name Brandon Meyer [ ] Date 10/03/2010 [ ]

Firm Name Brandon Meyer, Attorney at Law [ ] Daytime phone # with area code 858-558-1001 [ ]

Address 5440 Morehouse Drive, Suite 4400, San Diego, CA 92121 [ ]





**ACFI**

September 17, 2010

Mr. Brandon Meyer  
Country Place Living  
1333 Corporate Drive, Suite 206  
Irving, Texas 75038

Re: CP Homes (AL), L.L.C.

Dear Mr. Meyer:

America's Center for Foreign Investment, L.L.C., is pleased to identify CP Homes (AL), L.L.C., as a regional center investment project under the Immigrant Investor Pilot Program, also called the EB-5 Program.

Because your assisted living facilities will be located in rural areas, your investors may make the lower minimum investment amount of USD 500,000.

We look forward to working with you and your team and will devote our efforts to making certain that your investors receive the benefits of the EB-5 Program. We will make every effort to enable CP Homes (AL), L.L.C., to be successful within the geographic area of our regional center.

Sincerely,  
America's Center for Foreign Investment, L.L.C.

Boyd Campbell  
Vice President and General Counsel

**AMERICA'S CENTER FOR FOREIGN INVESTMENT**

150 S. LOS ROBLES AVE., SUITE 860 PASADENA, CALIFORNIA 91101 WWW.ACFI-USA.COM  
USA: (888) 688-ACFI TEL: (626) 683-9120 FAX: (626) 683-7393



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

October 22, 2009

Mr. Ron Drinkard  
Alabama Center for Foreign Investment, LLC  
100 North Union Street, Suite 682  
Montgomery, AL 36104

File No. W09001100

Mr. Boyd Campbell  
General Counsel  
Alabama Center for Foreign Investment, LLC  
100 North Union Street, Suite 682  
Montgomery, AL 36104

Application: Request to Amend Designation as a Regional Center  
Applicant(s): Ron Drinkard

Re: Alabama Center for Foreign Investment Regional Center

Pursuant to Section 610 of the Appropriations Act of 1993, on June 11, 2007, the Alabama Center for Foreign Investment Regional Center, was approved and designated as a regional center to participate in the Immigrant Investor Pilot Program. In a written request dated May 7, 2009, Alabama Center for Foreign Investment Regional Center sought to amend its initial Regional Center designation.

Based on its review and analysis of the request to amend the previous Alabama Center for Foreign Investment Regional Center, business plan, and supplementary evidence, the U.S. Citizenship and Immigration Services (USCIS) amends the designation of the Regional Center as described below. In accepting the amendment, USCIS has updated its records of your Regional Center approval, designation, and business plan to encompass this amendment relative to the investment.

**GEOGRAPHIC AREA:**

The Alabama Center for Foreign Investment Regional Center shall extend its geographic focus to include the States of Alabama and Tennessee; the Mississippi counties of Coahoma, Tunica, Desoto, Marshall, Benton, Tippah, Alcorn, Tishomingo, Prentiss, Union, Lafayette, Panola, Quitman, Tate, Lee, Pontotoc, Itawamba, Monroe, Lowndes, Clay, Noxubee, Kemper, Lauderdale, Clarke, Jasper, Jones, Wayne, Greene, Perry, Forrest, Lamar, Pearl River, Stone, George, Jackson, Harrison, Stone, and Hancock; the Georgia counties of Polk, Bartow, Pickens, Dawson, Hall, Jackson, Oconee, Barrow, Gwinnett, Rockdale, Forsyth, Cherokee, Paulding, Cobb, Haralson, Carroll, Douglas, Fulton, DeKalb, Newton, Morgan, Walton, Putnam, Jasper, Butts, Henry, Clayton, Fayette, Coweta, Heard, Troup, Meriwether, Pike, Lamar, Monroe, Jones, Bibb, Crawford, Upson, Talbot, Harris, Muscogee, Chattahoochee, Marion, Schley, Macon, Peach, Sumter, Webster, Stewart, Quitman, and Spalding; and the Florida counties of Escambia, Santa Rosa, Okaloosa, Walton, Holmes, Washington, Bay, Jackson, Calhoun, Gulf, Liberty, Franklin, Gadsden, Leon, Wakulla, Jefferson, Madison, Taylor, Hamilton, Suwannee, Lafayette, Dixie, Gilchrist, Levy, Columbia, Baker, Lincoln, Bradford, Alachua, Marion, Nassau, Duval, Clay, St. Johns, Putnam, Flagler, Volusia, Seminole and Alachua.

**FOCUS OF INVESTMENT ACTIVITY:**

As depicted in the economic model, the general proposal and the economic analysis and the amendment to the Regional Center Proposal, the Regional Center will engage in the following economic activities: the financing and development of projects and commercial enterprises in the five (5) target clusters of economic activity within the approved ACFI-RC's geographic area.

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

1. Heavy and light manufacturing; agriculture;
2. High technology; construction;
3. Hospitality, resort and service industries (hotels, restaurants, resorts, golf courses, entertainment, and the like);
4. Schools, health care facilities, and infrastructure; and
5. Cruise line support services.

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

Aliens seeking immigrant visas through the Immigrant Investor Pilot Program may file individual petitions with USCIS for these commercial enterprises located within the approved Regional Center area.

The geographic focus of this area may contain some High Unemployment Targeted Employment Areas (TEAs) as designated by the State of Alabama, the State of Florida, the State of Georgia, the State of Mississippi, the State of Tennessee, and rural areas as defined in 8 CFR 204.6(e). Therefore, the minimum capital investment threshold for any individual immigrant investment into an approved commercial enterprise throughout the Regional Center shall be not less than \$500,000, if the investment target is located within a TEA or \$1,000,000 if it is located outside of a TEA. No debt arrangement will be acceptable unless it is secured by assets owned by the alien entrepreneur. A full capital investment must be made and placed at risk.

### **EMPLOYMENT CREATION**

Immigrant investors who file petitions for commercial enterprises located in the Regional Center area must fulfill all of the requirements set forth in 8 CFR 204.6, except that the petition need not show that the new commercial enterprises created ten new jobs indirectly as a result of the immigrant investor's investment. This determination has been established by way of USCIS' acceptance of the final economic analysis that is contained as part of the approved Regional Center proposal and its indirect job creation model and multipliers contained within the final approved Regional Center application package. Rather, the investor must show at the time of removal of conditions that they performed the activities described in the model and on which the approved methodology is based.

However, where preservation or creation of "direct jobs" is claimed in support of an immigrant investor's I-526 petition affiliated with the Regional Center, then:

- To be credited for preserving/maintaining pre-existing direct jobs for "qualified employees" with the Regional Center for a "troubled business" as defined by the regulation at Part 204.6(e), the individual I-526 petition must be supported by probative evidence of the number of full time (35 hours per week) qualified employees, whose positions shall be preserved/maintained throughout the alien's period of conditional residency. Such evidence should include copies of quarterly state employment tax reports, Forms W-2, Forms I-9, and any other pertinent employment records sufficient to demonstrate the number of qualified employees whose jobs were created directly.
- To be credited with projected creation of new "direct" jobs for "qualifying employees" upon filing the I-526 petition, then the petition must be supported by a comprehensive detailed business plan and supporting financial, marketing and related data and analysis providing a reasonable basis for projecting creation of any new direct jobs for "qualifying employees" to be achieved/realized within two years pursuant to 8 CFR 204.6(j)(4)(B).

An alien investor's I-829 petition to remove the conditions which was based on an I-526 petition approval that involved the creation of new direct jobs or the creation of new indirect jobs based on a multiplier tied to underlying new direct jobs needs to be properly supported by evidence of job creation. To support the full number of direct and indirect new jobs being claimed in connection with removal of conditions, the petition will need to be supported by probative evidence of the number of new direct full time (35 hours per week) jobs for qualified employees whose positions have been created as a result of the alien's investment. Such evidence may include copies of quarterly state employment tax reports, Forms W-2, Forms I-9, and any other pertinent employment records sufficient to demonstrate the number of qualified employees whose jobs were created directly.

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

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

1. A copy of this letter, the Regional Center approval and designation.
2. A copy of the USCIS approved Regional Center narrative proposal and business plan.
3. A copy of the job creation methodology required in 8 CFR 204.6(j)(4)(iii), as contained in the final Regional Center economic analysis which has been approved by USCIS, which reflects that investment by an individual immigrant investor will create not fewer than ten (10) full-time employment positions, either directly or indirectly, per immigrant investor.

4. A legally executed copy of the USCIS approved:
  - a. Confidential Information Memorandum (version of March 2, 2007);
  - b. Escrow Agreement (revised version of March 2, 2007);
  - c. Subscription Agreement (version of March 2, 2007); and
  - d. Actual Offering Memorandum (version of March 2, 2007).

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

The law, as reflected in the regulations at 8 CFR 204.6(m)(6), requires that an approved Regional Center in order to maintain the validity of its approval and designation must continue to meet the statutory requirements of the Immigrant Investor Pilot Program by serving the purpose of promoting economic growth, including increased export sales (where applicable), improved regional productivity, job creation, and increased domestic capital investment. Therefore, in order for USCIS to determine whether your Regional Center is in compliance with the above cited regulation, and in order to continue to operate as a USCIS approved and designated Regional Center, your administration, oversight, and management of your Regional Center shall be such as to monitor all investment activities under the sponsorship of your Regional Center and to maintain records, data and information on a quarterly basis in order to report to USCIS upon request the following year to date information for each Federal Fiscal Year<sup>1</sup>, commencing with the initial year as follows:

1. Provide the principal authorized official and point of contact of the Regional Center responsible for the normal operation, management and administration of the Regional Center.
2. Be prepared to explain how you are administering the Regional Center and how you will be actively engaged in supporting a due diligence screening of its alien investors' lawful source of capital and the alien investor's ability to fully invest the requisite amount of capital.
3. Be prepared to explain the following:
  - a. How the Regional Center is actively engaged in the evaluation, oversight and follow up on any proposed commercial activities that will be utilized by alien investors.
  - b. How the Regional Center is actively engaged in the ongoing monitoring, evaluation, oversight and follow up on any investor commercial activity affiliated through the Regional Center that will be utilized by alien investors in order to create direct and/or indirect jobs through qualifying EB-5 capital investments into commercial enterprises within the Regional Center.
4. Be prepared to provide:
  - a. the name, date of birth, petition receipt number, and alien registration number (if one has been assigned by USCIS) of each principal alien investor who has made an investment and has filed an EB-5/I-526 Petition with USCIS, specifying whether:
    - i. the petition was filed,
    - ii. was approved,
    - iii. denied, or
    - iv. withdrawn by the petitioner, together with the date(s) of such event.

---

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

- 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](mailto:USCIS.ImmigrantInvestorProgram@dhs.gov) of any change of address or occurrence of any material change in:
- the name and contact information of the responsible official and/or Point of Contact (POC) for the RC
  - the management and administration of the RC,
  - the RC structure,
  - the RC mailing address, web site address, email address, phone and fax number,
  - the scope of the RC operations and focus,
  - the RC business plan,
  - any new, reduced or expanded delegation of authority , MOU, agreement, contract, etc. with another party to represent or act on behalf of the RC,
  - the economic focus of the RC, or
  - any material change relating to your Regional Center's basis for its most recent designation and/or reaffirmation by USCIS.

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

Sincerely,

Christina Poulos  
Director  
California Service Center



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

HOOPRD 70/6.2.8

JUN 11 2007

Mr. Ron Drinkard  
Director  
Alabama Center for Foreign Investment, L.L.C.  
100 North Union Street, Suite 682  
Montgomery, AL 36104

Mr. Boyd Campbell  
General Counsel  
Alabama Center for Foreign Investment, L.L.C.  
100 North Union Street, Suite 682  
Montgomery, AL 36104

Re: Alabama Center for Foreign Investment Regional Center

**DECISION:**

Pursuant to Section 610 of the Appropriations Act of 1993, the Alabama Center for Foreign Investment (ACFI) application for designation by U.S. Citizenship and Immigration Services (USCIS) as a Regional Center to participate in the Immigrant Investor Pilot Program is approved. This approval and designation is for the ACFI Regional Center (ACFI-RC) whose contiguous geographic area encompasses the State of Alabama.

**FOCUS OF INVESTMENT ACTIVITY AND CAPITAL INVESTMENT THRESHOLD:**

The new commercial enterprise investment focus of the ACFI-RC will concentrate within its geographic area on the following five (5) targeted clusters of economic activity:

1. Heavy and light manufacturing; agriculture;
2. High technology; construction;
3. Hospitality, resort and service industries (hotels, restaurants, resorts, golf courses, entertainment, and the like);
4. Schools, health care facilities, and infrastructure; and
5. Cruise line support services.

As such, aliens seeking immigrant visas through the Immigrant Investor Pilot Program may file individual petitions with USCIS for investments into the financing and development of projects and commercial enterprises in the above cited five (5) target clusters of economic activity within the approved ACFI-RC's geographic area.

The statewide geographic focus of the ACFI-RC is comprised of both small urban and rural areas, as well as those census tracts within the following larger urban and metropolitan areas with a population in excess of 20,000 which have been designated as a Targeted Employment Area (TEA) by the Alabama Department of Economic and Community Affairs as defined in 8 CFR 204.6(e).

- Birmingham (Population: 231,483)
- Montgomery (Population: 200,127)
- Mobile (Population: 191,544)
- Huntsville (Population: 166,313)
- Tuscaloosa (Population: 81,358)
- Hoover (Population: 67,469)
- Dothan (Population: 62,713)
- Decatur (Population: 54,909)
- Auburn (Population: 49,928)
- Gadsden (Population: 37,405)
- Florence (Population: 36,480)
- Madison (Population: 35,893)
- Vestavia Hills (Population: 31,022)
- Prattville (Population: 30,043)
- Phenix City (Population: 29,460)
- Bessemer (Population: 28,641)
- Prichard (Population: 27,963)
- Alabaster (Population: 27,517)
- Homewood (Population: 23,963)
- Opelika (Population: 23,804)
- Anniston (Population: 23,741)
- Enterprise (Population: 22,892)
- Northport (Population: 21,216)
- Mountain Brook (Population: 20,821)

Therefore, the minimum capital contribution threshold for any individual immigrant investment through the ACFI-RC into a new commercial enterprise located in a designated Rural Area or TEA within the ACFI-RC geographic area shall be not less than \$500,000. Investments made into enterprises whose principal location and place of business is in a non-TEA within one of

the above cited large urban or metropolitan areas shall be not less than one-million dollars (\$1,000,000).

**EMPLOYMENT CREATION AND/OR PRESERVATION:**

Alien entrepreneurs who file petitions for commercial enterprises located in the ACFI-RC area must fulfill all of the requirements set forth in 8 CFR 204.6, except that the petition need not show that the new commercial enterprises created ten new jobs indirectly as a result of the alien entrepreneur's investment. This determination has been established by way of USCIS' acceptance of the final economic analysis which is contained as part of the approved ACFI-RC proposal and its indirect job creation model and multipliers contained within the final approved ACFI-RC application package.

However, where job creation is claimed based on a multiplier rooted in underlying new "direct jobs" (or preservation of existing direct jobs in a troubled business) in support of an immigrant investor's individual I-526 petition affiliated with the ACFI-RC, then:

- To be credited for preserving/maintaining pre-existing direct jobs for "qualified employees" within the ACFI-RC for a "troubled business" as defined at 8 CFR 204.6(e), the individual I-526 petition must be supported by probative evidence of the number of full time (35 hours per week) qualified employees whose positions shall be preserved/maintained throughout the alien's period of conditional residency. Such evidence should include copies of quarterly state employment tax reports, Forms W-2, Forms I-9, and any other pertinent employment records sufficient to demonstrate the number of "direct" qualifying pre-existing full time jobs in the specified troubled business have been preserved/maintained, and any other pertinent employment records sufficient to demonstrate the number of employees before the investment.
- To be credited with projected creation of new "direct" jobs for "qualifying employees" upon filing the I-526 petition, then the petition must be supported by a comprehensive detailed business plan and supporting financial, marketing and related data and analysis providing a reasonable basis for projecting creation of the new direct jobs.
- For purposes of an alien investor's filing of a subsequent I-829 petition to remove the conditions wherein the investment through the ACFI-RC in an enterprise for which the initial I-526 petition approval involved the creation of new direct jobs or the creation of new indirect jobs based on a multiplier tied to underlying new direct jobs, then to support the full number of direct and indirect new jobs being claimed at that point, an alien's subsequent I-829 petition will need to be supported by probative evidence of the number of new direct full time (35 hours per week) qualified employees whose positions have been created as a result of the alien's investment. Such evidence would include copies of quarterly state employment tax reports,

Forms W-2, Forms I-9, and any other pertinent employment records sufficient to demonstrate the number of qualified employees whose jobs were created directly.

