



U.S. Citizenship
and Immigration
Services

COPY

June 23, 2009

Ronald Darling
Chief Executive Officer
C/O American Redevelopment Solutions, LLC
5 Hutton Centre, Suite 1050
Santa Ana, California 92707

File No. W09000140

Application: Request for Designation as a Regional Center
Applicant(s): Ronald Darling

Re: American Redevelopment Regional Center

Pursuant to Section 610 of the Appropriations Act of 1993, on January 5, 2009, Ronald Darling submitted a proposal seeking approval and designation by U.S. Citizenship and Immigration Services (USCIS) of the American Redevelopment Regional Center.

Based on its review and analysis of your proposal, and of your response to the USCIS Request For Evidence, USCIS hereby designates American Redevelopment Regional Center as a Regional Center within the Immigrant Investor Pilot Program and approves the request as described below:

GEOGRAPHIC AREA:

The American Redevelopment Regional Center shall have a geographic scope which includes the counties of San Bernardino, Riverside and Los Angeles.

FOCUS OF INVESTMENT ACTIVITY:

As depicted in the economic model, the general proposal and the economic analysis, the Regional Center will engage in the following economic activities: development and management of commercial properties and retail space projects within the Regional Center's boundaries.

The Regional Center for EB-5 Immigrant purposes shall focus investments into new commercial enterprises in the following 4 target industry economic clusters:

1. Professional Office Facilities

2. Medical Office Facilities
3. Retail/Trade
4. Food 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 California 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.

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:

- A comprehensive detailed business plan with 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. Offering Memorandum;
 - b. Subscription Agreement;
 - c. Limited Partnership Agreement and
 - d. Escrow Agreement.

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

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

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

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

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

American Redevelopment Regional Center
Page 6

- 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.

Sincerely,

A handwritten signature in black ink that reads "Christina Poulos". The signature is written in a cursive, slightly slanted style.

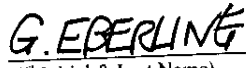
Christina Poulos
Director
California Service Center

cc: Linda W. Lau, Esq.

Decision Processing Worksheet

Officer Name: George Eberling		Receipt #: W09000140	
Officer Stamp #: 3700		American Redevelopment Regional Center	
Form Type: I-924C	Classification:	Division: 3	Team: 1
WS: 24064			
Action:			
<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			
I-129 H2A Expedite Processing:			
Date Received:	# of Un-Named Beneficiaries:	# of Named Beneficiaries:	
Officer Received Date:	AST Action Completed:		

I-129 PP Processing **H-1B CAP** **Master CAP**

Officer Prepares or Completes (Notice Ordered) RFE ITD/30 ITR/30 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> (1 st Initial & Last Name) (Date & Time)	Clerical/Officer Completes RFE/ITD/ITR (Notice Sent) _____ (1 st Initial & Last Name) _____ (Date & Time)	RFE/ITD/ITR Response Received _____ (1 st Initial & Last Name) _____ (Date & Time)	Officer Completes Final Decision (Notice Ordered - Approval/Denial) <div style="text-align: center;">  (1st Initial & Last Name) JUN 1 8 2009 (Date & Time) </div>	Clerical/Officer Completes Final Action (Notice Sent) _____ (1 st Initial & Last Name) _____ (Date & Time)
Mailer Enclosed? Y N	SCAO Review:		Final Decision:	

Officer's Comment:
Recommended Approval

Supervisor Review and Comments:

Initials/Date:	2 nd Review Initials/Date:	3 rd Review Initials/Date:
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Clerical Processing Completed: Initials/Date:

File Room Processing

To: 103 Hold Shelf

Call-Up Date: _____

I-924C

Receipt Number: W 09-000-140

Regional Center: AR REGIONAL CENTER
AMERICAN

General Partner: REDEVELOPMENT SOLUTIONS LLC Requester's Name: LINDA LAU, ESQ.

Target Non-Target Target & Non-Target

Geographic Area Delineated SAN BERNARDINO, RIVERSIDE & LA (SOUTHERN CALIFORNIA)

Indirect Job Creation Troubled Business Non-Troubled Business

Model: RIMS II
 Economic Analysis of Job Creation 363 Direct Jobs / 323 Indirect Jobs
 Industries: MEDICAL OFFICE BLDGS
RETAIL / RENTAL

686 Jobs Total:

Operational Plan
 Amount and Source of Regional Center's Capital
 Recruitment and Due Diligence
 Promotional Efforts

Regional or National Impact-Economic Analysis

Overall Economic Impact-Economic Analysis

Business Approach & Structure

Business Plan (Mandatory)
 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 Regional Center Operator
 Other relevant documents _____

Administrative Oversight

Decision Processing Worksheet

Officer Name: George Eberling		Receipt #: W09000145	
Officer Stamp #: 3700		American Redevelopment Regional Center	
Form Type: I-924C	Classification:	Division: 3	Team: 1
		WS: 24064	

Action:

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I-129 H2A Expedite Processing:

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

I-129 PP Processing H-1B CAP Master CAP

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

Officer's Comment:
Regular RFE.

Supervisor Review and Comments:

Initials/Date: <i>MAR 1 2009</i> <i>SR AD EBERLING</i>	2 nd Review Initials/Date:	3 rd Review Initials/Date:
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Clerical Processing Completed: Initials/Date:

File Room Processing

To: 103 Hold Shelf

Call-Up Date: JUN 13 2009

FedEx US Airbill Express
Tracking Number **8653 9895 7310**

RECIPIENT: PEEL HERE

1 **From:** This information has been removed for Recipient's records.
Date: 12/09/08 **FedEx Tracking Number:** 865398957310

Sender's Name: Elaine Soy **Phone:** 213 830-9933

Company: LAW, LINDA, LAW OFFICE OF
Address: 350 S FIGUEROA ST STE 760 **State:** CA **ZIP:** 90071-1303

2 **Your Internal Billing Reference:** CALDS ANGELES

3 **To:**
Recipient's Name: Mr. Robert Krutzka **Phone:** _____

Company: U.S. Citizenship & Immigration Services

Recipient's Address: 50 MASSACHUSETTS AVE NW, Rm 2123
We cannot deliver to PO boxes or DL ZIP codes.

Address: _____
To request a package be held at a specific FedEx location, print FedEx address here.

City: Washington **State:** DC **ZIP:** 20529



8653 9895 7310

0378515566

Recipients Copy

4a **Express Package Service**
 FedEx Priority Overnight
 FedEx Standard Overnight
 FedEx 2Day
 FedEx Express Saver

4b **Express Freight Service**
 FedEx 1Day Freight
 FedEx 2Day Freight
 FedEx 3Day Freight

5 **Packaging**
 FedEx Pak*
 Envelope
 Box
 Tube
 Other

6 **Special Handling**
 SATURDAY Delivery
 HOLD Saturday
 NO CONTACT
 NO SIGNATURE
 NO INSURANCE
 NO TRACKING
 NO DELIVERY
 NO RETURN
 NO RECEIPT
 NO CASH/CHECK
 NO CREDIT CARD
 NO OTHER

7 **Payment** **Bill to:** Sender Recipient Third Party Credit Card Cash/Check

8 **Residential Delivery Signature Options**
 No Signature Required
 Direct Signature
 Indirect Signature



FedEx Express US Airbill

8683 9997 2407

0200

FedEx Retrieval Copy

1 From **1/7/09** **45401860**

Date

Sender's Name **J. Whalen** Phone **2022728355**

Company **USCIS**

Address **20 Mass. Ave NW MS2060**

City **Washington** State **DC** ZIP **20529-2060**

2 Your Internal Billing Reference

3 To Recipient's Name **Blake Gato** Phone

Company **USCIS/CSC**

Recipient's Address **2400 Avila Rd and Fl WS 24051**

Address **Ernie Whalen**

City **Laguna Niguel** State **CA** ZIP **92677**



8683 9997 2407

4a Express Package Service

1 FedEx Priority Overnight **5** FedEx Standard Overnight **6**

3 FedEx 2Day **20** FedEx Express Saver **30**

4b Express Freight Service

7 FedEx 1Day Freight **8** FedEx 2Day Freight **83**

5 Packaging

2 FedEx Pak **3** FedEx Box **4** FedEx Tube **1** Other

6 Special Handling

1 HOLD Monday at FedEx Location **31** HOLD Saturday at FedEx Location

7 Payment **AMT** for

1 Sender **2** Recipient **3** Third Party **4** Credit Card **5** Cash/Check

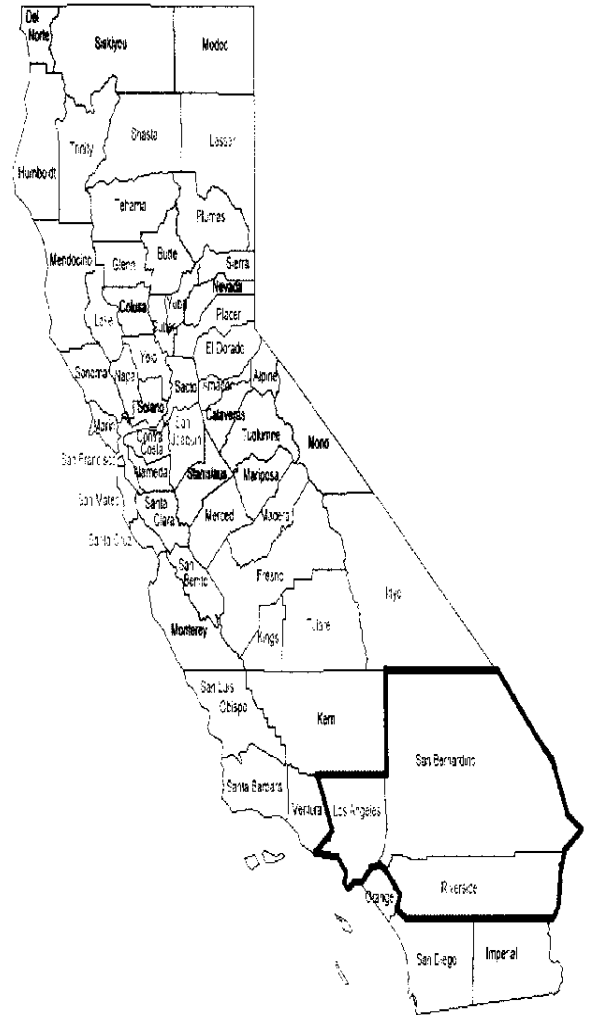
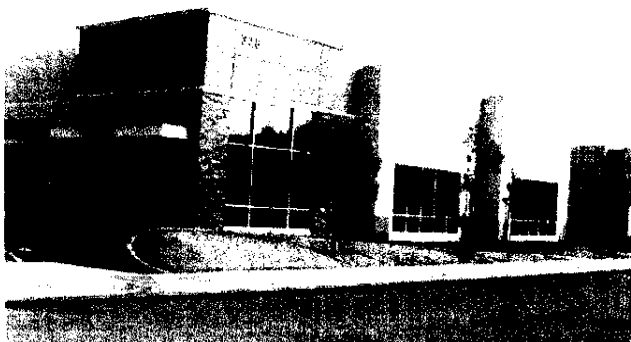
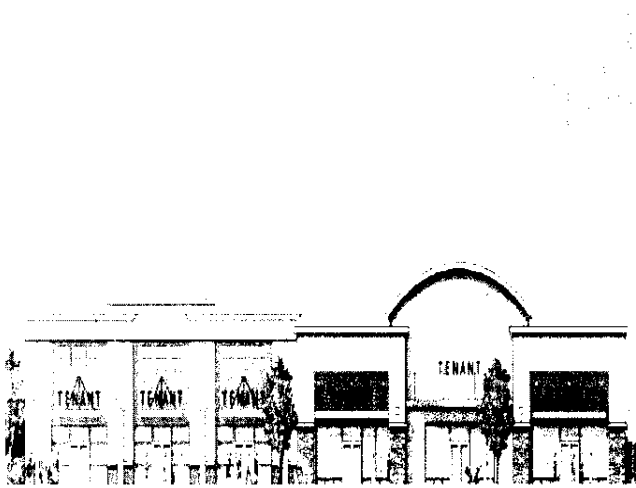
8 Residential Delivery Signature Options

No Signature Required **10** Direct Signature **34** Indirect Signature **520**

520

AMERICAN REDEVELOPMENT REGIONAL CENTER

Response to Request For Evidence Submitted June 2009



PROVIDING GROWTH FOR COMMUNITIES IN NEED

Receipt # 09000140		Application/Petition REGIONAL CENTER PROPOSAL
Notice Date March 18, 2009	Page 1 of 6	Regional Center American Redevelopment Regional Center

Linda W. Lau, Esq.
Global Immigration Law Group
350 S. Figueroa Street, Suite 760
Los Angeles, CA 90071

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 **JUN 13 2009** 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, 2nd Floor
Laguna Niguel, CA 92677

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

U.S. CITIZENSHIP AND IMMIGRATION SERVICES CALIFORNIA SERVICE CENTER Attn: EB 5 RC Proposal P.O. BOX 10590 LAGUNA NIGUEL, CA 92607-0526	 W09 000 145
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REC'D CSC3700 JUN 12 9:16
AL2100568

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 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 concludes 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.

In accordance with Federal Register Notice dated January 9, 2009, and effectively January 26, 2009, your case has been relocated to the California Service Center for processing.

What is the Immigrant Investor Pilot Program?

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 the specific evidence that must be submitted before consideration for eligibility for this benefit may proceed. After a review of your proposal in light of these requirements, the following information, evidence or clarification is needed to proceed.

The EB-5 program including the Regional Center or Pilot Program primarily focuses on job creation not general economic growth. Unlike other government programs which may deal in the general financial impact of investment dollars, this program is concerned with the specific impact of investment funds on creating new employment. In order to qualify as a Regional Center, the Regional Center Proposal must show the nexus between the Regional Center and job creation. It must also establish the specific activities relative to each category or industry for which the Center is requesting. Economical analyses and model which address the proposed activities are essential.

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

For your information, the Computer Disk (CD), which you provided has not been reviewed and will not be reviewed, in accordance with United States Government Network Security guidelines. If you wish the CD information to be considered, it should be submitted using a paper format.

Regional Center's Operational Plan – Amount and Source of the Regional Center's Operational Capital (8 CFR 204.6(m)(3)(iii)):

A proposal must include a detailed statement regarding the amount and source of the capital that has been committed to the Regional Center, in addition to the description of the promotional efforts taken and planned by the Regional Center's sponsors. USCIS has interpreted the words, "amount and source of capital that has been committed to the Regional Center" to mean the capital sufficient to sustain the Regional Center distinct from immigrant investors' required capital investment in a new commercial enterprise within the Regional Center.

The detailed statement that is required to meet the regulatory requirement relating to the amount and source of capital committed to the Regional Center should include:

- the exact amount of funds that have been dedicated to the Regional Center to accomplish the goals of the Pilot Program;
- the source of such funds;
- whether the amount is sufficient to sustain the Regional Center; and
- evidence that the funds have already been committed to the Regional Center.

None of the capital sustaining the Regional Center can come from immigrant investors' required threshold capital investment (as distinct from the new commercial enterprises' revenues). This separation of funds is necessary to enable the alien entrepreneur to qualify for the EB-5 immigrant investor classification.

The Development Plan does not state, indicate or include the exact amount of funds that have been or will be dedicated to accomplish the goals of the regional center, the source of funds by EB-5 immigrant investors and non EB-5 immigrant investors, whether the amount is sufficient to sustain the regional center and evidence that funds have already been committed to the regional center.

Submit evidence that clearly addresses these issues. Provide specific dollar amounts for each project in the regional center with respect to funding including the source of funding. Also, provide a prospective breakdown of the number of EB-5 and non-EB-5 immigrant investors by number and funding for each proposed project.

Regional Center's Operational Plan – Recruitment and Due Diligence (8 CFR 204.6(m)(3)(iii)):

For any individual alien investor who will be solicited by a Regional Center to invest the requisite capital into a Regional Center commercial activity, it will be incumbent on the Regional Center to engage in a due diligence process to establish that all sources of capital can be fully explained and clearly shown to have been lawfully obtained.

Submit a revised plan of proposed Regional Center operation which addresses how investors will be recruited and how the Regional Center will conduct its due diligence to accommodate the requirement that all immigrant investor funds will be lawfully obtained and describe what measures will be taken by the Regional Center to ensure and validate this. Will the submission of certain financial documents be required of foreign investors or will the Regional Center, for example, utilize a professional investigating firm to vet a potential investor's source of funds? What are your plans in this regard?

Regional Center's Operational Plan – Promotional Efforts (8 CFR 204.6(m)(3)(iii)):

USCIS interprets the words "promotional efforts" to mean an advertising or marketing program planned by the sponsors of the Regional Center that is designed to attract immigrant investors to the Regional Center. Regional Center proposals require a full description of the past, current and future promotional activities for the Regional Center. This shall include a description of the budget for this activity as well as a statement as to the source of those funds used to accomplish this necessary task.

Submit evidence that sufficiently addresses this issue including a full description of the past, current and future promotional activities for the proposed regional center.

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

8 CFR 204.6 (m)(3)(iv) requires that a proposal contain:

...a detailed prediction regarding the manner in which the regional center will have a positive impact on the regional or national economy for business services, utilities, maintenance and repair, and construction both within and without the regional center...

A detailed prediction must be provided which includes the topics of regional or national impact, household earnings, greater demand for business services, utilities, maintenance and repair, and construction both within and without the Regional Center.

The proposal should provide actual monetary predictions and address the elements listed in USCIS regulations. The economic model and analysis requested will also need to address these specific points as listed here.

The Business Approach and Structure of the Regional Center (Section 610 of Public Law 102-395):

The business aspects of the Regional Center must be fully explained as to its structure. This aspect of a proposal includes, but is not limited to, the following basic elements or samples of them as applicable to the business approach and structure to be used by the Regional Center:

- An overall Business Plan - mandatory
- Draft Operating Agreement
- Draft Partnership Agreement
- Draft Subscription Agreement
- Draft Escrow Agreements and Instructions (one for capital and one for any service fees). Such agreements usually include an "out clause" in the event of an unsuccessful visa process as a marketing tool¹ but are not required.
- List of proposed reputable financial institutions to serve as the Escrow Agent(s).
- Draft of an Offering Letter, Memorandum, Confidential Private Placement Memorandum, or similar offering made in writing to an immigrant investor through the Regional Center.
- Draft Memorandum of Understanding, Interagency Agreement, Contract, Letter of Intent, Advisory Agreement, or similar agreement to be entered into with any other party, agency or organization to engage in activities on behalf of or in the name of the Regional Center.

Evidence relating to the following has not been submitted:

- A Business Plan.
- The Articles of Incorporation.

¹ **NOTE: Under NO circumstances** may any agreement or document in support of an investor's I-526 petition offer or imply return or reimbursement of his/her capital investment should the subsequent I-829 Petition to Remove Conditions be denied by USCIS. The USCIS considers any such reimbursement provision within the period of an alien investor's conditional residence prohibited by precedent decision in Matter of Izumii.

In Matter of Ho, the Administrative Appeals Office held that a “comprehensive business plan as contemplated by the regulations should contain, at a minimum, a description of the business, its products and/or services, and its objectives.” Elaborating on the contents of an acceptable business plan, the decision states the following:

“The plan should contain a market analysis, including the names of competing businesses and their relative strengths and weaknesses, a comparison of the competition's products and pricing structures, and a description of the target market/prospective customers of the new commercial enterprise. The plan should list the required permits and licenses obtained. If applicable, it should describe the manufacturing or production process, the materials required, and the supply sources. The plan should detail any contracts executed for the supply of materials and/or the distribution of products. It should discuss the marketing strategy of the business, including pricing, advertising, and servicing. The plan should set forth the business's organizational structure and its personnel's experience. It should explain the business's staffing requirements and contain a timetable for hiring, as well as job descriptions for all positions. It should contain sales, cost, and income projections and detail the bases therefor. Most importantly, the business plan must be credible.”

See Matter of Ho at page 9.

Development plans relating to real estate projects should include the milestones with projected dates of completion, architectural design deadlines, estimated dates for building permit applications, estimated building permits, estimated completion dates and occupancy dates. Provide a business plan that includes these criteria.

Administrative Oversight (8 CFR 204.6(m)(6)):

The law and 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 (where applicable), improved regional productivity, job creation, and increased domestic capital investment. Therefore, in order for USCIS to determine whether an approved and designated 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 Year², commencing with the initial year as follows:

Submit a description of your plans to administer, oversee, and manage the proposed Regional Center, including but not limited to such things as to identify, assess and evaluate proposed immigrant investor projects and enterprises; how the proposed Regional Center would perform “due diligence” as to whether investment capital to be sought will consist solely of alien investor capital or a combination of alien investor capital and domestic capital; how to monitor all investment activities affiliated, through or under the sponsorship of the proposed Regional Center, and to maintain records, data and information on

² A Federal Fiscal Year runs for twelve consecutive months from October 1st to September 30th.

projects, investors, business activities, etc., in order to report to USCIS for each Federal Fiscal Year. This is known as "due diligence" and is coupled with "oversight reporting responsibilities" to be fully explained if approved and designated.

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.

From: Origin ID: EMTA (213) 830-9933
Linda Lau
Global Immigration Law Group
350 S Figueroa St Ste 760

Los Angeles, CA 90071



Ship Date: 11JUN09
ActWgt: 2.0 LB
CAD: 3464367/NET9011
Account#: S *****

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Invoice #
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AM JUN 12 2009

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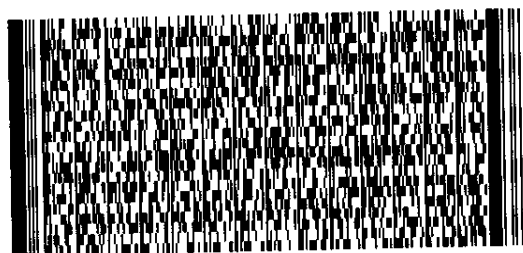
Q/RFC

SHIP TO: (714) 360-2769 BILL SENDER
ATTN: EB-5 Proposal
U.S Citizen and Immigration Service
24000 AVILA RD
2ND F., RM2312
LAGUNA NIGUEL, CA 92677

FRI - 12JUN A2

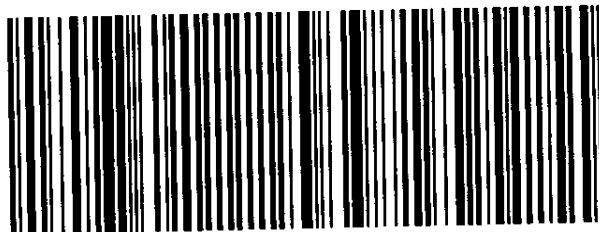
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PRIORITY OVERNIGHT



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

		Application/Petition REGIONAL CENTER PROPOSAL
Receipt # W09000140		
Notice Date March 18, 2009	Page 1 of 6	Regional Center American Redevelopment Regional Center

Linda W. Lau, Esq.
Global Immigration Law Group
350 S. Figueroa Street, Suite 760
Los Angeles, CA 90071

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.

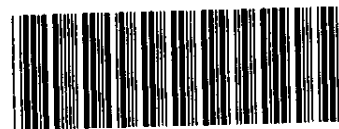
Note: You are given until JUN 13 2009 in which to submit the information requested.

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, 2nd Floor
Laguna Niguel, CA 92677

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

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



W09 000 145

In accordance with Federal Register Notice dated January 9, 2009, and effectively January 26, 2009, your case has been relocated to the California Service Center for processing.

What is the Immigrant Investor Pilot Program?

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 the specific evidence that must be submitted before consideration for eligibility for this benefit may proceed. After a review of your proposal in light of these requirements, the following information, evidence or clarification is needed to proceed.

The EB-5 program including the Regional Center or Pilot Program primarily focuses on job creation not general economic growth. Unlike other government programs which may deal in the general financial impact of investment dollars, this program is concerned with the specific impact of investment funds on creating new employment. In order to qualify as a Regional Center, the Regional Center Proposal must show the nexus between the Regional Center and job creation. It must also establish the specific activities relative to each category or industry for which the Center is requesting. Economical analyses and model which address the proposed activities are essential.

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

For your information, the Computer Disk (CD), which you provided has not been reviewed and will not be reviewed, in accordance with United States Government Network Security guidelines. If you wish the CD information to be considered, it should be submitted using a paper format.

Regional Center's Operational Plan – Amount and Source of the Regional Center's Operational Capital (8 CFR 204.6(m)(3)(iii)):

A proposal must include a detailed statement regarding the amount and source of the capital that has been committed to the Regional Center, in addition to the description of the promotional efforts taken and planned by the Regional Center's sponsors. USCIS has interpreted the words, "amount and source of capital that has been committed to the Regional Center" to mean the capital sufficient to sustain the Regional Center distinct from immigrant investors' required capital investment in a new commercial enterprise within the Regional Center.

The detailed statement that is required to meet the regulatory requirement relating to the amount and source of capital committed to the Regional Center should include:

- the exact amount of funds that have been dedicated to the Regional Center to accomplish the goals of the Pilot Program;
- the source of such funds;
- whether the amount is sufficient to sustain the Regional Center; and
- evidence that the funds have already been committed to the Regional Center.

None of the capital sustaining the Regional Center can come from immigrant investors' required threshold capital investment (as distinct from the new commercial enterprises' revenues). This separation of funds is necessary to enable the alien entrepreneur to qualify for the EB-5 immigrant investor classification.

The Development Plan does not state, indicate or include the exact amount of funds that have been or will be dedicated to accomplish the goals of the regional center, the source of funds by EB-5 immigrant investors and non EB-5 immigrant investors, whether the amount is sufficient to sustain the regional center and evidence that funds have already been committed to the regional center.

Submit evidence that clearly addresses these issues. Provide specific dollar amounts for each project in the regional center with respect to funding including the source of funding. Also, provide a prospective breakdown of the number of EB-5 and non-EB-5 immigrant investors by number and funding for each proposed project.

Regional Center's Operational Plan – Recruitment and Due Diligence (8 CFR 204.6(m)(3)(iii)):

For any individual alien investor who will be solicited by a Regional Center to invest the requisite capital into a Regional Center commercial activity, it will be incumbent on the Regional Center to engage in a due diligence process to establish that all sources of capital can be fully explained and clearly shown to have been lawfully obtained.

Submit a revised plan of proposed Regional Center operation which addresses how investors will be recruited and how the Regional Center will conduct its due diligence to accommodate the requirement that all immigrant investor funds will be lawfully obtained and describe what measures will be taken by the Regional Center to ensure and validate this. Will the submission of certain financial documents be required of foreign investors or will the Regional Center, for example, utilize a professional investigating firm to vet a potential investor's source of funds? What are your plans in this regard?

Regional Center's Operational Plan – Promotional Efforts (8 CFR 204.6(m)(3)(iii)):

USCIS interprets the words "promotional efforts" to mean an advertising or marketing program planned by the sponsors of the Regional Center that is designed to attract immigrant investors to the Regional Center. Regional Center proposals require a full description of the past, current and future promotional activities for the Regional Center. This shall include a description of the budget for this activity as well as a statement as to the source of those funds used to accomplish this necessary task.

Submit evidence that sufficiently addresses this issue including a full description of the past, current and future promotional activities for the proposed regional center.

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

8 CFR 204.6 (m)(3)(iv) requires that a proposal contain:

...a detailed prediction regarding the manner in which the regional center will have a positive impact on the regional or national economy for business services, utilities, maintenance and repair, and construction both within and without the regional center...

A detailed prediction must be provided which includes the topics of regional or national impact, household earnings, greater demand for business services, utilities, maintenance and repair, and construction both within and without the Regional Center.

