



U.S. Citizenship  
and Immigration  
Services

**COPY**

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RE: Global Investment Consulting, Inc.  
3600 Wilshire Blvd., Suite 1416  
Los Angeles, CA 90010

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

Applicant(s): Michael Y. An

Re: Initial Regional Center Designation  
Global Investment Consulting, Inc.  
RCW 11 098 50194 / ID 1109850194

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigration Investor Pilot Program that was filed by Global Investment Consulting, Inc. (the "applicant") with the U.S. Citizenship and Immigration Services ("USCIS") on April 08, 2011. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

**I. Executive Summary of Adjudication**

1. Effective the date of this notice, USCIS approves the Form I-924 request to designate Global Investment Consulting, Inc. as a qualifying participant in the Immigrant Investor Program.

**II. Regional Center Designation**

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

**A. Geographic Area**

State	Cities
Indiana	City of Marion

Note: An amendment request is required if investment opportunities arise outside approved geographic area.

Y9100

**B. Industry Categories**

NAICS	Industry Name
23622	Commercial and Industrial Building Construction
72111	Hotels (except Casino Hotels) and Motels
722	Food Service and Drinking Places
71394	Fitness and Recreational Sports Centers
81231	Coin-Operated Laundries and Dry Cleaners
53111	Lessors of Residential Buildings and Dwellings
53112	Lessors of Nonresidential Buildings (except mini-warehouses)

Note: An amendment request is required if investment opportunities arise outside approved industry categories.

**III. Job Creation**

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal. The job creation methodology presented in the economic impact analysis and underlying business plans are found to be reasonable based on the following inputs, when applying the IMPLAN economic model:

Hypothetical Business Plan for Hotel, Restaurant and Day Spa

NAICS	Critical Assumptions Used	Result/Model Input
7211	Applicant estimate	(b)(4)
7139		
7222		
5612		
23622	Applicant / construction manager estimate	

NAICS	Activity	Input	Implied Multiplier	Total Jobs
7211/411	Hotel Operations	(b)(4)		
7139/419	Spa Operations			
7222/413	Restaurant Operations			
5612/385	Building Management			
23622/**	Construction			

\*Indirect and induced jobs only

\*\*The applicant does not provide the construction-related IMPLAN sector

Hypothetical Business Plan for Commercial and Residential Building

NAICS	Critical Assumption Used	Result/Model Input
531	Applicant estimate	(b)(4)
23622	Applicant / construction manager estimate	

(b)(4)

NAICS	Activity	Input	Multiplier	Total Jobs
531/360	Rental Income	[REDACTED]		
23622/**	Construction			

\*Indirect and induced jobs only

\*\*The applicant does not provide the construction-related IMPLAN sector

Hypothetical Business Plan for Dry Cleaning Plant

NAICS	Critical Assumption Used	Result/Model Input
8123	Applicant estimate	[REDACTED]
23622	Construction manager estimate	

NAICS	Activity	Input	Multiplier	Total Jobs
8123/421	Dry Cleaning Operations	[REDACTED]		
23622/**	Construction			

\*Indirect and induced jobs only

\*\*The applicant does not provide the construction-related IMPLAN sector

The approval of this Form I-924 application is based upon the economically and statistically valid assumptions and estimates provided in the business plans for job creation. Please refer to the input and multiplier analysis tables above.

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

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

#### **V. Guidelines for Filing Form I-526 Petitions**

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

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

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

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

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

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

The regional center designation is non-transferable, as any changes in management of the regional center will require the approval of an amendment to the approved regional center designation.

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

Sincerely,



Donna P. Campagnolo  
Acting Director  
California Service Center