**INDIVIDUAL EB-5 INVESTOR AFFILIATION WITH THE REGIONAL CENTER:**

Each individual petition, in order to demonstrate that it is associated with the ACFI-RC, in conjunction with addressing all the requirements for an individual alien entrepreneur petition, shall also contain as supporting evidence relating to this regional center designation, the following:

1. A copy of this letter of approval and designation.
2. A copy of the approved regional center narrative proposal and business plan, and any applicable approved amendments.
3. A copy of the job creation methodology required in 8 CFR 204.6(j)(4)(iii), as contained in the initial and/or applicable amended regional center economic analysis which has been approved by USCIS in its final version, which reflects that investment by an individual alien investor of at least \$500,000 into a commercial enterprise in a targeted economic cluster (or \$1,000,000 into an enterprise located in a Non-Rural or Targeted Employment Area) within the geographic area of the ACFI-RC will preserve and/or create full-time employment positions, either directly or indirectly, for not fewer than ten qualified employees.
4. A copy of the Advisory Agreement the ACFI-RC the Alabama Partnership created to finance a new commercial enterprise through the ACFI-RC that is legally binding.
5. A copy of the actual confidential information memorandum.
6. A copy of the actual offering memorandum provided to the alien investor.
7. A copy of the subscription agreement for a limited partnership unit which is legally binding on the petitioner and constitutes the agreement between the limited partnership and the alien investor.
8. A copy of the escrow agreement and instructions which is legally binding on the petitioner and the ACFI-RC.

The approval and designation by USCIS of the ACFI-RC does not reflect any determination on the merits of individual petitions filed by alien entrepreneurs under the Immigrant Investor Pilot Program. All petitions for alien entrepreneurs who invest within the regional center will be adjudicated by the USCIS on a case-by-case basis and each petition must be fully documented. The individual petitions must be submitted to the USCIS Texas Service Center.

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

The regulations at 8 CFR 204.6(m)(6) require that an approved regional center in order to maintain the validity of its approval and designation must continue to meet the statutory requirements of the Immigrant Investor Pilot Program by serving the purpose of promoting economic growth, including increased export sales, improved regional productivity, job creation, and increased domestic capital investment. Therefore, in order for USCIS to determine whether your regional center is in compliance with the above cited regulation, and in order to continue to operate as a USCIS approved and designated regional center, your administration, oversight, and management of your regional center shall be such as to monitor all investment activities under the sponsorship of your regional center and to maintain records, data and information on a quarterly basis in order to report to USCIS upon request year to date for each Federal Fiscal Year<sup>1</sup>, commencing with the current year as follows:

1. The principal official and point of contact of the ACFI-RC responsible for the normal operation, management and administration of the regional center.
2. How the ACFI-RC is administering its regional center and is actively engaged in supporting a due diligence screening of its alien investors' lawful source of capital and the alien investor's ability to fully invest the requisite amount of capital.
3. How the ACFI-RC is actively engaged in the evaluation, oversight and follow up on any proposed commercial activities that will be utilized by alien investors in order to create direct and/or indirect jobs through qualifying EB-5 capital investments into commercial enterprises within the State of Alabama.
4. The name, date of birth, and alien registration number of each alien investor who makes an investment and files an EB-5/I-526 Petition with USCIS, specifying whether the petition was approved, denied, or withdrawn by the petitioner.
5. The country of nationality of each alien investor who makes an investment and files an EB-5/I-526 petition with USCIS.
6. The city and state of residence of each alien investor who makes an investment and files an EB-5/I-526 petition with USCIS.
7. The categories of business activity within the geographic boundaries of your regional center that have received the alien investors capital, and in what amount
8. The names and locations of the each job creating commercial enterprise located within the geographic boundaries of your regional center that has received alien investor capital.
9. The amounts of alien investor capital and the amounts of other domestic capital that has been invested together in each job creating commercial enterprise specified in item 8 above, distinguishing the separate totals for each.<sup>2</sup>

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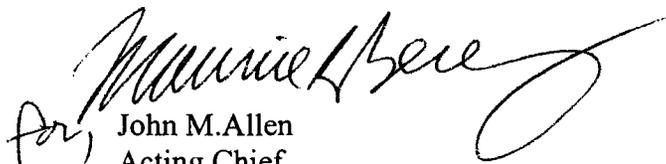
<sup>1</sup> A Federal Fiscal Year runs for twelve consecutive months from October 1<sup>st</sup> to September 30<sup>th</sup>.

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

10. The total aggregate number of approved EB-5 alien investor I-526 petitions per Federal Fiscal Year to date made through your regional center.
11. The total aggregate number of approved EB-5 alien investor I-829 petitions per Federal Fiscal Year to date through your regional center.
12. The total aggregate of EB-5 alien capital invested through your regional center for each Federal Fiscal Year to date since your approval and designation.
13. The combined total aggregate of "new" direct and/or indirect jobs created by EB-5 investors through your regional center for each Federal Fiscal Year to date since your approval and designation.
14. If applicable, the total aggregate of "preserved" jobs by EB-5 alien investors into troubled businesses through your regional center for each Federal Fiscal Year to date since your approval and designation.
15. If for any given Federal Fiscal Year your regional center does not have investors to report, then provide an explanation for the inactivity along with a specific plan which details timelines and steps to actively promote your regional center program, and recruit legitimate and viable alien investors.
16. Notification to USCIS within 30 days of the occurrence any material change in the structure, operation, administration, focus, or activities relating to your regional center's basis for it's most recent designation and/or reaffirmation by USCIS.
17. The total aggregate of EB-5 alien capital invested through your regional center for each Federal Fiscal Year.

If you have any questions concerning the ACFI Regional Center approval and designation under the Immigrant Investor Pilot Program, please contact the USCIS Foreign Trader, Investor and Regional Center Program at (202)272-8410.

Sincerely,



For, John M. Allen  
Acting Chief  
Service Center Operations



POPULATION FINDER

United States | Alabama | Foley city

**Foley city, Alabama**

**estimate for Foley city, Alabama is 14,197.**

**The 2009 population**

city/ town, county, or zip

Foley

state

Alabama



[search by address »](#)

Note: Information about challenges to population estimates data can be found on the Population Estimates Challenges page.

**View population trends...**

	2009	2000	1990
Population	14,197	7,590	4,937

Source: U.S. Census Bureau, 2009 Population Estimates, Census 2000, 1990 Census

**View more results...**

Population for all cities and towns in Alabama, 2000-2009:

[alphabetic](#) | [ranked](#)

Map of Persons per Square Mile, City/Town by Census Tract:

[2000](#) | [1990](#)

See more data for Foley city, Alabama on the Fact Sheet.

The letters PDF or symbol  indicate a document is in the Portable Document Format (PDF). To view the file you will need the Adobe® Acrobat® Reader, which is available for free from the Adobe web site.

# **Labor Market Areas, 2010**

U.S. Department of Labor  
Bureau of Labor Statistics

March 2010

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# Labor Market Areas, 2010

This directory presents a comprehensive listing of the labor market areas of the United States and Puerto Rico. Every 10 years, the Nation's system of labor market areas is reevaluated and redefined, using the latest decennial census information on the population and commutation. Labor market areas are identified in order to standardize and promote comparability for the collection and use of labor force information in administering various government programs. A general definition for a labor market area is an economically integrated geographic area within which individuals can reside and find employment within a reasonable distance or can readily change employment without changing their place of residence.

Labor market areas are metropolitan areas, micropolitan areas, or small labor market areas. They exhaust the geography of all States, the District of Columbia, and Puerto Rico, with the exceptions of Kalawao County, Hawaii, and 18 isolated minor civil divisions (MCDs) in New England. (See Appendix I.) The Office of Management and Budget (OMB) is responsible for defining the metropolitan and micropolitan areas, while the Bureau of Labor Statistics' Division of Local Area Unemployment Statistics (LAUS) performs this function for small labor market areas. The metropolitan, micropolitan, and small labor market area definitions contained in this directory were introduced with labor force estimates for January 2005. The previous major revision of labor market area definitions was implemented in 1994.

Labor market area definitions are updated on an annual basis, and changes to area definitions and titles are introduced with the labor force estimates for the following January. In order to maintain a consistent time series, data for labor market areas generally are reconstructed back to January 1990 or as far back as practicable.

This directory lists all labor market areas alphabetically by State and area title. Since the areas are listed by State, to find all counties or MCDs of an interstate area, one should look for the area under each of the States as identified in the area's title. Also included with each area title are the type of area, the LAUS area code, and the definition of the area. The type of labor market

area is metropolitan (Metro), micropolitan (Micro), or small (SLMA). The LAUS area code is a unique area-specific alphanumeric code used for LAUS programmatic purposes. Definitions are in terms of full counties or county equivalents in all areas except New England, where MCDs are used. (For New England, the city- and town-based areas, or NECTAs, that OMB defined as an alternative to the county-based areas for those States are used.)

The areas listed in the directory comprise 380 metropolitan areas, of which 50 are interstate; 590 micropolitan areas, of which 16 are interstate; and 1,364 small areas, of which 5 are interstate.

Under the current standards, 11 of the most populous metropolitan areas are composed of 34 metropolitan divisions, which are essentially separately identifiable employment centers within these metropolitan areas. Metropolitan divisions are listed by State and metropolitan area after the labor market area listing. Nine of the metropolitan divisions are interstate.

Labor force estimates for all of the areas listed in this directory are available from the LAUS Division of BLS, telephone number—202-691-6392.

Appendix I lists the 18 isolated MCDs in New England that are not defined within any labor market area. Most of these are residual areas not included by OMB in metropolitan or micropolitan areas, but often totally surrounded by them. Appendix II contains the concepts and criteria developed and used by BLS in defining small labor market areas. The standards used by OMB to define metropolitan and micropolitan areas are contained in the *Federal Register*, December 27, 2000, pages 82228-82238. Complete listings of the metropolitan and micropolitan areas, effective December 1, 2009, are contained in OMB Bulletin No. 10-02, *Update of Statistical Area Definitions and Guidance on Their Uses*.

This directory was prepared in the Office of Employment and Unemployment Statistics, Division of Local Area Unemployment Statistics.

Labor Market Areas

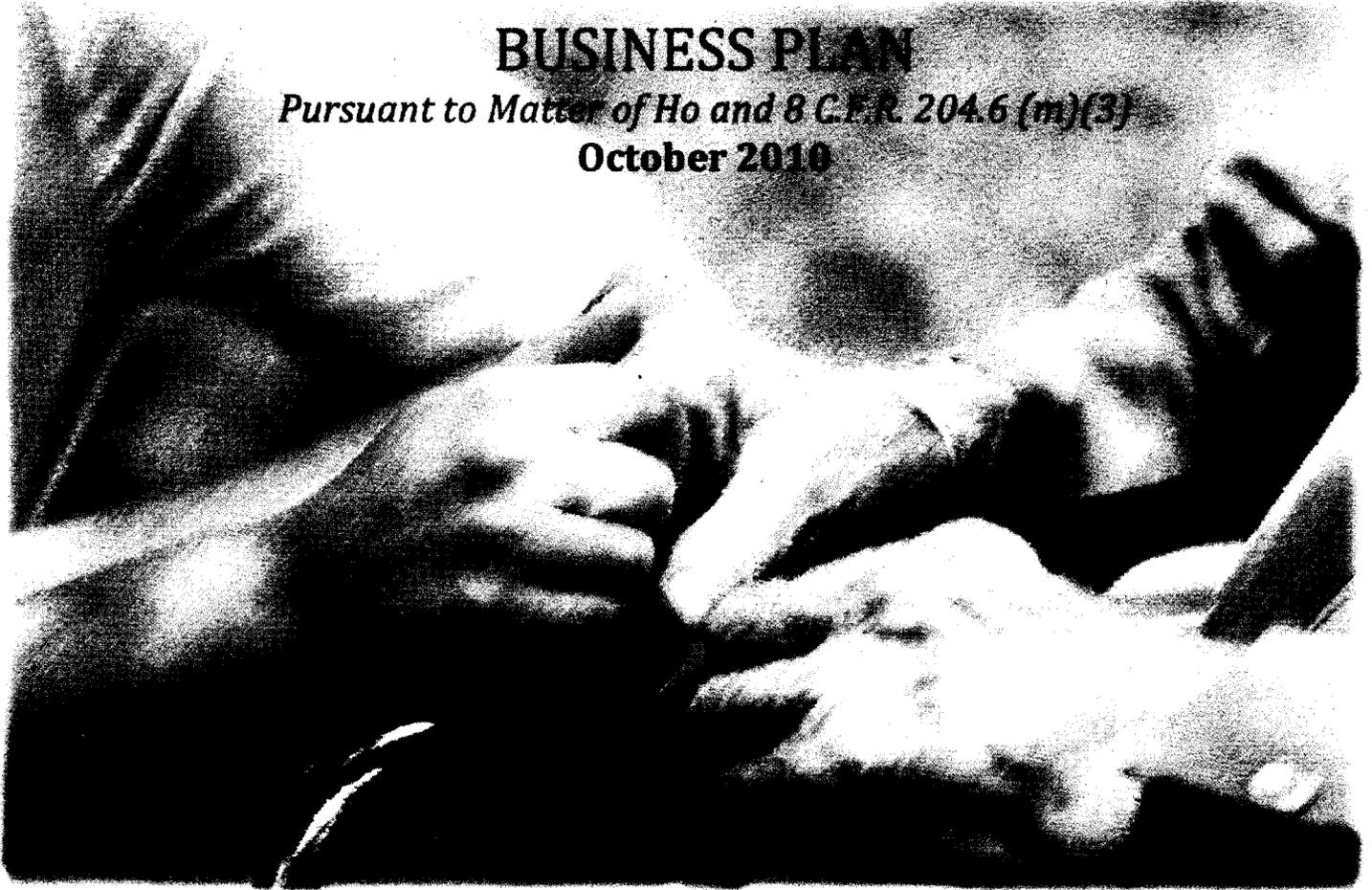
Area title	Type of Area	Area code	Definition
<b>Alabama</b>			
Albertville, AL Micropolitan Statistical Area .....	Micro	MC011070	Marshall County
Alexander City, AL Micropolitan Statistical Area .....	Micro	MC011076	Coosa County Tallapoosa County
Anniston-Oxford, AL Metropolitan Statistical Area .....	Metro	MT011150	Calhoun County
Auburn-Opelika, AL Metropolitan Statistical Area .....	Metro	MT011222	Lee County
Birmingham-Hoover, AL Metropolitan Statistical Area .....	Metro	MT011382	Bibb County Blount County Chilton County Jefferson County Shelby County St. Clair County Walker County
Bullock County, AL .....	SLMA	CN010110	Bullock County
Butler County, AL .....	SLMA	CN010130	Butler County
Cherokee County, AL .....	SLMA	CN010190	Cherokee County
Choctaw County, AL .....	SLMA	CN010230	Choctaw County
Clarke County, AL .....	SLMA	CN010250	Clarke County
Clay County, AL .....	SLMA	CN010270	Clay County
Cleburne County, AL .....	SLMA	CN010290	Cleburne County
Columbus, GA-AL Metropolitan Statistical Area .....	Metro	MT131798	Russell County
Conecuh County, AL .....	SLMA	CN010350	Conecuh County
Covington County, AL .....	SLMA	CN010390	Covington County
Crenshaw County, AL .....	SLMA	CN010410	Crenshaw County
Cullman, AL Micropolitan Statistical Area .....	Micro	MC011898	Cullman County
Daphne-Fairhope-Foley, AL Micropolitan Statistical Area .....	Micro	MC011930	Baldwin County
Decatur, AL Metropolitan Statistical Area .....	Metro	MT011946	Lawrence County Morgan County
Dothan, AL Metropolitan Statistical Area .....	Metro	MT012002	Geneva County Henry County Houston County

# CP HOMES 1 (ALABAMA) LP

## BUSINESS PLAN

*Pursuant to Matter of Ho and 8 C.F.R. 204.6 (m)(3)*

**October 2010**



Sponsored by:

**America's Center for Foreign Investment**

RSA Union Building

100 North Union Street, Suite 682

Montgomery, AL 36104

***Strictly Private and Confidential***

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**THE REGIONAL ECONOMIC IMPACT OF  
PROPOSED COUNTRY PLACE  
ASSISTED LIVING FACILITY**

Conducted by:

**e<sub>2</sub>**

**edwards economics**

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## Key Findings of the Study

(b) (4)

































# APPENDIX A: DEMOGRAPHIC DATA



## Demographic and Income Profile

Assisted Living Facility  
Foley, AL  
Ring: 1 mile radius

Latitude: 30.40585  
Longitude: -87.68382

(b) (4)



Data Note: Income is expressed in current dollars  
Source: U.S. Bureau of the Census, 2000 Census of Population and Housing. ESRI forecasts for 2010 and 2015.