The proposal should provide actual monetary predictions and address the elements listed in USCIS regulations. The economic model and analysis requested will also need to address these specific points as listed here.

The Business Approach and Structure of the Regional Center (Section 610 of Public Law 102-395):

The business aspects of the Regional Center must be fully explained as to its structure. This aspect of a proposal includes, but is not limited to, the following basic elements or samples of them as applicable to the business approach and structure to be used by the Regional Center:

- An overall Business Plan - mandatory
- Draft Operating Agreement
- Draft Partnership Agreement
- Draft Subscription Agreement
- Draft Escrow Agreements and Instructions (one for capital and one for any service fees). Such agreements usually include an "out clause" in the event of an unsuccessful visa process as a marketing tool¹ but are not required.
- List of proposed reputable financial institutions to serve as the Escrow Agent(s).
- Draft of an Offering Letter, Memorandum, Confidential Private Placement Memorandum, or similar offering made in writing to an immigrant investor through the Regional Center.
- Draft Memorandum of Understanding, Interagency Agreement, Contract, Letter of Intent, Advisory Agreement, or similar agreement to be entered into with any other party, agency or organization to engage in activities on behalf of or in the name of the Regional Center.

Evidence relating to the following has not been submitted:

- A Business Plan.
- The Articles of Incorporation.

¹ **NOTE: Under NO circumstances** may any agreement or document in support of an investor's I-526 petition offer or imply return or reimbursement of his/her capital investment should the subsequent I-829 Petition to Remove Conditions be denied by USCIS. The USCIS considers any such reimbursement provision within the period of an alien investor's conditional residence prohibited by precedent decision in Matter of Izumii.

In Matter of Ho, the Administrative Appeals Office held that a “comprehensive business plan as contemplated by the regulations should contain, at a minimum, a description of the business, its products and/or services, and its objectives.” Elaborating on the contents of an acceptable business plan, the decision states the following:

“The plan should contain a market analysis, including the names of competing businesses and their relative strengths and weaknesses, a comparison of the competition’s products and pricing structures, and a description of the target market/prospective customers of the new commercial enterprise. The plan should list the required permits and licenses obtained. If applicable, it should describe the manufacturing or production process, the materials required, and the supply sources. The plan should detail any contracts executed for the supply of materials and/or the distribution of products. It should discuss the marketing strategy of the business, including pricing, advertising, and servicing. The plan should set forth the business’s organizational structure and its personnel’s experience. It should explain the business’s staffing requirements and contain a timetable for hiring, as well as job descriptions for all positions. It should contain sales, cost, and income projections and detail the bases therefor. Most importantly, the business plan must be credible.”

See Matter of Ho at page 9.

Development plans relating to real estate projects should include the milestones with projected dates of completion, architectural design deadlines, estimated dates for building permit applications, estimated building permits, estimated completion dates and occupancy dates. Provide a business plan that includes these criteria.

Administrative Oversight (8 CFR 204.6(m)(6)):

The law and 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 (where applicable), improved regional productivity, job creation, and increased domestic capital investment. Therefore, in order for USCIS to determine whether an approved and designated 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 Year², commencing with the initial year as follows:

Submit a description of your plans to administer, oversee, and manage the proposed Regional Center, including but not limited to such things as to identify, assess and evaluate proposed immigrant investor projects and enterprises; how the proposed Regional Center would perform “due diligence” as to whether investment capital to be sought will consist solely of alien investor capital or a combination of alien investor capital and domestic capital; how to monitor all investment activities affiliated, through or under the sponsorship of the proposed Regional Center, and to maintain records, data and information on

² A Federal Fiscal Year runs for twelve consecutive months from October 1st to September 30th.

projects, investors, business activities, etc., in order to report to USCIS for each Federal Fiscal Year. This is known as "due diligence" and is coupled with "oversight reporting responsibilities" to be fully explained if approved and designated.

Translations:

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Copies:

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A Professional Law Corporation

June 11, 2009

Via FedEx (Tracking No. 7966 8605 5747)

U.S. Citizenship and Immigration Services

ATTN: EB-5 RC Proposal

California Service Center

24000 Avila Road, 2nd Floor, Room 2312

P.O. Box 10590

Laguna Niguel, CA 92677

RE: Response to Request for Evidence (Regional Center Proposal)
Application: American Redevelopment Regional Center Proposal
Applicant: American Redevelopment Solutions, LLC

We represent Applicant American Redevelopment Solutions, LLC in the above-referenced matter, and are submitting this response to the Request for Evidence (RFE) issued by USCIS on March 18, 2009. Our G-28 is on file with the California Service Center.

This response consists of the following three components, presented together in a binder, containing the information requested by USCIS for the proposed American Redevelopment Regional Center:

- **Revised Executive Summary** containing updated contact information and a clear summary of RIMS II-based job calculation formula used to obtain the job count for the proposed regional center based on its two sample projects;
- **Operational Plan (in yellow);**
- **Overall Business Plan**, which fully integrates all material contained in the previously submitted development plan in order to facilitate review of the plan without requiring cross-referencing to previously submitted materials;
- **Economic Impact Analysis Report Addendum of June 11, 2009 (in orange)** discussing the economic impact of the proposed regional center in categories other than job creation, along with a copy of the initial Economic Impact Analysis Report by Dr. Hart Hodges of December 23, 2008 for ease of reference; and
- **Exhibits** containing relevant supplemental materials.



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Kindly note that the revised Executive Summary shows the following job calculation formula on page two:

(b)(4)

Use	Square Footage	Employees Per 1,000 Square Feet*	# of Primary Jobs	RIMS II "Direct Effects" Employment Multiplier	Total Jobs (Primary + Secondary jobs created indirectly)
Professional Office	10,000				
Medical Office	10,000				
Retail Trade	10,000				
Food Services	10,000				

*Based upon data published by the Southern California Association of Governments, Urban Land Institute and the International Council of Shopping Centers; and the 2002 U.S. Economic Census.

USCIS' requests and each associated response are enumerated as follows:

- Requests #1A-1B:** Regional Center's Operational Plan—Amount and Source of the Regional Center's Operational Capital (8 CFR 204.6(m)(3)(iii))
 - #1A** – Regional Center Funding
 - #1B** – Project Funding
- Request #2:** Regional Center's Operational Plan—Recruitment and Due Diligence (8 CFR 204.6(m)(3)(iii))
- Request #3:** Regional Center's Operational Plan—Promotional Efforts (8 CFR 204.6(m)(3)(iii))
- Request #4:** Regional or National Impact of the Regional Center (8 CFR 204.6(m)(3)(iv))
- Request #5:** The Business Approach and Structure of the Regional Center (Section 610 of Public Law 102-395)
- Request #6:** Administrative Oversight (8 CFR 204.6(m)(6))



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Please find thorough and complete responses to all requests, below.

USCIS Request #1A: Regional Center's Operational Plan—Amount and Source of the Regional Center's Operational Capital (8 CFR 204.6(m)(3)(iii))

The Development Plan does not state, indicate or include the exact amount of funds that have been or will be dedicated to accomplish the goals of the regional center, the source of funds by EB-5 immigrant investors and non EB-5 immigrant investors, whether the amount is sufficient to sustain the regional center and evidence that funds have already been committed to the regional center.

Submit evidence that clearly addresses these issues.

Response #1A:

As requested, the enclosed Operational Plan of American Redevelopment Regional Center includes information concerning the funding required to sustain regional center operations as well as the funds that have already been committed to the proposed regional center.

(b)(4)



USCIS Request #1B:

Regional Center's Operational Plan—Amount and Source of the Regional Center's Operational Capital (8 CFR 204.6(m)(3)(iii))

Provide specific dollar amounts for each project in the regional center with respect to funding including the source of funding. Also, provide a prospective breakdown of the number of EB-5 and non EB-5 immigrant investors by number and funding for each proposed project.



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Response #1B:

As requested, the enclosed Operational Plan contains estimates of the specific dollar amounts of the costs for the sample projects within the proposed regional center. The projected project cost amounts for the initial sample projects are as follows:

Project/Use	Limited Partnership	Projected Project Cost
Professional Office Building	(b)(4)	
Medical Office Building		
Retail and Food Service Space		

Further, the source of project funding is outlined as follows:

Funding Source	Funding Amount
EB-5 Investors	Minimum of 70%
Construction Loans Secured by American Redevelopment Solutions, LLC	Maximum of 20%
Other Domestic Sources and General Partners	10%

As noted in the Operational Plan, details of funding requirements for each project will be contained in project-specific business plans submitted with individual EB-5 investor petitions.

USCIS Request #2:

Regional Center's Operational Plan—Recruitment and Due Diligence (8 CFR 204.6(m)(3)(iii))

Submit a revised plan of proposed Regional Center operation which addresses how investors will be recruited and how the



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Regional Center will conduct its due diligence to accommodate the requirement that all immigrant investor funds will be lawfully obtained and describe what measures will be taken by the Regional Center to ensure and validate this. Will the submission of certain financial documents by required of foreign investors or will the Regional Center, for example, utilize a professional investigating firm to vet a potential investor's source of funds? What are your plans in this regard?

Response #2:

As requested, an Operational Plan is enclosed that specifies the due diligence to be conducted to ensure EB-5 investor funds derive from a lawful source. P. 10 of the Operational Plan provides:

The initial screening process will be through direct contact with the proposed investor, answering questions and inquiring into the potential investor's background and business needs. ARRC will then have each investor, and the investor's representative if applicable, complete detailed questionnaires as to the background of the potential investor. Finally, ARRC will reserve the right to retain the services of a professional investigative firm such as Vance International (www.vanceglobal.com), Control Risks (www.controlrisks.com), and Investigative Services Agency (www.isadetective.com) to further perform background check and analysis of the source of funds to be used for the investment.

Information on the above-referenced investigative firms is included at Exhibit 2 in this RFE response binder.

USCIS Request #3:

Regional Center's Operational Plan—Promotional Efforts (8 CFR 204.6(m)(3)(iii))

Regional Center proposals require a full description of the past, current and future promotional activities for the Regional Center. This shall include a description of the budget for this activity as well as a statement as to the source of those funds



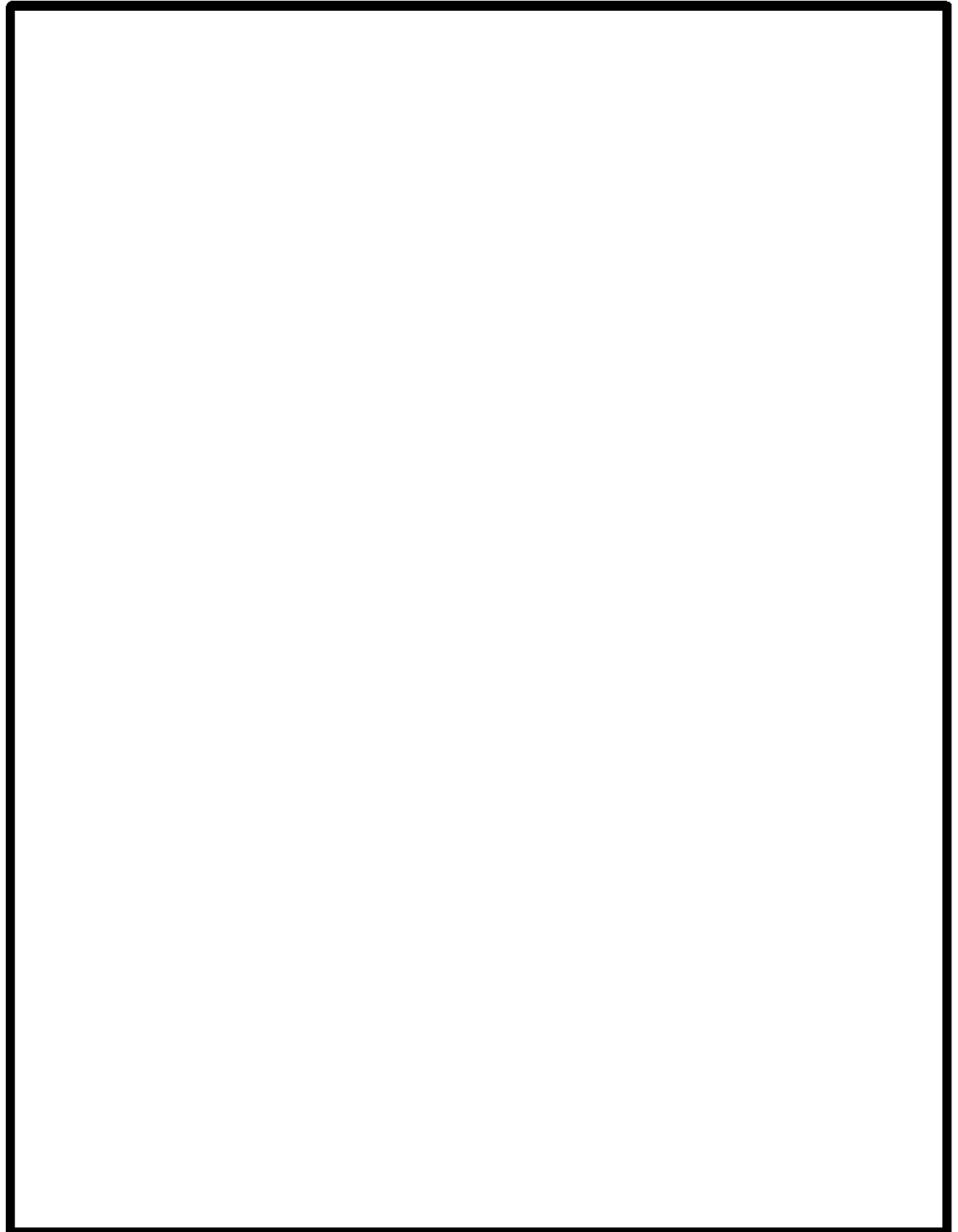
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used to accomplish this necessary task. Submit evidence that sufficiently addresses this issue including a full description of the past, current and future promotional activities for the proposed regional center.

Response #3:

(b)(4)



Sample marketing brochures for American Redevelopment Regional Center are enclosed as Exhibit 3 in this RFE response binder. Also, information on Invest in the USA and the California Redevelopment Association is included as Exhibit 4 in this RFE response binder.



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USCIS Request #4:

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

A detailed prediction must be provided which includes the topics of regional or national impact, household earnings, greater demand for business services, utilities, maintenance and repair, and construction both within and without the Regional Center.

The proposal should provide actual monetary predictions and address the elements listed in USCIS regulations. The economic model and analysis requested will also need to address these specific points as listed here.

Response #4:

As requested, a detailed prediction regarding the regional impact of American Redevelopment Regional Center as a whole is included within the Addendum of June 11, 2009 to the Economic Impact Analysis Report for the proposed American Redevelopment Regional Center. The regional impacts, based on the two sample projects across four industry types, are summarized as follows:

(b)(4)

Output Category	Impact
Total Industry output	(b)(4)
Business Support Services, including Maintenance & Repair Services and Utilities (such as electricity, gas, water and waste management)	
Professional and Technical Services	
Administrative Support Services	
Other Support Services	
Household Earnings (Labor Income)	
Construction Services	

As requested, the initial Economic Impact Analysis Report of American Redevelopment Regional Center along with the Addendum submitted with this RFE response constitutes a complete economic analysis that discusses, based on a reasonable methodology using the economically valid forecasting tools of



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RIMS II Multiplier tables, the overall impact to be made by the proposed regional center in terms of both job creation and other impacts.

(b)(4)

These impacts will be increased to scale as additional projects are developed within the regional center.

USCIS Request #5:

The Business Approach and Structure of the Regional Center

Evidence relating to the following has not been submitted:

- A Business Plan
- The Articles of Incorporation

In Matter of Ho, the Administrative Appeals Office held that a "comprehensive business plan as contemplated by the regulations should contain, at a minimum, a description of the business, its products and/or services, and its objectives. ..."

Development plans relating to real estate projects should include the milestones with projected dates of completion, architectural design deadlines, estimated dates for building permit applications, estimated building permits, estimated completion dates and occupancy dates. Provide business plan that includes these criteria.

Response #5:

As requested, a comprehensive Overall Business Plan has been prepared containing detailed information about the proposed regional center in compliance with Matter of Ho. The Overall Business Plan addresses the following overall topics:

- **Business Development Strategy**
- **Geographic Focus**
- **Target Industries**
- **Project Objectives**
- **Proposed Escrow Agent**



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- **Management and Consulting Team**
- **Project Descriptions**
- **Market Analysis for Each Project**
- **Timelines and Milestones**
- **Sample Business Agreements**

Please note in particular that as requested, the Overall Business Plan lists as the proposed Escrow Agent for American Redevelopment Regional Center First American Title Company or other reputable financial institutions such as Bank of America or Wells Fargo. Information concerning project timelines and milestones is also included in the Overall Business Plan.

USCIS Request #6:

Administrative Oversight (8 CFR 204.6(m)(6))

Submit a description of your plans to administer, oversee, and manage the proposed Regional Center, including but not limited to such things as to identify, assess and evaluate proposed immigrant investor projects and enterprises; how the proposed Regional Center would perform "due diligence" as to whether investment capital to be sought will consist solely of alien investor capital or a combination of alien investor capital and domestic capital; how to monitor all investment activities affiliated, through or under the sponsorship of the proposed Regional Center, and to maintain records, data and information on projects, investors, business activities, etc., in order to report to USCIS for each Federal Fiscal Year. This is known as "due diligence" and is coupled with "oversight reporting responsibilities" to be fully explained if approved and designated.

Response #6:

As requested, the Operational Plan contains information on how the regional center applicant will conduct due diligence with regard to determining the feasibility for each project, proper monitoring of the development process to ensure efficiency, proper selection of commercial tenants, and maintaining records on projects and investors and business activities for each federal fiscal year.

9



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The information, under Section 5 of the Operational Plan (pp. 12-15) titled “Administrative Oversight” sets forth details regarding:

- **Due Diligence Regarding Investor Funds**
- **Monitoring of Investment Activities (including selection of commercial enterprises and monitoring of development process)**
- **Evaluation of Projects**
- **Maintenance of Records**

Based on the above and on the supporting documentation enclosed herewith, the Applicant in this matter has provided a thorough and comprehensive response to all items in the RFE issued by USCIS. The responses given fulfill all regulatory requirements pertaining to regional center proposals set forth in the pertinent regulations. We therefore request that the American Redevelopment Regional Center proposal be approved.

Thank you for your kind consideration of this matter and please feel free to contact the undersigned with any questions.

Sincerely,

Linda Lau, Esq.

Enclosures

EXECUTIVE SUMMARY (Revised 6/10/09)

Proposed Name of Regional Center. American Redevelopment Regional Center (AR Regional Center).

Website. The website is www.arregionalcenter.com

Regional Center Applicant. The applicant, American Redevelopment Solutions, LLC, was established on November 17, 2008 for the purpose of developing and managing commercial properties with profession and/or medical offices, retail and/or food services.

AR Regional Center's management team has over 20 years of combined experience in project & property management, and acquisition & development of real estate properties.

Regional Center Boundary. AR Regional Center will encompass the three contiguous counties of San Bernardino, Riverside and Los Angeles in Southern California.

(b)(4) **Proposed Sample Regional Center Projects.**

(b)(4) **Primary Contact.** The primary contact for AR Regional Center is Mr. Ronald Darling, CEO of American Redevelopment Solutions, LLC, and his contact information is: 5 Hutton Centre Suite 1050, Santa Ana, California 92707. His telephone number is (714) 384-4250 and his fax number is (714) 384-4251. His email address is red@arregionalcenter.com.

The immigration law counsel for AR Regional Center is Linda Lau, Esq. of Global Immigration Law Group. She can be reached by telephone at (213) 830-9933 ext. 108 and by email at Linda@GlobalLawGroup.net.

Activities of the Regional Center

Job Creation. The job creation projections for the sample projects within the AR Regional Center were based on an economic methodology that applied **RIMS II** (the Regional Input-Output Multiplier System) "Direct Effects" multipliers for particular uses to the primary/direct job figures for those uses that were determined based on square footage. The resulting figure is the total jobs generated as a result of investments into the regional center, including indirect and induced jobs.

The job calculation formula for AR Regional Center is as follows, assuming 10,000 square feet for each type of use:

Use	Square Footage	Employees Per 1,000 Square Feet*	# of Primary Jobs	RIMS II "Direct Effects" Employment	Total Jobs (Primary + Secondary jobs created)
Professional Office	10,000				
Medical Office	10,000				
Retail Trade	10,000				
Food Services	10,000				

(b)(4)

*Based upon data published by the Southern California Association of Governments, Urban Land Institute and the International Council of Shopping Centers; and the 2002 U.S. Economic Census.

Targeted Employment Area (TEA). The geographic focus of AR Regional Center will encompass a three-county area of California comprised of Riverside, San Bernardino and Los Angeles counties.

In accordance with 8 CFR 204.6(i), the California Employment Development Department (EDD) at the instruction of Office of Business, Transportation and Housing Agency (BTH) has identified cities, counties, metropolitan statistical areas (MSAs) and geopolitical subdivisions (census tracts) that meet the "high unemployment" definition and therefore qualify for the \$500,000 minimum investment threshold. The two sample proposed projects are located in San Bernardino and Hesperia cities of San Bernardino County. Based on the 2008 State of California report by EDD entitled Federal Immigration Act of 1990 Investor Visa Program and the most recent published statistics, both the cities of San Bernardino and Hesperia were listed and identified by the EDD as \$500,000 qualifying areas.

(b)(4)

Promotional Efforts.

Funding of the Regional Center.

The Investment Entities. American Redevelopment Solutions, LLC will establish a number of limited partnerships that will serve as the investment entities within AR Regional Center. American Redevelopment Solutions, LLC will be the General Partner holding 70% interest of each LP. Immigrant investors and other investors will contribute their capital to limited partnerships, which will collectively hold [redacted] of each LP.

Sample Limited Partnership Agreements. Standard agreements to be used in the operation of the regional center activities are included within the application. These include a Limited Partnership Agreement, Subscription Agreement, Offering Memorandum, Escrow Agreement, Risk Factor and Disclosures.

Investment and Fee Escrow Accounts. The investment funds will be deposited into an escrow account in the United States. These funds shall be released to the development entity upon approval of the Immigrant Petition by Alien Entrepreneur (I-526) or earlier.

A separate fee escrow account shall be established for associated service fees related to investment administration, due diligence, and legal services in the processing of the visa applications.

Regional Center Responsibilities. The administration, management and oversight of AR Regional Center will be in compliance with 8 CFR 204.6 (m)(6) in monitoring all investment activity, data, and information in order to report to USCIS on a regular basis. These responsibilities are outline in the attached model regional center designation approval letter drafted for the review of USCIS.

Investor Management Responsibilities. Individual investors will be expected to provide advice to the General Partner of the limited partnership on significant financial, management, and project related issues. Individual investor will also be engaged in policy formulation activities and have the fullest extent of rights, powers and duties relating to management that are normally granted to limited partners under the Uniform Limited Partnership Act.

American Redevelopment Regional Center

OPERATIONAL PLAN

June 2009



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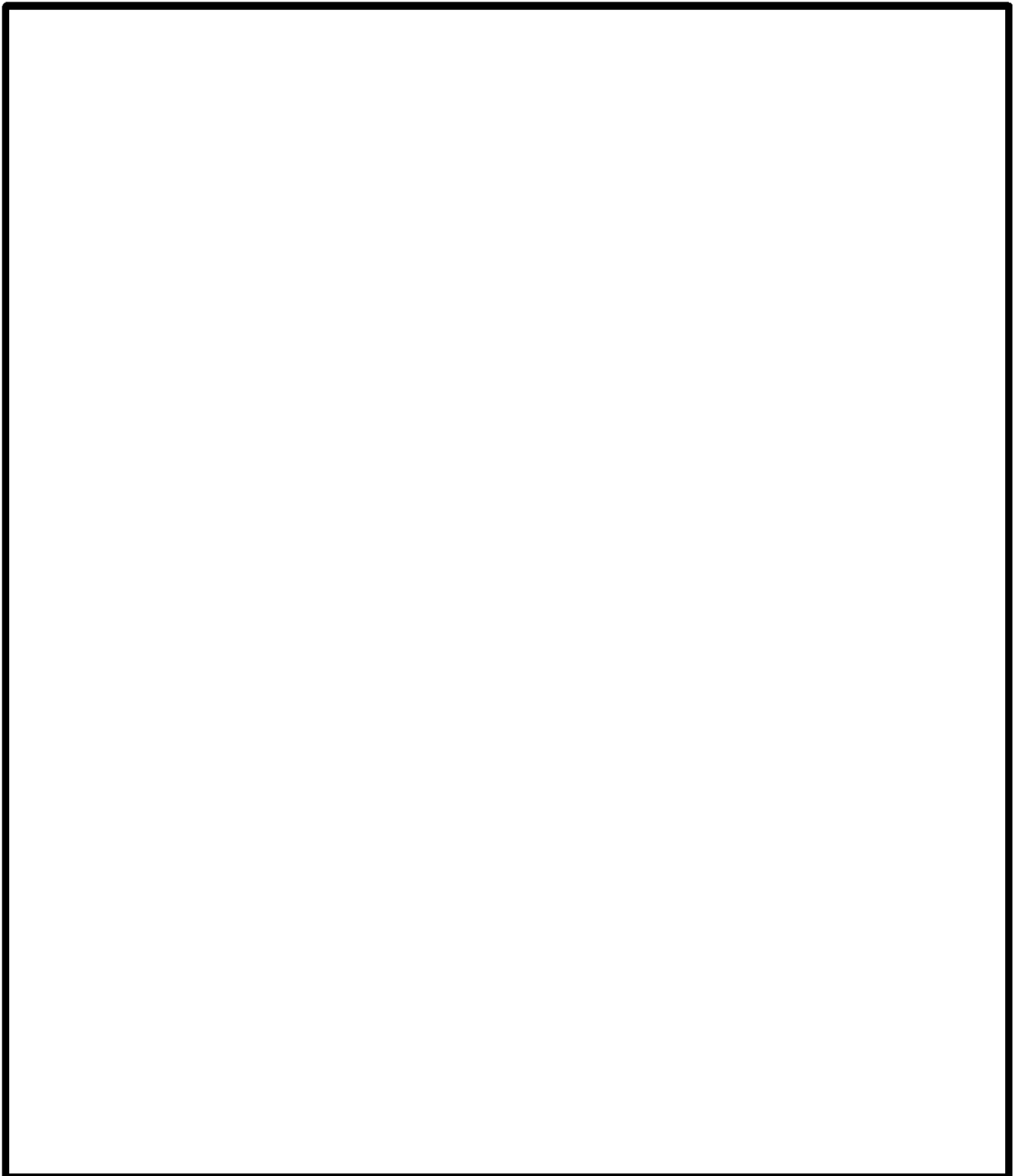
1. Regional Center Overview
 - 1.1 Objective
 - 1.2 Target Industries
 - 1.3 Point of Contact
2. Regional Center Funding
 - 2.1 Funding Requirements for Projects
 - 2.2 Funds for Operations
 - 2.3 Costs of Sample Projects and Breakdown of Source of Project Funding
3. Promotional Efforts
 - 3.1 Target Markets
 - 3.2 Promotional Activities
 - 3.3 Budget for Marketing Activities
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5. Administrative Oversight
 - 5.1 Due Diligence Process Regarding Investor Funds
 - 5.2 Monitoring of Investment Activities
 - 5.3 Evaluation of Project
 - 5.4 Maintenance of Records

ARS OPERATIONAL PLAN (June 2009)

1. Regional Center Overview

1.1 Objective

(b)(4)



(b)(4)



1.3 Point of Contact

American Redevelopment Solutions, LLC (“ARS”) will be the primary contact for the ARRC. ARS will be responsible for researching, locating, and investigating all development projects within ARRC. Additionally, ARS will be responsible for marketing the investment opportunities, as well as working with the investors, the contractors, and the redevelopment agencies to ensure successful development.

