



U.S. Citizenship
and Immigration
Services

Date: JUL 25 2013

Robert J. Ellis
Gulf Coast Renewables & Redevelopment, LLC
One Shell Square, 701 Poydras Street, Suite 4100
New Orleans, LA 70139

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

Applicant: Robert J. Ellis

Re: Initial Regional Center Designation
Gulf Coast Renewables & Redevelopment, LLC
RCW1120750248 / ID1120750248

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on July 26, 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).

In addition to the Form I-924, the applicant submitted a completed exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, seeking USCIS review and approval of an actual project supported by a comprehensive business plan as contemplated in Matter of Ho, 22 I. & N. Dec. 206 (Assoc. Comm'r 1998).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate Gulf Coast Renewables & Redevelopment, LLC as a qualifying participant in the Immigrant Investor Program.

1. Effective the date of this notice, USCIS approves the Gulf Coast Renewables & Redevelopment Investment Project One, LLC project based on the evidence submitted with the exemplar Form I-526.

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II. Regional Center Designation¹

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	Region	Sub-region
Louisiana	Baton Rouge, Covington, Harahan, Houma, Lafayette, Lake Charles, New Orleans	<u>Parishes</u> East Baton Rouge, East Feliciana, Iberville, Pointe Coupee, West Baton Rouge, West Feliciana, Livingston, St. Helena, St. John, St. Tammany, Tangipahoa, Washington, Jefferson, Plaquemines, St. Bernard, Ascension, Assumption, Iberia, Lafourche, St. Charles, St. James, St. Martin, St. Mary, Terrebonne, Acadia, Evangeline, Lafayette, St. Landry, Vermilion, Allen, Beauregard, Calcasieu, Cameron, Jefferson Davis, Orleans
Mississippi	Central Mississippi, East Central Mississippi, Pearl River County, Southern Mississippi, Southwest Mississippi	<u>Counties</u> Copiah, Hinds, Madison, Rankin, Simpson, Warren, Yazoo, Clarke, Jasper, Kemper, Lauderdale, Leake, Neshoba, Newton, Scott, Smith,

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

		Pearl River, Covington, Forrest, George, Greene, Hancock, Harrison, Jackson, Jefferson Davis, Jones, Lamar, Marion, Perry, Stone, Wayne, Adams, Amite, Claiborne, Franklin, Jefferson, Lawrence, Lincoln, Pike, Walthall, Wilkinson
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B. Industry Categories

NAICS	Industry Name
23621	Industrial Building Construction
23713	Power and Communication Line and Related Structures Construction
2383	Building Finishing Contractors
4238	Machinery, Equipment, and Supplies Merchant Wholesalers
4234	Professional and Commercial Equipment and Supplies Merchant Wholesalers
334413	Semiconductor and Related Device Manufacturing

III. The Project

Effective the date of this notice, USCIS approves the applicant's request to include the following actual capital investment project supported by an exemplar Form I-526.

Project	Type of Project	Organization Documents	Date of Document
Gulf Coast Renewables & Redevelopment Investment Project One, LLC Geographic Location: Pearl River County, MS Focus of Investment: Loan	Exemplar Form I-526 Petition Project	Business Plan	Submitted 09/12/2012 and updated through 06/04/2013
		Economic Analysis	Submitted 09/01/2012 and updated through 06/03/2013
		Operating Agreement	Submitted 05/10/2012
		Confidential Private Placement Memorandum	Submitted 05/10/2012
		Subscription Agreement	Submitted 05/10/2012
		Escrow Agreement	Submitted 07/26/2011

Note: If changes to this project and its supporting documents are found in subsequent Form I-526 or Form I-829 petitions, USCIS will review the supporting documents once more to ensure compliance with EB-5 program requirements.

The proposal identifies the new commercial enterprise ("NCE") of the project as Gulf Coast Renewables & Redevelopment Investment Project One, LLC, which was formed in the State of Louisiana on July 6, 2011. The project will be located at East Frontage Road & Larkin Smith Drive, Poplarville, MS 39470 or 1203 MLK Boulevard, Picayune, MS 39466, both located in Pearl River County, Mississippi. (b)(4) immigrant investors will subscribe to the NCE as members in exchange for capital contributions of \$500,000 each and an aggregate of (b)(4)

The NCE will loan the (b)(4) of EB-5 capital to a third-party entity, Lifeline Energy Louisiana, LLC. The EB-5 capital loan proceeds will be used to finance the construction and operation of a solar panel manufacturing plant in Pearl River County, Mississippi. The development involves the renovation of an existing building into a solar panel manufacturing plant. The projected total cost of the project is (b)(4) in year 1 and (b)(4) in year 2. The construction of the project will take less than two (b)(4) (2) years to complete and will generate approximately (b)(4) jobs. (b)(4)

A. 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 capital investment project. The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the REDYN economic model:

Activity	NAICS	Input (\$Millions Expenditure)	
		Year 1	Year 2
Construction			
Industrial Building Construction	23621	(b)(4)	(b)(4)
Power Communication Line and Related Structures Construction	2373		
Building Finishing Contractors	2383		
Machinery, Equipment, and Supplies Merchant Wholesalers	4238		
Professional and Commercial Equipment Merchant Wholesalers	4234		
Yearly Total			
Grand Total			

Scope	Implied Multiplier	Jobs
Regional Center	(b)(4)	(b)(4)

(b)(4)

The approval of this Form I-924 application supported by an exemplar Form I-526 petition is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

When an actual project is specifically named in this notice and the critical inputs remain materially unchanged, USCIS will give deference to the job creation methodology when adjudicating Forms I-526 associated with the named project. The same business plan and the same reasonable job creation methodology and projected inputs must be submitted when the individual investor's Form I-526 is filed in order to receive deference.

It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time).

If the job creation estimated in the business plan 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.

IV. Guidelines for Filing Form I-526 Petitions Based on Gulf Coast Renewables and Redevelopment Project One, LLC

Each individual petition, in order to demonstrate that it is affiliated with the Gulf Coast Renewables & Redevelopment, LLC, 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. The documents may be the same documents noted in Section III of this approval notice.

Note: If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

V. 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.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th 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 29th 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.

Sincerely,



Daniel M. Renaud
Acting Chief, Immigrant Investor Program

cc: Robert Divine, Esq.