September 02, 2010

Made with ESRI Business Analyst











**1-3-5- MILE CONCENTRIC RING DATA**



## Demographic and Income Profile

Foley City, AL  
Foley city, AL (0126992)  
Geography: Place

(b) (4)



Data Note: Income is expressed in current dollars  
Source: U.S. Bureau of the Census, 2000 Census of Population and Housing. ESRI forecasts for 2010 and 2015.

September 02, 2010

Made with ESRI Business Analyst



# IMPLAN OUTPUT REPORTS



Copyright MIG 2010

# Output Impact

Assisted Living Clinic Foley 2.iap

September 2, 2010

CT NAME: Regional Impact ACFI Geographic Coverage    MILLIPIPER: Tvr

Industry	Direct*	Indirect*	Induced*	Total*	Deflator
----------	---------	-----------	----------	--------	----------

(b) (4)

(b) (4)					
---------	--	--	--	--	--

\*2010 Dollars - if results are deflated and aggregated, then deflators displayed are set to 1.0 (results have been deflated)

Version: 2010.07





























































































Copyright MIG 2010

# TAX IMPACT

September 2, 2010

IMPACT NAME: Regional Impact ACFI Geographic Coverage Assisted Living Clinic Foley 2.iap MULTIPLIER: Type SAM

(b) (4)



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

Name: \_\_\_\_\_

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

**SAMPLE CONFIDENTIAL PRIVATE OFFERING MEMORANDUM**

\_\_\_\_\_ UNITS

**OF**

**CP Homes 1 (Alabama) LP**

**(An Alabama Limited Partnership)**

\$ \_\_\_\_\_ of

Limited Partnership Interests  
\$500,000.00 per Interest ("Unit")

Contact:

**CP Homes (AL) LLC**  
5440 Morehouse Dr., Suite 4400  
San Diego, CA 92121  
Telephone: (858) 558-1001  
Attn: Brandon Meyer

CONFIDENTIAL PRIVATE OFFERING MEMORANDUM

\_\_\_\_ UNITS OF  
CP HOMES 1 (ALABAMA) LP

(b) (4)



\* \* \* \* \*









**MANAGEMENT, ADVISORS, AND CONSULTANTS  
BIOGRAPHIES AND INTERRELATIONS**

***BIOGRAPHIES***

**CP Homes (AL) LLC (the General Partner)**

The General Partner of the Partnership is CP Homes (AL) LLC, an Alabama limited liability company organized on [\_\_\_\_], 2010, with its principal place of business located at 5440 Morehouse Dr., Suite 4400, San Diego, CA 92121.

**The Regional Center**

In 2010, the General Partner applied under the EB-5 Immigration Investor Pilot Program as a “regional center” for the specific purpose of investing EB-5 monies into targeted commercial enterprises located in the geographic area of the Regional Center. On \_\_\_\_\_, 201\_\_\_\_, the Regional Center received designation as an EB-5 Regional Center approving it to solicit qualifying investments from foreign investors, and administer those investments, under the EB-5 Pilot Program. Under the title of “\_\_\_\_\_” the Regional Center was approved for assisted living industry.

**Brandon Meyer – Director**

Brandon Meyer is an attorney based in San Diego, CA. Mr. Meyer is the author of numerous scholarly articles on the EB-5 program and U.S. immigration policy. He is a member in good standing of the Connecticut bar.

**Edwards Economics, LLC**

Economic and employment impact analysis (the “Economic Impact Analysis”) for the Project was prepared by Edwards Economics, LLC, a comprehensive economic consulting company based in Boca Raton, Florida that specializes in economic modeling for EB-5 applications and analysis. Beyond EB-5 specialization, Edwards Economics conducts economic impact analysis and labor/workforce studies for numerous economic development organizations and industry. The firm is headed by Dr. Judson Edwards, who uses various research methods and tools, such as IMPLAN and Geographic Information Systems (GIS), to present accurate job creation estimates.

\* \* \* \* \*











SAMPLE LIMITED PARTNERSHIP AGREEMENT OF

CP Homes 1 (Alabama) LP

(b) (4)























**EXHIBIT A**

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

**GENERAL PARTNER:**

CP Homes (AL) LLC  
5440 Morehouse Dr., Suite 4400  
San Diego, CA 92121

**LIMITED PARTNERS:**

**EXHIBIT B**

**SCHEDULE OF CAPITAL CONTRIBUTIONS AND UNITS**

(b) (4)



---

**CP Homes 1 (Alabama) LP  
Subscription Instructions**

---

(b) (4)



WIRE TRANSFER INSTRUCTIONS:

(b) (4)



CP Homes (AL) LLC  
5440 Morehouse Dr., Suite 4400  
San Diego, CA 92121  
Telephone: (858) 558-1001

Re: CP Homes 1 (Alabama) LP

Ladies and Gentlemen:

(b) (4)











**SAMPLE INVESTOR ELIGIBILITY QUESTIONNAIRE**

**CP HOMES 1 (ALABAMA) LP**

(b) (4)

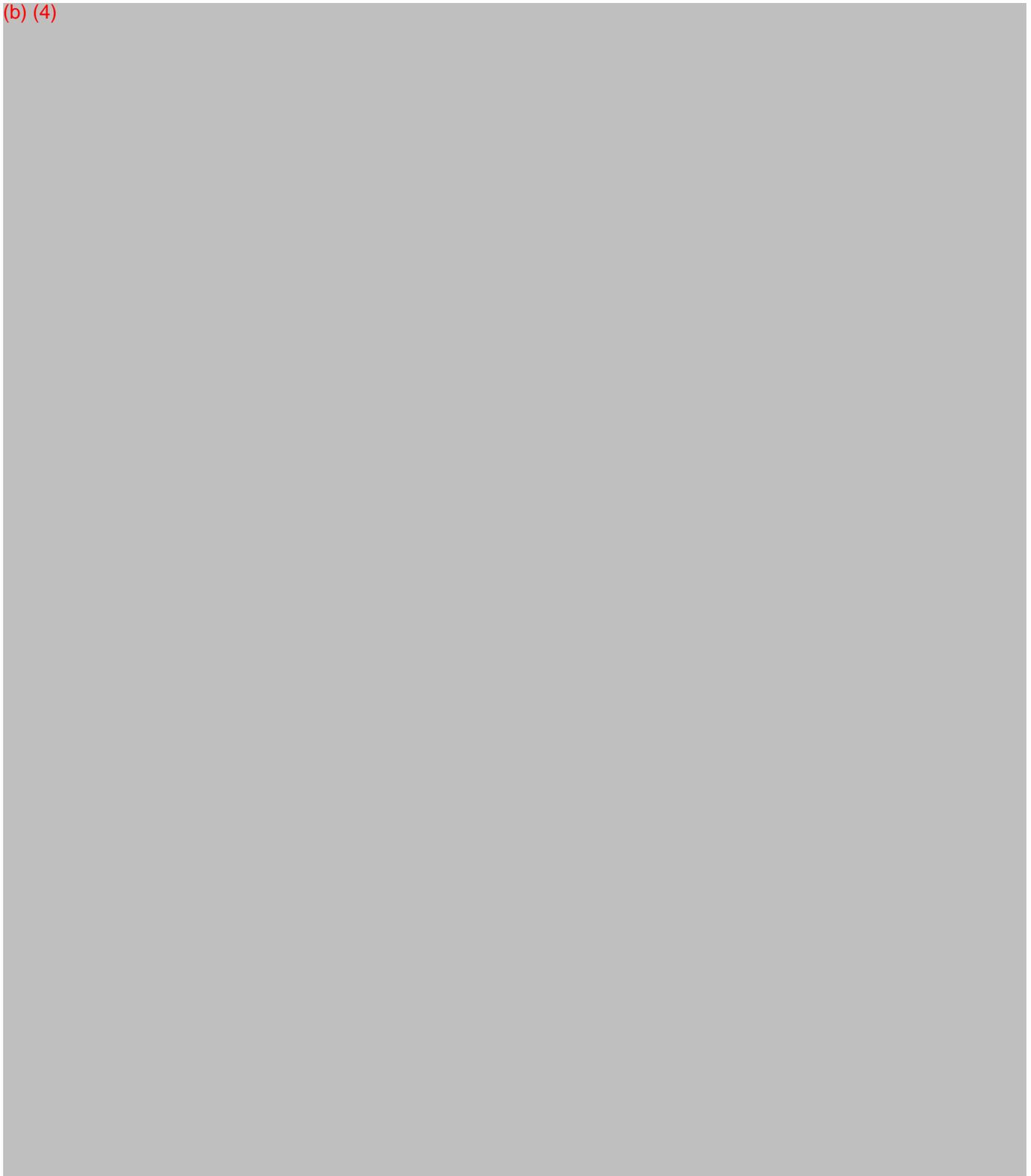






**SAMPLE ESCROW AGREEMENT  
FOR INVESTMENT CAPITAL CONTRIBUTION**

(b) (4)











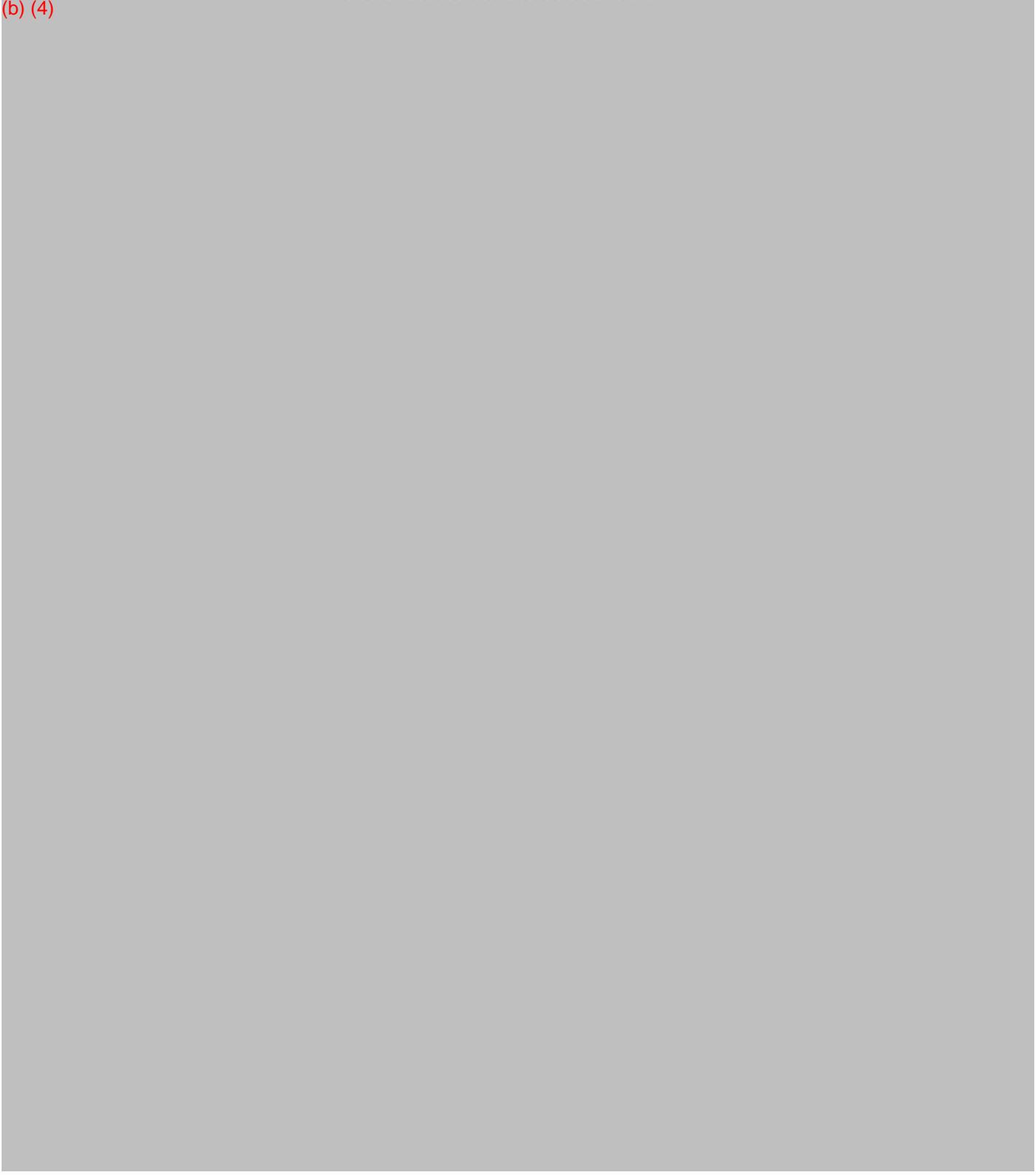




**SAMPLE ESCROW AGREEMENT**

**FOR ADMINISTRATIVE FEE**

(b) (4)

















**PRESS FIRMLY** you are writing through 4 copies.

**PURCHASE AGREEMENT  
UNIMPROVED LAND/LOT**



**EFFECTIVE DATE: DATE:** \_\_\_\_\_ **INITIALS:** \_\_\_\_\_ / \_\_\_\_\_  
(To be completed by the last party to sign acceptance of the final offer.)

**PLEASE READ CAREFULLY** - Alabama is a Caveat Emptor State. If you have any questions, please seek advice of legal counsel. This is a legally binding preprinted Purchase Agreement and prior to its signing by all parties is subject to negotiation between the parties to the Agreement. You may retain legal counsel to review and/or prepare this Purchase Agreement for you. Wherever Buyer or Seller is mentioned below, if there is more than one Buyer or more than one Seller party to this Agreement, it is understood that the words Buyer or Seller shall represent all Buyers or all Sellers. Any items left unmarked do not apply and are not material to this transaction.

(b) (4)















## STATE OF ALABAMA

DOMESTIC LIMITED LIABILITY COMPANY  
ARTICLES OF ORGANIZATION GUIDELINES

## INSTRUCTIONS:

STEP 1: THE NAME OF THE LIMITED LIABILITY COMPANY MUST CONTAIN THE WORDS LIMITED LIABILITY COMPANY, LLC OR L.L.C.

STEP 2: FILE THE ORIGINAL AND TWO COPIES OF THE ARTICLES OF ORGANIZATION IN THE COUNTY WHERE THE LLC'S REGISTERED OFFICE IS LOCATED. THE SECRETARY OF STATE'S FILING FEE IS \$40. PLEASE CONTACT THE JUDGE OF PROBATE TO VERIFY THE PROBATE FILING FEE.

PURSUANT TO THE ALABAMA LIMITED LIABILITY COMPANY ACT, THE UNDERSIGNED HEREBY ADOPTS THE FOLLOWING ARTICLES OF ORGANIZATION.