Ronald E. Darling is the Chief Executive Officer for ARS and will ultimately be the person responsible for all ARRC activities. Mr. Darling will retain the services of experienced individuals for each aspect of the development, but will remain the primary person in charge of the ARRC activities. His contact information is:

Ronald E. Darling
5 Hutton Centre, Suite 1050,
Santa Ana California 92707
red@arregionalcenter.com

2. Regional Center Funding

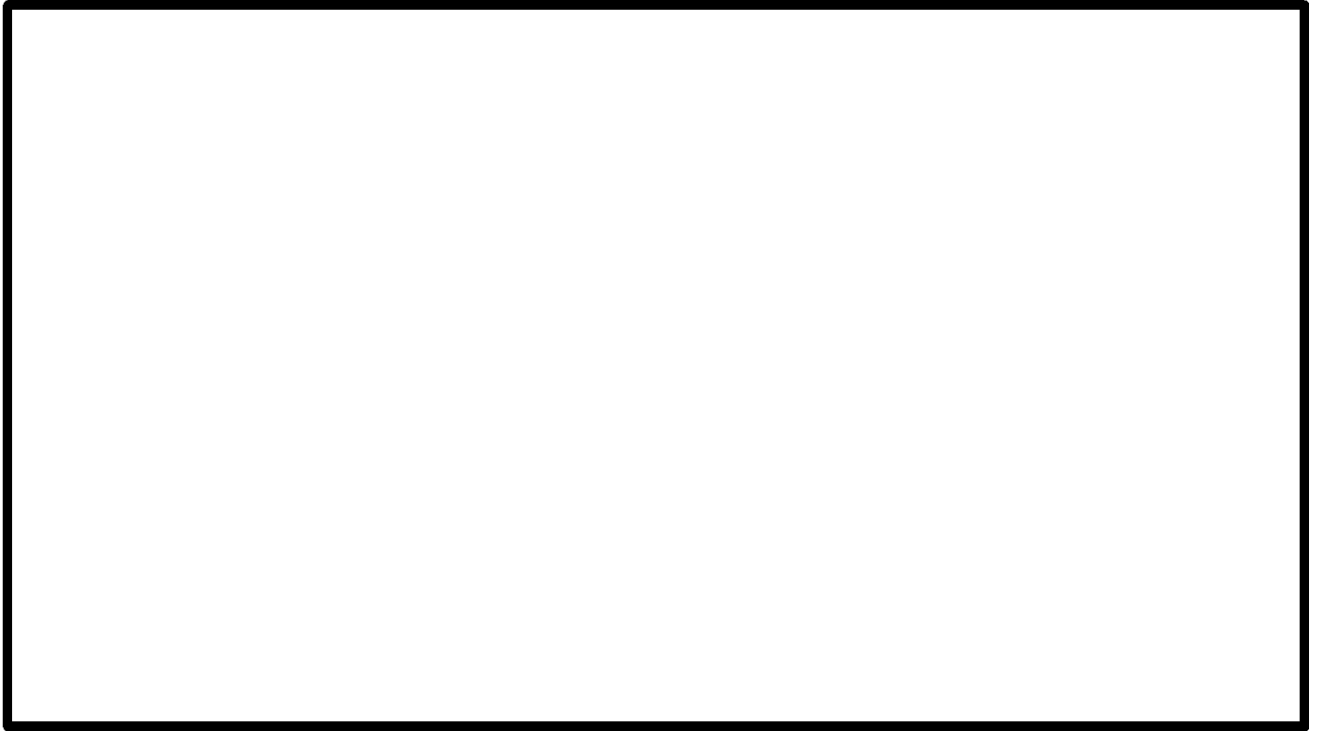
ARRC will work with the Redevelopment Agencies to obtain favorable economic benefits to establish the projects, as well as concessions which will aid in the expedition of the government approval process for the developments. ARRC will match foreign investor needs with the needs of the redevelopment projects as well as obtaining additional private equity, institutional financing, bonding, grant funds, and investment tax credits to obtain the necessary capital with which to fund the projects.

2.1 Funding for Operations

(b)(4)



(b)(4) by Ronald Darling, CEO and LLC member of ARS, LLC, the applicant of American Redevelopment Regional Center.



(b)(4)

2.2 Funding Requirements for Projects



(b)(4)

(b)(4)

(b)(4)

(b)(4)

(b)(4)

4.3 Subscription Process

The subscription process will commence with the initial contact by the potential investor. This initial contact could be through an inquiry on the ARRC website, contact with a professional marketing agent, or direct contact with an ARRC representative after a seminar or other event. After the initial contact, information will be provided regarding the investment opportunity. Communications will take place between the potential investor and ARRC to exchange information about the project as well as to determine if the potential investor fits the requirements of ARRC.

Once a potential investor decides to seriously consider the ARRC investment opportunity, the investor will deposit US\$10,000 into the designated ARRC Fee Escrow Account. After receipt of this initial deposit, ARRC will provide the potential investor with copies of the Subscription Agreement, Offering Memorandum, Risk Factors and Disclosures document, Limited Partnership Agreement, Escrow Agreements and Investor Questionnaire for the investor's review and consideration.

The potential investor will be given the opportunity to review the material provided. During the review process, the potential investor can request additional information, inspect the site, review plans, etc. If the potential investor decides not to invest in ARRC, the US\$10,000 deposit will be returned to the investor and the investor will return to ARRC the materials provided.

If the potential investor decides to invest in ARRC, the investor will execute all documents, including returning the completed investor questionnaire for analysis and review. ARRC will analyze the information provided as well as transmit the information to the professional investigation firm to verify the background and source of funds. ARRC will notify the investor that its subscription into the project has been approved. After obtaining the approval of ARRC, the investor will deposit the subscription fee into the designated escrow account. The escrowed investment funds will not be released to the project until the filing of the Immigrant Petition By Alien Entrepreneur (I-526).

5. Administrative Oversight

5.1 Due Diligence Regarding Investor Funds

ARRC will take numerous steps to ensure that the immigrant investor funds are lawfully obtained and that such funds are from a valid source. As set forth above, the due diligence will begin with the exchange of information during the initial contact between ARRC and the potential investor. Next, ARRC will require all potential investors to complete a detailed questionnaire listing past experience as well as the source of funds. Finally, analysis will be performed by the professional investigation firm such as Vance International, Control Risks, or Investigative Services Agency retained by ARRC for this purpose.

5.2 Monitoring of Investment Activities

All future projects developed as a part of the ARRC will be investigated thoroughly to make certain it meets strict criteria. ARRC will first meet with the local redevelopment agencies to discuss the current needs for development of the designated area.

5.3 Evaluation of Projects

ARRC will utilize the services of real estate experts, such as Mr. Ryan Borzouei and Mr. Spencer Rose to perform investigations and review all potential projects to determine the economic and structural viability of such projects.

It will be important to select each project with detailed analysis of the income to be generated for each development. The project must meet several criteria. First, the area selected must be able to sustain the type of commercial development selected. The local redevelopment agency must have a beneficial economic package and agree to assist with the development either through direct economic aid or through assistance with the entitlement process. A property must be located which meets the construction needs for the project. The project must create the amount of new jobs to justify the investment by immigrant investors pursuant to the Immigrant Investor Visa Pilot Program which will cover the initial costs and expenses for the development. Finally, the project must create sufficient revenue to sustain its operations and provide a profit for those involved.

After completing the analysis and review of the proposed projects by the real estate experts, ARRC will then again meet with the local redevelopment agency to make the final economic determinations and needs for both the redevelopment agency and ARRC. Only after obtaining approval for the proposed project from the redevelopment agency, and obtaining confirmation of the ability to complete the project from the real estate development experts retained by ARRC will ARRC form the new Limited Partnership and offer the new investment opportunity to any investors.

ARRC will retain the services of one of the most well-known experts in real estate investment such as Grubb & Ellis Company, to assist in the leasing of the completed development projects. Grubb & Ellis Investors handle over \$6.7 billion dollars in real property investment worldwide. Grubb & Ellis is one of the largest and most respected commercial real estate services and investment companies in the world. Grubb & Ellis has over 6,000 professionals in more than 130 company-owned and affiliated offices, allowing them to draw from a unique platform of real estate services to deliver comprehensive, integrated solutions for real estate owners, tenants and investors. ARRC will retain Grubb & Ellis to act as the real estate brokers for the projects. Grubb & Ellis will conduct marketing for the leasing of the development projects as well as will be responsible for screening all potential tenants. Grubb & Ellis services are supported by highly regarded proprietary market research and extensive local expertise allowing it to successfully locate qualified tenants to lease the development projects.

Individual investors will be expected to participate in an annual meeting to provide advice to the General Partner of the investment Limited Partnerships on significant financial, management, and project related issues. Additionally, these investors will be engaged in policy formulation activities and have the fullest extent of rights, powers and duties relating to management that are normally granted to limited partners under the Uniform Limited Partnership Act.

Professionals will be retained to oversee the development aspects of the project and will be required to provide regular detailed reports of all activities. These reports will be delivered to all investors for their review and approval. ARS will closely monitor the progress of the developments,

conducting on site visits, and reviewing all reports. ARRC believes strongly that the key to a successful development is not only hiring the best professionals to complete the project, but also to keep all parties informed of the progress of the project at all times.

5.4 Maintenance of Records

5.4.1 Investment and Other Financial Records

The Limited Partnership investment funds will be deposited into an escrow account with an approved escrow company in the United States such as First American Title Company or other reputable US financial institutions such as Bank of America, Wells Fargo Bank, etc. These funds shall be released to the development entity upon filing of the Immigrant Petition By Alien Entrepreneur (Form I-526). A separate fee escrow account will be established for associated services and fees related to due diligence in the processing of the visa application. The funds in the investment fund will not be released to escrow until filing of the Immigrant Petition By Alien Entrepreneur (Form I-526). Thus, the invested funds will be monitored both by the records of the Limited Partnership and ARRC as well as by the escrow company.

After the funds are released from escrow and invested into the Limited Partnership, the General Partner will be responsible for maintaining complete and accurate records of all financial transactions. The Limited Partnership will hire an outside accounting firm to maintain these detailed records and to keep the financial records of the Limited Partnership. These records will be made available to all investors and financial reports will be delivered to the investors on an ongoing and regular basis to allow each investor to be involved in the development.

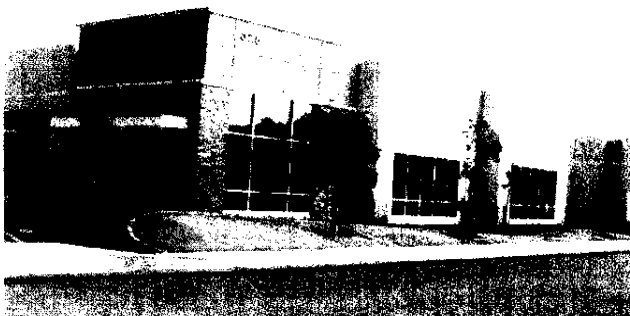
5.4.2 Development Records

Records regarding the progress of the development project will be maintained by the General Partner. Such records will include progress reports of the development, as well as all entitlements, contracts, and related documents. Progress reports will be supplied to each investor on an ongoing and regular basis, allowing each investor to have full knowledge of the project and to be involved with each aspect of the development process.

5.4.3 Immigration Documents

Documents related to the immigration filings of alien investors will be retained at the General Partner's office.

OVERALL BUSINESS PLAN OF
FOR
AMERICAN REDEVELOPMENT
REGIONAL CENTER
JUNE 2009



Overall Business Plan of
American Redevelopment Regional Center

1. REGIONAL CENTER BUSINESS OVERVIEW

[Pursuant to 8 CFR 204.6(m)(3)(i) and Matter of Ho]

- 1.1 Overview of Redevelopment Opportunities
- 1.2 Business Development Strategy
- 1.3 Geographic Focus
- 1.4 Target Industries
 - A. Commercial and Mixed Use Buildings
- 1.5 Project Objectives
- 1.6 Management Team
 - A. American Redevelopment Solutions, LLC – Applicant with Articles of Organization
- 1.7 The Role of American Redevelopment Solutions, LLC
- 1.8 Proposed Escrow Agent

2. PROJECT DESCRIPTIONS

[Pursuant to 8 CFR 204.6(m)(3)(ii) and Matter of Ho]

- 2.1 Overview of Regional Center Projects
- 2.2 Initial Proposed Office Building Project
- 2.3 Proposed Retail Building Project

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- 3.1 Market Analysis for the Three Designated Counties
 - (a) Economic Profile – Riverside County
 - (b) Economic Profile – San Bernardino County
 - (c) Economic Profile – Los Angeles County
 - (d) Demographic Information
 - (i) Current Population
 - (ii) Population's Characteristics
 - (iii) Current Economic Conditions

- (iv) Summary of Demographic Analysis
- (e) Workforce – Expansion, Development and Training
- (f) Quality of Life Impact
- (g) Regional Economic Development Stakeholders
- 3.2 Specific Market Analysis for Office Building Project
 - (i) Southeast Industrial Park – Redevelopment Project
 - (ii) Tenant Demand
 - (iii) Loma Linda University Medical Center
 - (iv) Residential Growth
 - (v) National View Market Analysis
 - (vi) West Coast Market Analysis
- 3.3 Specific Market Analysis for Retail Building Project

4. TIMELINES AND MILESTONES

[In Compliance with Matter of Ho]

5. PROMOTION OF ECONOMIC GROWTH AND PROJECTED OVERALL REGIONAL IMPACT

6. SAMPLE AGREEMENTS

(For Use for Redevelopment Opportunities I Limited Partnership)

- 6.1 Subscription Agreement
- 6.2 Offering Memorandum
- 6.3 Limited Partnership Agreement
- 6.4 Statement of Risk Factors and Disclosures
- 6.5 Escrow Agreement for Capital
- 6.6 Escrow Agreement for Service Fees

7. CONCLUSION

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Index 2	Aerial Map
Index 3	Aerial Map
Index 4	Vicinity Map
Index 5	Nearby Retail Center With Medical Tenants
Index 6	Retail Building Proposal
Index 7	Redevelopment Map of Hesperia
Index 8	Hesperia Retail Map
Index 9	Riverside County Characteristics Per 2007 American Community Survey
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Exhibit A	Articles of Organization of American Redevelopment Solutions, LLC
Exhibit B	Projected ARRC Project Time Line
Exhibit C	Sample Subscription Agreement
Exhibit D	Sample Offering Memorandum
Exhibit E	Sample Limited Partnership Agreement
Exhibit F	Sample Statement of Risk Factors and Disclosures
Exhibit G	Sample Escrow Agreement for Capital Contribution.
Exhibit H	Economic Report Addendum

1. REGIONAL CENTER BUSINESS OVERVIEW

1.1 Overview of Redevelopment Opportunities

The California Redevelopment Law was passed to provide local agencies with a framework to entice private investors to invest in deteriorated economic areas which are plagued with a lack of jobs, lack of business opportunities, higher crime rate, poor housing availability, or other challenging social conditions, in order to reverse the downward spiral of those communities by revitalizing the area. The program has shown that by bringing in more jobs, more businesses, and better housing, it results in a revitalization of an entire community.

After World War II, the country first began experiencing the effects of urban flight in which middle class and wealthier residents began moving out of the centralized urban areas, choosing to move out to the suburbs, taking their businesses and tax dollars with them. This movement soon left behind deteriorating neighborhoods with limited business opportunities and higher crime rates as the lack of opportunities brought frustration to those remaining. The higher crimes rates and lack of employment opportunities create more demands on the government as well as drive property values and economic revenues for the communities down significantly.

Therefore in 1952, California passed the California Community Redevelopment Law which established a program in which local agencies were provided tools to not only identify these deteriorated areas, but also with which to entice private investment into these deteriorated geographic areas to reverse the negative impacts suffered by the communities left behind.

In a nutshell, the California Redevelopment Law provides economic incentives for private businesses to invest in these blighted areas by providing low interest loans, economic assistance, or other types of governmental assistance to make redevelopment more economically advantageous. Redevelopment is a locally driven activity that assists local governments in revitalizing their communities. Redevelopment encourages new development, creates jobs and generates tax revenues in declining

urbanized areas by developing partnerships between local governments and private entities.

1.2 Business Development Strategy

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(b)(4)

(b)(4)

1.6 Management Team

A. American Redevelopment Solutions, LLC - Applicant

ARS is a development company founded in August, 2008 for the purpose of designing, planning and developing economically viable commercial enterprises within redevelopment agencies in order to assist in the growth of communities in need. A copy of the Articles of Organization for ARS is attached hereto as **Exhibit A**. ARS believes in the sustainable revitalization of communities through commercially viable and environmentally responsible development. ARS will partner with highly respected and experienced developers and construction companies known in the specific area of development which is needed for each project, as well as work with the redevelopment agencies to complete projects and

developments which are not only successful businesses, but which are also targeted to create a positive impact in the community for which the redevelopment is being sought.

(1) Ronald E. Darling, Chief Executive Officer

Ronald E. Darling is a California licensed real estate broker and a corporate attorney. Mr. Darling received his undergraduate degree from the University of California at Irvine in 1983. Mr. Darling is a 1986 graduate of Loyola Law School, Los Angeles, where he was a member of the St. Thomas Moore Law Honor Society, and an articles editor on the International Law Review.

Mr. Darling was born and raised in Southern California and thus grew up gaining knowledge as to the various particular needs and nature of the Southern California communities. Mr. Darling has been active in the real estate community and has long held an interest in real estate investment. He has purchased and managed investment property since 1986 and has held his real estate broker's license for California since 1992.

Mr. Darling began his involvement with the Immigrant Investor Visa Pilot Program in the mid 1990's when the program first began. He has provided legal representation to both the investors as well as businesses which have offered investment opportunities pursuant to the terms of the program. In light of the economic issues being presented, Mr. Darling is merging his interest and knowledge of Southern California real estate, his business and real estate legal experience, and his knowledge of the needs of the Immigrant Investor Pilot Program to build a successful regional center which meets the needs of the individual investors as well as meets the very essence of the Immigrant Investor Pilot Program which is to allow for the development of projects in communities which have a need for economic revitalization.

(2) Spencer Rose, Consultant

As a Senior Associate for Equity Office Properties, Mr. Rose is responsible for financial analysis, underwriting, and due diligence for all

acquisition, disposition, and development activity in the Southern California region. Mr. Rose is further responsible for lease analysis and assists in performance review relating to Equity's existing 11+ million square foot portfolio of commercial assets.

Prior to joining Equity Office, Mr. Rose worked in acquisitions and development at Parker Properties in Orange County. At Parker, Mr. Rose was actively involved in all aspects of the development process ranging from market research, feasibility analysis, design, marketing and leasing. Prior to Parker, Mr. Rose worked in site acquisitions for World Savings Bank where he acquired retail land sites to facilitate the development of new savings and lending branch offices.

Mr. Rose earned his bachelors degree from the University of California, Berkeley and his MBA and MRED (Master is Real Estate Development) degrees from the University of Southern California. Mr. Rose is actively involved in ULI, ICSC, and NAIOP.

(3) Ryan J. Borzouei, Consultant

Mr. Borzouei has specialized in analyzing the feasibility, and profitability of real estate acquisitions. Mr. Borzouei began his career as a research analyst for InteCap, a division of Charles River & Associates, where he was involved in all aspects of economic research and consulting for economic impact studies and property valuations. After spending some time as a senior consultant for Ernst & Young, LLP, he became an asset Management Analyst for BlackRock, assisting with the management of a \$350 million portfolio of investment properties.

Mr. Borzouei was recruited to work for KPMG, LLP's Economic Valuations Services to provide real estate valuation consulting services for real estate investment firms. After gaining experience with KPMG, Mr. Borzouei became an Acquisition Analyst for Birtcher Anderson Realty, a real estate investment firm, providing value added advisory services and responsible for securing financing for large commercial projects ranging from \$15-\$75 million including performing property and market research and preparing business plans and acquisition strategies.

Mr. Borzouei earned his bachelors degree from the University of California, San Diego and his MBA (Master of Business Administration, Real Estate and Finance) degree from the University of Southern California. Spencer is actively involved in ULI and NAIOP.

**(4) Linda Lau, Esq., Global Immigration Law Group,
Immigration Counsel**

Linda Lau is an attorney whose focus is on business immigration. She holds a B.A. degree from the University of California at Berkeley and an M.S. degree from University of Michigan, Ann Arbor. She received her J.D. degree from the UCLA School of Law. Ms. Lau has represented hundreds of businesses over the course of 20 years of practice. She provides legal representation to domestic and international companies and represents firms in the connection with the transfer and employment of executive, managers, and professional on both a temporary and permanent basis in compliance with employer sanctions laws. Ms. Lau advises companies and individuals on the development of significant immigrant investor projects.

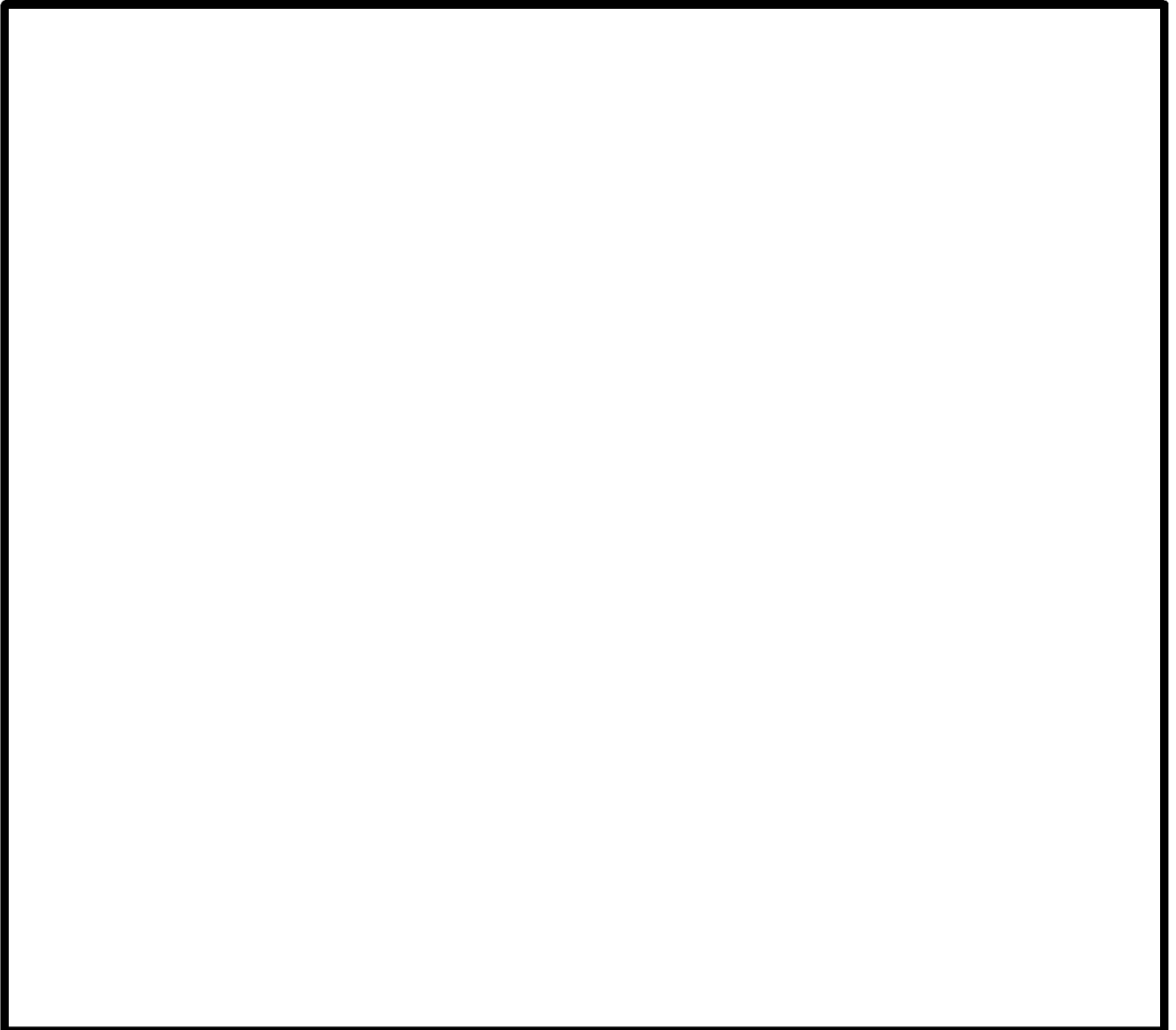
(5) Dr. Hart Hodges, Economist

Dr. Hodges is the director of the Center for Economic and Business Research and an assistant professor of economics at Western Washington University. Before coming to Western Washington, Dr. Hodges spent several years with an economic consulting firm in Alaska and before that was a financial planner for the City of Portland, OR. Dr. Hodges has also served as the natural resource damage assessment economist for the U.S. Department of the Interior and was a research associate at World Resources Institute in Washington, D.C. Dr. Hodges received his Ph.D. in 1994 from the University of Washington and his Masters in Environmental Management from Duke University in 1987. He started his career at Western Washington University in 2000 and was appointed director of the Center of Economic and Business Research in 2001. His research interests include natural resource and environmental economics, applied business research, and health economics.

1.7 The Role of American Redevelopment Solutions, LLC

There are currently over 100 active redevelopment agencies contained within the three designated counties, all of which are overseen by the local city council, county board of supervisors or a separate appointed board -- all accountable to the public. Because they are locally governed and their boards are comprised of local elected or appointed officials, redevelopment agencies are in the best position to identify what a community needs and to work with private investors on local projects to meet those needs. Redevelopment agencies are unique in that they exist solely to reduce unfavorable economic and social conditions in existing communities.

(b)(4)



(b)(4)



1.8 Proposed Escrow Agent

The proposed Escrow Agent will be First American Title Company. Or other reputable financial institution such as Bank of America or Wells Fargo Bank. Established more than 100 years ago, First American is a leader in the real estate and foreign investment services industry. Every year, First American Title insures one out of every five properties sold or refinanced in the country. They have a commitment to efficiency, service and accuracy that makes it possible to remain the industry leader. As the country's leading provider of real estate information, First American is well known in the industry to expedite transactions promptly and reliably, and generate revenue with greater ease and confidence while maintaining the security of the funds deposited.

Limited Partnership investment funds will be deposited into an escrow account with an approved escrow company in the United States. These funds shall only be released to the development entity upon approval of the Immigrant Petition By Alien Entrepreneur (Form I-526).

A fee escrow account will be established for associated services and fees related to due diligence in the processing of the visa application. A portion of the fee escrowed amount shall be released within ten days of escrow opening, with the balance remaining in escrow until approval of the Immigrant Petition By Alien Entrepreneur (Form I-526) unless an earlier release is required for use by the project.

2. PROJECT DESCRIPTIONS

[Pursuant to 8 CFR 204.6(m)(3)(ii) and *Matter of Ho*] (b)(4)

2.1 Overview of Regional Center Projects



(b)(4)

2.2 Sample Office Building Project



Index 1 - Professional and Medical Offices

Redevelopment Project

San Bernardino, CA

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Index 6 - Retail Building Proposal

Retail Development

Redevelopment Zone

Hesperia, California

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Recent Business Development Headlines in Hesperia

- **84 Lumber Returns to the Victor Valley with Hesperia Site**
Another prestigious name was added to the City's business directory with 84 Lumber breaking ground.
- **7/1/07 New Businesses Open All Over City**
Development on a variety of new commercial centers continues around the City. Residents can look forward to a variety of new retail businesses and restaurants opening.
- **Home Depot and Wal-Mart Announce Plans for Hesperia**
Both will anchor new center.
- **Gateway Center on Target**
New center to be anchored by Target.
- **Lennox Plaza, Coming Soon**
New retail and business center.