- Article I** The name of the Limited Liability Company:  
CP Homes (AL) LLC  
(Your company title must end with the words Limited Liability Company, L.L.C. or LLC)
- Article II** The duration of the Limited Liability Company is perpetual unless otherwise stated.
- Article III** The Limited Liability Company has been organized for the following purpose(s):  
Investment
- Article IV** The **street address** (NO PO BOX) of the registered office: 2 North Jackson Street,  
Suite 605, Montgomery, AL 36104 and the name of the  
registered agent at that office: C T Corporation System
- Article V** The names and addresses of the initial member(s), and organizer (if any):  
Country Place Inc.  
c/o Brandon Meyer, Attorney at Law, 5440 Morehouse Dr., #4400, San Diego, CA 92121  
(Attach additional sheets if necessary.)
- Article VI** If the Limited Liability Company is to be managed by one or more managers, list the names and addresses of the managers who are to serve until the first annual meeting of the members or until their successors are elected and qualified.  
Brandon Meyer  
5440 Morehouse Dr., #4400, San Diego, CA 92121

Any provision that is not inconsistent with the law for the regulation of the internal affairs of the Limited Liability Company is permitted to be set forth in the operating agreement of the LLC.

IN WITNESS THEREOF, the undersigned members executed these Articles of Organization on  
this the 10th day of September, 2010.

THIS DOCUMENT PREPARED BY:

Brandon Meyer  
5440 Morehouse Drive, #4400  
San Diego CA 92121
  
Signature of Member/Organizer  
Country Place Inc.

DLL 1.1 Rev. 6/2001

STATE OF ALA. MONTGOMERY CO.  
I CERTIFY THIS INSTRUMENT WAS FILED ON  
CORP 00294 PG 0376 2010 Sep 22 09:27AMREESE MCKINNEY JR.  
JUDGE OF PROBATE

INDEX	\$5.00
REC FEE	\$35.00
CERT	\$0.00
CHECK TOTAL	\$40.00
131292	Clerk: NANCY 09:27AM

STATE OF ALABAMA

DOMESTIC LIMITED PARTNERSHIP (LP)  
CERTIFICATE OF LIMITED PARTNERSHIP

PURPOSE: In order to form a Limited Partnership under Section 10-9C-201 of the Code of Alabama 1975 this Certificate and the appropriate filing fees must be filed with the Office of the Judge of Probate in the county where the Limited Partnership's initial designated office is located.

INSTRUCTIONS: Mail two (2) signed originals of this completed Certificate and the appropriate filing fees to the Office of the Judge of Probate in the county where the Limited Partnership's designated office is located. Contact the Judge of Probate's Office to determine the county filing fees. Make a separate check or money order payable to the Secretary of State for the state filing fees and the Judge of Probate's Office will transmit the fees along with a certified copy of the Certificate to the Office of the Secretary of State within 10 days after the Certificate is issued. The Secretary of State filing fee is \$0 prior to January 1, 2011/\$100.00 after January 1, 2011.

(For SOS Office Use Only)

**This form must be typed or laser printed.**

OPTION: A record delivered for filing may specify an effective time and delayed effective date. This is not required.

Effective Time: \_\_\_\_\_ : \_\_\_\_\_  AM  PM      Delayed Effective Date(mm/dd/yyyy): \_\_\_\_/\_\_\_\_/\_\_\_\_

REQUIRED INFORMATION:

- 1. The name of the Limited Partnership (must contain the phrase Limited Partnership; the word Limited; or the abbreviation LP, L.P., or Ltd., and comply with Code of Alabama Title 10-9C-108):

CP Homes 1 (Alabama) LP

- 2. Street (**No PO Boxes**) address of designated office of the Limited Partnership: c/o Brandon Meyer, Attorney at Law,

5440 Morehouse Dr., #4400, San Diego, CA 92121

County in which designated office is located: San Diego, CA

Mailing address of designated office (if different from street address): \_\_\_\_\_

- 3. The name of the Registered Agent: C T Corporation System

Street (**No PO Boxes**) address of Registered Agent: 2 North Jackson Street, Suite 605, Montgomery,

Alabama 36104

Mailing address of Registered Agent (if different from street address): \_\_\_\_\_

DOCUMENT PREPARED BY:  
Brandon Meyer  
5440 Morehouse Drive, #4400  
San Diego CA 92121

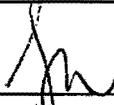
**DOMESTIC LIMITED PARTNERSHIP (LP) CERTIFICATE**

- 4. This Partnership is not a Limited Liability Limited Partnership and will not be registered as such. The undersigned understand and agree that in order to file a Limited Liability Limited Partnership a different form with additional information would be required (for example: see Certificate of Limited Partnership for LLLP).
- 5. The names, street addresses, mailing addresses, and signatures for each of the general partners must be attached. Use page 2 of this document to provide this information and duplicate the blank form as necessary to include all general partners. This information is required pursuant to Section 10-9C-201(3) and the signatures are required pursuant to Section 10-9C-204(a)(1).

The name of the General Partner: CP Homes (AL) LLC

Street (**No PO Boxes**) address of General Partner: c/o Brandon Meyer, Attorney at Law, 5440 Morehouse Dr., #4400, San Diego, CA 92121

Mailing address (if different): \_\_\_\_\_

  
\_\_\_\_\_  
Signature of General Partner

The name of the General Partner: \_\_\_\_\_

Street (**No PO Boxes**) address of General Partner: \_\_\_\_\_

Mailing address (if different): \_\_\_\_\_

\_\_\_\_\_  
Signature of General Partner

The name of the General Partner: \_\_\_\_\_

Street (**No PO Boxes**) address of General Partner: \_\_\_\_\_

Mailing address (if different): \_\_\_\_\_



STATE OF ALA.  
MONTGOMERY CO.  
I CERTIFY THIS INSTRUMENT  
WAS FILED ON  
Signature of General Partner PLPY 00103 PG 0525-0526 2010 Sep 22  
09:25AM  
REESE MCKINNEY JR.  
JUDGE OF PROBATE

INDEX	Page 2 of 2	\$5.00
REC FEE		\$5.00
CERT		\$1.00
CHECK TOTAL		\$11.00
131290	Clerk: NANCY	09:25AM

STATE OF ALABAMA

DOMESTIC LIMITED PARTNERSHIP (LP)  
CERTIFICATE OF LIMITED PARTNERSHIP

PURPOSE: In order to form a Limited Partnership under Section 10-9C-201 of the Code of Alabama 1975 this Certificate and the appropriate filing fees must be filed with the Office of the Judge of Probate in the county where the Limited Partnership's initial designated office is located.

INSTRUCTIONS: Mail two (2) signed originals of this completed Certificate and the appropriate filing fees to the Office of the Judge of Probate in the county where the Limited Partnership's designated office is located. Contact the Judge of Probate's Office to determine the county filing fees. Make a separate check or money order payable to the Secretary of State for the state filing fees and the Judge of Probate's Office will transmit the fees along with a certified copy of the Certificate to the Office of the Secretary of State within 10 days after the Certificate is issued. The Secretary of State filing fee is \$0 prior to January 1, 2011/\$100.00 after January 1, 2011.

(For SOS Office Use Only)

This form must be typed or laser printed.

OPTION: A record delivered for filing may specify an effective time and delayed effective date. This is not required.

Effective Time: \_\_\_\_\_  AM  PM Delayed Effective Date(mm/dd/yyyy):  / /

REQUIRED INFORMATION:

- 1. The name of the Limited Partnership (must contain the phrase Limited Partnership; the word Limited; or the abbreviation LP, L.P., or Ltd., and comply with Code of Alabama Title 10-9C-108):

CP Homes 1 (Alabama) LP

- 2. Street (No PO Boxes) address of designated office of the Limited Partnership: c/o Brandon Meyer, Attorney at Law,

5440 Morehouse Dr., #4400, San Diego, CA 92121

County in which designated office is located: San Diego, CA

Mailing address of designated office (if different from street address): \_\_\_\_\_

- 3. The name of the Registered Agent: C T Corporation System

Street (No PO Boxes) address of Registered Agent: 2 North Jackson Street, Suite 605, Montgomery,

Alabama 36104

Mailing address of Registered Agent (if different from street address): \_\_\_\_\_

DOCUMENT PREPARED BY:  
Brandon Meyer  
5440 Morehouse Drive, #4400  
San Diego CA 92121

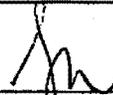
**DOMESTIC LIMITED PARTNERSHIP (LP) CERTIFICATE**

- 4. This Partnership is not a Limited Liability Limited Partnership and will not be registered as such. The undersigned understand and agree that in order to file a Limited Liability Limited Partnership a different form with additional information would be required (for example: see Certificate of Limited Partnership for LLLP).
- 5. The names, street addresses, mailing addresses, and signatures for each of the general partners must be attached. Use page 2 of this document to provide this information and duplicate the blank form as necessary to include all general partners. This information is required pursuant to Section 10-9C-201(3) and the signatures are required pursuant to Section 10-9C-204(a)(1).

The name of the General Partner: CP Homes (AL) LLC

Street (No PO Boxes) address of General Partner: c/o Brandon Meyer, Attorney at Law, 5440 Morehouse Dr., #4400, San Diego, CA 92121

Mailing address (if different): \_\_\_\_\_

  
\_\_\_\_\_  
Signature of General Partner

The name of the General Partner: \_\_\_\_\_

Street (No PO Boxes) address of General Partner: \_\_\_\_\_

Mailing address (if different): \_\_\_\_\_

\_\_\_\_\_  
Signature of General Partner

The name of the General Partner: \_\_\_\_\_

Street (No PO Boxes) address of General Partner: \_\_\_\_\_

Mailing address (if different): \_\_\_\_\_



STATE OF ALA.  
MONTGOMERY CO.  
I CERTIFY THIS INSTRUMENT  
WAS FILED ON  
Signature of General Partner PLPY 00103 PG 0626-0626 2010 Sep 22  
09:26AM  
REESE MCKINNEY JR.  
JUDGE OF PROBATE

INDEX	Page 2 of 2	\$5.00
REC FEE		\$5.00
CERT		\$1.00
CHECK TOTAL		\$11.00
131290	Clerk: NANCY	09:26AM

STATE OF ALABAMA

DOMESTIC FOR-PROFIT CORPORATION  
ARTICLES OF INCORPORATION GUIDELINES

INSTRUCTIONS:

STEP 1: CONTACT THE OFFICE OF THE SECRETARY OF STATE AT (334)242-5324 TO RESERVE A CORPORATE NAME.  
STEP 2: TO INCORPORATE, FILE THE ORIGINAL, TWO COPIES OF THE ARTICLES OF INCORPORATION AND THE CERTIFICATE OF NAME RESERVATION IN THE COUNTY WHERE THE CORPORATION'S REGISTERED OFFICE IS LOCATED. THE SECRETARY OF STATE'S FILING FEE IS \$40. PLEASE CONTACT THE JUDGE OF PROBATE TO VERIFY FILING FEES.

PURSUANT TO THE PROVISIONS OF THE ALABAMA BUSINESS CORPORATION ACT, THE UNDERSIGNED HEREBY ADOPTS THE FOLLOWING ARTICLES OF INCORPORATION.

Article I The name of the corporation:  
CP 1 (AL), Inc.

Article II The duration of the corporation is "perpetual" unless otherwise stated.

Article III The corporation has been organized for the following purpose(s):  
Project Development

Article IV The number of shares which the corporation shall have the authority to issue is 10,000.

Article V The street address (NO PO BOX) of the registered office: 2 North Jackson Street,  
Suite 605, Montgomery, Alabama 36104 and the name of the registered agent at that office: C T Corporation System

Article VI The name(s) and address(es) of the Director(s):  
Brandon Meyer  
c/o Brandon Meyer, Attorney at Law, 5440 Morehouse Dr., #4400, San Diego, CA 92121

Article VII The name(s) and address(es) of the Incorporator(s):  
Pacrim US (AL) Inc.  
c/o Brandon Meyer, Attorney at Law, 5440 Morehouse Dr., #4400, San Diego, CA 92121

Any provision that is not inconsistent with the law for the regulation of the internal affairs of the corporation or for the restriction of the transfer of shares may be added.

IN WITNESS THEREOF, the undersigned incorporator executed these Articles of Incorporation on this the 10th day of September, 20 10.

Printed Name and Business Address of Person Preparing this Document: Susan Wheeler  
CT CORPORATION SYSTEM  
818 West 7th Street, Suite 200  
Los Angeles CA 90017

Pacrim US (AL) Inc.  
Type or Print Name of Incorporator  
Brandon Meyer on behalf of Pacrim US (AL) Inc.  
Signature of Incorporator

STATE OF ALA. MONTGOMERY CO.  
I CERTIFY THIS INSTRUMENT WAS FILED ON  
CORP 00294 PG 0313 2010 Sep 16 02:42PM  
REESE MCKINNEY JR.  
JUDGE OF PROBATE

INDEX	\$5.00
REC FEE	\$35.00
CERT	\$0.00
CHECK TOTAL	\$40.00
131014	Clerk: SHAUNTE 02:42PM

Beth Chapman  
Secretary of State

P.O. Box 5616  
Montgomery, AL 36103-5616

# STATE OF ALABAMA

I, Beth Chapman, Secretary of State of the State of Alabama, having custody of the Great and Principal Seal of said State, do hereby certify that

pursuant to the provisions of Section 10-2B-4.02, Code of Alabama 1975, and upon an examination of the corporation records on file in this office, the following corporate name is reserved as available:

CP 1 (AL), Inc.

This domestic corporation name is proposed to be incorporated in Montgomery County and is for the exclusive use of Susan Wheeler, 818 W 7th Street Ste 200, Los Angeles, CA 90017 for a period of one hundred twenty days beginning September 15, 2010 and expiring January 14, 2011.

In Testimony Whereof, I have hereunto set my hand and affixed the Great Seal of the State, at the Capitol, in the City of Montgomery, on this day.

September 15, 2010

Date



Beth Chapman

Secretary of State

## STATE OF ALABAMA

DOMESTIC FOR-PROFIT CORPORATION  
ARTICLES OF INCORPORATION GUIDELINES

## INSTRUCTIONS:

STEP 1: CONTACT THE OFFICE OF THE SECRETARY OF STATE AT (334)242-5324 TO RESERVE A CORPORATE NAME.

STEP 2: TO INCORPORATE, FILE THE ORIGINAL, TWO COPIES OF THE ARTICLES OF INCORPORATION AND THE CERTIFICATE OF NAME RESERVATION IN THE COUNTY WHERE THE CORPORATION'S REGISTERED OFFICE IS LOCATED. THE SECRETARY OF STATE'S FILING FEE IS \$40. PLEASE CONTACT THE JUDGE OF PROBATE TO VERIFY FILING FEES.

PURSUANT TO THE PROVISIONS OF THE ALABAMA BUSINESS CORPORATION ACT, THE UNDERSIGNED HEREBY ADOPTS THE FOLLOWING ARTICLES OF INCORPORATION.

- Article I** The name of the corporation:  
Pacrim US (AL) Inc.
- Article II** The duration of the corporation is "perpetual" unless otherwise stated.
- Article III** The corporation has been organized for the following purpose(s):  
Investment Holding Company
- Article IV** The number of shares which the corporation shall have the authority to issue is 10,000.
- Article V** The street address (NO PO BOX) of the registered office: 2 North Jackson Street,  
Suite 605, Montgomery, Alabama 36104 and the name of the  
registered agent at that office: C T Corporation System
- Article VI** The name(s) and address(es) of the Director(s):  
Brandon Meyer  
c/o 5440 Morehouse Dr., #4400, San Diego, CA 92121
- Article VII** The name(s) and address(es) of the Incorporator(s):  
Pacrim Capital International Inc.  
c/o Brandon Meyer, Attorney at Law, 5440 Morehouse Dr., #4400, San Diego, CA 92121

Any provision that is not inconsistent with the law for the regulation of the internal affairs of the corporation or for the restriction of the transfer of shares may be added.

IN WITNESS THEREOF, the undersigned incorporator executed these Articles of Incorporation  
on this the 10th day of September, 20 10.Printed Name and Business Address of Person Preparing this  
Document: Susan Wheeler  
CT CORPORATION SYSTEM  
818 West 7th Street, Suite 200  
Los Angeles CA 90017Pacrim Capital International Inc.  
Type or Print Name of Incorporator  
[Signature]  
Signature of Incorporator

Rev. 7/03

STATE OF ALA.MONTGOMERY CO.  
I CERTIFY THIS INSTRUMENT WAS FILED ON  
CORP 00294 PG 0314 2010 Sep 16 02:42PM  
REESE MCKINNEY JR.  
JUDGE OF PROBATE

INDEX	\$5.00
REC FEE	\$35.00
CERT	\$0.00
CHECK TOTAL	\$40.00
131014	Clerk: SHAUNTE 02:42PM

Beth Chapman  
Secretary of State

P.O. Box 5616  
Montgomery, AL 36103-5616

# STATE OF ALABAMA

I, Beth Chapman, Secretary of State of the State of Alabama, having custody of the Great and Principal Seal of said State, do hereby certify that

pursuant to the provisions of Section 10-2B-4.02, Code of Alabama 1975, and upon an examination of the corporation records on file in this office, the following corporate name is reserved as available:

**Pacrim US (AL) Inc.**

This domestic corporation name is proposed to be incorporated in Montgomery County and is for the exclusive use of Susan Wheeler, 818 W 7th Street Ste 200, Los Angeles, CA 90017 for a period of one hundred twenty days beginning September 15, 2010 and expiring January 14, 2011.

In Testimony Whereof, I have hereunto set my hand and affixed the Great Seal of the State, at the Capitol, in the City of Montgomery, on this day.

September 15, 2010

Date



*Beth Chapman* TM

Beth Chapman

Secretary of State





*Country Place*<sup>SM</sup>

LIVING

Do Well While Doing Good.<sup>SM</sup>

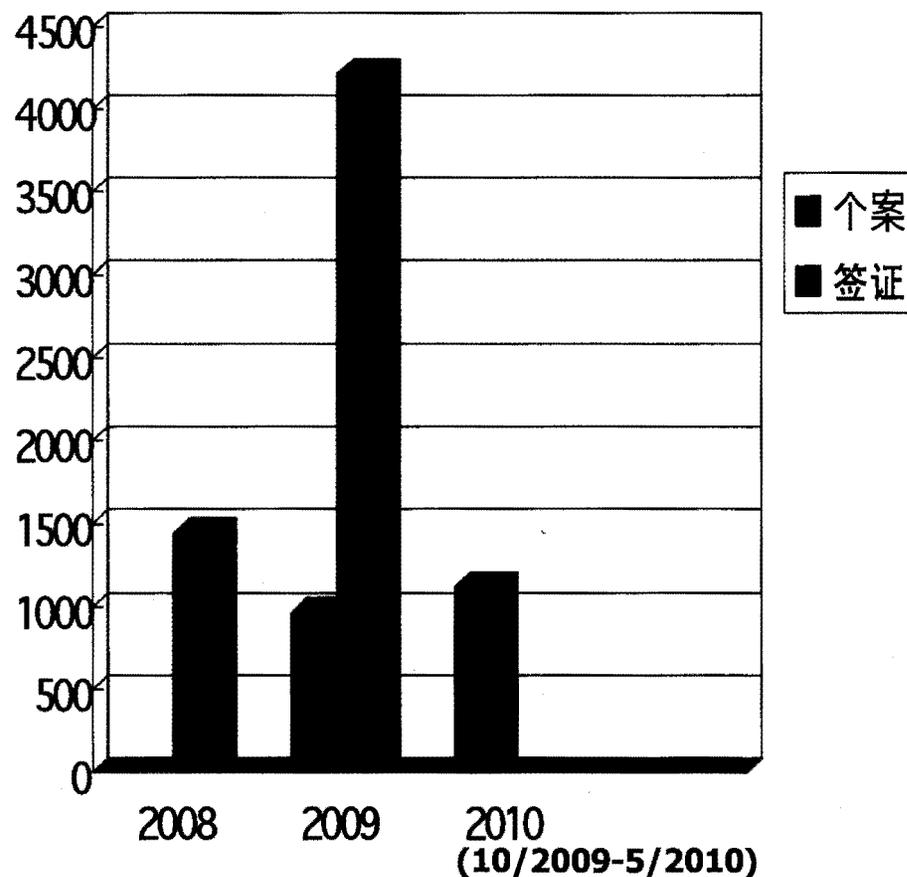


• CP长者屋美国投资移民项目



# EB-5投资移民及区域中心方案

- EB-5, 始于1990年
- 2008年获批1443人
- 2009年获批966个案
- 2009年获批4218人
- 10/2009~5/2010获批1120个案

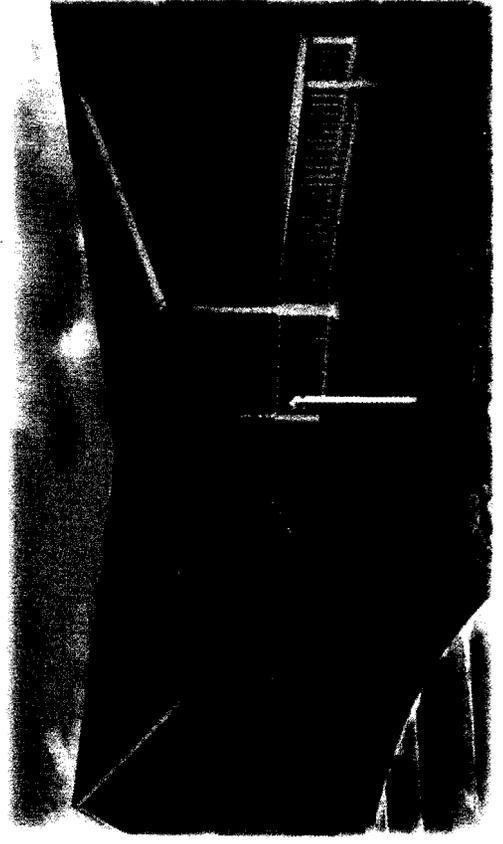
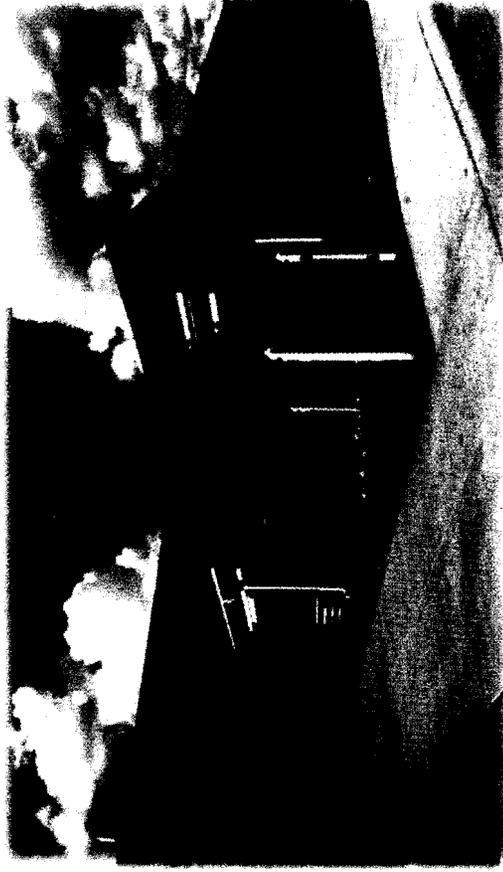




CP HOMES LP

# 关于CP长者屋

- CP=田园居屋
- CP长者屋RC已获美国移民局批准
- CP长者屋是辅助式长者居住小区
- CP长者屋已发展为全美连锁品牌





# CP长者屋项目背景

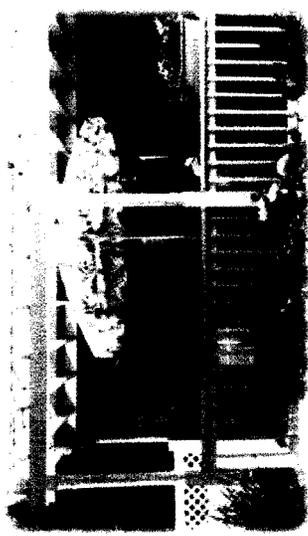
- 美国人口老化
- 婴儿潮时出生的人群已达 60~70岁
- 美国人不养老，老人怕孤独
- 美国老人购买力强：退休金、政府津贴、养老保险、卖房
- 老人居屋需求强劲





# CP长者屋项目概要

- 服务式住屋：医疗、餐饮、娱乐
- 提供个别协助和舒适照料
- 优质建筑、优雅装饰
- 享受独立、安全和尊严
- 分布于美国多个洲及其各县
- 满足长者居住及特殊需求





# CP长者屋项目管理团队

- 项目创办人兼行政总裁
- 八十年代初开始关注长者安居事业
- 曾任堪萨斯州Wichita Bank商业银行副总裁
- 2003年推出CP长者屋品牌，刚推出即被抢购一空
- 2007年CP长者屋品牌转为全国连锁



**Jack West**



# CP长者屋项目管理团队

- Pacrim International Capital Inc. 集团董事
- Pacrim USA LLC 首席执行官
- 加拿大卡城喜来登酒店始创公司 Pacrim Developments Inc. 发起人和总裁
- 加拿大上市房地产基金 Holloway Lodging REIT 执行副总裁和董事
- 超过30年的房地产开发、房地产证券化及投融资经验。



**Edward Good**

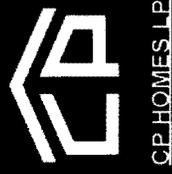


# CP长者屋项目管理团队

- Pacrim International Capital Inc. 集团董事长
- 深圳华生创新包装股份有限公司 董事长
- 加拿大皇后大学法律学士
- 美国哥伦比亚大学法学硕士
- 加拿大、澳洲、英国和香港 注册律师



**Guy K. H. Lam**  
林国雄先生



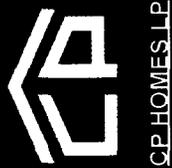
# CP长者屋项目管理团队

- **Mr. Guy Lam 林国雄先生曾获**
- 第二届“中华杰出商业领袖”社会责任奖
- 深圳市商业联合会理事
- 受聘为武汉大学教授
- 2009年度中国企业创新优秀人物
- 影响中国60年十大杰出贡献人物之一



# CP长者屋项目现有案例

Project Name	Location	Units	Year
Periwinkle Village	Perth, WA	43	Feb, 1990
The Homestead Assisted Living	Garden City, MS	35	October, 1998
The Homestead Assisted Living	Marysville, WA	35	March, 1997
The Homestead Assisted Living	Huntsville, MS	35	July, 1997
The Homestead Assisted Living	Keeney, NE	35	December, 1997
The Homestead Assisted Living	Oriskany, MS	35	August, 1999
Country Place Senior Living Assisted Living	Houston, TX	18	February, 2003
Country Place Senior Living Assisted Living	Larned, WA	8	March, 2005
Country Place Senior Living Assisted Living	Mapleton, WA	18	October, 2006
Country Place Senior Living Assisted Living	Mapleton, WA	18	October, 2006



# CP 长者屋全美网络





# 已选定及购置之土地，用于开发新CP长者屋项目



Arbor Gates Apartments, Fairhope, AL, United States



County Road 20 and James Rd Foley, Al, 36535



East Laurel Gulf coast health center



Jubilee Trail, Fairhope, Baldwin,



Spa 619 east laurel av, foley



# CP长者屋运作模式

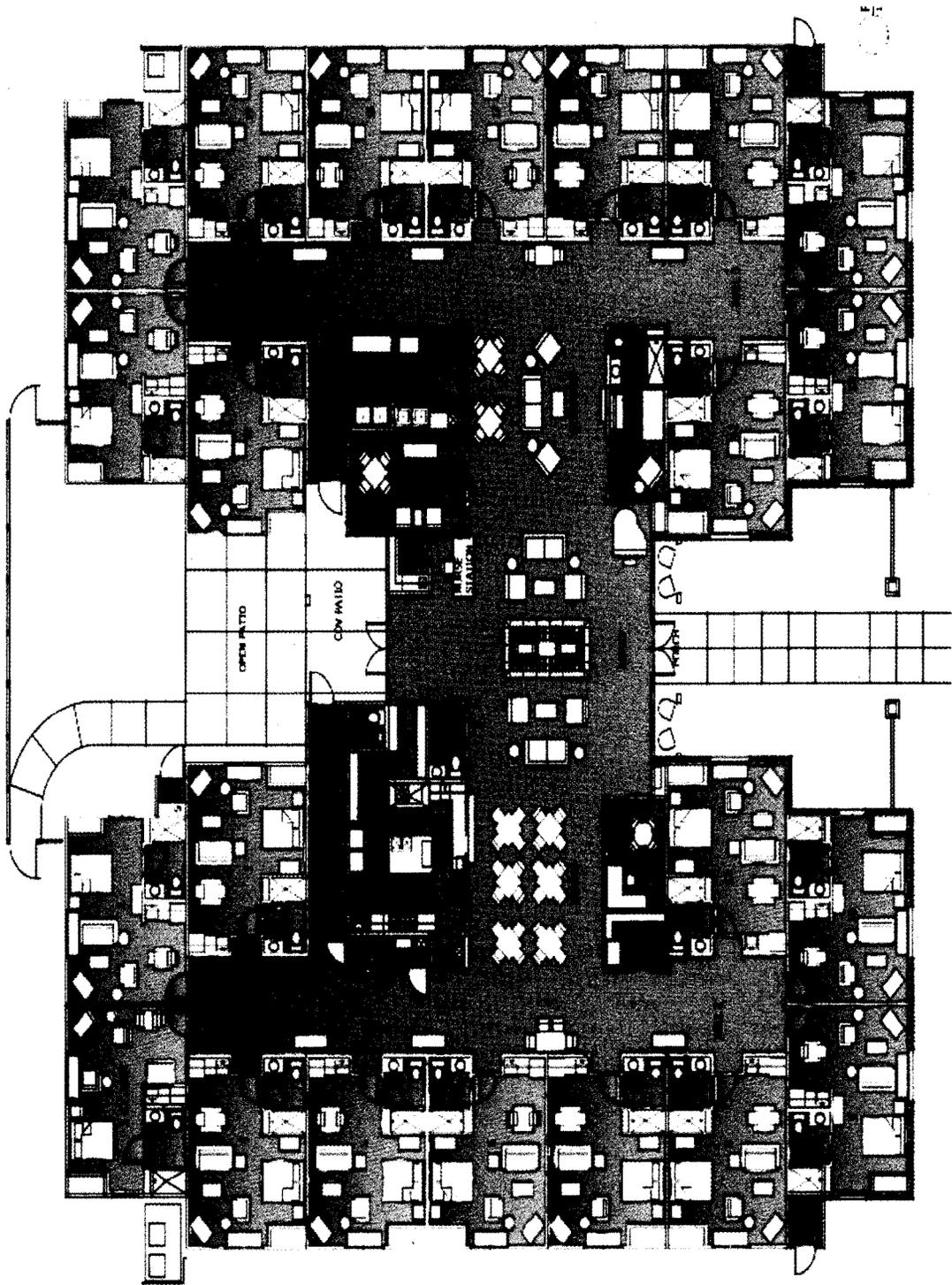
- 投资者投资50万美元及管理费于CPLP
- CPLP贷款给CP长者屋项目
- 拿CP长者屋全部资产做抵押担保
- 每300万美元为一个单位，将开发一个22住宅单位的长者屋小区





CP HOMES, L.P.