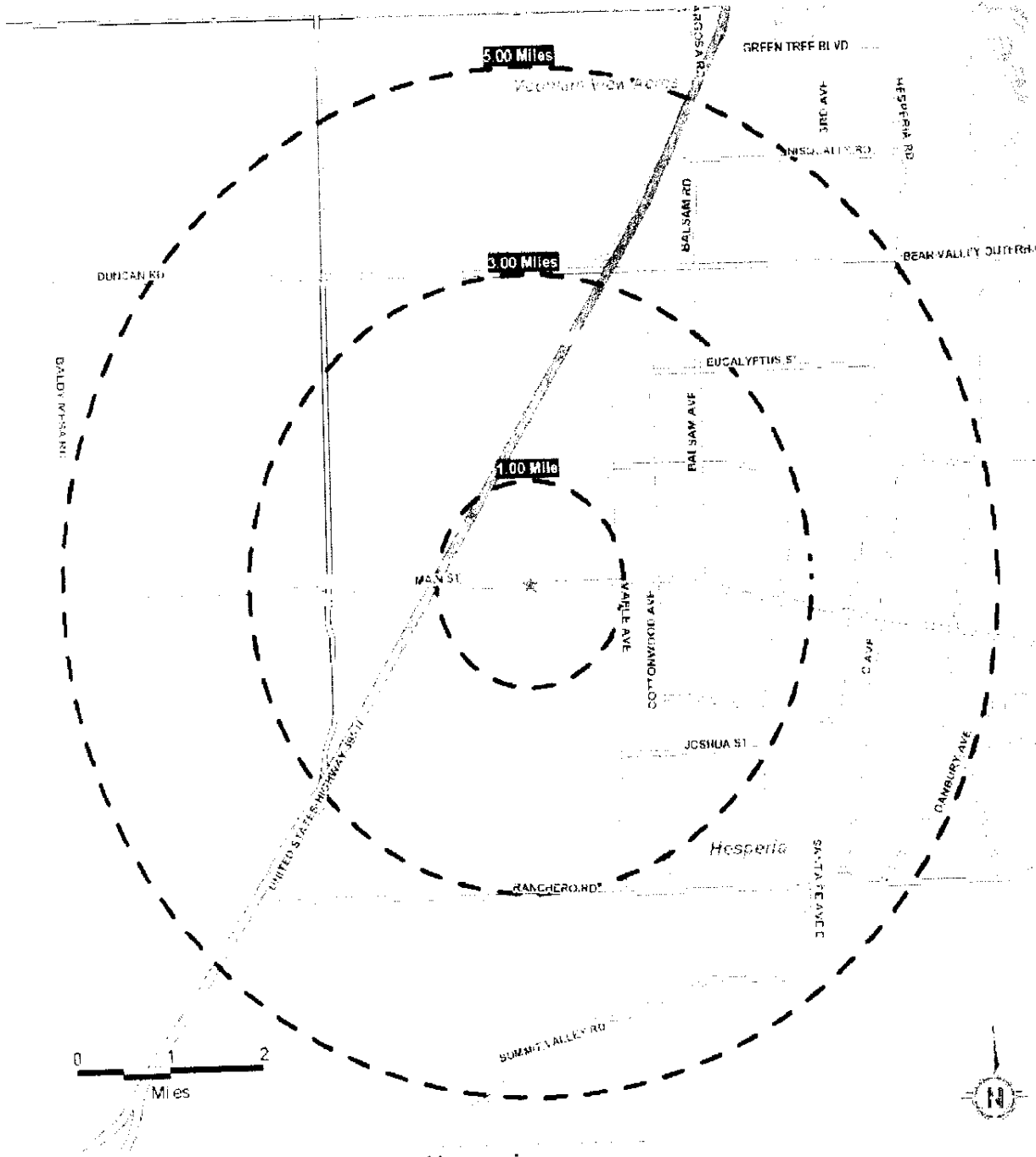
Hesperia, California		radius	radius	radius
RACE	2005 Est. White Population	78.1%	77.9%	73.5%
	2005 Est. Black Population	3.9%	3.7%	5.0%
	2005 Est. Asian & Pacific Islander	1.8%	1.6%	2.6%
	2005 Est. American Indian & Alaska Native	1.3%	1.3%	1.2%
	2005 Est. Other Races Population	10.8%	10.2%	13.8%
HISPANIC	2005 Est. Hispanic Population	1,133	9,075	31,133
	2005 Est. Hispanic Population Percent	36.0%	36.5%	36.5%
	2005 Est. Hispanic Population Percent	41.0%	41.1%	41.1%
	2005 Hispanic Population Percent	31.0%	30.6%	31.0%
EDUCATION (Adults 25 or Older)	2005 Est. Adult Population (25 years or Older)	1,754	16,525	50,233
	2005 Est. Literate % of Adul	8.4%	9.9%	9.7%
	2005 Est. Below High School (9 to 11)	10.1%	11.6%	11.6%
	2005 Est. High School Graduate (12)	23.0%	25.7%	25.1%
	2005 Est. Some College (13 to 18)	21.7%	21.4%	21.6%
	2005 Est. Associate Degree Only	7.4%	7.7%	7.4%
	2005 Est. Bachelor Degree Only	17.1%	16.6%	16.0%
	2005 Est. Graduate Degree	8.4%	8.0%	8.7%
HOUSING	2005 Est. Total Housing Units	1,011	6,998	26,610
	2005 Est. Owner Occupied Percent	50.7%	73.0%	73.2%
	2005 Est. Renter Occupied Percent	38.1%	21.7%	25.8%
	2005 Est. Vacant Housing Percent	0.2%	4.0%	1.0%
HOMES BUILT BY YEAR	2005 Homes Built 1980 to 2000	0.4%	1.6%	1.8%
	2005 Homes Built 1960 to 1980	9.2%	7.4%	7.1%
	2005 Homes Built 1900 to 1960	25.0%	14.1%	21.6%
	2005 Homes Built 1980 to 1990	39.3%	43.6%	41.6%

Hesperia Hesperia, California		1.00 mi radius	3.00 mi radius	5.00 mi radius
LABOR FORCE	2005 Est. Labor Population Age 16+	8,227	20,036	62,029
	2005 Est. Civilian Employed	43,874	65,596	54,776
	2005 Est. Civilian Unemployed	4,956	3,796	3,796
	2005 Est. in Armed Forces	-	0.1%	0.1%
	2005 Est. in Labor Force	41.0%	40.6%	41.5%
	2005 Est. Labor Force - Male	48.0%	49.0%	48.3%
	2005 Est. Labor Force - Female	50.0%	50.0%	51.2%
OCCUPATION	2005 Occupation - Population Age 16+	950	4,319	27,180
	2005 Mgmt. Business & Financial Operations	7.9%	6.0%	8.4%
	2005 Professional and Related	11.8%	10.6%	14.1%
	2005 Service	13.4%	15.0%	17.0%
	2005 Sales and Office	21.6%	27.4%	26.9%
	2005 Farming, Fishing, and Forestry	0.0%	0.0%	0.0%
	2005 Construction, Extraction, & Maintenance	14.2%	16.2%	15.2%
	2005 Production, Transportation & Material Moving	21.0%	18.5%	19.1%
	2005 Health Care Support	21.5%	18.9%	19.1%
	2005 Health Care Support - Male	40.5%	51.5%	51.6%
TRANSPORTATION TO WORK	2005 Drive to Work Alone	76.2%	76.4%	76.1%
	2005 Drive to Work in Carpool	18.0%	17.6%	18.1%
	2005 Travel to Work by Public Transportation	1.0%	0.5%	0.7%
	2005 Drive to Work on Motorcycle	0.2%	0.0%	0.0%
	2005 Walk or Bicycle to Work	0.5%	1.0%	1.0%
	2005 Other Means	2.4%	0.5%	0.9%
	2005 Work at Home	1.4%	3.7%	3.3%
	2005 Average Travel Time to Work	16.4%	17.9%	21.0%
TRAVEL TIME	2005 Travel to Work in 15 Minutes or Less	16.4%	17.9%	21.0%
	2005 Travel to Work in 15 to 29 Minutes	26.6%	26.5%	27.6%
	2005 Travel to Work in 30 to 59 Minutes	36.0%	33.2%	29.8%
	2005 Travel to Work in 60 Minutes or More	18.1%	22.2%	21.0%
	2005 Average Travel Time to Work	35.0	35.0	35.0
CONSUMER EXPENDITURE	2005 Est. Retail Business Expenditure on Merchandise	\$ 454	\$ 424.7	\$ 1,273.2
	2005 Est. Apparel	\$ 3.0	\$ 14.7	\$ 59.6
	2005 Est. Books, Music, & Gifts	\$ 2.7	\$ 23.7	\$ 77.1
	2005 Est. Education & Reading	\$ 1.0	\$ 9.7	\$ 29.6
	2005 Est. Entertainment	\$ 2.5	\$ 23.7	\$ 59.7
	2005 Est. Food, Beverages & Tobacco	\$ 7.0	\$ 37.7	\$ 204.0
	2005 Est. Furniture and Equipment	\$ 1.8	\$ 16.9	\$ 50.7
	2005 Est. Health, Drug & Cosmetics	\$ 3.3	\$ 31.0	\$ 93.1
	2005 Est. Household Operations & Services & Utilities	\$ 13.9	\$ 150.1	\$ 591.9
	2005 Est. Household Operations & Services & Utilities	\$ 3.7	\$ 6.7	\$ 20.0
	2005 Est. Motor Vehicle Expenses	\$ 0.6	\$ 3.9	\$ 17.9
	2005 Est. Personal Care	\$ 9.0	\$ 69.0	\$ 237.4
2005 Est. Transportation				

Full Demographic Profile⁵

⁵ Source: Applied Geographic Solutions.

Index 21- Population Density Map



Population Density
 (Persons per Square Mile)

- 7,500 or More
- 5,000 to 7,500
- 2,500 to 5,000
- 1,000 to 2,500
- Less than 1,000

Hesperia Hesperia, California

Current Year Estimated
 Persons per Square Mile

January, 2009

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5. PROMOTION OF ECONOMIC GROWTH AND PROJECTED OVERALL REGIONAL IMPACT

Attached as **Exhibit I**, as an addition to the economic report submitted with the original regional center application, is a further analysis of the economic growth and impact to the region which will result due to the ARRC's activities. As shown in **Exhibit I**, ARRC will have a significant impact on the growth and development of the designated geographic area, providing needed employment opportunities which will allow the areas to prosper.

In summary, the job creation projections for the sample projects within the AR Regional Center were based on an economic methodology that applied **RIMS II** (the Regional Input-Output Multiplier System) "Direct Effects" multipliers for particular uses to the primary/direct job figures for those uses that were determined based on square footage. The resulting figure is the total jobs generated as a result of investments into the regional center, including indirect and induced jobs.

The job calculation formula for AR Regional Center is as follows, assuming 10,000 square feet for each type of use:

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Exhibit A
(Exhibit to Overall Business Plan)



**State of California
Secretary of State**

LLC-1

File # **200832310139**

**LIMITED LIABILITY COMPANY
ARTICLES OF ORGANIZATION**

ENDORSED - FILED
In the office of the Secretary of State
of the State of California

NOV 17 2008

A \$70.00 filing fee must accompany this form.

This Space For Filing Use Only

IMPORTANT - Read instructions before completing this form.

ENTITY NAME (End the name with the words "Limited Liability Company," or the abbreviations "LLC" or "L.L.C." The words "Limited" and "Company" may be abbreviated to "Ltd." and "Co.," respectively.)

1. NAME OF LIMITED LIABILITY COMPANY
American Redevelopment Solutions, LLC

PURPOSE (The following statement is required by statute and should not be altered.)

2. THE PURPOSE OF THE LIMITED LIABILITY COMPANY IS TO ENGAGE IN ANY LAWFUL ACT OR ACTIVITY FOR WHICH A LIMITED LIABILITY COMPANY MAY BE ORGANIZED UNDER THE BEVERLY-KILLEA LIMITED LIABILITY COMPANY ACT.

INITIAL AGENT FOR SERVICE OF PROCESS (If the agent is an individual, the agent must reside in California and both items 3 and 4 must be completed. If the agent is a corporation, the agent must have on file with the California Secretary of State a certificate pursuant to Corporations Code section 1506 and item 3 must be completed (leave item 4 blank).)

3. NAME OF INITIAL AGENT FOR SERVICE OF PROCESS
InCorp Services, Inc.

4. IF AN INDIVIDUAL, ADDRESS OF INITIAL AGENT FOR SERVICE OF PROCESS IN CALIFORNIA

CITY	STATE	ZIP CODE
	CA	

MANAGEMENT (Check only one)

5. THE LIMITED LIABILITY COMPANY WILL BE MANAGED BY:

- ONE MANAGER
- MORE THAN ONE MANAGER
- ALL LIMITED LIABILITY COMPANY MEMBER(S)

ADDITIONAL INFORMATION

6. ADDITIONAL INFORMATION SET FORTH ON THE ATTACHED PAGES, IF ANY, IS INCORPORATED HEREIN BY THIS REFERENCE AND MADE A PART OF THIS CERTIFICATE.

EXECUTION

7. I DECLARE I AM THE PERSON WHO EXECUTED THIS INSTRUMENT, WHICH EXECUTION IS MY ACT AND DEED.

August 8, 2008
DATE

Sherilyn O'Dell
SIGNATURE OF ORGANIZER

Sherilyn Learned O'Dell
TYPE OR PRINT NAME OF ORGANIZER



Exhibit B
(Exhibit to Overall Business Plan)

Year 1 refers to time of investment made by immigrant investor

Projected ARRC Project Time Line

(subject to change due to market conditions)

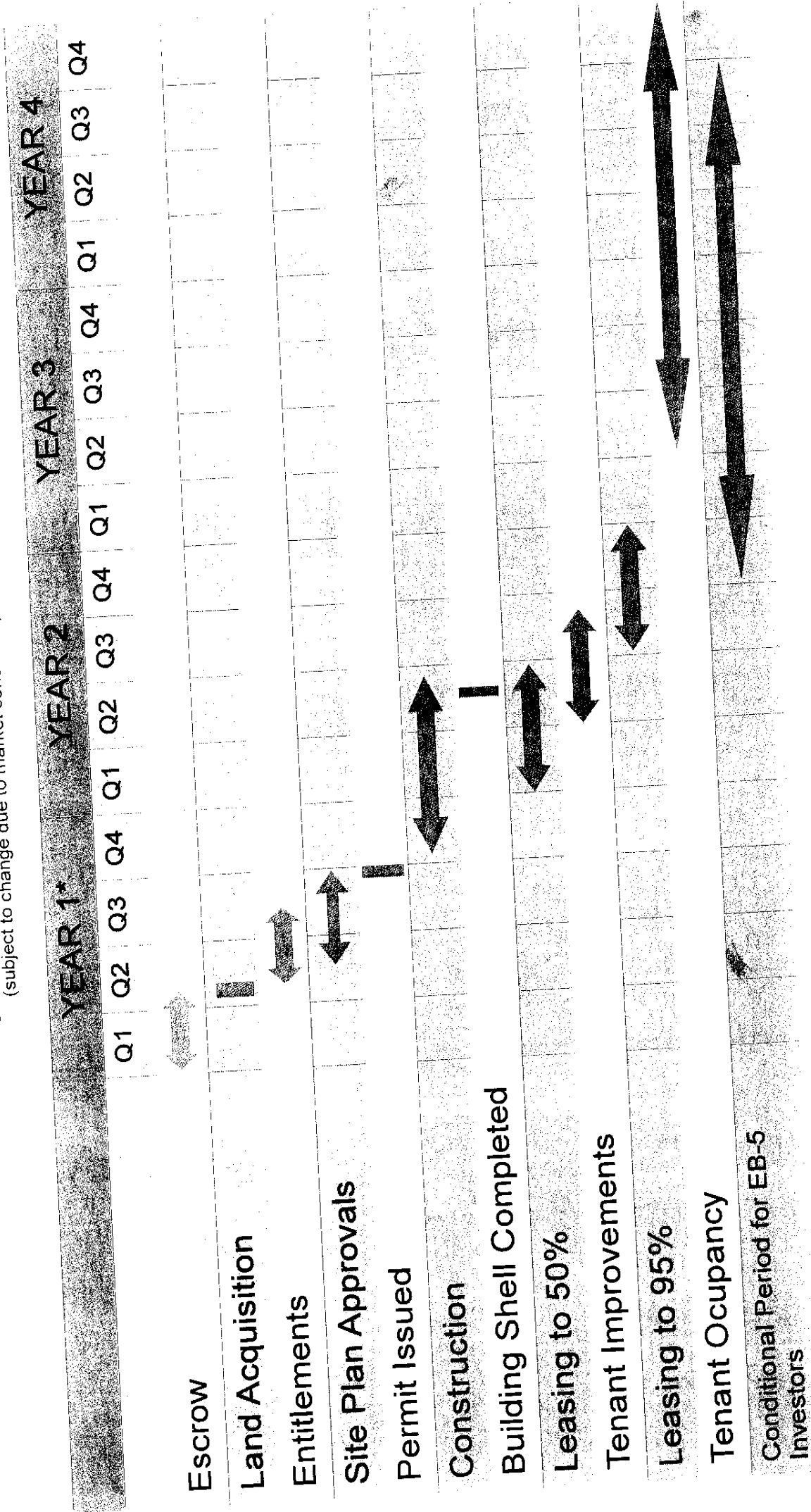
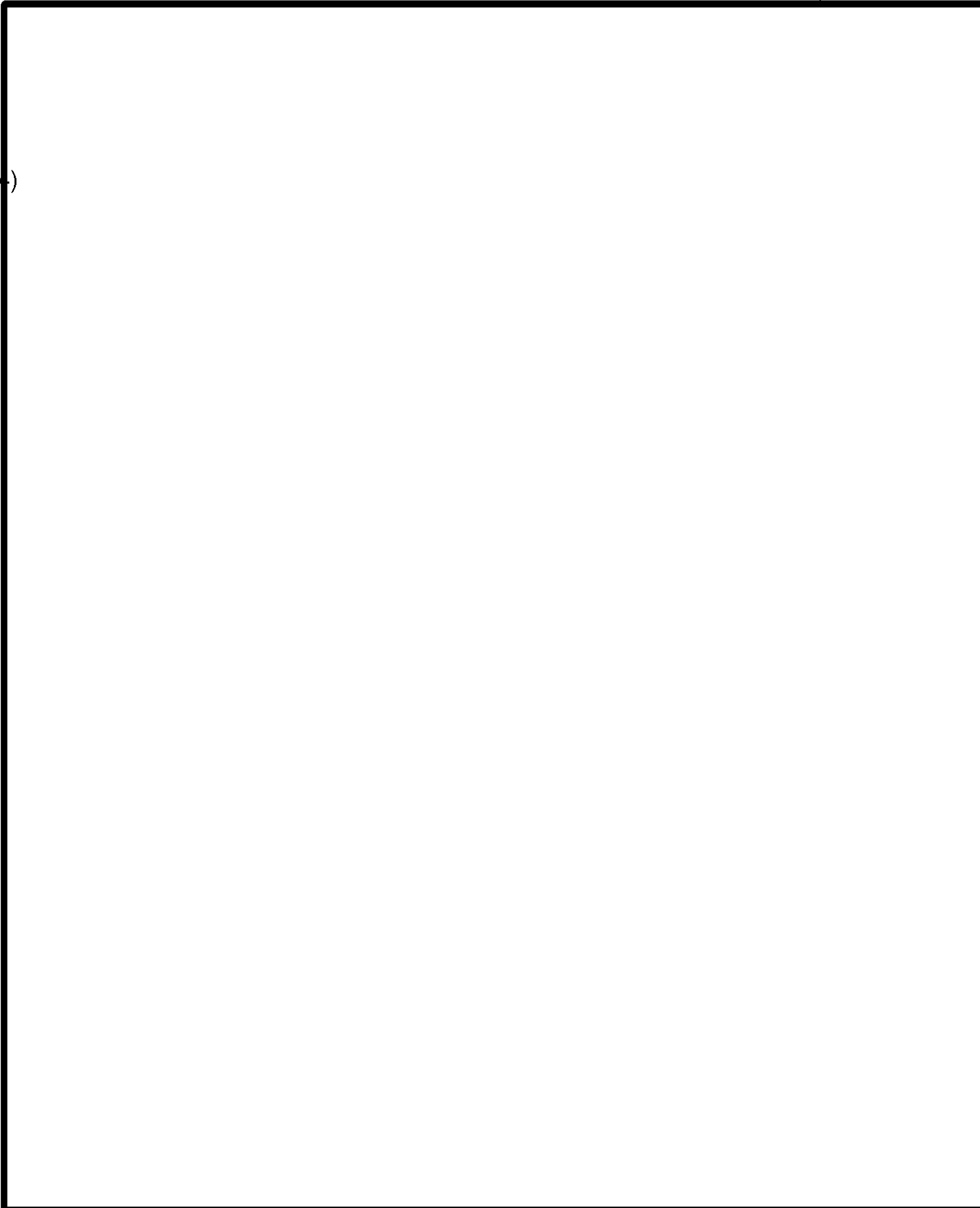


Exhibit C
(Exhibit to Overall Business Plan)

IMMIGRATION INVESTOR SUBSCRIPTION AGREEMENT

Dear Prospective Investor:

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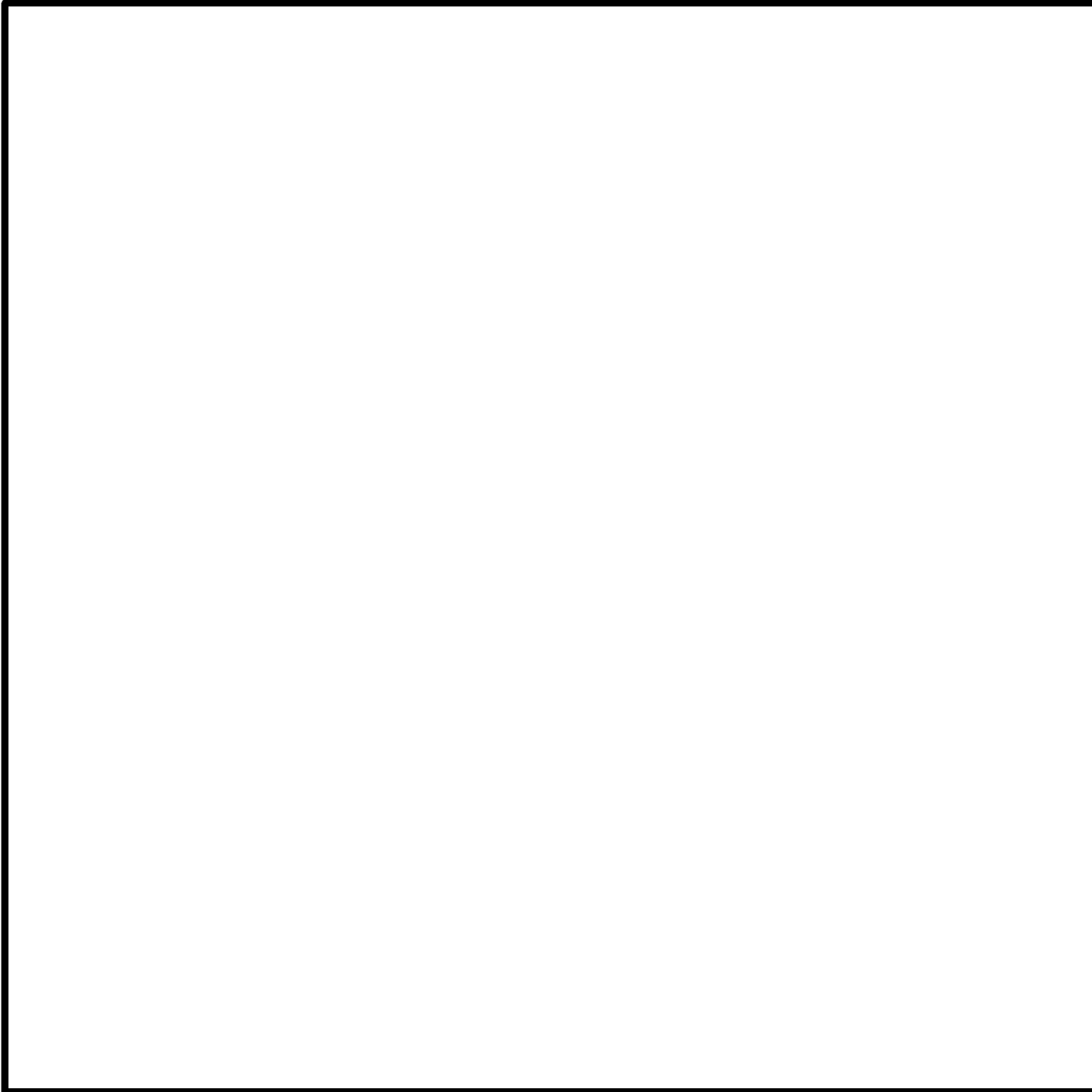
Exhibit D
(Exhibit to Overall Business Plan)

OFFERING Circular # _____

**REDEVELOPMENT OPPORTUNITY I LIMITED
PARTNERSHIP**
A California Limited Partnership

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OFFERING MEMORANDUM



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OFFERING MEMORANDUM

INTRODUCTION

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Exhibit E
(Exhibit to Overall Business Plan)

LIMITED PARTNERSHIP AGREEMENT

OF

REDEVELOPMENT OPPORTUNITIES I LIMITED PARTNERSHIP

A California Limited Partnership

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**LIMITED PARTNERSHIP AGREEMENT
OF
REDEVELOPMENT OPPORTUNITIES I LIMITED PARTNERSHIP
A California Limited Partnership**