# 22单位长者屋规划图





# CP长者屋运作模式

- 每小区都拥有专利技术治疗糖尿病病的康复中心，向社会公众提供服务
- 小区出租房间并提供服务给长者，同时经营糖尿病康复中心
- 二年后投资者获得永久绿卡
- 五年后长者屋小区向CPLP还款，CPLP还款给投资者，无利息

### Economic Impact of Employment from Clinic/Assisted Living Operations

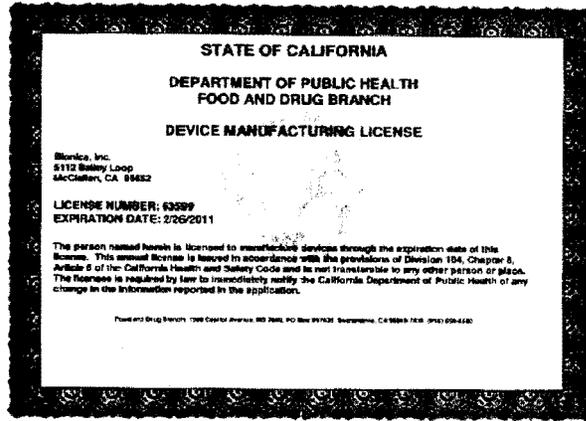
Based on the employment data provided by the developers of the clinic/assisted living center, the following table presents the economic impact of employment for project supporters in the regional economy. Where specific payroll data for a sector is not available, the 2007 regional average is used in the 2008 model. Employment figures for the total sector are based on the phased growth assumptions provided by County, Moor Valley Clinic, and Assisted Living Facility.

Category	2007 Payroll (\$)	2008 Payroll (\$)	2009 Payroll (\$)	2010 Payroll (\$)	2011 Payroll (\$)	2012 Payroll (\$)
Construction	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567
Manufacturing	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567
Retail	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567
Food Service	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567
Healthcare	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567
Education	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567
Professional	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567
Government	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567
Other	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567	1,234,567
<b>Total</b>	<b>12,345,678</b>	<b>12,345,678</b>	<b>12,345,678</b>	<b>12,345,678</b>	<b>12,345,678</b>	<b>12,345,678</b>

经济学家报告显示  
每50万美元投资等  
于10个就业机会

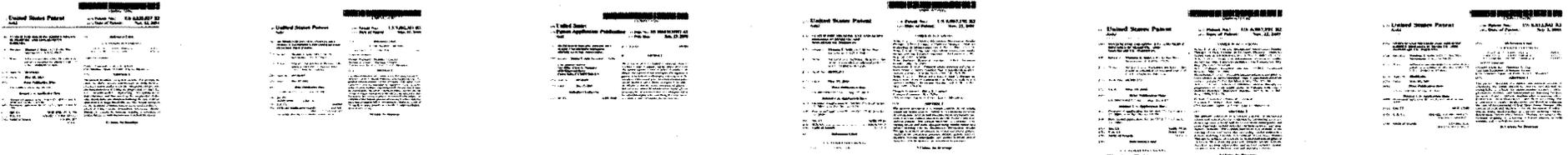


# 糖尿病治疗技术获9项美国专利



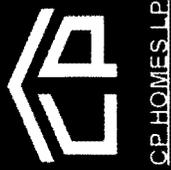
## 美国食品及药品管理局批文

## 治疗情形



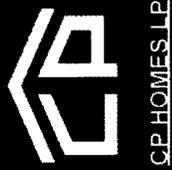
# CP长者屋盈利模式

- 每个康复中心有6台治疗仪，每台治疗仪每天可提供两次治疗，收费1000美元/次
- 满负荷运转：每个康复中心每年收入 $1000 \times 6 \times 2 \times 250 = 3,000,000$ 美元（年工作250天）
- 按康复中心30%的产能保守估算，年收入为 $3,000,000 \times 30\% = 900,000$ 美元
- 目前运营中长者屋小区每单位月租金收入为3,400美元，年收入为 $3,400 \times 22 \times 12 = 897,600$ 美元
- 康复中心与单位出租的年收入合计为： $897,600 + 900,000 = 1,797,600$ 美元



# CP长者屋简要盈利分析

项目	金额 (美元)
投资额=500,000×6	3,000,000
年收入约= 897,600+900,000	1,797,600
年费用约 700,000 (长者屋) +300,000 (医疗中心) +100,000 (专利权使用)	1,100,000
年纯利约	697,600
根据国际通行的计算方法: 公司市值约等于10年的盈利额	6,970,000



# CP长者屋还款保障

- 市值700万可贷款300万 (43%); CPLP 收到300万后以优先分红形式还投资者50万美元本金
- 美国政府支持, 提供SBA504贷款: 6个投资者融资300万或3个投资者+政府贷款
- 国内企业或上市公司提供担保

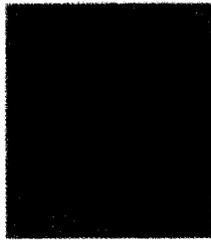
South Central Kansas Economic Development District, Inc. (SCKEDD)  
 Certified Development Company (CDC)  
 SBA 504 LOAN PROGRAM

The Small Business Administration (SBA) and Certified Development Company (CDC) have entered into a partnership to provide SBA 504 financing to small businesses in the South Central Kansas Economic Development District. This program is designed to help small businesses in the district obtain financing for the purchase, construction, or renovation of real estate. The program is available to businesses that are located in the district and are currently operating. The program is subject to SBA and CDC approval. For more information, please contact the CDC at (785) 843-1234.

### ELIGIBILITY CRITERIA FOR SBA 504 FINANCING PROGRAM PARTICIPANTS

- 1. Be a small business.
- 2. Be a U.S. citizen.
- 3. Be located within the District.
- 4. Be currently operating.
- 5. Have a good credit record.
- 6. Have a good financial record.
- 7. Have a good management record.
- 8. Have a good track record.
- 9. Have a good reputation.
- 10. Have a good track record.

The information on this page is provided for informational purposes only. It is not intended to constitute an offer of any financial product or service. The information is subject to change without notice. For more information, please contact the CDC at (785) 843-1234.



## SBA504贷款文件

## 提供担保的企业



美 J·PICI--Pacrim International Capital Inc.

- 多伦多股票交易所挂牌之上市公司，代码PCN
- 主营房地产开发、基金管理(HOLLOWAT REIT) 等
- 在北美成功建造、管理和经营了大量项目，屡获殊荣，包括全球管理最佳Radisson Hotel兰心酒店





# 华生创新包装股份有限公司

## 企业法人营业执照

(副本)

副本1

注册号 440301501130237

深圳华生创新包装股份有限公司

深圳吉发同兴印刷有限公司  
林宇雄

人民币16439.739万元

人民币16439.739万元

大正街的中外合资股份制企业  
如本公司经营纸杯、纸碗、纸盘及纸碟等品，且取  
理其他物资生产、销售、运输、仓储。

名称 住所 法定代表人 注册资本 实收资本 企业类型 经营范围

编号: NO 1032049

说明

1. 本执照的有效期为自颁发之日起五年。
2. 本执照的有效期满前，企业应当依法办理续期登记。
3. 本执照的有效期满前，企业应当依法办理变更登记。
4. 本执照的有效期满前，企业应当依法办理注销登记。
5. 本执照的有效期满前，企业应当依法办理其他登记。

年度检验情况



登记机关

股东(发起人)

营业期限自 至  
成立日期

2008年01月01日

## 华生创新包装的营业执照

- 总资产10亿元人民币，位于深圳
- 华南地区最大之一印刷包装工厂
- 深圳五百强企业
- 已申请A股上市  
(保荐机构: 海通证券)



# 资金监管—中国银行深圳市分行

- 投资款存放于国内，即可进行移民申请
- 中国银行提供多种出国金融服务
- 中银美国分行分布于纽约、加州及其他各大城市



中国银行 全球服务  
WITH YOU



## CP长者屋项目优势

- 投资款可由国内银行监管，资金仍在国内即可申请美国移民
- 已有**20**多个成熟项目运营经验，经营风险更低
- 多位美国律师常驻国内，提供快速支持
- 可由国内企业或上市公司提供第三方担保



# 问答时间

CP HOMES LP  
1333 Corporate Drive Suite 206  
Irving, TX 75038 United States  
Phone: (817) 545-5353  
Secondary Phone: (866) 505-2775  
Fax: (866) 787-7087

## 国内联络处

深圳市人民南路嘉里中心2808室  
**0755-82280595 82180765 82197053**

深圳 广州 上海 北京

[www.cphomes.us](http://www.cphomes.us)

# CP HOMES LP

[HOME](#) | [ABOUT US](#) | [OUR STRATEGY](#) | [EB-5 INVESTMENT](#) | [COUNTRY PLACE LIVING](#) | [CONTACT US](#) | [LINKS](#)



## Welcome to Country Place LP!

Country Place LP is led by a dedicated team of immigration experts with many decades of experience. Our goal is to assist investors and their families to migrate to the United States via the EB-5 visa program, and to make this as seamless and enjoyable a process as possible.

Country Place LP has a respected reputation as a leader in the assisted living industry. Country Place LP owns, develops, and franchises quality senior living residences in rural and suburban areas of the United States.

Country Place LP projects are strategically designed to take advantage of opportunities in today's challenging economy. Both Country Place LP and local governments perform extensive analysis prior to the start of each project to ensure that it is feasible. Business plans for Country Place LP have also been reviewed and approved by U.S. Citizenship and Immigration Services to receive immigration investment.

**Build a Country Place Home in the USA. Seize this prosperous investment opportunity now and obtain a Green Card at the same time.**

# CP HOMES LP

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About Us

## Country Place LP

Country Place Living Project for seniors is a residential project of assisted living established especially for seniors and launched by a regional center approved by the USCIS. It mainly aims at attracting foreign investment, creating job opportunities, improving the environment in communities, providing jobs in the area and providing the seniors in the communities with integrated residential and medical services of high quality. There is a very strong operational team for this project, consisting of the Pacrim International Capital Inc., a company listed on the Toronto Stock Exchange, and Country Place Living LP which belongs to Jack West, the creator of the project.

### ► Country Place LP

Pacrim International Capital Inc.

Management Expertise

News

© 2010 Country Place LP

# CP HOMES LP

HOME ABOUT US OUR STRATEGY EB-5 INVESTMENT COUNTRY PLACE LIVING CONTACT US LINKS



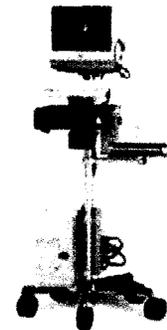
Strategy

## Cellular Activation Therapy (CAT)

Country Place LP

▶ Cellular Activation Therapy

<http://www.diabetes.net>



**"The Only Treatment Proven to Stop, Retard and for several conditions Reverse the Chronic Complications of Diabetes"**

**No other treatment does this, and no other treatment can make these claims**

### Summary

Diabetes is a disease of improper metabolism. It is not a disease of improper blood sugars. Blood sugar excursions are just one of the symptoms of improper metabolism. Cellular Activation Therapy (CAT) directly corrects the core problem of diabetes, which is improper carbohydrate and lipid metabolism. This lack of proper metabolism is the direct cause of the many complications of diabetes; kidney failure, blindness, amputations, heart disease, stroke, neuropathy, progressing wounds, fatigue, sexual dysfunction, diabetic related dementia, and depression.

CAT has been known by a number of names during its clinical trials and early development, such as PIVIT, Metabolic Treatment, and Hepatic Treatment etc. They are all the same treatment, developed and owned by CATC and Bionica Inc. CAT achieves better metabolism by stimulating the liver to naturally produce the enzymes needed for proper carbohydrate and lipid metabolism.



The primary goal of the insulin pulses and the glucose meals is to provide a bimolecular (insulin and glucose) signal to the liver and other tissues to synthesize enzymes needed to catalyze a number of biochemical reactions in the liver and other tissues. The CAT therapy mimics in part the normal physiology and biochemistry of a person who does not have diabetes. With these enzymes and their related biochemical reactions in place, the liver can auto-regulate the circulating glucose levels. Without these enzymes, the liver can only overproduce glucose, leading to high glucose levels in diabetic patients, especially after meals. Insulin is delivered by the Bionica Insulin pump, an FDA, and CE approved pump. CAT using pulses of insulin and oral glycemic

stimulation, provides the two (2) signals needed for the liver to perform its job of producing the enzymes that are deficient in diabetic people.

The improvement in body-wide resting metabolism is documented by standard metabolism measurement (sports) equipment. In fact, every cell uses insulin, and CAT activates proper functioning at the cellular level, hence the name Cellular Activation Therapy.

Since CAT addresses the core problem of diabetes, it is effective for both Type 1 and Type 2 diabetes. It was first used in 1984 with Type 1 patients, where the progression of the disease was slowed and in some ways stopped in the most severely ill. In 1992 studies of Type 2 patients began, and the same effectiveness has been proven for Type 2 diabetes. After 100,000 treatments, there is no doubt that the therapy works on both Type 1 and Type 2 patients.

The effects of the treatment are cumulative over weeks, months and years, at first gradually normalizing the metabolism or use of fuels (and other chemicals) and then with weekly therapy, maintains the now more normal metabolic process. If patients stop the weekly CAT procedures, their metabolism will revert to the diabetic pattern and their risk of developing diabetic complications increases or reoccurs. The improved quality of life is due to the disappearance of symptoms caused by diabetes, the stabilization, or reversal of the progression of diabetic complications, and improved cellular energy utilization and production.



During the time the patient is in therapy, his/her body undergoes a continual metabolic metamorphosis and the patient's complex array of medications, including insulin and oral diabetes medications, must be adjusted to take into account the better health of the patient.

**Patents**

The treatment itself, of giving insulin in pulses intravenously, is patented as is the treatment when used for the major complications of diabetes. The Bionica patent issued also provides patent protection for the next generation device, the automatic CAT pump. These patents extend the protection for treatment of specific problems, and expand the patent applications to the pumping system itself. Intellectual property rights also include the patents from Connecticut Innovations Inc (T. Aoki patents) and include extensive trade secrets of know-how (data) used in building equipment. Generally, physicians are not willing to experiment with new untested equipment when the proven system is available. Thus, the Company enjoys very strong intellectual property protections as well as the only proven data, which uses the Bionica pump.

The Company is protected by a very complete set of patents which cover the use of the CAT therapy and the use of the pump. These patents include inventions, improvements, and techniques as they relate to the patents, and patents pending used for the delivering of insulin which including US Patent Number 6,565,535, with other patents planned by Gregory F. Gilbert. Patents include any and all improvements thereto developed, whether patentable or not, which may now or may hereafter develop; the Development Purchase Agreement between Bionica and Connecticut Innovations Inc; (the Aoki patents) and other intellectual property as described herein. A complete list of issued, pending and intended patents are available within the Due Diligence package and will be provided with a signed non-disclosure agreement.

In addition to the existing patent for the method of treating diabetes, four new US

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Public Health Service  
Food and Drug Administration  
1095 New Hampshire Avenue  
Building 66  
Silver Spring, Maryland 20910

Certificate No. 27-1-0916

**CERTIFICATE TO FOREIGN GOVERNMENT**

In order to allow the preparation of United States products into foreign countries, the U.S. Food and Drug Administration (FDA) certifies the following information concerning the product(s) to be exported listed below:

Name of Product(s)	Name of Manufacturer/Supplier/Address
Medication Artificially Infused Pump	Device Inc 5112 Sunny Lane McLean, California 94025 (United States of America)

The product(s) described above have the manufacturer/distributor name(s) which product(s) does not subject to the jurisdiction of the FDA under the Federal Food, Drug, and Cosmetic Act.

It is certified that the above product(s) meet the requirements of, and comply with, the United States of America as set forth. The manufacturer/distributor in respect to product(s) is subject to domestic regulations. The use of such inspection should not be construed, at this time, as approval or disapproval of compliance with current good manufacturing practice requirements for the product(s) listed above.

*Cheryl J. Hays*  
Cheryl J. Hays  
Acting Director  
Division of Field Management Operations  
Office of Compliance  
Center for Devices and Radiological Health

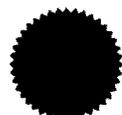
This certificate expires 24 months from the date indicated.

COUNTY OF MONTGOMERY  
STATE OF MARYLAND

Subscribed and sworn to before me this 27th day of 2010, month 2010 year.

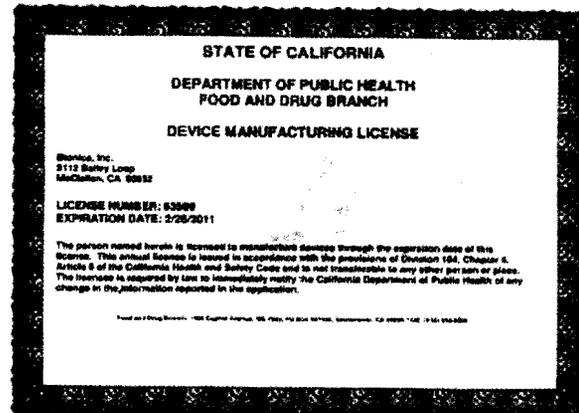
*Catherine A. Ryan*

Notary Public, State of Maryland  
My Commission Expires 12/31/2011



patents and one Japanese patent have been granted, as well as two more worldwide patent applications are pending to extend both the treatment and the device technologies to cardiovascular, neurological, kidney disease, and wound healing complications for non-diabetic related diseases.

In conclusion, the intellectual properties protections for this treatment are actually more strong and pervasive than those of just device patents. For any business to directly compete, the requirements for data, clinical trials, pump development, and the time to accomplish all of these requirements make that decision to compete illogical in light of the low cost of the treatment as currently given. At the same time, due to the previous work and efforts of the Licensor's founders, the treatment can now be given very successfully with good profit margins, and at a very low price.



### Competition

There is no direct competition for this therapy.

The only issue is the perceived competition of other claims of progress often found in the media, but which never seems to get past the initial announcement of "promising preliminary results". The only current competition is just aggressive conventional treatment (Tight Control) that is shown for many patients to be ineffective to the onset or retarding of complications in many patients with diabetes. One study showed that over 40% of all tight control patients go on to develop complications in ten years.

It should also be noted that with all therapies currently known in development (except for gene replacement therapy which actually replaces the islet cells in the pancreas), patients undergoing such therapies would benefit from the normalization of metabolism as provided by Pulse Insulin Therapy. None of the other new therapies have been shown to provide adequate insulin to the liver to allow production of the array of enzymes the human body needs to function properly.

Within the market of acute care diabetic procedures, no other treatment brings blood glucose levels under control effectively. And, no other treatment provides dramatic and needed improvements in the metabolism and the overall well being of ill patients. **Most importantly, no other treatment has yet shown any evidence of arresting complications.**

Existing conventional insulin therapies are not viewed as competitors but collaborators. "CAT" works most effectively in conjunction with a tightly controlled insulin therapy regimen which is delivered by multiple injections, insulin pump, possibly in the future with inhaled insulin or any other new insulin delivery modalities. Potential partnerships or joint ventures could be possible with any or all of the above.

The unique and patented method of treatment with "CAT" and its benefits cannot be duplicated by other existing conventional treatment therapy.

The idea of stem cell treatments is widely seen as a new frontier for all types of diseases. In the Diabetic population, there is no evidence that stem cells will reestablish normal metabolism, as opposed to replace the production of insulin. For this and other technical reasons, Stem Cell therapy is not considered

competition.

CAT, The Only Treatment Proven to Stop, Retard and for several conditions Reverse the Chronic Complications of Diabetes".

**Facts**

[Texas Diabetes Fact Sheet, 2009 \(Click to see\)](#)

[The Burden of Diabetes in Texas \(Click to see\)](#)

[Diabetes Overview for Alabama and Texas \(Click to see\)](#)

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# CP HOMES LP

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 [COUNTRY PLACE LIVING](#) | 
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Country Place Living

- ▶ [Country Place Living](#)
- [List of Country Place Homes](#)
- [Network of operation](#)

## Country Place Living

Country Place LP is a leader in the assisted living industry. Country Place LP owns, develops, and franchises quality senior living residences in rural and suburban areas of the U.S.. Country Place LP residences are welcoming, well-designed, and focus on the specific needs of older adults. Country Place LP stresses individual care and comfort, and facilities are staffed to provide whatever level of assistance is necessary for their residents. Residences are constructed to exacting standards for quality, and their modern and elegant interiors are designed to help seniors feel independent, secure, and dignified.

Country Place LP offers assisted living and group home residences where seniors truly feel at home. Country Place LP specializes in small group residences consisting of either 18 apartments (Country Place Senior Living) or 8 bedrooms (Country Place Home Plus Country Place Senior Living is designed for active seniors, while Country Place Home Plus is created especially for those seniors who may need additional specialized care. All of their facilities promote social interaction and a more intimate environment, while at the same time preserving the privacy and dignity of seniors.

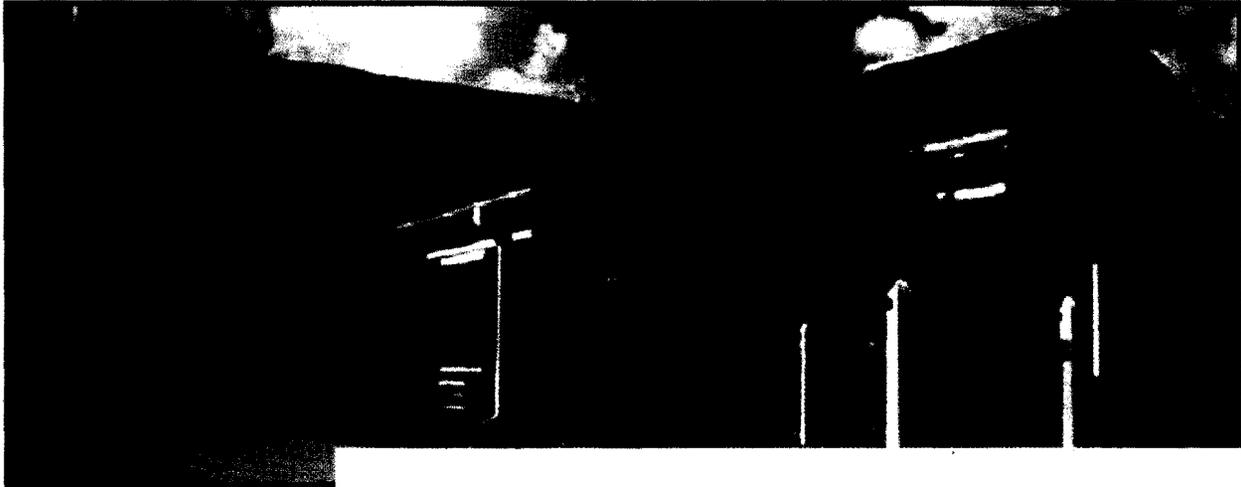
Country Place LP provides each franchisee with a comprehensive training program to get their Country Place LP residence off to a successful start. In order to ensure residence continuity to thrive, in-depth and proven operational, marketing and standards training is provided for the franchisee, the director and the nurse. Their onsite training also provides numerous ongoing educational opportunities.

### [Visit Country Place Living](#)

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# CP HOMES LP

HOME ABOUT US OUR STRATEGY EB-5 INVESTMENT COUNTRY PLACE LIVING CONTACT US LINKS



Country Place Living

## List of Country Place Homes Developed by Jack West

Country Place Living

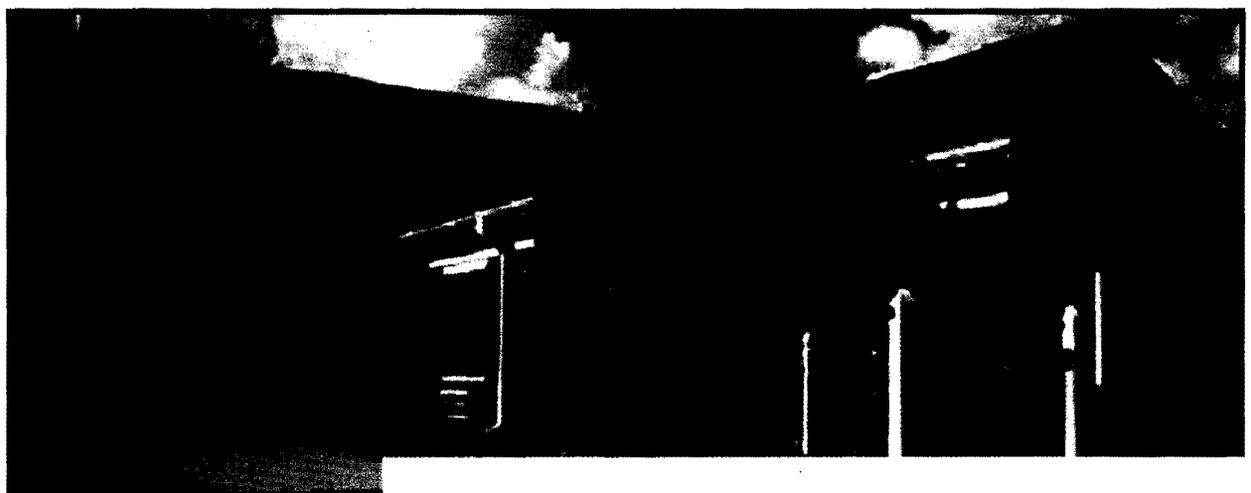
▶ List of Country Place Homes

Network of operation

<u>Residence Name</u>	<u>Location</u>	<u>Number of Units</u>	<u>Opened</u>
George Town Village	Wichita, KS	200	Summer, 1983
Parkwood Village	Pratt, KS	43	Fall, 1990
Woodland Terrace	Liberal, KS	44	Summer, 1992
The Homestead Assisted Living	Garden City, KS	35	October, 1995
The Homestead Assisted Living	Wichita, KS	35	May, 1996
The Homestead Assisted Living	Manhattan, KS	35	March, 1997
The Homestead Assisted Living	Leavenworth, KS	35	May, 1997
The Homestead Assisted Living	Hutchinson, KS	35	July, 1997
The Homestead Assisted Living	Hastings, NE	35	December, 1997
The Homestead Assisted Living	Kearney, NE	35	December, 1997
The Homestead Assisted Living	Mason City, IA	35	May, 1999
The Homestead Assisted Living	Great Bend, KS	35	August, 1999
The Homestead Assisted Living	Norfolk, NE	35	September, 1999
Country Place Senior Living Assisted Living Residence	Hosington, KS	18	February, 2003
Country Place Senior Living Home Plus Residence	Ellinwood, KS	8	May, 2004
Country Place Senior Living Home Plus Residence	Larned, KS	8	March, 2005
Country Place Senior Living Assisted Living Residence	Clay Center, KS	18	June, 2006
Country Place Senior Living Assisted Living Residence	Belleville, KS	18	October, 2006
Country Place Senior Living Assisted Living Residence	Seneca, KS	18	May, 2007
Country Place Senior Living Assisted Living Residence	Marysville, KS	18	Under construction
Country Place Senior Living Home Plus Residence	Hosington, KS	8	Under construction

# CP HOMES LP

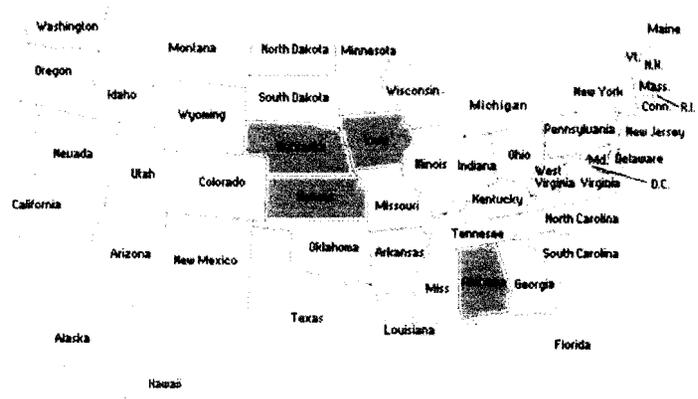
- HOME
- ABOUT US
- OUR STRATEGY
- EB-5 INVESTMENT
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- CONTACT US
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Country Place Living

## Network of operation of 20 Country Place LP for Seniors in USA

- Country Place Living
- List of Country Place Homes
- ▶ Network of operation



BRANDON MEYER  
(858) 205-3542  
THE UPS STORE #0002  
249 S HWY 101  
SOLANA BEACH CA 92075-1807

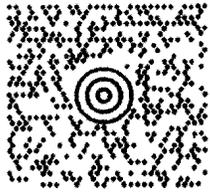
2.6 LBS PAK 1 OF 1  
SHP WT: 3 LBS  
DATE: 06 OCT 2010

the following serv

SHIP CALIFORNIA SERVICE CENTER - I-526  
TO: USCIS  
24000 AVILA RD

LAGUNA NIGUEL CA 92677-3401

use this Express Pal



CA 926 9-02



UPS NEXT DAY AIR

TRACKING #: 1Z 9X2 682 01 3109 1214

1



BILLING: P/P

AM OCT 07 2010

STAMP #84

ISH 13 00 E2844 06.5A 07/2010



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## USCIS Immigrant Investor Program

---

**From:** Boyd Campbell [usvisa2000@gmail.com]  
**Sent:** Thursday, January 12, 2012 8:29 PM  
**To:** USCIS Immigrant Investor Program  
**Subject:** Advisory Agreement

WAC-11-903-07582  
WAC-11-902-26934  
RCW-10-319-10261

Do you have an Advisory Agreement signed by me as general counsel of America's Center for Foreign Investment in the files of the case numbers listed above?

Boyd Campbell  
General Counsel

America's Center for Foreign Investment, LLC  
RSA Union, 100 North Union St., Suite 682  
P O Box 5079  
Montgomery Alabama 36103-5079  
Tel +334.954.3111  
Direct +334.832.9090  
<http://www.acfi-usa.com>

## USCIS Immigrant Investor Program

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P O Box 5079  
Montgomery Alabama 36103-5079  
Tel +334.954.3111  
Direct +334.832.9090  
<http://www.acfi-usa.com>

**OFFICIAL  
COPY**

JUN 11 2007

U.S. Department of Homeland Security  
20 Massachusetts Avenue, NW  
Washington, DC 20529



U.S. Citizenship  
and Immigration  
Services

HOOPRD 70/6.2.8

Mr. Ron Drinkard  
Director  
Alabama Center for Foreign Investment, L.L.C.  
100 North Union Street, Suite 682  
Montgomery, AL 36104

Mr. Boyd Campbell  
General Counsel  
Alabama Center for Foreign Investment, L.L.C.  
100 North Union Street, Suite 682  
Montgomery, AL 36104

Re: Alabama Center for Foreign Investment Regional Center

**DECISION:**

Pursuant to Section 610 of the Appropriations Act of 1993, the Alabama Center for Foreign Investment (ACFI) application for designation by U.S. Citizenship and Immigration Services (USCIS) as a Regional Center to participate in the Immigrant Investor Pilot Program is approved. This approval and designation is for the ACFI Regional Center (ACFI-RC) whose contiguous geographic area encompasses the State of Alabama.

**FOCUS OF INVESTMENT ACTIVITY AND CAPITAL INVESTMENT THRESHOLD:**

The new commercial enterprise investment focus of the ACFI-RC will concentrate within its geographic area on the following five (5) targeted clusters of economic activity:

1. Heavy and light manufacturing; agriculture;
2. High technology; construction;
3. Hospitality, resort and service industries (hotels, restaurants, resorts, golf courses, entertainment, and the like);
4. Schools, health care facilities, and infrastructure; and
5. Cruise line support services.

As such, aliens seeking immigrant visas through the Immigrant Investor Pilot Program may file individual petitions with USCIS for investments into the financing and development of projects and commercial enterprises in the above cited five (5) target clusters of economic activity within the approved ACFI-RC's geographic area.

The statewide geographic focus of the ACFI-RC is comprised of both small urban and rural areas, as well as those census tracts within the following larger urban and metropolitan areas with a population in excess of 20,000 which have been designated as a Targeted Employment Area (TEA) by the Alabama Department of Economic and Community Affairs as defined in 8 CFR 204.6(e).

- Birmingham (Population: 231,483)
- Montgomery (Population: 200,127)
- Mobile (Population: 191,544)
- Huntsville (Population: 166,313)
- Tuscaloosa (Population: 81,358)
- Hoover (Population: 67,469)
- Dothan (Population: 62,713)
- Decatur (Population: 54,909)
- Auburn (Population: 49,928)
- Gadsden (Population: 37,405)
- Florence (Population: 36,480)
- Madison (Population: 35,893)
- Vestavia Hills (Population: 31,022)
- Prattville (Population: 30,043)
- Phenix City (Population: 29,460)
- Bessemer (Population: 28,641)
- Prichard (Population: 27,963)
- Alabaster (Population: 27,517)
- Homewood (Population: 23,963)
- Opelika (Population: 23,804)
- Anniston (Population: 23,741)
- Enterprise (Population: 22,892)
- Northport (Population: 21,216)
- Mountain Brook (Population: 20,821)

Therefore, the minimum capital contribution threshold for any individual immigrant investment through the ACFI-RC into a new commercial enterprise located in a designated Rural Area or TEA within the ACFI-RC geographic area shall be not less than \$500,000. Investments made into enterprises whose principal location and place of business is in a non-TEA within one of

the above cited large urban or metropolitan areas shall be not less than one-million dollars (\$1,000,000).