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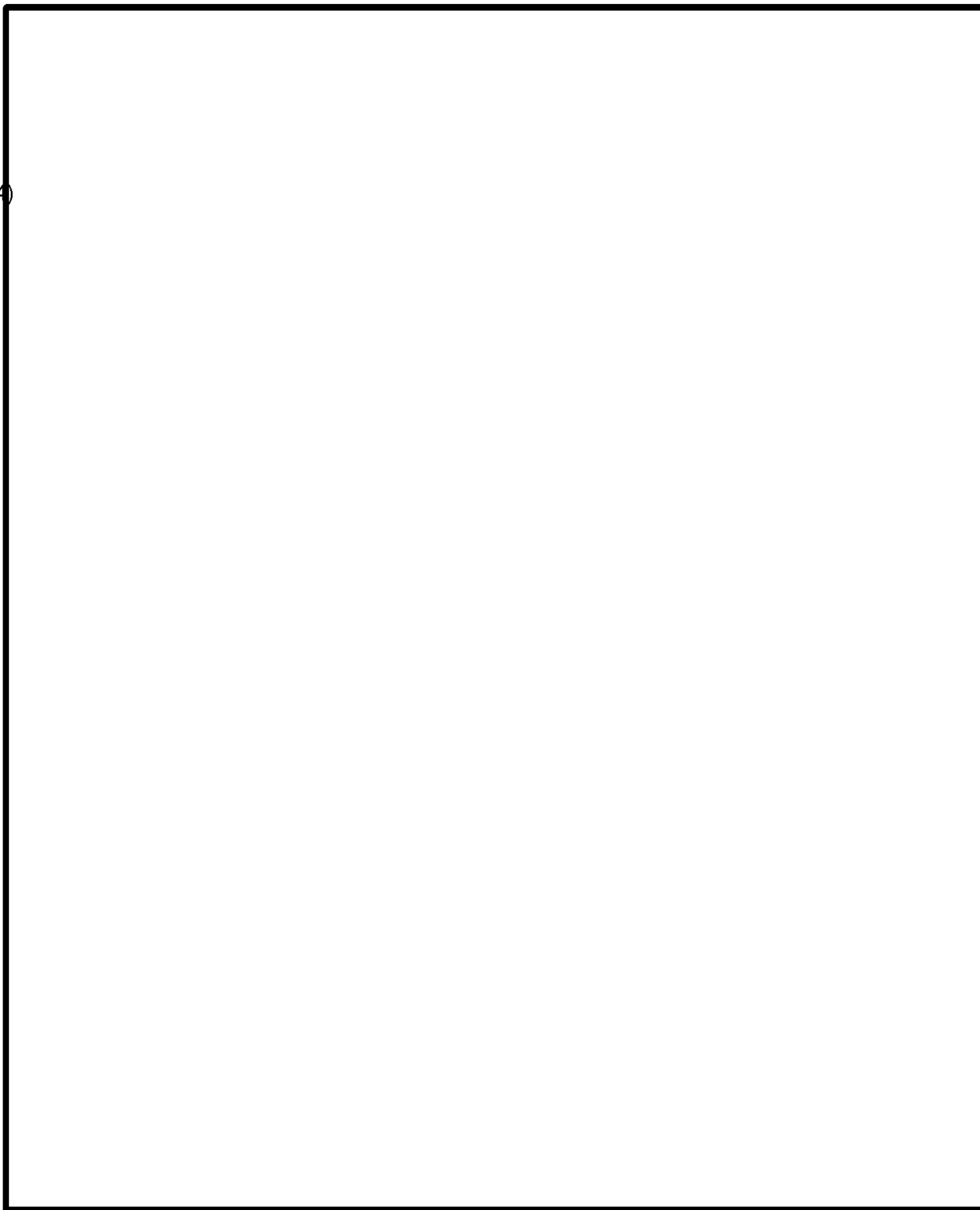
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Exhibit F
(Exhibit to Overall Business Plan)

RISK FACTORS AND DISCLOSURES



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Exhibit G
(Exhibit to Overall Business Plan)

Redevelopment Opportunities I Limited Partnership

ESCROW AGREEMENT

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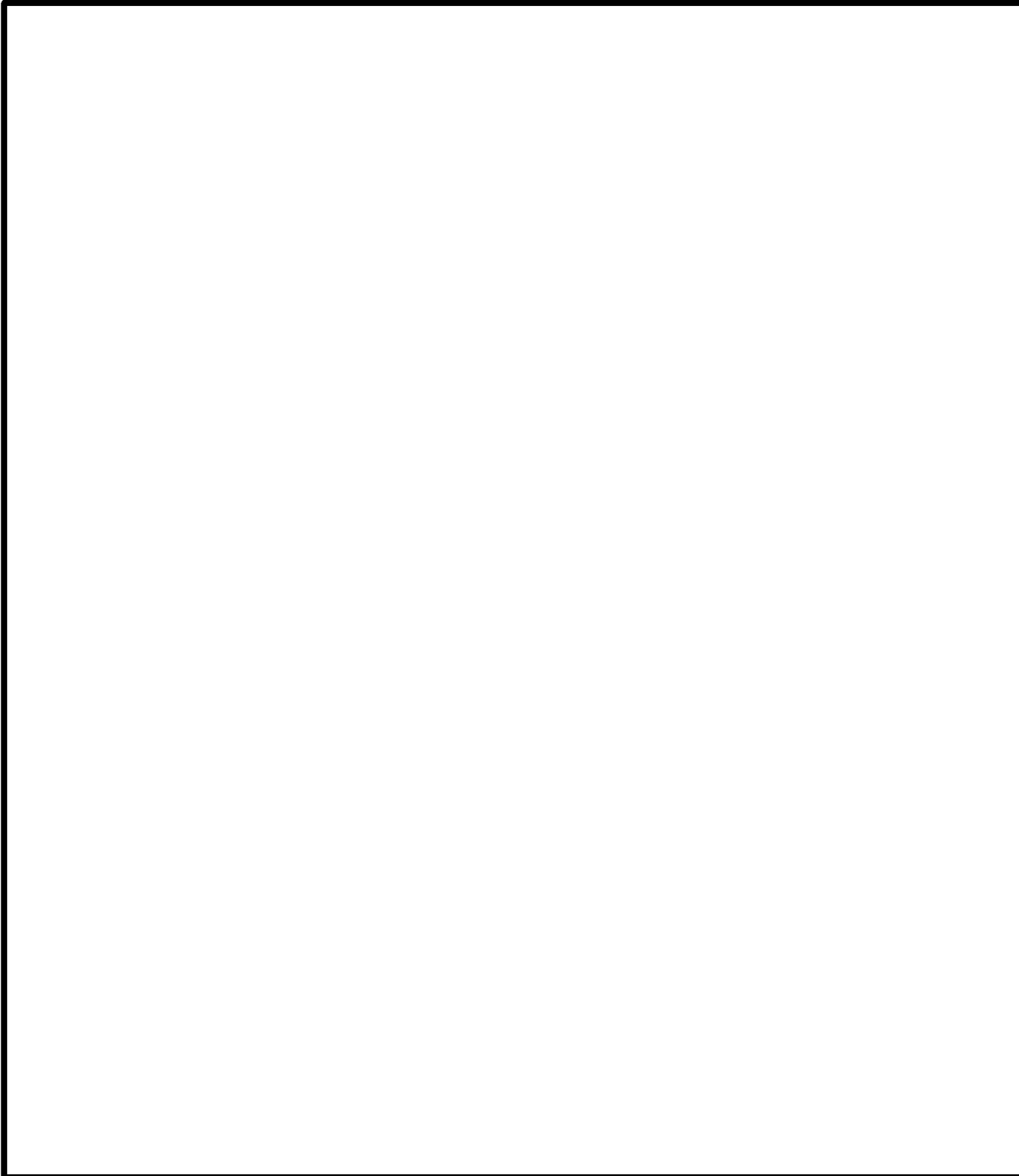
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Exhibit H
(Exhibit to Overall Business Plan)

**AMERICAN REDEVELOPMENT REGIONAL CENTER ECONOMIC ANALYSIS
ADDENDUM (DR. HART HODGES, JUNE 11, 2009)**

I. OVERVIEW OF ANALYSIS



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**AMERICAN REDEVELOPMENT REGIONAL CENTER ECONOMIC ANALYSIS
ADDENDUM (DR. HART HODGES, JUNE 11, 2009)**

I. OVERVIEW OF ANALYSIS

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Industry List A. RIMS II 473 Detailed Industry Codes

Detailed industry code and title	Related 1997 NAICS codes	Detailed industry code and title	Related 1997 NAICS codes
AGRICULTURE, FORESTRY, FISHING, AND HUNTING		MANUFACTURING	
1110 Crop production		3110 Food manufacturing	
1111A0 Oilseed farming	11111, 11112	311111 Dog and cat food manufacturing	311111
1111B0 Grain farming	11113, 11114, 11115, 11116, 11119	311119 Other animal food manufacturing	311119
111200 Vegetable and melon farming	1112	311211 Flour milling	311211
1113A0 Fruit farming	11131, 11132, 111331- 4, 111336, 111339	311212 Rice milling	311212
111335 Tree nut farming	111335	311213 Malt manufacturing	311213
111400 Greenhouse and nursery production	1114	311221 Wet corn milling	311221
111910 Tobacco farming	11191	311222 Soybean processing	311222
111920 Cotton farming	11192	311223 Other oilseed processing	311223
1119A0 Sugarcane and sugar beet farming	11193, 111991	311225 Fats and oils refining and blending	311225
1119B0 All other crop farming	11194, 111992, 111998	311230 Breakfast cereal manufacturing	31123
1120 Animal production		311310 Sugar manufacturing	31131
112100 Cattle ranching and farming	1121	311320 Confectionery manufacturing from cacao beans	31132
112300 Poultry and egg production	1123	311330 Confectionery manufacturing from purchased chocolate	31133
112A00 Animal production, except cattle and poultry and eggs	1122, 1124, 1125, 1129	311340 Nonchocolate confectionery manufacturing	31134
1130 Forestry and logging		311410 Frozen food manufacturing	31141
113A00 Forest nurseries, forest products, and timber tracts	1131, 1132	311420 Fruit and vegetable canning and drying	31142
113300 Logging	1133	311511 Fluid milk manufacturing	311511
1140 Fishing, hunting and trapping		311512 Creamery butter manufacturing	311512
114100 Fishing	1141	311513 Cheese manufacturing	311513
114200 Hunting and trapping	1142	311514 Dry, condensed, and evaporated dairy products	311514
1150 Agriculture and forestry support activities		311520 Ice cream and frozen dessert manufacturing	31152
115000 Agriculture and forestry support activities	115	311611 Animal, except poultry, slaughtering	311611
MINING		311612 Meat processed from carcasses	311612
2110 Oil and gas extraction		311613 Rendering and meat byproduct processing	311613
211000 Oil and gas extraction	211	311615 Poultry processing	311615
2121 Coal mining		311700 Seafood product preparation and packaging	3117
212100 Coal mining	2121	31181A Bread and bakery product, except frozen, manufacturing	31181-2
2122 Metal ores mining		311813 Frozen cakes and other pastries manufacturing	311813
212210 Iron ore mining	21221	311821 Cookie and cracker manufacturing	311821
212230 Copper, nickel, lead, and zinc mining	21223	311822 Mixes and dough made from purchased flour	311822
2122A0 Gold, silver, and other metal ore mining	21222, 21229	311823 Dry pasta manufacturing	311823
2123 Nonmetallic mineral mining and quarrying		311830 Tortilla manufacturing	31183
212310 Stone mining and quarrying	21231	311911 Roasted nuts and peanut butter manufacturing	311911
212320 Sand, gravel, clay, and refractory mining	21232	311919 Other snack food manufacturing	311919
212390 Other nonmetallic mineral mining	21239	311920 Coffee and tea manufacturing	31192
2130 Support activities for mining		311930 Flavoring syrup and concentrate manufacturing	31193
213111 Drilling oil and gas wells	213111	311941 Mayonnaise, dressing, and sauce manufacturing	311941
213112 Support activities for oil and gas operations	213112	311942 Spice and extract manufacturing	311942
21311A Support activities for other mining	213113-5	311990 All other food manufacturing	31199
UTILITIES		3121 Beverage manufacturing	
2211 Power generation and supply		312110 Soft drink and ice manufacturing	31211
2211A0 Power generation and supply	2211 (1)	312120 Breweries	31212
2212 Natural gas distribution		312130 Wineries	31213
221200 Natural gas distribution	2212	312140 Distilleries	31214
2213 Water, sewage and other systems		3122 Tobacco manufacturing	
221300 Water, sewage and other systems	2213	312210 Tobacco stemming and redrying	31221
CONSTRUCTION		312221 Cigarette manufacturing	312221
2300 Construction		312229 Other tobacco product manufacturing	312229
230000 Construction	23	3130 Textile mills	
		313100 Fiber, yarn, and thread mills	3131
		313210 Broadwoven fabric mills	31321
		313220 Narrow fabric mills and schiffli embroidery	31322
		313230 Nonwoven fabric mills	31323
		313240 Knit fabric mills	31324
		313310 Textile and fabric finishing mills	31331
		313320 Fabric coating mills	31332
		3140 Textile product mills	
		314110 Carpet and rug mills	31411
		314120 Curtain and linen mills	31412
		314910 Textile bag and canvas mills	31491
		314992 Tire cord and tire fabric mills	314992
		31499A Other miscellaneous textile product mills	314991, 314999
		3150 Apparel manufacturing	
		315111 Sheer hosiery mills	315111

Industry List A. RIMS II 473 Detailed Industry Codes

Detailed industry code and title	Related 1997 NAICS codes	Detailed industry code and title	Related 1997 NAICS codes
315119 Other hosiery and sock mills	315119	325320 Pesticide and other agricultural chemical manufacturing	32532
315190 Other apparel knitting mills	31519	3254 Pharmaceutical and medicine manufacturing	
315200 Cut and sew apparel manufacturing	3152	325400 Pharmaceutical and medicine manufacturing	3254
315900 Accessories and other apparel manufacturing	3159	3255 Paint, coating, and adhesive manufacturing	
3160 Leather and allied product manufacturing		325510 Paint and coating manufacturing	32551
316100 Leather and hide tanning and finishing	3161	325520 Adhesive manufacturing	32552
316200 Footwear manufacturing	3162	3256 Soap, cleaning compound, and toiletry manufacturing	
316900 Other leather product manufacturing	3169	325611 Soap and other detergent manufacturing	325611
3210 Wood product manufacturing		325612 Polish and other sanitation good manufacturing	325612
321113 Sawmills	321113	325613 Surface active agent manufacturing	325613
321114 Wood preservation	321114	325620 Toilet preparation manufacturing	32562
32121A Veneer and plywood manufacturing	321211-2	3259 Other chemical product and preparation manufacturing	
32121B Engineered wood member and truss manufacturing	321213-4	325910 Printing ink manufacturing	32591
321219 Reconstituted wood product manufacturing	321219	325920 Explosives manufacturing	32592
321911 Wood windows and door manufacturing	321911	325991 Custom compounding of purchased resins	325991
321912 Cut stock, resawing lumber, and planing	321912	325992 Photographic film and chemical manufacturing	325992
321918 Other millwork, including flooring	321918	325998 Other miscellaneous chemical product manufacturing	325998
321920 Wood container and pallet manufacturing	32192	3260 Plastics and rubber products manufacturing	
321991 Manufactured home, mobile home, manufacturing	321991	326110 Plastics packaging materials, film and sheet	32611
321992 Prefabricated wood building manufacturing	321992	326120 Plastics pipe, fittings, and profile shapes	32612
321999 Miscellaneous wood product manufacturing	321999	326130 Laminated plastics plate, sheet, and shapes	32613
3221 Pulp, paper, and paperboard mills		3261A0 Foam product manufacturing	3261A, 32615
322110 Pulp mills	32211	326160 Plastics bottle manufacturing	32616
3221A0 Paper and paperboard mills	32212, 32213	326192 Resilient floor covering manufacturing	326192
3222 Converted paper product manufacturing		32619A Plastics plumbing fixtures and all other plastics products	326191, 326199
322210 Paperboard container manufacturing	32221	326210 Tire manufacturing	32621
32222A Coated and laminated paper and packaging materials	322221-2	326220 Rubber and plastics hose and belting manufacturing	32622
32222B Coated and uncoated paper bag manufacturing	322223-4	326290 Other rubber product manufacturing	32629
322225 Flexible packaging foil manufacturing	322225	3270 Nonmetallic mineral product manufacturing	
322226 Surface-coated paperboard manufacturing	322226	327111 Vitreous china plumbing fixture manufacturing	327111
322231 Die-cut paper office supplies manufacturing	322231	327112 Vitreous china and earthenware articles manufacturing	327112
322232 Envelope manufacturing	322232	327113 Porcelain electrical supply manufacturing	327113
322233 Stationery and related product manufacturing	322233	327121 Brick and structural clay tile manufacturing	327121
322291 Sanitary paper product manufacturing	322291	327122 Ceramic wall and floor tile manufacturing	327122
322299 All other converted paper product manufacturing	322299	32712A Clay refractory and other structural clay products	327123-4
3230 Printing and related support activities		327125 Glass container manufacturing	327125
32311A Commercial printing	323110-5, 323119	327213 Glass and glass products, except glass containers	327213
323116 Manifold business forms printing	323116	327310 Cement manufacturing	32731
323117 Books printing	323117	327320 Ready-mix concrete manufacturing	32732
323118 Blankbook and looseleaf binder manufacturing	323118	327331 Concrete block and brick manufacturing	327331
323121 Tradebinding and related work	323121	327332 Concrete pipe manufacturing	327332
323122 Prepress services	323122	327390 Other concrete product manufacturing	32739
3240 Petroleum and coal products manufacturing		327410 Lime manufacturing	32741
324110 Petroleum refineries	32411	327420 Gypsum product manufacturing	32742
324121 Asphalt paving mixture and block manufacturing	324121	327910 Abrasive product manufacturing	32791
324122 Asphalt shingle and coating materials manufacturing	324122	327991 Cut stone and stone product manufacturing	327991
324191 Petroleum lubricating oil and grease manufacturing	324191	327992 Ground or treated minerals and earths manufacturing	327992
324199 All other petroleum and coal products manufacturing	324199	327993 Mineral wool manufacturing	327993
3251 Basic chemical manufacturing		327999 Miscellaneous nonmetallic mineral products	327999
325110 Petrochemical manufacturing	32511	331A Iron and steel mills and manufacturing from purchased steel	
325120 Industrial gas manufacturing	32512	331111 Iron and steel mills	331111
325130 Synthetic dye and pigment manufacturing	32513	331112 Ferroalloy and related product manufacturing	331112
325180 Other basic inorganic chemical manufacturing	32518	331210 Iron, steel pipe and tube from purchased steel	33121
325190 Other basic organic chemical manufacturing	32519	331221 Rolled steel shape manufacturing	331221
3252 Resin, rubber, and artificial fibers manufacturing		331222 Steel wire drawing	331222
325211 Plastics material and resin manufacturing	325211	331B Nonferrous metal production and processing	
325212 Synthetic rubber manufacturing	325212	331311 Alumina refining	331311
325221 Cellulosic organic fiber manufacturing	325221	331312 Primary aluminum production	331312
325222 Noncellulosic organic fiber manufacturing	325222	331314 Secondary smelting and alloying of aluminum	331314
3253 Agricultural chemical manufacturing		331315 Aluminum sheet, plate, and foil manufacturing	331315
325311 Nitrogenous fertilizer manufacturing	325311	331316 Aluminum extruded product manufacturing	331316
325312 Phosphatic fertilizer manufacturing	325312	331319 Other aluminum rolling and drawing	331319
325314 Fertilizer, mixing only, manufacturing	325314	331411 Primary smelting and refining of copper	331411

Industry List A. RIMS II 473 Detailed Industry Codes

Detailed industry code and title	Related 1997 NAICS codes	Detailed industry code and title	Related 1997 NAICS codes
331419 Primary nonferrous metal, except copper and aluminum...	331419	333295 Semiconductor machinery manufacturing	333295
331421 Copper rolling, drawing, and extruding	331421	333298 All other industrial machinery manufacturing	333298
331422 Copper wire, except mechanical, drawing	331422	3333 Commercial and service industry machinery	
331423 Secondary processing of copper	331423	33331A Automatic vending, commercial laundry and drycleaning machinery	333311-2
331491 Nonferrous metal, except copper and aluminum, shaping	331491	333313 Office machinery manufacturing	333313
331492 Secondary processing of other nonferrous	331492	333314 Optical instrument and lens manufacturing	333314
3315 Foundries		333315 Photographic and photocopying equipment manufacturing	333315
331510 Ferrous metal foundries	33151	333319 Other commercial and service machinery manufacturing	333319
33152A Aluminum foundries	331521, 331524	3334 HVAC and commercial refrigeration equipment	
33152B Nonferrous foundries, except aluminum	331522, 331525, 331528	333411 Air purification equipment manufacturing	333411
3321 Forging and stamping		333412 Industrial and commercial fan and blower manufacturing	333412
332111 Iron and steel forging	332111	333414 Heating equipment, except warm air furnaces	333414
332112 Nonferrous forging	332112	333415 AC, refrigeration, and forced air heating	333415
332114 Custom roll forming	332114	3335 Metalworking machinery manufacturing	
33211A All other forging and stamping	332115-7	333511 Industrial mold manufacturing	333511
3322 Cutlery and handtool manufacturing		333512 Metal cutting machine tool manufacturing	333512
332211 Cutlery and flatware, except precious, manufacturing	332211	333513 Metal forming machine tool manufacturing	333513
332212 Hand and edge tool manufacturing	332212	333514 Special tool, die, jig, and fixture manufacturing	333514
332213 Saw blade and handsaw manufacturing	332213	333515 Cutting tool and machine tool accessory manufacturing	333515
332214 Kitchen utensil, pot, and pan manufacturing	332214	33351A Rolling mill and other metalworking machinery	333516, 333518
3323 Architectural and structural metals manufacturing		3336 Turbine and power transmission equipment manufacturing	
332311 Prefabricated metal buildings and components	332311	333611 Turbine and turbine generator set units manufacturing	333611
332312 Fabricated structural metal manufacturing	332312	33361A Speed changers and mechanical power transmission equipment	333612-3
332313 Plate work manufacturing	332313	333618 Other engine equipment manufacturing	333618
332321 Metal window and door manufacturing	332321	3339 Other general purpose machinery manufacturing	
332322 Sheet metal work manufacturing	332322	333911 Pump and pumping equipment manufacturing	333911
332323 Ornamental and architectural metal work manufacturing	332323	333912 Air and gas compressor manufacturing	333912
3324 Boiler, tank, and shipping container manufacturing		333913 Measuring and dispensing pump manufacturing	333913
332410 Power boiler and heat exchanger manufacturing	33241	333921 Elevator and moving stairway manufacturing	333921
332420 Metal tank, heavy gauge, manufacturing	33242	333922 Conveyor and conveying equipment manufacturing	333922
332430 Metal can, box, and other container manufacturing	33243	333923 Overhead cranes, hoists, and monorail systems	333923
332A Ordnance and accessories manufacturing		333924 Industrial truck, trailer, and stacker manufacturing	333924
33299A Ammunition manufacturing	332992-3	333991 Power-driven handtool manufacturing	333991
332994 Small arms manufacturing	332994	333992 Welding and soldering equipment manufacturing	333992
332995 Other ordnance and accessories manufacturing	332995	333993 Packaging machinery manufacturing	333993
332B Other fabricated metal product manufacturing		333994 Industrial process furnace and oven manufacturing	333994
332500 Hardware manufacturing	3325	333995 Fluid power cylinder and actuator manufacturing	333995
332600 Spring and wire product manufacturing	3326	333996 Fluid power pump and motor manufacturing	333996
332710 Machine shops	33271	33399A Scales, balances, and miscellaneous general purpose machinery	333997, 333999
332720 Turned product and screw, nut, and bolt manufacturing	33272	3341 Computer and peripheral equipment manufacturing	
332811 Metal heat treating	332811	334111 Electronic computer manufacturing	334111
332812 Metal coating and nonprecious engraving	332812	334112 Computer storage device manufacturing	334112
332813 Electroplating, anodizing, and coloring metal	332813	334113 Computer terminal manufacturing	334113
332910 Metal valve manufacturing	33291	334119 Other computer peripheral equipment manufacturing	334119
332991 Ball and roller bearing manufacturing	332991	334A Audio, video, and communications equipment manufacturing	
332996 Fabricated pipe and pipe fitting manufacturing	332996	334210 Telephone apparatus manufacturing	33421
332997 Industrial pattern manufacturing	332997	334220 Broadcast and wireless communications equipment	33422
332998 Enameled iron and metal sanitary ware manufacturing	332998	334290 Other communications equipment manufacturing	33429
332999 Miscellaneous fabricated metal product manufacturing	332999	334300 Audio and video equipment manufacturing	3343
3331 Agriculture, construction, and mining machinery		3344 Semiconductor and electronic component manufacturing	
333111 Farm machinery and equipment manufacturing	333111	334411 Electron tube manufacturing	334411
333112 Lawn and garden equipment manufacturing	333112	334413 Semiconductors and related device manufacturing	334413
333120 Construction machinery manufacturing	33312	33441A All other electronic component manufacturing	334412, 334414-9
333131 Mining machinery and equipment manufacturing	333131	3345 Electronic instrument manufacturing	
333132 Oil and gas field machinery and equipment	333132	334510 Electromedical apparatus manufacturing	334510
3332 Industrial machinery manufacturing		334511 Search, detection, and navigation instruments	334511
333210 Sawmill and woodworking machinery	33321	334512 Automatic environmental control manufacturing	334512
333220 Plastics and rubber industry machinery	33322	334513 Industrial process variable instruments	334513
333291 Paper industry machinery manufacturing	333291	334514 Totalizing fluid meters and counting devices	334514
333292 Textile machinery manufacturing	333292	334515 Electricity and signal testing instruments	334515
333293 Printing machinery and equipment manufacturing	333293		
333294 Food product machinery manufacturing	333294		

Industry List A. RIMS II 473 Detailed Industry Codes

Detailed industry code and title	Related 1997 NAICS codes	Detailed industry code and title	Related 1997 NAICS codes
334516 Analytical laboratory instrument manufacturing	334516	337212 Custom architectural woodwork and millwork	337212
334517 Irradiation apparatus manufacturing	334517	337214 Office furniture, except wood, manufacturing	337214
33451A Watch, clock, and other measuring and controlling device manufacturing	334518-9	337215 Showcases, partitions, shelving, and lockers	337215
3346 Magnetic media manufacturing and reproducing		337910 Mattress manufacturing	33791
334611 Software reproducing	334611	337920 Blind and shade manufacturing	33792
334612 Audio and video media reproduction	334612	3391 Medical equipment and supplies manufacturing	
334613 Magnetic and optical recording media manufacturing	334613	339111 Laboratory apparatus and furniture manufacturing	339111
3351 Electric lighting equipment manufacturing		339112 Surgical and medical instrument manufacturing	339112
335110 Electric lamp bulb and part manufacturing	33511	339113 Surgical appliance and supplies manufacturing	339113
335120 Lighting fixture manufacturing	33512	339114 Dental equipment and supplies manufacturing	339114
3352 Household appliance manufacturing		339115 Ophthalmic goods manufacturing	339115
335211 Electric housewares and household fan manufacturing	335211	339116 Dental laboratories	339116
335212 Household vacuum cleaner manufacturing	335212	3399 Other miscellaneous manufacturing	
335221 Household cooking appliance manufacturing	335221	339910 Jewelry and silverware manufacturing	33991
335222 Household refrigerator and home freezer manufacturing	335222	339920 Sporting and athletic goods manufacturing	33992
335224 Household laundry equipment manufacturing	335224	339930 Doll, toy, and game manufacturing	33993
335228 Other major household appliance manufacturing	335228	339940 Office supplies, except paper, manufacturing	33994
3353 Electrical equipment manufacturing		339950 Sign manufacturing	33995
335311 Electric power and specialty transformer manufacturing	335311	339991 Gasket, packing, and sealing device manufacturing	339991
335312 Motor and generator manufacturing	335312	339992 Musical instrument manufacturing	339992
335313 Switchgear and switchboard apparatus manufacturing	335313	339994 Broom, brush, and mop manufacturing	339994
335314 Relay and industrial control manufacturing	335314	339995 Burial casket manufacturing	339995
3359 Other electrical equipment and component manufacturing		33999A Buttons, pins, and all other miscellaneous manufacturing	339993, 339999
335911 Storage battery manufacturing	335911	WHOLESALE TRADE	
335912 Primary battery manufacturing	335912	4200 Wholesale trade	
335921 Fiber optic cable manufacturing	335921	420000 Wholesale trade	42
335929 Other communication and energy wire manufacturing	335929	RETAIL TRADE	
335930 Wiring device manufacturing	33593	4400 Retail trade	
335991 Carbon and graphite product manufacturing	335991	440000 Retail trade	44, 45
335999 Miscellaneous electrical equipment manufacturing	335999	TRANSPORTATION AND WAREHOUSING, EXCLUDING POSTAL SERVICE	
3361 Motor vehicle manufacturing		4810 Air transportation	
336110 Automobile and light truck manufacturing	33611	481000 Air transportation	481
336120 Heavy duty truck manufacturing	33612	4820 Rail transportation	
336A Motor vehicle body, trailer, and parts manufacturing		482000 Rail transportation	482
336211 Motor vehicle body manufacturing	336211	4830 Water transportation	
336212 Truck trailer manufacturing	336212	483000 Water transportation	483
336213 Motor home manufacturing	336213	4840 Truck transportation	
336214 Travel trailer and camper manufacturing	336214	484000 Truck transportation	484
336300 Motor vehicle parts manufacturing	3363	4850 Transit and ground passenger transportation	
3364 Aerospace product and parts manufacturing		485A00 Transit and ground passenger transportation	485 (1)
336411 Aircraft manufacturing	336411	4860 Pipeline transportation	
336412 Aircraft engine and engine parts manufacturing	336412	486000 Pipeline transportation	486
336413 Other aircraft parts and equipment	336413	48A0 Scenic and sightseeing transportation and support activities for transportation	
336414 Guided missile and space vehicle manufacturing	336414	48A000 Scenic and sightseeing transportation and support activities for transportation	487, 488
33641A Propulsion units and parts for space vehicles and guided missiles	336415, 336419	4920 Couriers and messengers	
336B Other transportation equipment manufacturing		492000 Couriers and messengers	492
336500 Railroad rolling stock manufacturing	3365	4930 Warehousing and storage	
336611 Ship building and repairing	336611	493000 Warehousing and storage	493
336612 Boat building	336612	INFORMATION	
336991 Motorcycle, bicycle, and parts manufacturing	336991	5111 Newspaper, book, and directory publishers	
336992 Military armored vehicles and tank parts manufacturing	336992	511110 Newspaper publishers	51111
336999 All other transportation equipment manufacturing	336999	511120 Periodical publishers	51112
3370 Furniture and related product manufacturing			
337110 Wood kitchen cabinet and countertop manufacturing	33711		
337121 Upholstered household furniture manufacturing	337121		
337122 Nonupholstered wood household furniture manufacturing	337122		
337124 Metal household furniture manufacturing	337124		
337127 Institutional furniture manufacturing	337127		
33712A Other household and institutional furniture	337125, 337129		
337211 Wood office furniture manufacturing	337211		