**EMPLOYMENT CREATION AND/OR PRESERVATION:**

Alien entrepreneurs who file petitions for commercial enterprises located in the ACFI-RC area must fulfill all of the requirements set forth in 8 CFR 204.6, except that the petition need not show that the new commercial enterprises created ten new jobs indirectly as a result of the alien entrepreneur's investment. This determination has been established by way of USCIS' acceptance of the final economic analysis which is contained as part of the approved ACFI-RC proposal and its indirect job creation model and multipliers contained within the final approved ACFI-RC application package.

However, where job creation is claimed based on a multiplier rooted in underlying new "direct jobs" (or preservation of existing direct jobs in a troubled business) in support of an immigrant investor's individual I-526 petition affiliated with the ACFI-RC, then:

- To be credited for preserving/maintaining pre-existing direct jobs for "qualified employees" within the ACFI-RC for a "troubled business" as defined at 8 CFR 204.6(e), the individual I-526 petition must be supported by probative evidence of the number of full time (35 hours per week) qualified employees whose positions shall be preserved/maintained throughout the alien's period of conditional residency. Such evidence should include copies of quarterly state employment tax reports, Forms W-2, Forms I-9, and any other pertinent employment records sufficient to demonstrate the number of "direct" qualifying pre-existing full time jobs in the specified troubled business have been preserved/maintained, and any other pertinent employment records sufficient to demonstrate the number of employees before the investment.
- To be credited with projected creation of new "direct" jobs for "qualifying employees" upon filing the I-526 petition, then the petition must be supported by a comprehensive detailed business plan and supporting financial, marketing and related data and analysis providing a reasonable basis for projecting creation of the new direct jobs.
- For purposes of an alien investor's filing of a subsequent I-829 petition to remove the conditions wherein the investment through the ACFI-RC in an enterprise for which the initial I-526 petition approval involved the creation of new direct jobs or the creation of new indirect jobs based on a multiplier tied to underlying new direct jobs, then to support the full number of direct and indirect new jobs being claimed at that point, an alien's subsequent I-829 petition will need to be supported by probative evidence of the number of new direct full time (35 hours per week) qualified employees whose positions have been created as a result of the alien's investment. Such evidence would include copies of quarterly state employment tax reports,

Forms W-2, Forms I-9, and any other pertinent employment records sufficient to demonstrate the number of qualified employees whose jobs were created directly.

**INDIVIDUAL EB-5 INVESTOR AFFILIATION WITH THE REGIONAL CENTER:**

Each individual petition, in order to demonstrate that it is associated with the ACFI-RC, in conjunction with addressing all the requirements for an individual alien entrepreneur petition, shall also contain as supporting evidence relating to this regional center designation, the following:

1. A copy of this letter of approval and designation.
2. A copy of the approved regional center narrative proposal and business plan, and any applicable approved amendments.
3. A copy of the job creation methodology required in 8 CFR 204.6(j)(4)(iii), as contained in the initial and/or applicable amended regional center economic analysis which has been approved by USCIS in its final version, which reflects that investment by an individual alien investor of at least \$500,000 into a commercial enterprise in a targeted economic cluster (or \$1,000,000 into an enterprise located in a Non-Rural or Targeted Employment Area) within the geographic area of the ACFI-RC will preserve and/or create full-time employment positions, either directly or indirectly, for not fewer than ten qualified employees.
4. A copy of the Advisory Agreement the ACFI-RC the Alabama Partnership created to finance a new commercial enterprise through the ACFI-RC that is legally binding.
5. A copy of the actual confidential information memorandum.
6. A copy of the actual offering memorandum provided to the alien investor.
7. A copy of the subscription agreement for a limited partnership unit which is legally binding on the petitioner and constitutes the agreement between the limited partnership and the alien investor.
8. A copy of the escrow agreement and instructions which is legally binding on the petitioner and the ACFI-RC.

The approval and designation by USCIS of the ACFI-RC does not reflect any determination on the merits of individual petitions filed by alien entrepreneurs under the Immigrant Investor Pilot Program. All petitions for alien entrepreneurs who invest within the regional center will be adjudicated by the USCIS on a case-by-case basis and each petition must be fully documented. The individual petitions must be submitted to the USCIS Texas Service Center.

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

The regulations at 8 CFR 204.6(m)(6) require that an approved regional center in order to maintain the validity of its approval and designation must continue to meet the statutory requirements of the Immigrant Investor Pilot Program by serving the purpose of promoting economic growth, including increased export sales, improved regional productivity, job creation, and increased domestic capital investment. Therefore, in order for USCIS to determine whether your regional center is in compliance with the above cited regulation, and in order to continue to operate as a USCIS approved and designated regional center, your administration, oversight, and management of your regional center shall be such as to monitor all investment activities under the sponsorship of your regional center and to maintain records, data and information on a quarterly basis in order to report to USCIS upon request year to date for each Federal Fiscal Year<sup>1</sup>, commencing with the current year as follows:

1. The principal official and point of contact of the ACFI-RC responsible for the normal operation, management and administration of the regional center.
2. How the ACFI-RC is administering its regional center and is actively engaged in supporting a due diligence screening of its alien investors' lawful source of capital and the alien investor's ability to fully invest the requisite amount of capital.
3. How the ACFI-RC is actively engaged in the evaluation, oversight and follow up on any proposed commercial activities that will be utilized by alien investors in order to create direct and/or indirect jobs through qualifying EB-5 capital investments into commercial enterprises within the State of Alabama.
4. The name, date of birth, and alien registration number of each alien investor who makes an investment and files an EB-5/I-526 Petition with USCIS, specifying whether the petition was approved, denied, or withdrawn by the petitioner.
5. The country of nationality of each alien investor who makes an investment and files an EB-5/I-526 petition with USCIS.
6. The city and state of residence of each alien investor who makes an investment and files an EB-5/I-526 petition with USCIS.
7. The categories of business activity within the geographic boundaries of your regional center that have received the alien investors capital, and in what amount
8. The names and locations of the each job creating commercial enterprise located within the geographic boundaries of your regional center that has received alien investor capital.
9. The amounts of alien investor capital and the amounts of other domestic capital that has been invested together in each job creating commercial enterprise specified in item 8 above, distinguishing the separate totals for each.<sup>2</sup>

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

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

10. The total aggregate number of approved EB-5 alien investor I-526 petitions per Federal Fiscal Year to date made through your regional center.
11. The total aggregate number of approved EB-5 alien investor I-829 petitions per Federal Fiscal Year to date through your regional center.
12. The total aggregate of EB-5 alien capital invested through your regional center for each Federal Fiscal Year to date since your approval and designation.
13. The combined total aggregate of "new" direct and/or indirect jobs created by EB-5 investors through your regional center for each Federal Fiscal Year to date since your approval and designation.
14. If applicable, the total aggregate of "preserved" jobs by EB-5 alien investors into troubled businesses through your regional center for each Federal Fiscal Year to date since your approval and designation.
15. If for any given Federal Fiscal Year your regional center does not have investors to report, then provide an explanation for the inactivity along with a specific plan which details timelines and steps to actively promote your regional center program, and recruit legitimate and viable alien investors.
16. Notification to USCIS within 30 days of the occurrence any material change in the structure, operation, administration, focus, or activities relating to your regional center's basis for it's most recent designation and/or reaffirmation by USCIS.
17. The total aggregate of EB-5 alien capital invested through your regional center for each Federal Fiscal Year.

If you have any questions concerning the ACFI Regional Center approval and designation under the Immigrant Investor Pilot Program, please contact the USCIS Foreign Trader, Investor and Regional Center Program at (202)272-8410.

Sincerely,

*for JMB*  
John M. Allen  
Acting Chief

Service Center Operations

cc: Official File  
MRBEREZ 6/11/07

*MRBEREZ*  
*6-11-07*



## Decision Processing Worksheet

Officer Name: George Eberling		Receipt #: W09002670		
Officer Stamp #: 3700		America's Center for Foreign Investment RC		
Form Type: I-924C	Classification:	Division: 3	Team: 1	WS: 24064
<b>Action:</b>				
<input checked="" type="checkbox"/> Approval <input type="checkbox"/> No Record <input type="checkbox"/> Pending Name Check <input type="checkbox"/> Abandonment <input type="checkbox"/> Withdrawal	<input type="checkbox"/> MTR <input type="checkbox"/> Appeal	<input type="checkbox"/> RFE Initial <input type="checkbox"/> RFE Additional <input type="checkbox"/> RFE Initial & Additional <input type="checkbox"/> 30 <input type="checkbox"/> 42 <input type="checkbox"/> 84	<input type="checkbox"/> Revocation <input type="checkbox"/> Auto-terminate <input type="checkbox"/> Auto-revocation <input type="checkbox"/> Relocate	<input type="checkbox"/> Denial <input type="checkbox"/> ITD <input type="checkbox"/> ITR
<b>I-924 Expedite Processing:</b>				
Date Received:		# of Un-Named Beneficiaries:		# of Named Beneficiaries:
Officer Received Date:		AST Action Completed:		

### I-924 Processing

<b>Officer Prepares or Completes</b> (Notice Ordered) RFE    ITD/30    ITR/30 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> (1 <sup>st</sup> Initial & Last Name) (Date & Time)	<b>Clerical/Officer Completes RFE/ITD/ITR</b> (Notice Sent) _____ (1 <sup>st</sup> Initial & Last Name) (Date & Time)	<b>RFE/ITD/ITR Response Received</b> _____ (1 <sup>st</sup> Initial & Last Name) (Date & Time)	<b>Officer Completes Final Decision</b> (Notice Ordered – Approval/Denial) <div style="text-align: center;"> <i>G. EBERLING</i>            (1<sup>st</sup> Initial &amp; Last Name)  <i>4 JAN 2011</i>            (Date &amp; Time)         </div>	<b>Clerical/Officer Completes Final Action</b> (Notice Sent). <div style="text-align: center;"> <i>ST.</i>            (1<sup>st</sup> Initial &amp; Last Name)  <i>JAN 20 2011</i>            (Date &amp; Time)         </div>
Mailer Enclosed? <b>Y</b> <b>N</b> SCAO Review: _____    Final Decision: _____				

Officer's Comment: Recommended Approval	<i>AMENDMENT</i>
--	------------------

Supervisor Review and Comments: <i>OK</i>		
Initials/Date: <i>Yusuf Basch 1/19/11</i>	2 <sup>nd</sup> Review Initials/Date:	3 <sup>rd</sup> Review Initials/Date:

Clerical Processing Completed: Initials/Date:
---

### File Room Processing

<b>To: 103 Hold Shelf</b> <b>Call-Up Date: _____</b>
---

## Decision Processing Worksheet

Officer Name: George Eberling		Receipt #: W09002670 (Amendment) America's Center for Foreign Investment RC		
Officer Stamp #: 3700				
Form Type: I-924C	Classification:	Division: 3	Team: 1	WS: 24064
<b>Action:</b>				
<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
<b>I-924 Expedite Processing:</b>				
Date Received:		# of Un-Named Beneficiaries:		# of Named Beneficiaries:
Officer Received Date:			AST Action Completed:	

### I-924 PP Processing

<b>Officer Prepares or Completes</b> (Notice Ordered) RFE <input checked="" type="checkbox"/> ITD/30 <input type="checkbox"/> ITR/30 <input type="checkbox"/> <i>G. EBERLING</i> (1 <sup>st</sup> Initial & Last Name) OCT 13 2010 (Date & Time)	<b>Clerical/Officer Completes RFE/ITD/ITR</b> (Notice Sent)  (1 <sup>st</sup> Initial & Last Name) (Date & Time)	<b>RFE/ITD/ITR Response Received</b>  (1 <sup>st</sup> Initial & Last Name) (Date & Time)	<b>Officer Completes Final Decision</b> (Notice Ordered – Approval/Denial)  (1 <sup>st</sup> Initial & Last Name) (Date & Time)	<b>Clerical/Officer Completes Final Action</b> (Notice Sent)  (1 <sup>st</sup> Initial & Last Name) (Date & Time)
Mailer Enclosed?    Y    N		SCAO Review:		Final Decision:

Officer's Comment: *AMENDMENT*  
Regular RFE.

Supervisor Review and Comments:

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

Clerical Processing Completed: Initials/Date:

### File Room Processing

<b>To: 103 Hold Shelf</b> <b>Call-Up Date:</b> <u>MARCH 8, 2011</u>
--

AMENDMENT

7 OCT 2015

### I-924 Regional Center Proposal

Receipt Number: W09002670 Attorney: BRANDON MEYER, ESQ

Regional Center: ACFI  G-28

General Partner: CP NOMES (AL) LLC Requester's Name: BRANDON MEYER

IS26 EXEMPLAR FILING FOR CP1 (AL) INC.

Economic Unit-Organizational Documents for Regional Center \_\_\_\_\_

Target  Non-Target  Both

Geographic Area Delineated: → SEE AMENDMENT

Economic Growth Analysis → SEE ORIG. PROPOSAL

Regional or National Impact- Economic Analysis → SEE ORIG PROPOSAL

Indirect Job Creation:  
 Troubled Business  Non-Troubled Business

Econometric Model: IMPLAN

Economic Analysis of Job Creation: \_\_\_\_\_

Business Plan:

Hypothetical Investment Plan  Investment Plan ACTUAL

Industries: HEALTH CARE

Activities: LOANS FOR CONSTRUCTION & OPERATION

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:

CONFIDENTIAL  
PRIVATE PLACEMENT MEMORANDUM

Assisted Living Facility



(b) (4)







<b>RECEIPT NUMBER</b> W09002670		<b>CASE TYPE</b> Regional Center Proposal	
<b>RECEIPT DATE</b> October 07, 2010		<b>REGIONAL CENTER NAME</b> America's Center for Foreign Investment LLC (Amendment)	
<b>PAGE</b> 1 of 1			
Brandon Meyer, Attorney at Law 5440 Morehouse Drive Suite 4400 San Diego, CA 92121		<b>Notice Type:</b>  <b>Receipt Notice</b>	
<p><b>Receipt Notice</b> - This notice confirms that USCIS received your Regional Center Proposal. If any of the above information is incorrect, send an e-mail to: <a href="mailto:USCIS.ImmigrantInvestorProgram@dhs.gov">USCIS.ImmigrantInvestorProgram@dhs.gov</a>. This notice does not grant any immigration status or benefit. It is not even evidence that this case is still pending. It only shows that the application or petition was filed on the date shown.</p> <p><b>Processing Time</b> - The current processing time for this case is estimated at 120 days. Unlike other case types, verification or tracking of this case is not available electronically or on our website. We will notify you by mail when we make a decision on this case or if we need something from you. If you do not receive an initial decision or update from us within our current processing time, you may send an e-mail to: <a href="mailto:USCIS.ImmigrantInvestorProgram@dhs.gov">USCIS.ImmigrantInvestorProgram@dhs.gov</a>. or contact us at the address below.</p> <p><b>Address Change</b> - If your mailing address changes while your case is pending, you may send an e-mail to: <a href="mailto:USCIS.ImmigrantInvestorProgram@dhs.gov">USCIS.ImmigrantInvestorProgram@dhs.gov</a>. Otherwise, you might not receive notice of our action on this case.</p> <p>Please save this notice and a copy of any papers that you send to us along with proof of delivery.</p>			
U.S. CITIZENSHIP & IMMIGRATION SVC CALIFORNIA SERVICE CENTER Attn: EB-5 RC Proposal P.O. BOX 10526 LAGUNA NIGUEL CA 92607-10526			

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

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### ***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*.