Industry List A. RIMS II 473 Detailed Industry Codes

Detailed industry code and title	Related 1997 NAICS codes	Detailed industry code and title	Related 1997 NAICS codes
511130 Book publishers.....	51113	5414 Specialized design services	
5111A0 Database, directory, and other publishers.....	51114, 51119	541400 Specialized design services.....	5414
5112 Software publishers		5415 Computer systems design and related services	
511200 Software publishers.....	5112	541511 Custom computer programming services.....	541511
5120 Motion picture and sound recording industries		541512 Computer systems design services.....	541512
512100 Motion picture and video industries.....	5121	54151A Other computer related services, including facilities management.....	541513, 541519
512200 Sound recording industries.....	5122	5416 Management and technical consulting services	
5131 Radio and television broadcasting		541610 Management consulting services.....	54161
513100 Radio and television broadcasting.....	5131	5416A0 Environmental and other technical consulting services.....	54162, 54169
5132 Cable networks and program distribution		5417 Scientific research and development services	
513200 Cable networks and program distribution.....	5132	541700 Scientific research and development services.....	5417
5133 Telecommunications		5418 Advertising and related services	
513300 Telecommunications.....	5133	541800 Advertising and related services.....	5418
5141 Information services		5419 Other professional and technical services	
514100 Information services.....	5141	541920 Photographic services.....	54192
5142 Data processing services		541940 Veterinary services.....	54194
514200 Data processing services.....	5142	5419A0 All other miscellaneous professional and technical services.....	54191, 54193, 54199
FINANCE AND INSURANCE		MANAGEMENT OF COMPANIES AND ENTERPRISES	
52A0 Monetary authorities, credit intermediation and related activities		5500 Management of companies and enterprises	
52A000 Monetary authorities and depository credit intermediation.....	521, 5221	550000 Management of companies and enterprises.....	55
522A00 Nondepository credit intermediation and related activities.....	5222, 5223	ADMINISTRATIVE AND WASTE MANGEMENT SERVICES	
5230 Securities, commodity contracts, investments		5613 Employment services	
523000 Securities, commodity contracts, investments.....	523	561300 Employment services.....	5613
5240 Insurance carriers and related activities		5615 Travel arrangement and reservation services	
524100 Insurance carriers.....	5241	561500 Travel arrangement and reservation services.....	5615
524200 Insurance agencies, brokerages, and related.....	5242	561A All other administrative and support services	
5250 Funds, trusts, and other financial vehicles		561100 Office administrative services.....	5611
525000 Funds, trusts, and other financial vehicles.....	525	561200 Facilities support services.....	5612
REAL ESTATE AND RENTAL AND LEASING		561400 Business support services.....	5614
5310 Real estate		561600 Investigation and security services.....	5616
531000 Real estate.....	531	561700 Services to buildings and dwellings.....	5617
5008 Owner-occupied dwellings		561900 Other support services.....	5619
500800 Owner-occupied dwellings.....		5620 Waste management and remediation services	
5321 Automotive equipment rental and leasing		562000 Waste management and remediation services.....	562
532100 Automotive equipment rental and leasing.....	5321	EDUCATIONAL SERVICES	
532A Consumer goods and general rental centers		6100 Educational services	
532A00 General and consumer goods rental except video tapes and discs.....	53221, 53222, 53229, 5323	611100 Elementary and secondary schools.....	6111
532230 Video tape and disc rental.....	53223	611A00 Colleges, universities, and junior colleges.....	6112, 6113
5324 Machinery and equipment rental and leasing		611B00 Other educational services.....	6114, 6115, 6116, 6117
532400 Machinery and equipment rental and leasing.....	5324	HEALTH CARE AND SOCIAL ASSISTANCE	
5330 Lessors of nonfinancial intangible assets		6210 Ambulatory health care services	
533000 Lessors of nonfinancial intangible assets.....	533	621A00 Offices of physicians, dentists, and other health practitioners.....	6211, 6212, 6213
PROFESSIONAL, SCIENTIFIC, AND TECHNICAL SERVICES		621600 Home health care services.....	6216
5411 Legal services		621800 Other ambulatory health care services.....	6214, 6215, 6219
541100 Legal services.....	5411	6220 Hospitals	
5412 Accounting and bookkeeping services		622000 Hospitals.....	622
541200 Accounting and bookkeeping services.....	5412	6230 Nursing and residential care facilities	
5413 Architectural and engineering services		623000 Nursing and residential care facilities.....	623
541300 Architectural and engineering services.....	5413	6240 Social assistance	
		624400 Child day care services.....	6244

Industry List A. RIMS II 473 Detailed Industry Codes

Detailed industry code and title	Related 1997 NAICS codes
624A00 Social assistance, except child day care services	6241, 6242, 6243
ARTS, ENTERTAINMENT, AND RECREATION	
71A0 Performing arts, spectator sports, museums, zoos, and parks	
711100 Performing arts companies	7111
711200 Spectator sports	7112
711A00 Promoters of performing arts and sports and agents for public figures	7113, 7114
711500 Independent artists, writers, and performers.....	7115
712000 Museums, historical sites, zoos, and parks.....	712
7130 Amusements, gambling, and recreation	
713940 Fitness and recreational sports centers	71394
713950 Bowling centers	71395
713A00 Other amusement, gambling, and recreation industries	7131, 7132, 71391, 71392, 71393, 71399
ACCOMMODATION AND FOOD SERVICES	
7210 Accommodation	
7211A0 Hotels and motels, including casino hotels	72111, 72112
721A00 Other accommodations	72119, 7212, 7213
7220 Food services and drinking places	
722000 Food services and drinking places.....	722
OTHER SERVICES, EXCEPT PUBLIC ADMINISTRATION	
8111 Automotive repair and maintenance	
8111A0 Automotive repair and maintenance, except car washes...	81111, 81112, 811191, 811198
811192 Car washes	811192
811A Electronic, commercial, and household goods repair	
811200 Electronic equipment repair and maintenance	8112
811300 Commercial machinery repair and maintenance	8113
811400 Household goods repair and maintenance	8114
8120 Personal and laundry services	
812100 Personal care services	8121
812200 Death care services.....	8122
812300 Drycleaning and laundry services	8123
812900 Other personal services	8129
813A Religious, grantmaking and giving, and social advocacy organizations	
813100 Religious organizations	8131
813A00 Grantmaking and giving and social advocacy organizations	8132, 8133
813B Civic, social, professional and similar organizations	
813B00 Civic, social, professional and similar organizations	8134, 8139
SPECIAL INDUSTRIES	
S001 Federal and state and local government enterprises	
491000 Postal service	491
S00A00 Other government enterprises.....	
S002 Households	
H00000 Households	

1. Includes Federal Government enterprises.

Industry List B. RIMS II 60 Aggregated Industry Codes

Aggregate industry code and title	RIMS II detailed industry codes ¹
Agriculture, forestry, fishing, and hunting	
1 Crop and animal production.....	1111A0-112A00
2 Forestry, fishing, and related activities.....	113A00-115000
Mining	
3 Oil and gas extraction.....	211000
4 Mining, except oil and gas.....	212100-212390
5 Support activities for mining.....	213111-21311A
Utilities*	
6 Utilities*.....	2211A0-221300
Construction	
7 Construction.....	230000
Manufacturing	
8 Wood product manufacturing.....	321113-321999
9 Nonmetallic mineral product manufacturing.....	327111-327999
10 Primary metal manufacturing.....	331111-33152B
11 Fabricated metal product manufacturing.....	332111-332999
12 Machinery manufacturing.....	333111-33399A
13 Computer and electronic product manufacturing.....	334111-334613
14 Electrical equipment and appliance manufacturing.....	335110-335999
15 Motor vehicle, body, trailer, and parts manufacturing.....	336110-336300
16 Other transportation equipment manufacturing.....	336411-336999
17 Furniture and related product manufacturing.....	337110-337920
18 Miscellaneous manufacturing.....	339111-33999A
19 Food, beverage, and tobacco product manufacturing.....	311111-312229
20 Textile and textile product mills.....	313100-31499A
21 Apparel, leather, and allied product manufacturing.....	315111-316900
22 Paper manufacturing.....	322110-322299
23 Printing and related support activities.....	32311A-323122
24 Petroleum and coal products manufacturing.....	324110-324199
25 Chemical manufacturing.....	325110-325998
26 Plastics and rubber products manufacturing.....	326110-326290
Wholesale trade	
27 Wholesale trade.....	420000
Retail trade	
28 Retail trade.....	4A0000
Transportation and warehousing*	
29 Air transportation.....	481000
30 Rail transportation.....	482000
31 Water transportation.....	483000
32 Truck transportation.....	484000
33 Transit and ground passenger transportation*.....	485A00
34 Pipeline transportation.....	486000
35 Other transportation and support activities*.....	48A000-492000, 491000
36 Warehousing and storage.....	493000

Industry List B. RIMS II 60 Aggregated Industry Codes

Aggregate industry code and title		RIMS II detailed industry codes ¹
Information		
37	Publishing including software	511110-511200
38	Motion picture and sound recording industries	512100-512200
39	Broadcasting and telecommunications	513100-513300
40	Information and data processing services	514100-514200
Finance and insurance		
41	Federal Reserve banks, credit intermediation and related services	52A000-522A00
42	Securities, commodity contracts, investments	523000
43	Insurance carriers and related activities	524100-524200
44	Funds, trusts, and other financial vehicles	525000
Real estate and rental and leasing		
45	Real estate	531000, S00800
46	Rental and leasing services and lessors of intangible assets	532100-533000
Professional, scientific, and technical services		
47	Professional, scientific, and technical services	541100-5419A0
Management of companies and enterprises		
48	Management of companies and enterprises	550000
Administrative and waste management services		
49	Administrative and support services	561300-561900
50	Waste management and remediation services	562000
Educational services		
51	Educational services	611100-611B00
Health care and social assistance		
52	Ambulatory health care services	621A00-621B00
53	Hospitals and nursing and residential care facilities	622000-623000
54	Social assistance	624400-624A00
Arts, entertainment, and recreation		
55	Performing arts, museums, and related activities	711100-712000
56	Amusements, gambling, and recreation	713940-713A00
Accommodation and food services		
57	Accommodation	7211A0-721A00
58	Food services and drinking places	722000
Other services*		
59	Other services*	8111A0-813B00, S00A00
Households		
60	Households	H00000

* Includes Federal Government enterprises.

1. Industry List A identifies the RIMS II detailed industry codes.

Industry List C. RIMS II 20 Row Industry Codes

Group industry code and title	RIMS II detailed industry codes ¹	RIMS II aggregated industry codes ²
1 Agriculture, forestry, fishing, and hunting	1111A0-115000	1-2
2 Mining	211000-21311A	3-5
3 Utilities*	2211A0-221300	6
4 Construction	230000	7
5 Manufacturing	311111-33999A	8-26
6 Wholesale trade	420000	27
7 Retail trade	4A0000	28
8 Transportation and warehousing*	481000-493000	29-36
9 Information	511110-514200	37-40
10 Finance and insurance	52A000-525000	41-44
11 Real estate and rental and leasing	531000-533000	45-46
12 Professional, scientific, and technical services	541100-5419A0	47
13 Management of companies and enterprises	550000	48
14 Administrative and waste management services	561300-562000	49-50
15 Educational services	611100-611B00	51
16 Health care and social assistance	621A00-624A00	52-54
17 Arts, entertainment, and recreation	711100-713A00	55-56
18 Accommodation and food services	7211A0-722000	57-58
19 Other services*	8111A0-813B00, S00A00	59
20 Households	H00000	60

* Includes Federal Government enterprises.

1. Industry List A identifies the RIMS II detailed industry codes.

2. Industry List B identifies the RIMS II aggregated industry codes.



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Brief Description

Regional Multipliers from the Regional Input-Output Modeling System (RIMS II): A Brief Description

Overview

Effective planning for public- and private-sector projects and programs at the State and local levels requires a systematic analysis of the economic impacts of these projects and programs on affected regions. In turn, systematic analysis of economic impacts must account for the interindustry relationships within regions because these relationships largely determine how regional economies are likely to respond to project and program changes. Thus, regional input-output (I-O) multipliers, which account for interindustry relationships within regions, are useful tools for conducting regional economic impact analysis.

In the 1970s, the Bureau of Economic Analysis (BEA) developed a method for estimating regional I-O multipliers known as RIMS (Regional Industrial Multiplier System), which was based on the work of Garnick and Drake.¹ In the 1980s, BEA completed an enhancement of RIMS, known as RIMS II (Regional Input-Output Modeling System), and published a handbook for RIMS II users.² 1992, BEA published a second edition of the handbook in which the multipliers were based on more recent data and improved methodology. In 1997, BEA published a third edition of the handbook (PDF • 677 KB) that provides more detail on the use of the multipliers and the data sources and methods for estimating them.

RIMS II is based on an accounting framework called an I-O table. For each industry, an I-O table shows the industrial distribution of inputs purchased and outputs sold. A typical I-O table in RIMS II is derived mainly from two data sources: BEA's national I-O table (PDF • 824 KB), which shows the input and output structure of nearly 500 U.S. industries, and BEA's regional economic accounts, which are used to adjust the national I-O table to show a region's industrial structure and trading patterns.³

Using RIMS II for impact analysis has several advantages. RIMS II multipliers can be estimated for any region composed of one or more counties and for any industry, or group of industries, in the national I-O table. The accessibility of the main data sources for RIMS II keeps the cost of estimating regional multipliers relatively low. Empirical tests show that estimates based on relatively expensive surveys and RIMS II-based estimates are similar in magnitude.⁴

BEA's RIMS multipliers can be a cost-effective way for analysts to estimate the economic impacts of changes in a regional economy. However, it is important to keep in mind that, like all economic impact models, RIMS provides approximate order-of-magnitude estimates of impacts. RIMS multipliers are best suited for estimating the impacts of small changes on a regional economy. For some applications, users may want to supplement RIMS estimates with information they gather from the region undergoing the potential change. Examples of case studies where it is appropriate to use RIMS multipliers appear in the [RIMS II User Handbook](#). (PDF • 677 KB)

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To effectively use the multipliers for impact analysis, users must provide geographically and industrially detailed information on the initial changes in output, earnings, or employment that are associated with the project or program under study. The multipliers can then be used to estimate the total impact of the project or program on regional output, earnings, and employment.

RIMS II is widely used in both the public and private sector. In the public sector, for example, the Department of Defense uses RIMS II to estimate the regional impacts of military base closings. State transportation departments use RIMS II to estimate the regional impacts of airport construction and expansion. In the private-sector, analysts and consultants use RIMS II to estimate the regional impacts of a variety of projects, such as the development of shopping malls and sports stadiums.

RIMS II Methodology

RIMS II uses BEA's benchmark and annual I-O tables for the nation. Since a particular region may not contain all the industries found at the national level, some direct input requirements cannot be supplied by that region's industries. Input requirements that are not produced in a study region are identified using BEA's regional economic accounts.

The RIMS II method for estimating regional I-O multipliers can be viewed as a three-step process. In the first step, the producer portion of the national I-O table is made region-specific by using six-digit NAICS location quotients (LQs). The LQs estimate the extent to which input requirements are supplied by firms within the region. RIMS II uses LQs based on two types of data: BEA's personal income data (by place of residence) are used to calculate LQs in the service industries; and BEA's wage-and-salary data (by place of work) are used to calculate LQs in the nonservice industries.

In the second step, the household row and the household column from the national I-O table are made region-specific. The household row coefficients, which are derived from the value-added row of the national I-O table, are adjusted to reflect regional earnings leakages resulting from individuals working in the region but residing outside the region. The household column coefficients, which are based on the personal consumption expenditure column of the national I-O table, are adjusted to account for regional consumption leakages stemming from personal taxes and savings.

In the last step, the Leontief inversion approach is used to estimate multipliers. This inversion approach produces output, earnings, and employment multipliers, which can be used to trace the impacts of changes in final demand on directly and indirectly affected industries.

Accuracy of RIMS II

Empirical evidence suggests that RIMS II commonly yields multipliers that are not substantially different in magnitude from those generated by regional I-O models based on relatively expensive surveys. For example, a comparison of 224 industry-specific multipliers from survey-based tables for Texas, Washington, and West Virginia indicates that the RIMS II average multipliers overestimate the average multipliers from the survey-based tables by approximately 5 percent. For the majority of individual industry-specific multipliers within these states, the difference between RIMS II and survey-based multipliers is less than 10 percent. In addition, RIMS II and survey multipliers show statistically similar distributions of affected industries.⁴

Advantages of RIMS II

There are numerous advantages to using RIMS II. First, the accessibility of the main data sources makes it possible to estimate regional multipliers without

conducting relatively expensive surveys. Second, the level of industrial detail used in RIMS II helps avoid aggregation errors, which often occur when industries are combined. Third, RIMS II multipliers can be compared across areas because they are based on a consistent set of estimating procedures nationwide. Fourth, RIMS II multipliers are updated to reflect the most recent local-area wage-and-salary and personal income data.

Applications of RIMS II

RIMS II multipliers can be used in a wide variety of regional impact studies. For example, the U.S. Nuclear Regulatory Commission has used RIMS II multipliers in environmental impact statements required for licensing nuclear electricity-generating facilities. The U.S. Department of Housing and Urban Development has used RIMS II multipliers to estimate the impacts of various types of urban redevelopment expenditures. RIMS II multipliers have also been used to estimate the regional economic and industrial impacts of: opening or closing military bases, tourist expenditures, new energy facilities, energy conservation, offshore drilling, opening or closing manufacturing plants, shopping malls, new sports stadiums, and new airport or port facilities.

Footnotes

1. See Daniel H. Garnick, "Differential Regional Multiplier Models," *Journal of Regional Science* 10 (February 1970): 35-47; and Ronald L. Drake, "A Short-Cut to Estimates of Regional Input-Output Multipliers," *International Regional Science Review* 1 (Fall 1976): 1-17.
2. See U.S. Department of Commerce, Bureau of Economic Analysis, *Regional Input-Output Modeling System (RIMS II): Estimation, Evaluation, and Application of a Disaggregated Regional Impact Model* (Washington, DC: U.S. Government Printing Office, 1981). Available from the National Technical Information Service, 5285 Port Royal Road, Springfield, VA 22161; order no. PB-82-168-865; price \$26.
3. See U.S. Department of Commerce, Bureau of Economic Analysis, *The Detailed Input-Output Structure of the U.S. Economy, Volume II* (Washington, DC: U.S. Government Printing Office, November 1994); and U.S. Department of Commerce, Bureau of Economic Analysis, *State Personal Income, 1929-93* (Washington, DC: U.S. Government Printing Office, June 1995).
4. See U.S. Department of Commerce, *Regional Input-Output Modeling System (RIMS II)*, chapter 5. Also see Sharon M. Brucker, Steven E. Hastings, and William R. Latham III, "The Variation of Estimated Impacts from Five Regional Input-Output Models," *International Regional Science Review* 13 (1990): 119-39.

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Bureau of Economic Analysis is an agency of the U.S. Department of Commerce.



**The Economic Impact Analysis Report
of
American Redevelopment Regional Center**

Prepared for
American Redevelopment Solutions LLC

On December 23, 2008

Prepared by
Dr. Hart Hodges,
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Director of Center for Economic and Business Research
Western Washington University

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HART HODGES

VITAE

EDUCATION

Ph.D. in Economics, University of Washington; Seattle, Washington (1994)

Primary field: Natural Resource and Environmental Economics

Secondary field: Industrial Organizations, Microeconomics, and Econometrics

Masters in Environmental Management, Duke University; Durham North Carolina (1987)

Field: Natural Resource Economics

Resource area: Water Resource Systems Analysis

B.A., Williams College, Williamstown, Massachusetts (1985)

Major: American Studies

Minor: Environmental Studies

ACADEMIC APPOINTMENTS and PROFESSIONAL EXPERIENCE

Western Washington University

Director, Center for Economic and Business Research, 2003 – present

Assistant Professor, Department of Economics, 2003 – present

Interim Director, Center for Economic and Business Research, 2001 – 2003

Visiting Assistant Professor, Department of Economics, 2000 – 2003

Course taught:

Forecasting

Health Economics

Environmental Economics, Senior Seminar

History of Economic Thought

Microeconomics – MBA Program

Managerial Economics

Natural Resource Economics

Introductory microeconomics

Introductory macroeconomics

Northern Economics, Inc. (consulting firm)

Senior Economist, 1998 – 2001

Sample of projects managed:

- Analysis of restoration costs as a measure of damages to the Skokomish River estuary. Analysis included review of natural resource damage assessment regulations, techniques used in non-market valuation, and Habitat Equivalency Analysis. In conjunction with ENTRIX, Inc., for Morisset, Shlosser, Ayer, and Jozwiak.
- Alaska Rural Energy Plan, Phase 2B: Analyzed options for reducing the cost of electricity and heat in rural Alaska and for improving the reliability of electricity in rural Alaska – for Alaska Industrial Development and Export Authority, U.S. Department of Agriculture, and Denali Commission.
- Design and conduct load research sample of residential and commercial customers for Chugach Electric Association.
- Alaska Visitor Statistics Program IV: Quantify the number of visitors and residents entering Alaska by all modes and major points of entry; develop surveys, prepare sample plan, and conduct interviews to determine the number and composition of visitors by entry mode, trip purpose, and place of origin to assess visitor expenditure patterns and satisfaction with all major components of the Alaska experience, and to identify characteristics and interests of first time and repeat visitors; for the Alaska Department of Community and Economic Development, Division of Tourism.
- Market study for construction aggregates in Alaska, British Columbia, and the Western U.S.; outlined the flow of construction aggregates, forecasted prices, and contacted major suppliers to discuss opportunities for the development of aggregate resources in Alaska; for Sealaska Corporation.
- Market study and preliminary business plan for development and commercialization of energy storage and hydrogen production system: Identify power cost, need for energy storage, and market opportunities for hydrogen in Alaska, and make cash flow predictions for operable systems in different regions; for the SRT group of Miami, Florida.
- Impact Study for 1997-98 Bristol Bay Fishing Disasters: Identify impacts to Lake and Peninsula and Bristol Bay boroughs and document state and federal disaster assistance efforts, for the Lake and Peninsula and Bristol Bay boroughs.

Economist and Financial Analyst – City of Portland, Oregon, Office of Finance and Administration (1996- 1998)

Natural Resource Damage Assessment Economist, U.S. Department of Interior, Office of Environmental Policy and Compliance, Portland, Oregon (1995 – 1996)

Assistant Professor at the University of Puget Sound, Tacoma, Washington (1993 – 1995)

Course taught:

Environmental Economics
 Mathematical Economics
 Introductory Micro and Macroeconomics
 Intermediate Micro and Macroeconomics

Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/ (dollars)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
1111A0 Oilseed farming						
1111B0 Grain farming						
111200 Vegetable and melon farming						
1113A0 Fruit farming						
111335 Tree nut farming						
111400 Greenhouse and nursery production						
111910 Tobacco farming						
111920 Cotton farming						
1119A0 Sugarcane and sugar beet farming						
1119B0 All other crop farming						
112100 Cattle ranching and farming						
112300 Poultry and egg production						
112A00 Animal production, except cattle and poultry and eggs						
113A00 Forest nurseries, forest products, and timber tract						
113300 Logging						
114100 Fishing						
114200 Hunting and trapping						
115000 Agriculture and forestry support activities						
211000 Oil and gas extraction						
212100 Coal mining						
212210 Iron ore mining						
212230 Copper, nickel, lead, and zinc mining						
2122A0 Gold, silver, and other metal ore mining						
212310 Stone mining and quarrying						
212320 Sand, gravel, clay, and refractory mining						
212390 Other nonmetallic mineral mining						
213111 Drilling oil and gas wells						
213112 Support activities for oil and gas operations						
21311A Support activities for other mining						
2211A0 Power generation and supply						
221200 Natural gas distribution						
221300 Water, sewage and other systems						
230000 Construction						
311111 Dog and cat food manufacturing						
311119 Other animal food manufacturing						
311211 Flour milling						
311212 Rice milling						
311213 Malt manufacturing						
311221 Wet corn milling						
311222 Soybean processing						

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(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.

1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
2. Each entry in column 2 represents the total dollar change in earnings of households employed by all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
3. Each entry in column 3 represents the total change in number of jobs that occurs in all industries for each additional 1 million dollars of output delivered to final demand by the industry corresponding to the entry. Because the employment multipliers are based on 2006 data, the output delivered to final demand should be in 2006 dollars.
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5. Each entry in column 5 represents the total dollar change in earnings of households employed by all industries for each additional dollar of earnings paid directly to households employed by the industry corresponding to the entry.
6. Each entry in column 6 represents the total change in number of jobs in all industries for each additional job in the industry corresponding to the entry.

NOTE.--Multipliers are based on the 1997 Benchmark Input-Output Table for the Nation and 2006 regional data. Appendix B identifies the industries corresponding to the entries.

Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

(b)(4) INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output(1)	Earnings(2)	Employment(3)	Value added(4)	Earnings(5)	Employment(6)
311223 Other oilseed processing						
311225 Fats and oils refining and blending						
311230 Breakfast cereal manufacturing						
311310 Sugar manufacturing						
311320 Confectionery manufacturing from cacao beans						
311330 Confectionery manufacturing from purchased chocolate						
311340 Nonchocolate confectionery manufacturing						
311410 Frozen food manufacturing						
311420 Fruit and vegetable canning and drying						
311511 Fluid milk manufacturing						
311512 Creamery butter manufacturing						
311513 Cheese manufacturing						
311514 Dry, condensed, and evaporated dairy products						
311520 Ice cream and frozen dessert manufacturing						
311611 Animal, except poultry, slaughtering						
311612 Meat processed from carcasses						
311613 Rendering and meat byproduct processing						
311615 Poultry processing						
311700 Seafood product preparation and packaging						
31181A Bread and bakery product, except frozen, manufacturing						
311813 Frozen cakes and other pastries manufacturing						
311821 Cookie and cracker manufacturing						
311822 Mixes and dough made from purchased flour						
311823 Dry pasta manufacturing						
311830 Tortilla manufacturing						
311911 Roasted nuts and peanut butter manufacturing						
311919 Other snack food manufacturing						
311920 Coffee and tea manufacturing						
311930 Flavoring syrup and concentrate manufacturing						
311941 Mayonnaise, dressing, and sauce manufacturing						
311942 Spice and extract manufacturing						
311990 All other food manufacturing						
312110 Soft drink and ice manufacturing						
312120 Breweries						
312130 Wineries						
312140 Distilleries						
312210 Tobacco stemming and redrying						
312221 Cigarette manufacturing						
312229 Other tobacco product manufacturing						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.

1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
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6. Each entry in column 6 represents the total change in number of jobs in all industries for each additional job in the industry corresponding to the entry.

NOTE:--Multipliers are based on the 1997 Benchmark Input-Output Table for the Nation and 2006 regional data. Appendix B identifies the industries corresponding to the entries.

Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

(b)(4)

INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/ (dollars)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
313100 Fiber, yarn, and thread mills						
313210 Broadwoven fabric mills						
313220 Narrow fabric mills and schiffli embroidery						
313230 Nonwoven fabric mills						
313240 Knit fabric mills						
313310 Textile and fabric finishing mills						
313320 Fabric coating mills						
314110 Carpet and rug mills						
314120 Curtain and linen mills						
314910 Textile bag and canvas mills						
314992 Tire cord and tire fabric mills						
31499A Other miscellaneous textile product mills						
315111 Sheer hosiery mills						
315119 Other hosiery and sock mills						
315190 Other apparel knitting mills						
315200 Cut and sew apparel manufacturing						
315900 Accessories and other apparel manufacturing						
316100 Leather and hide tanning and finishing						
316200 Footwear manufacturing						
316900 Other leather product manufacturing						
321113 Sawmills						
321114 Wood preservation						
32121A Veneer and plywood manufacturing						
32121B Engineered wood member and truss manufacturing						
321219 Reconstituted wood product manufacturing						
321911 Wood windows and door manufacturing						
321912 Cut stock, resawing lumber, and planing						
321918 Other millwork, including flooring						
321920 Wood container and pallet manufacturing						
321991 Manufactured home, mobile home, manufacturing						
321992 Prefabricated wood building manufacturing						
321999 Miscellaneous wood product manufacturing						
322110 Pulp mills						
3221A0 Paper and paperboard mills						
322210 Paperboard container manufacturing						
32222A Coated and laminated paper and packaging material						
32222B Coated and uncoated paper bag manufacturing						
322225 Flexible packaging foil manufacturing						
322226 Surface-coated paperboard manufacturing						
322231 Die-cut paper office supplies manufacturing						
322232 Envelope manufacturing						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.

1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
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3. Each entry in column 3 represents the total change in number of jobs that occurs in all industries for each additional 1 million dollars of output delivered to final demand by the industry corresponding to the entry. Because the employment multipliers are based on 2006 data, the output delivered to final demand should be in 2006 dollars.
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5. Each entry in column 5 represents the total dollar change in earnings of households employed by all industries for each additional dollar of earnings paid directly to households employed by the industry corresponding to the entry.
6. Each entry in column 6 represents the total change in number of jobs in all industries for each additional job in the industry corresponding to the entry.

NOTE.—Multipliers are based on the 1997 Benchmark Input-Output Table for the Nation and 2006 regional data. Appendix B identifies the industries corresponding to the entries.

RIMS II Multipliers (1997/2006)

Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/ (dollars)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
322233 Stationery and related product manufacturing						
322291 Sanitary paper product manufacturing						
322299 All other converted paper product manufacturing						
32311A Commercial printing						
323116 Manifold business forms printing						
323117 Books printing						
323118 Blankbook and looseleaf binder manufacturing						
323121 Tradebinding and related work						
323122 Prepress services						
324110 Petroleum refineries						
324121 Asphalt paving mixture and block manufacturing						
324122 Asphalt shingle and coating materials manufactur						
324191 Petroleum lubricating oil and grease manufactur						
324199 All other petroleum and coal products manufactu						
325110 Petrochemical manufacturing						
325120 Industrial gas manufacturing						
325130 Synthetic dye and pigment manufacturing						
325180 Other basic inorganic chemical manufacturing						
325190 Other basic organic chemical manufacturing						
325211 Plastics material and resin manufacturing						
325212 Synthetic rubber manufacturing						
325221 Cellulosic organic fiber manufacturing						
325222 Noncellulosic organic fiber manufacturing						
325311 Nitrogenous fertilizer manufacturing						
325312 Phosphatic fertilizer manufacturing						
325314 Fertilizer, mixing only, manufacturing						
325320 Pesticide and other agricultural chemical manufacturing						
325400 Pharmaceutical and medicine manufacturing						
325510 Paint and coating manufacturing						
325520 Adhesive manufacturing						
325611 Soap and other detergent manufacturing						
325612 Polish and other sanitation good manufacturing						
325613 Surface active agent manufacturing						
325620 Toilet preparation manufacturing						
325910 Printing ink manufacturing						
325920 Explosives manufacturing						
325991 Custom compounding of purchased resins						
325992 Photographic film and chemical manufacturing						
325998 Other miscellaneous chemical product manufactu						
326110 Plastics packaging materials, film and sheet						

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Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.
 1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
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 6. Each entry in column 6 represents the total change in number of jobs in all industries for each additional job in the industry corresponding to the entry.

NOTE.--Multipliers are based on the 1997 Benchmark Input-Output Table for the Nation and 2006 regional data. Appendix B identifies the industries corresponding to the entries.

Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

(b)(4)

INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/ (dollars)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
326120 Plastics pipe, fittings, and profile shapes						
326130 Laminated plastics plate, sheet, and shapes						
3261A0 Foam product manufacturing						
326160 Plastics bottle manufacturing						
326192 Resilient floor covering manufacturing						
32619A Plastics plumbing fixtures and all other plastics products						
326210 Tire manufacturing						
326220 Rubber and plastics hose and belting manufacturing						
326290 Other rubber product manufacturing						
327111 Vitreous china plumbing fixture manufacturing						
327112 Vitreous china and earthenware articles manufacturing						
327113 Porcelain electrical supply manufacturing						
327121 Brick and structural clay tile manufacturing						
327122 Ceramic wall and floor tile manufacturing						
32712A Clay refractory and other structural clay products						
327125 Nonclay refractory manufacturing						
327213 Glass container manufacturing						
32721A Glass and glass products, except glass containers						
327310 Cement manufacturing						
327320 Ready-mix concrete manufacturing						
327331 Concrete block and brick manufacturing						
327332 Concrete pipe manufacturing						
327390 Other concrete product manufacturing						
327410 Lime manufacturing						
327420 Gypsum product manufacturing						
327910 Abrasive product manufacturing						
327991 Cut stone and stone product manufacturing						
327992 Ground or treated minerals and earths manufacturing						
327993 Mineral wool manufacturing						
327999 Miscellaneous nonmetallic mineral products						
331111 Iron and steel mills						
331112 Ferroalloy and related product manufacturing						
331210 Iron, steel pipe and tube from purchased steel						
331221 Rolled steel shape manufacturing						
331222 Steel wire drawing						
331311 Alumina refining						
331312 Primary aluminum production						
331314 Secondary smelting and alloying of aluminum						
331315 Aluminum sheet, plate, and foil manufacturing						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.

1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
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NOTE.--Multipliers are based on the 1997 Benchmark Input-Output Table for the Nation and 2006 regional data. Appendix B identifies the industries corresponding to the entries.

Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

INDUSTRY	Multiplier				
	Final Demand			Direct Effect	
	Output/1/ (dollars)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)
331316 Aluminum extruded product manufacturing					
331319 Other aluminum rolling and drawing					
331411 Primary smelting and refining of copper					
331419 Primary nonferrous metal, except copper and aluminum					
331421 Copper rolling, drawing, and extruding					
331422 Copper wire, except mechanical, drawing					
331423 Secondary processing of copper					
331491 Nonferrous metal, except copper and aluminum, shaping					
331492 Secondary processing of other nonferrous					
331510 Ferrous metal foundries					
33152A Aluminum foundries					
33152B Nonferrous foundries, except aluminum					
332111 Iron and steel forging					
332112 Nonferrous forging					
332114 Custom roll forming					
33211A All other forging and stamping					
332211 Cutlery and flatware, except precious, manufacturing					
332212 Hand and edge tool manufacturing					
332213 Saw blade and handsaw manufacturing					
332214 Kitchen utensil, pot, and pan manufacturing					
332311 Prefabricated metal buildings and components					
332312 Fabricated structural metal manufacturing					
332313 Plate work manufacturing					
332321 Metal window and door manufacturing					
332322 Sheet metal work manufacturing					
332323 Ornamental and architectural metal work manufacturing					
332410 Power boiler and heat exchanger manufacturing					
332420 Metal tank, heavy gauge, manufacturing					
332430 Metal can, box, and other container manufacturing					
33299A Ammunition manufacturing					
332994 Small arms manufacturing					
332995 Other ordnance and accessories manufacturing					
332500 Hardware manufacturing					
332600 Spring and wire product manufacturing					
332710 Machine shops					
332720 Turned product and screw, nut, and bolt manufacturing					
332811 Metal heat treating					
332812 Metal coating and nonprecious engraving					

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(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.

1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
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NOTE.—Multipliers are based on the 1997 Benchmark Input-Output Table for the Nation and 2006 regional data. Appendix B identifies the industries corresponding to the entries.

Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

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INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/ (dollars)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
332813 Electroplating, anodizing, and coloring metal						
332910 Metal valve manufacturing						
332991 Ball and roller bearing manufacturing						
332996 Fabricated pipe and pipe fitting manufacturing						
332997 Industrial pattern manufacturing						
332998 Enameled iron and metal sanitary ware manufacturing						
332999 Miscellaneous fabricated metal product manufacturing						
333111 Farm machinery and equipment manufacturing						
333112 Lawn and garden equipment manufacturing						
333120 Construction machinery manufacturing						
333131 Mining machinery and equipment manufacturing						
333132 Oil and gas field machinery and equipment						
333210 Sawmill and woodworking machinery						
333220 Plastics and rubber industry machinery						
333291 Paper industry machinery manufacturing						
333292 Textile machinery manufacturing						
333293 Printing machinery and equipment manufacturing						
333294 Food product machinery manufacturing						
333295 Semiconductor machinery manufacturing						
333298 All other industrial machinery manufacturing						
33331A Automatic vending, commercial laundry and drycleaning machinery						
333313 Office machinery manufacturing						
333314 Optical instrument and lens manufacturing						
333315 Photographic and photocopying equipment manufacturing						
333319 Other commercial and service industry machinery manufacturing						
333411 Air purification equipment manufacturing						
333412 Industrial and commercial fan and blower manufacturing						
333414 Heating equipment, except warm air furnaces						
333415 AC, refrigeration, and forced air heating						
333511 Industrial mold manufacturing						
333512 Metal cutting machine tool manufacturing						
333513 Metal forming machine tool manufacturing						
333514 Special tool, die, jig, and fixture manufacturing						
333515 Cutting tool and machine tool accessory manufacturing						
33351A Rolling mill and other metalworking machinery						
333611 Turbine and turbine generator set units manufacturing						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.

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Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/ (jobs)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
33361A Speed changers and mechanical power transmission equipment						
333618 Other engine equipment manufacturing						
333911 Pump and pumping equipment manufacturing						
333912 Air and gas compressor manufacturing						
333913 Measuring and dispensing pump manufacturing						
333921 Elevator and moving stairway manufacturing						
333922 Conveyor and conveying equipment manufacturing						
333923 Overhead cranes, hoists, and monorail systems						
333924 Industrial truck, trailer, and stacker manufacturing						
333991 Power-driven handtool manufacturing						
333992 Welding and soldering equipment manufacturing						
333993 Packaging machinery manufacturing						
333994 Industrial process furnace and oven manufacturing						
333995 Fluid power cylinder and actuator manufacturing						
333996 Fluid power pump and motor manufacturing						
33399A Scales, balances, and miscellaneous general purpose machinery						
334111 Electronic computer manufacturing						
334112 Computer storage device manufacturing						
334113 Computer terminal manufacturing						
334119 Other computer peripheral equipment manufacturing						
334210 Telephone apparatus manufacturing						
334220 Broadcast and wireless communications equipment						
334290 Other communications equipment manufacturing						
334300 Audio and video equipment manufacturing						
334411 Electron tube manufacturing						
334413 Semiconductors and related device manufacturing						
33441A All other electronic component manufacturing						
334510 Electromedical apparatus manufacturing						
334511 Search, detection, and navigation instruments						
334512 Automatic environmental control manufacturing						
334513 Industrial process variable instruments						
334514 Totalizing fluid meters and counting devices						
334515 Electricity and signal testing instruments						
334516 Analytical laboratory instrument manufacturing						
334517 Irradiation apparatus manufacturing						
33451A Watch, clock, and other measuring and controlling device manufacturing						
334611 Software reproducing						
334612 Audio and video media reproduction						
334613 Magnetic and optical recording media manufacturing						

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(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

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RIMS II Multipliers (1997/2006)

Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

(b)(4)

INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/	Earnings/2/	Employment/3/	Value-added/4/	Earnings/5/	Employment/6/
	(dollars)	(jobs)	(dollars)	(dollars)	(jobs)	
335110 Electric lamp bulb and part manufacturing						
335120 Lighting fixture manufacturing						
335211 Electric housewares and household fan manufacturing						
335212 Household vacuum cleaner manufacturing						
335221 Household cooking appliance manufacturing						
335222 Household refrigerator and home freezer manufacturing						
335224 Household laundry equipment manufacturing						
335228 Other major household appliance manufacturing						
335311 Electric power and specialty transformer manufacturing						
335312 Motor and generator manufacturing						
335313 Switchgear and switchboard apparatus manufacturing						
335314 Relay and industrial control manufacturing						
335911 Storage battery manufacturing						
335912 Primary battery manufacturing						
335921 Fiber optic cable manufacturing						
335929 Other communication and energy wire manufacturing						
335930 Wiring device manufacturing						
335991 Carbon and graphite product manufacturing						
335999 Miscellaneous electrical equipment manufacturing						
336110 Automobile and light truck manufacturing						
336120 Heavy duty truck manufacturing						
336211 Motor vehicle body manufacturing						
336212 Truck trailer manufacturing						
336213 Motor home manufacturing						
336214 Travel trailer and camper manufacturing						
336300 Motor vehicle parts manufacturing						
336411 Aircraft manufacturing						
336412 Aircraft engine and engine parts manufacturing						
336413 Other aircraft parts and equipment						
336414 Guided missile and space vehicle manufacturing						
33641A Propulsion units and parts for space vehicles and guided missiles						
336500 Railroad rolling stock manufacturing						
336611 Ship building and repairing						
336612 Boat building						
336991 Motorcycle, bicycle, and parts manufacturing						
336992 Military armored vehicles and tank parts manufacturing						
336999 All other transportation equipment manufacturing						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

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American Redevelopment Regional Center

(b)(4)

INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/ (dollars)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
337110 Wood kitchen cabinet and countertop manufacturing						
337121 Upholstered household furniture manufacturing						
337122 Nonupholstered wood household furniture manufacturing						
337124 Metal household furniture manufacturing						
337127 Institutional furniture manufacturing						
33712A Other household and institutional furniture						
337211 Wood office furniture manufacturing						
337212 Custom architectural woodwork and millwork						
337214 Office furniture, except wood, manufacturing						
337215 Showcases, partitions, shelving, and lockers						
337910 Mattress manufacturing						
337920 Blind and shade manufacturing						
339111 Laboratory apparatus and furniture manufacturing						
339112 Surgical and medical instrument manufacturing						
339113 Surgical appliance and supplies manufacturing						
339114 Dental equipment and supplies manufacturing						
339115 Ophthalmic goods manufacturing						
339116 Dental laboratories						
339910 Jewelry and silverware manufacturing						
339920 Sporting and athletic goods manufacturing						
339930 Doll, toy, and game manufacturing						
339940 Office supplies, except paper, manufacturing						
339950 Sign manufacturing						
339991 Gasket, packing, and sealing device manufacturing						
339992 Musical instrument manufacturing						
339994 Broom, brush, and mop manufacturing						
339995 Burial casket manufacturing						
33999A Buttons, pins, and all other miscellaneous manufacturing						
420000 Wholesale trade						
4A0000 Retail trade						
481000 Air transportation						
482000 Rail transportation						
483000 Water transportation						
484000 Truck transportation						
485A00 Transit and ground passenger transportation						
486000 Pipeline transportation						
48A000 Scenic and sightseeing transportation and support activities for transportation						
492000 Couriers and messengers						
493000 Warehousing and storage						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

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Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

(b)(4)

INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/ (dollars)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
511110 Newspaper publishers						
511120 Periodical publishers						
511130 Book publishers						
5111A0 Database, directory, and other publishers						
511200 Software publishers						
512100 Motion picture and video industries						
512200 Sound recording industries						
513100 Radio and television broadcasting						
513200 Cable networks and program distribution						
513300 Telecommunications						
514100 Information services						
514200 Data processing services						
52A000 Monetary authorities and depository credit intermediation						
522A00 Nondepository credit intermediation and related activities						
523000 Securities, commodity contracts, investments						
524100 Insurance carriers						
524200 Insurance agencies, brokerages, and related						
525000 Funds, trusts, and other financial vehicles						
531000 Real estate						
S00800 Owner-occupied dwellings						
532100 Automotive equipment rental and leasing						
532A00 General and consumer goods rental except video tapes and discs						
532230 Video tape and disc rental						
532400 Machinery and equipment rental and leasing						
533000 Lessors of nonfinancial intangible assets						
541100 Legal services						
541200 Accounting and bookkeeping services						
541300 Architectural and engineering services						
541400 Specialized design services						
541511 Custom computer programming services						
541512 Computer systems design services						
54151A Other computer related services, including facility management						
541610 Management consulting services						
5416A0 Environmental and other technical consulting services						
541700 Scientific research and development services						
541800 Advertising and related services						
541920 Photographic services						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

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American Redevelopment Regional Center

INDUSTRY	Multiplier				
	Final Demand			Direct Effect	
	Output/1/	Earnings/2/	Employment/3/	Value-added/4/	Earnings/5/
	(dollars)	(jobs)	(dollars)	(dollars)	(jobs)
541940 Veterinary services					
5419A0 All other miscellaneous professional and technical services					
550000 Management of companies and enterprises					
561300 Employment services					
561500 Travel arrangement and reservation services					
561100 Office administrative services					
561200 Facilities support services					
561400 Business support services					
561600 Investigation and security services					
561700 Services to buildings and dwellings					
561900 Other support services					
562000 Waste management and remediation services					
611100 Elementary and secondary schools					
611A00 Colleges, universities, and junior colleges					
611B00 Other educational services					
621A00 Offices of physicians, dentists, and other health practitioners					
621600 Home health care services					
621B00 Other ambulatory health care services					
622000 Hospitals					
623000 Nursing and residential care facilities					
624400 Child day care services					
624A00 Social assistance, except child day care services					
711100 Performing arts companies					
711200 Spectator sports					
711A00 Promoters of performing arts and sports and agents for public figures					
711500 Independent artists, writers, and performers					
712000 Museums, historical sites, zoos, and parks					
713940 Fitness and recreational sports centers					
713950 Bowling centers					
713A00 Other amusement, gambling, and recreation industries					
7211A0 Hotels and motels, including casino hotels					
721A00 Other accommodations					
722000 Food services and drinking places					
8111A0 Automotive repair and maintenance, except car washes					
811192 Car washes					
811200 Electronic equipment repair and maintenance					
811300 Commercial machinery repair and maintenance					

(b)(4)

(Continued)

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INDUSTRY	Multiplier					
	Final Demand			Direct Effect		
	Output/1/	Earnings/2/	Employment/3/	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
811400 Household goods repair and maintenance						
812100 Personal care services						
812200 Death care services						
812300 Drycleaning and laundry services						
812900 Other personal services						
813100 Religious organizations						
813A00 Grantmaking and giving and social advocacy organizations						
813B00 Civic, social, professional and similar organizations						
491000 Postal service						
S00A00 Other government enterprises						
H00000 Households						

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EXHIBIT LIST
AMERICAN REDEVELOPMENT REGIONAL CENTER
RFE RESPONSE BINDER

- Exhibit 1 (b)(4) Bank statement from Commerce National Bank evidencing
 committed
- Exhibit 2 Information on investigative firms: Vance International, Control
Risks and Investigative Services Agency
- Exhibit 3 Sample marketing brochures for American Redevelopment
Regional Center
- Exhibit 4 Information on Invest in the USA and the California
Redevelopment Association
- Exhibit 5 Information on Unemployment Statistics

Exhibit 1

(b)(4)

FINANCE CHARGE INFORMATION

NOTICE: Important information about your Open End Credit Account (herein referred to as "Account"), if any.

The balance subject to a periodic **FINANCE CHARGE** is the daily balance of the Account during the period covered by the statement ("billing cycle"). We figure a portion of the finance charge on your account by applying the periodic rate to the "daily balance" of your account (including current transactions). To get the "daily balance", we take the beginning balance of your account each day, subtract any payments or credits and add any new advances or other charges (including the annual fee). This gives us the daily balance. We multiply the daily balances by the daily periodic rate disclosed on the face of this statement. The **FINANCE CHARGE**, although posted to the account at the end of the billing cycle, will accrue daily.

Equity Access. Your account has a variable rate feature, which means that the daily periodic rate and corresponding annual percentage rate can change from time to time based on changes in the index.

BILLING RIGHTS SUMMARY

In Case of Errors or Questions About Your Open End Credit Account Statement

If you think your statement is wrong, or if you need more information about a transaction on your statement, write us on a separate sheet at the address shown on the face of this statement as soon as possible. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared. You can telephone us, but doing so may not preserve your rights.

On your letter, give us the following information:

1. Your name and account number.
2. The dollar amount of the suspected error.
3. Describe the error and explain, if you can, why you believe there is an error. If you need more information, describe the item you are unsure about.

You do not have to pay any amount in question while we are investigating, but you are still obligated to pay the parts of your statement that are not in question. While we investigate your question, we cannot report you as delinquent or take action to collect the amount you question.

In Case of Errors or Questions About Your Electronic Transfers

Contact us at the telephone number or address shown on the front of this statement as soon as you can, if you think your statement or receipt is wrong or if you need more information about a transfer on the statement or receipt. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.

1. Your name and account number.
2. Describe the error or the transfer you are unsure about, and explain as clearly as you can why you believe there is an error or why you need more information.
3. Tell us the dollar amount of the suspected error.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days (or 20 business days for New Accounts) to do this, we will credit your account for the amount you think is in error, so that you will have use of the money during the time it takes us to complete our investigation.

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NOTICE: Important information about your Open End Credit Account (herein referred to as "Account"), if any.

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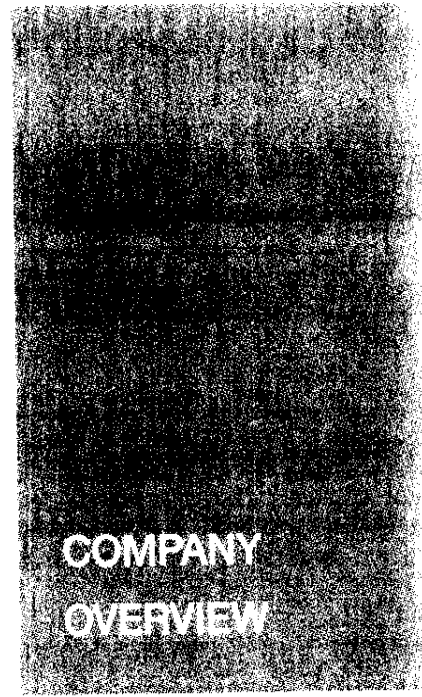
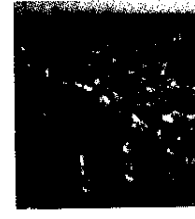
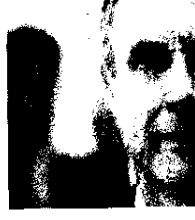
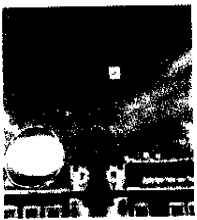
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Exhibit 2

VANCE®

GARDA



COMPANY
OVERVIEW

As a leading provider of security services, VANCE is a trusted investigation and security partner for organizations in the world. We help organizations protect their people, property and response to risks.

Vance is the first choice of professionals who need dependable advice to manage risks. With more than 3,700 employees and over 20 years of experience, clients count on us to help them proceed in business and in life with confidence. Our commitment to place integrity first, aspire to a higher standard, develop innovative solutions, and

Plan, manage, respond



All organizations face a certain level of risk associated with various threats. These threats may be a result of natural events, accidents, or intentional acts to cause harm. Regardless of the nature of the threat, professionals have a responsibility to proactively limit or manage risk to the greatest extent possible.

Vance's Targeted Services and Integrity Solutions™ are based on a consultative approach that helps organizations plan for, manage, and respond to risks. Our highly experienced consultants conduct a thorough risk analysis to evaluate all potential threats, quantify risk, establish the level of acceptable risk, and determine what measures and costs are required to reduce unacceptable risks to a suitable level.



PRESERVE REPUTATION – By proactively analyzing vulnerabilities and implementing measures to reduce risks, clients can more effectively avoid crisis and public scandal from lawsuits, poorly informed decisions, and other incidents. As a result, organizations can better safeguard their valuable reputation.

MAINTAIN BUSINESS CONTINUITY – A comprehensive plan can help maintain critical business functions in case of a workplace incident, natural disaster, or other disruption following the loss of (or denial of access to) buildings, a significant number of staff, IT systems, records, and information.

PROTECT PEOPLE AND ASSETS – Effective risk management addresses legitimate threats to critical assets, such as personnel, finances, facilities, sensitive information, and operations, without wasting resources on unnecessary measures. The result is a carefully designed plan based on prevention, protection, deterrence, and emergency preparedness that will better protect people and assets.

REDUCE RISKS – To effectively reduce risks, organizations require a proactive approach that pairs the level of risk with the appropriate level of management and response. As a result, organizations can achieve greater risk reduction based on accurate information and a plan that properly balances costs against risk tolerance.

TARGETED

- Risk Analysis and Planning
- Business Intelligence and Due Diligence
- Education and Training
- Contingency Planning and Response
- Uniformed Protection
- Executive Protection
- Labor Unrest Protection
- Protection
- Security and Intelligence in High-Risk Markets
- Monitoring and Compliance
- Investigation
- Litigation Support
- Digital Security and Investigation

TOTAL SOLUTIONS

- Travel Integrity™
- Event Integrity™
- Litigation Integrity™
- Property Integrity™
- Product Integrity™
- Workplace Integrity™

provide customer value continues to differentiate us. Today, Vance is one of the most trusted investigation and security consulting firms in the world with operations in the Americas, Europe, and the Middle East.

- Director of support services, leading wireless phone service provider

INTEGRITY - Vance understands and operates in accordance with the highest standards of legal and ethical behavior, maintains strict confidentiality, and works on assignments free of conflict.

and responding to risks helps you improve business continuity, reduce risk, and better protect your people and assets.

- Managing partner, leading international law firm


EXPERIENCE - Vance employs highly trained and trusted consultants from the elite ranks of private corporations, legal professions; law enforcement; military; and government agencies, such as the Central Intelligence Agency, Federal Bureau of Investigation, Scotland Yard, UK Special Forces, and U.S. Secret Service.

HIGHER STANDARD OF SERVICE - Vance is committed to exceeding your expectations, by providing complete access to a highly experienced senior consultant. The consultant is carefully selected based on his/her specialized expertise and serves as the single point of contact from planning through execution. In addition, you have access to a team of experts who are hand chosen for each unique need.

- Director of corporate security, large manufacturer of trucks

COMPLETE SOLUTIONS - Vance Integrity Solutions include integrated services, partnerships with market leaders, innovative technologies, and sound consulting from experts who have specialized knowledge across disciplines. Our approach to planning for, managing,

PROVEN TRACK RECORD - Vance has been in business for more than 20 years, helped thousands of clients, and conducted assignments in more than 100 countries around the world.

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--	---	--

- Legal professional, Fortune 500 company

PEOPLE

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We try to anticipate our client's changing needs to deliver cost-effective advice and risk management solutions. We welcome the opportunity to strengthen our relationship with you and your organization.



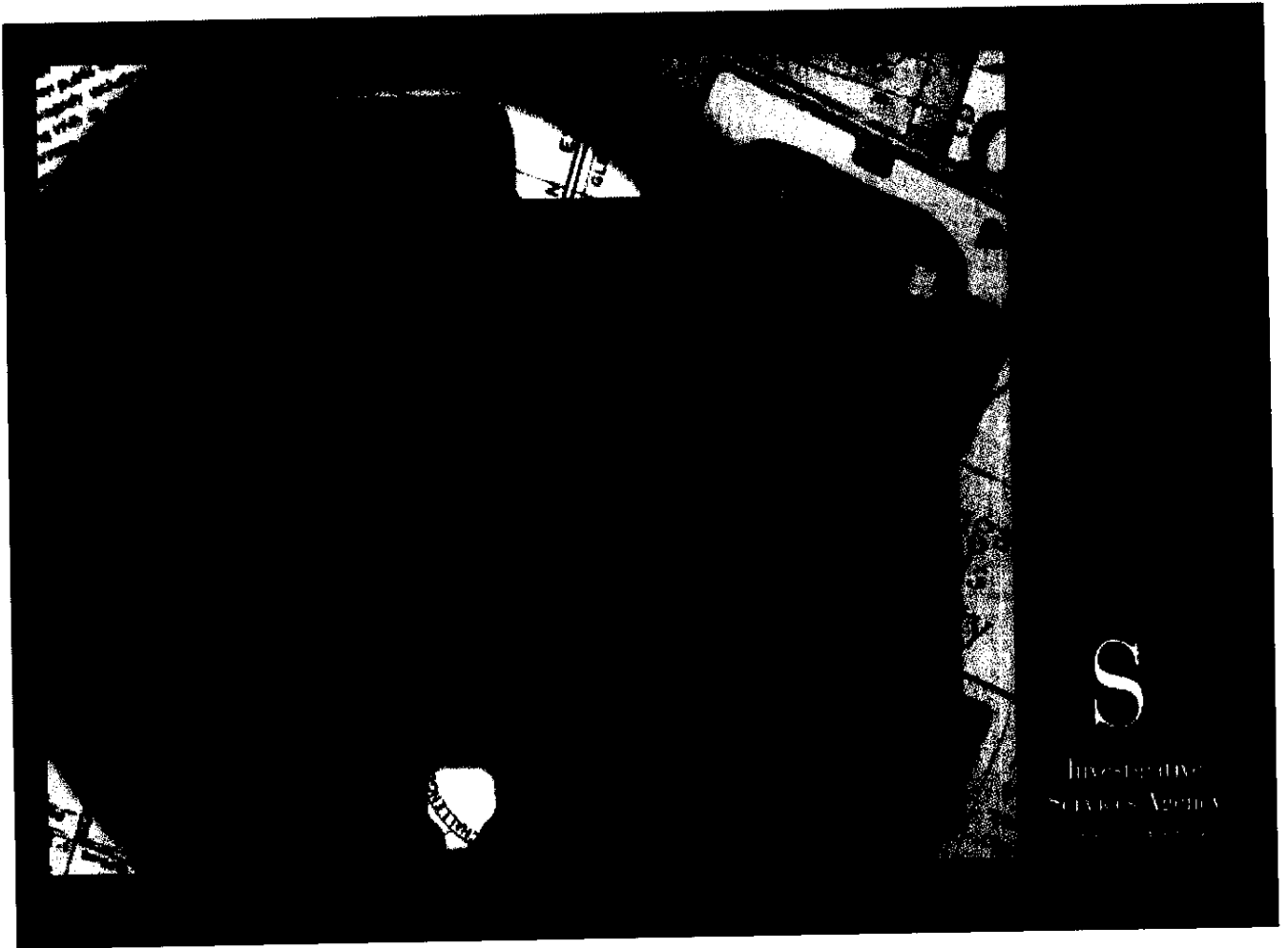
All risk inquiries are directed to our senior investigation and security experts. To discuss your unique needs and how Vance can help, please contact us.



Contact a Vance Expert:

+1 (703) 592-1400
info@gardaglobal.com
www.vanceglobal.com
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Investigative Services Agency, Inc. (ISA), founded in January 1998 by James J. Miller, is a fully licensed detective and security agency dedicated to providing a wide range of investigative, security, and protection services.

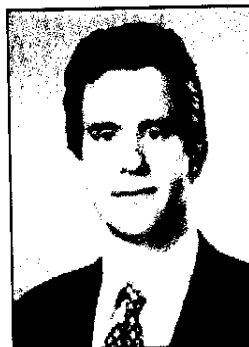
ISA's private detectives are licensed with the State of Illinois, and are highly skilled in providing sophisticated, professional investigations, and protection.

ISA is a member of the highly regarded Global Investigators Network, which allows the agency to provide clients with top-quality international support for their investigations. Furthermore, ISA is a member of the Association of Security and Investigative Specialists, the American Society for Industrial Security, the National Council of Investigation and Security Services, the World Association of Detectives, the National Association of Professional

Process Servers and the Chicagoland Chamber of Commerce.

James J. Miller, President/Founder

James J. Miller is a licensed Private Detective / Security Contractor by the Illinois Department of Professional Regulation (IDPR). He received an MBA in General Management/Finance from the University of Chicago, has a level three certification in Homeland Security, is on the Emergency Homeland Security Response Team, and is a member of the American College of Forensic Examiners Institute. He has 15 years experience in law enforcement, and currently consults with the FBI on cases involving ten most wanted fugitive retrieval.



S
Investigative
Services Agency

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- Knowing your business partners
- Corporate integrity and governance
- Managing a crisis
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Control Risks is an independent, specialist risk consultancy. We provide advice and services that enable our clients to accelerate opportunities and manage strategic and operational risks.

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With 27 offices worldwide and a diverse team of consultants who are all experts in their respective fields, Control Risks offers consultancy, advice and assistance to a diverse range of corporate, governmental and non-governmental clients worldwide.

We provide a diverse range of risk consultancy services to assist with finding the solution to a multitude of issues for a wide variety of clients in every region of the world.

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- **How we can help** - for an overview of some of the problems and issues we can help to solve.
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Top Corporate Investi...

Control Risks (What ...

Exhibit 3

American Redevelopment Solutions, LLC

Bringing Investment And Immigration Together


5 HUTTON CENTER
SUITE 1050
TENTH FLOOR
SANTA ANA, CALIFORNIA 92707
PHONE: 714.384.4250 / FAX: 714.384.4251
WWW.ARREGIONALCENTER.COM



AMERICAN REDEVELOPMENT SOLUTIONS

Purpose

The purpose of American Redevelopment Solutions, LLC is to provide the opportunity to bring together the common goals of the California Community Redevelopment Law and the Immigrant Visa Pilot Program.



The California Redevelopment Law was passed to provide local agencies with a framework to entice private investors to invest in deteriorated economic areas which are plagued with a lack of jobs, lack of business opportunities, higher crime rate, poor housing availability, or other challenging social conditions, in order to reverse the downward spiral of those communities by revitalizing the area. The program has shown that by bringing in more jobs, more businesses, and better housing, the entire community revitalizes. Where graffiti covered empty buildings once stood, new businesses and residents who take pride once again in their community are left. As a result, crimes rates in these redeveloped communities decrease significantly, and the positive economic benefit for the community is enormous as people take pride in their community and have the ability to find employment and decent housing. However, while the program provides local redevelopment agencies with the ability to offer certain incentives, the actual redevelopment of these designated blighted areas must come from private investors.



What is Redevelopment?

Redevelopment is a tool created by state law to assist local governments in eliminating blight from a designated area, as well as to achieve the goals of development, reconstruction and rehabilitation of residential, commercial, industrial and retail districts.

After World War II, the country first began experiencing the effects of urban flight in which middle class and wealthier residents began moving out of the centralized urban areas, choosing to move out to the suburbs, taking their businesses and tax dollars with them. This movement soon left behind deteriorating neighborhoods with limited business opportunities and higher crime rates as the lack of opportunities brought frustration to those remaining.

Therefore in 1952, California passed the California Community Redevelopment Law which established a program in which local agencies were provided tools to not only identify these deteriorated areas, but also with which to entice private investment into these deteriorated geographic areas to reverse the negative impacts suffered by the communities left behind. Redevelopment is a locally driven activity that assists local governments in revitalizing their communities. Redevelopment encourages new development, creates jobs and generates tax revenues in declining urbanized areas by developing partnerships between local governments and private entities.

AMERICAN
SOCIETY
FOR
HUMAN RIGHTS
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The Immigrant Visa Pilot Program was designed to encourage private foreign investment to "promote economic growth, improved regional productivity, job creation, and increased domestic capital investment." In other words, the Pilot Program's goals are identical to the goals of the California Redevelopment Law. Both programs are focused on increasing economic growth and the creation of jobs. Nowhere is the need for private investment in order to create jobs and encourage economic growth greater than in these designated redevelopment areas. The impact from the private investment in the redevelopment areas goes far beyond the mere creation of jobs and economic growth, this investment changes the entire community and the lives of so many who reside within the redevelopment area boundaries.

American Redevelopment Solutions, LLC. will match the needs of the designated redevelopment areas with the needs of the foreign investor. In addition to the investment incentives established in the California Community Redevelopment Law, foreign investors will have the additional incentive to invest in these redevelopment areas as part of the Pilot Program. All parties will benefit. The foreign investor will not only have the opportunity to meet the requirements of the Pilot Program, but the investor will be able to invest in a beneficial and worthwhile project. The redevelopment area will gain much needed investment funds which will not only create new jobs, more businesses, and more economic growth, these investments will help to change the face of the entire community.

American Redevelopment Solutions, LLC

5 Hutton Centre Suite 1050

Santa Ana California 92707

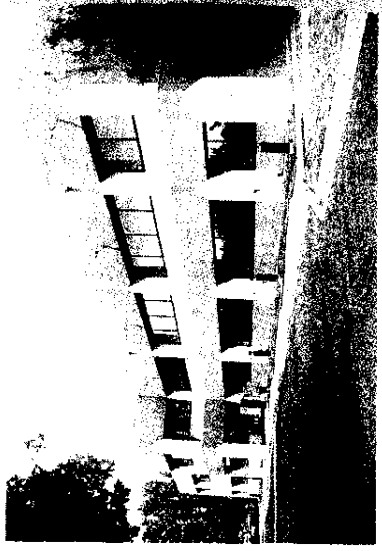
Ph: (714)384-4250 Fax: (714) 384-4251

red@arregionalcenter.com

www.arregionalcenter.com

America's best interests

In short, California redevelopment agencies are mandated by state law to locate private investments to provide funding for redevelopment and create local jobs. Often private investors are difficult for the local governments to find. The goal of the Pilot Program is to bring private investment dollars into the country for much the same purpose. Thus, ARS facilitates the channeling of private investment where it is needed most. It goes without saying that those areas most in need of economic growth are also those areas which have been designated redevelopment agencies



American Redevelopment Solutions, LLC
Bringing Investment
And
Immigration together

make your DREAMS



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American Redevelopment Solutions, LLC (ARS) was created to maximize the impact of immigrant investment in furtherance of the goals of the Pilot Program. Specifically, ARS will participate in projects within designated California redevelopment agency geographic boundaries. California has set up a statutory system to encourage private investment in blighted areas without the use of taxpayer dollars through the creation of local redevelopment agencies. Similarly, the Pilot Program was designed to encourage private foreign investment to "promote economic growth, improved regional productivity, job creation, and increased domestic capital investment."

How to Redevelop an Area

Redevelopment is a process authorized under California law that enables local government entities to identify deteriorated and blighted areas in their jurisdictions in need of revitalization. Redevelopment agencies develop a plan and provide the initial funding to launch revitalization of those areas. In doing so, redevelopment encourages and attracts private sector investment that otherwise would not occur. Redevelopment is one of the most effective tools available to generate new life into deteriorated areas plagued by social, physical, environmental or economic conditions which act as barriers to new investment by private enterprise. Redevelopment activities create jobs and expand business opportunities, provide housing for families most in need, help reduce crime, improve infrastructure and public works and lead the cleanup of environmentally-threatened and rundown areas.



State law gives a local government (city or county) the authority to form a redevelopment agency with the specific goal of revitalizing a deteriorated area. There are 386 active redevelopment agencies throughout California, all of which are overseen by the local city council, county board of supervisors or a separate appointed board -- all accountable to the public. Because they are locally governed and their boards

are comprised of local elected or appointed officials, redevelopment agencies are in the best position to identify what a community needs and to work with

private investors on local projects to meet those needs. Redevelopment agencies are unique in that they exist solely to reduce unfavorable economic and social conditions in existing communities. However, redevelopment agencies can not complete revitalization on their own. The agencies themselves do not have the power to raise taxes. The funds necessary for each project within the geographic area must come from private investors.

Exhibit 4

IN THE NEWS

03.06.2008
FOR FOREIGN INVESTORS, PROFIT
ISN'T ONLY GOAL

The New York Times, March 26, 2008 -- Under the program, known as EB-5, a foreigner receives a green card for investing \$500,000 in a business in a rural or high-unemployment area. Read more

12.26.2007
FOREIGNERS INVEST GREENBACKS
IN RETURN FOR GREEN CARDS

The Washington Post, December 8, 2007 -- Though the number of applicants each year is still far below the quota, Berez said the amount invested through EB-5 visas was \$300 million last year and is projected to rise to \$100 million in 2007 and \$1 billion in 2008. Read more

11.02.2007
U.S. GOVERNMENT'S EB-5
PROGRAM OFFERS FOREIGN
INVESTORS GREEN CARDS FOR JOB
CREATION

Wall Street Journal, November 2, 2007 -- The EB-5 immigration program is pumping millions of dollars from foreign investors into dilapidated inner cities and employment-starved rural areas across the U.S. Read more

THE ASSOCIATION TO INVEST IN USA

Invest In the USA (IIUSA) is a trade association of Regional Centers and others interested in foreign investors. Regional Centers are private corporations and governmental agencies designated by the U.S. government to allow foreign investors to invest capital in their local economies with the goals of preserving and creating jobs through economic development.

Foreign investors are attracted to participate in Regional Center investment programs for the benefits of an economic return and the prospect of qualifying for a permanent residency visa (green card) pursuant to the EB-5 Investor Program. Regional Centers have invested over \$1.6 billion of foreign capital, creating over 25,000 jobs and reducing the U.S. foreign trade imbalance.

IIUSA represents active Regional Centers across the United States. Current Regional Center members are located in Alabama, California, the District of Columbia, Florida, Hawaii, Iowa, Kansas, Louisiana, Maryland, Mississippi, New Jersey, New York, Pennsylvania, Oklahoma, South Carolina, South Dakota, Texas, Vermont, Virginia, Washington and Wisconsin. Their targeted investment programs, distinct to each Regional Center's focus, include:

- Aerospace
- Agriculture
- Alternative energy
- Commercial development
- Healthcare development
- Industrial development
- Public infrastructure
- Residential development
- Urban renewal

Foreign investors assume the investment risk of the targeted investment of the Regional Center. The minimum investment per investor is \$1 million except in rural areas and areas of high unemployment, where it is \$500,000. The invested funds must create or save at least 10 jobs for U.S. workers for every \$500,000 or \$1 million investment. The typical term of investment is 5 years.

A typical foreign investor in a Regional Center investment program is highly educated, a successful business executive or entrepreneur, an accredited investor by the standards of the U.S. Securities and Exchange Commission, and a head of household with a global perspective.

Foreign investors' motivations to invest through a Regional Center include:

- Conduct and/or expand their business in the United States
- Educate themselves or their children
- Diversify their investment portfolios
- Manage their investments in the Regional Center
- Reside in the United States and become U.S. citizens

The Regional Center investment program is growing rapidly. When fully utilized it will contribute between \$1.5-3.0 billion in foreign capital to the U.S. economy each year. Such investment also leverages significant additional domestic capital. Of equal significance, a fully functioning Regional Center program will create or preserve more than 30,000 jobs for U.S. workers each year.

The IIUSA has several missions:

- Stimulate economic development and job growth in the United States, while aiding to reduce foreign trade imbalances.
- Further immigration to the United States by qualified, educated, highly skilled and investment-oriented foreign nationals.
- Educate the public and government about the benefits derived by the Regional Centers through the EB-5 investment program.
- Help Regional Centers address administrative, regulatory and legislative issues.
- Advance and maintain Regional Center industry standards and best practices.



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What is CRA?

The California Redevelopment Association was established as a not-for-profit organization in 1979. Its name was changed to the California Redevelopment Association Foundation and an affiliated not-for-profit trade association called the California Redevelopment Association was formed in December, 2006. These two affiliated organizations (hereafter referred to as CRA) represent redevelopment agencies and allied firms throughout the state of California in responding to legislative proposals and administrative regulations, providing member services, conducting training and professional development events, and providing public information regarding redevelopment law and activities. CRA is comprised of over 350 redevelopment agencies. In addition, CRA's associate members include more than 300 private sector companies such as financial institutions, redevelopment consultants, developers, and law firms that are involved in the redevelopment process.

Legislative Advocacy

CRA sponsors, supports, opposes, and monitors redevelopment and related legislation, providing advocacy services in the State Capital.

Professional Development

CRA provides education and networking opportunities for redevelopment practitioners so they can effectively apply California redevelopment law and regulations in reducing blight, promoting economic development, creating jobs, and developing affordable housing in their communities. CRA conducts educational seminars and conferences each year and publishes workbooks and documents regarding various aspects of redevelopment.

Public Education

CRA supports redevelopment agencies in educating the public, members of the press, public officials, and legislators about the benefits and accomplishments of redevelopment and its contributions to livable communities with affordable housing, infrastructure development, jobs creation, and economic viability of cities and counties in California.

Member Services

CRA publishes a monthly Redevelopment Journal, periodic legislative analyses, a membership directory, and other publications. It also conducts regional briefings on current issues and maintains a clearinghouse for information pertaining to redevelopment.

Governance & Funding

Eighteen executive directors or designees from local redevelopment agencies constitute the Board of Directors of CRA. The Board is assisted by an Advisory Board comprised of representatives from private businesses. CRA also has various standing committees of its members. Funding for CRA is primarily through agency and organization membership dues and seminar registration fees.

Professional Development & Public Education Events

CRA's conferences, seminars and workshops improve the skill sets and knowledge bases of redevelopment practitioners.

Our events offer substantive sessions, networking opportunities, and venues to create public-private partnerships. The following programs are open to all interested persons:

- **Annual Conference & Expo**
 A large convention of local and state officials, organizations and firms to take part in substantive sessions, small group discussions, a trade show, networking, and keynotes that provoke thought, stir to action, develop relationships and renew acquaintances.
 Spring
- **Introduction to Redevelopment**
 An educational seminar and survey course on redevelopment.
 Spring / Fall
- **Redevelopment Institute**
 One dozen intensive, hands-on classes in small forums.
 Late Spring / Summer
- **Redevelopment 101 & Financial Reporting Workshops**
 Summer / Summer
- **Legal Issues Symposium**
 A conference and forum for discussion of legislative, judicial and executive issues.
 Summer
- **Affordable Housing Conference**
 A joint meeting of CRA and the California Association of Local Housing Finance Agencies to address California housing issues and needs.
 Fall
- **Regional Legislative/Membership Meetings**
 Held throughout California in the Fall, these meetings provide a forum for information about results of CRA's legislative efforts and discussion with members to give the Association direction on the needs of local government and private-sector members.
 Fall

Exhibit 5

FEDERAL Immigration Act of 1990

May 2008

CONGRESS PASSED THE IMMIGRATION ACT OF 1990 that includes a program permitting foreign investors to obtain permanent residence in the United States. This is an amendment to the Immigration and Naturalization Act (INA). Section 203(b)5 of the INA provides an immigrant investor visa category aimed at generating an inflow of foreign capital and creating jobs for U.S. workers. The law allows 10,000 permanent visas ("green cards") each year for qualifying immigrant investors. The INA requires a capital investment of \$1 million for all areas in California, except in rural, high unemployment, or targeted areas where a lower investment threshold of \$500,000 may be made. In all cases, the investment must also create full-time employment for at least 10 U.S. citizens or other legal residents—other than members of the investor's family. Investors (and qualified family members) may be granted conditional permanent residence status for two years if they meet and document the investment criteria. With timely filing to remove the conditional status, a permanent green card may be issued. Five years after the initial grant of conditional permanent residence, an investor may apply for U.S. citizenship. "High unemployment" is defined as 150 percent of the annual national average unemployment rate. The current qualifying rate is 6.9 percent. In accordance to 8 CFR §204.6(i), the California Employment Development Department (EDD) has been designated to identify the cities, counties, metropolitan statistical areas (MSAs) and geopolitical subdivisions (census tracts) that meet the "high unemployment" definition and therefore qualify for the \$500,000 minimum investment threshold. Though the rate changes often, the qualifying areas are identified at one point in time and published annually. A list of qualifying areas and census tracts can be found below. Census tract numbers for corresponding addresses can be found at <http://factfinder.census.gov/servlet/BasicFactsServlet>.

Program Highlights

- 10,000 new green cards available nationwide each year
- Permanent green card in only 2 years
- Citizenship possible in 5 years

Program Requirements

- Minimum investment of \$500,000 or \$1 million
- Creation of 10 full-time jobs for U.S. citizens

Qualifying Targeted Areas in California

- 292 Cities and Census Designated Places, 83 of these did not qualify at the MSA or County Level
- 33 Counties, 21 of these are Rural
- 11 MSAs
- 1,567 Census Tracts, 1080 of these are in Non-Qualifying Counties

Qualifying Unemployment Rate for Targeted Areas

- 6.9 percent or greater

IMMIGRATION ACT OF 1990 FOREIGN INVESTOR PROVISIONS

QUALIFYING AREAS
(Unemployment Rate 6.9% or greater)

Source: Employment Development Department
Labor Market Information Division
Local Area Unemployment Statistics
2007 Annual Average Unemployment Rates

METROPOLITAN STATISTICAL AREAS (MSA) (BOLD IF QUALIFYING)	COUNTIES COVERED (BOLD IF QUALIFYING)	QUALIFYING CITIES and CENSUS DESIGNATED PLACES	RATE
Bakersfield	Kern		8.3%
Chico	Butte		
		Biggs city	8.4%
		Concow CDP	7.5%
		Gridley city	15.2%
		Magalia CDP	8.6%
		Oroville city	9.3%
		Palermo CDP	9.8%
		South Oroville CDP	11.7%
		Thermalito CDP	12.9%
El Centro	Imperial		18.0%
Fresno	Fresno		8.6%
Hanford-Corcoran	Kings		8.7%
Los Angeles-Long Beach-Glendale	Los Angeles		
		Bell Gardens city	8.2%
		Commerce city	9.3%
		Compton city	8.9%
		Cudahy city	7.1%
		East Compton CDP	8.9%
		East Los Angeles CDP	7.0%
		Florence Graham CDP	10.0%
		Huntington Park city	7.7%
		Industry city	8.6%
		Lake Los Angeles CDP	7.2%
		Lancaster city	7.2%
		Littlerock CDP	7.0%
		Lynwood city	8.2%
		Maywood city	7.5%
		Paramount city	7.5%
		West Compton CDP	8.1%
		Westmont CDP	10.2%
		Willowbrook CDP	9.1%

Madera	Madera		7.6%
Merced	Merced		10.1%
Modesto	Stanislaus		8.8%
Napa	Napa		
		American Canyon city	6.9%
Oakland-Fremont-Hayward	Alameda	Cherryland CDP	7.9%
		Oakland city	7.4%
	Contra Costa		
		Bay Point CDP	9.4%
		Bayview Montalvin CDP	8.7%
		Bethel Island CDP	8.4%
		Crockett CDP	9.2%
		Knightsen CDP	8.9%
		Moraga town	7.4%
		Pittsburg city	7.7%
		Richmond city	7.9%
		Rollingwood CDP	10.6%
		San Pablo city	9.9%
Oxnard-Thousand Oaks-Ventura	Ventura		
		Fillmore city	7.2%
		Piru CDP	8.9%
		Santa Paula city	8.4%
Redding	Shasta		7.5%
Riverside-San Bernardino-Ontario	Riverside	Banning city	7.1%
		Beaumont city	7.6%
		Blythe city	7.4%
		Cabazon CDP	16.2%
		Coachella city	10.1%
		Desert Hot Springs city	8.4%
		Hemet city	7.9%
		Highgrove CDP	7.6%
		Homeland CDP	12.1%
		Idyllwild Pine Cove CDP	7.9%
		Lakeland Village CDP	9.7%
		Lakeview CDP	6.9%
		Mecca CDP	12.4%
		Moreno Valley city	7.2%
		Murrieta Hot Springs CDP	13.4%
		Perris city	9.9%
		Quail Valley CDP	9.9%
		Romoland CDP	9.8%
		Rubidoux CDP	8.8%
		San Jacinto city	9.6%
		Sun City CDP	7.2%
		Winchester CDP	8.9%

San Bernardino			
		Adelanto city	8.7%
		Barstow city	7.1%
		Bloomington CDP	8.0%
		Bluewater CDP	7.1%
		Hesperia city	7.4%
		Highland city	7.2%
		Lenwood CDP	10.3%
		Muscoy CDP	12.6%
		Nebo Center CDP	13.2%
		Rialto city	7.4%
		San Bernardino city	7.8%
		Twentynine Palms Base CDP	6.9%
		Victorville city	6.9%
Sacramento-Arden-Arcade-Roseville	El Dorado		
		Georgetown CDP	9.2%
		Placerville city	7.8%
		South Lake Tahoe city	7.1%
Sacramento			
Placer			
		Foresthill CDP	7.7%
		Lincoln city	9.1%
Yolo			
		West Sacramento city	9.3%
		Woodland city	7.0%
Salinas	Monterey		7.2%
San Diego-Carlsbad-San Marcos	San Diego		
		Imperial Beach city	7.6%
		National City city	9.2%
San Fran-San Mateo-Redwood City	Marin		
San Francisco			
San Mateo			
		East Palo Alto city	9.4%
		North Fair Oaks CDP	7.9%
San Jose-Sunnyvale-Santa Clara	Santa Clara		
		Gilroy city	7.3%
		San Martin CDP	11.6%
San Benito			7.2%
San Luis Obispo-Paso Robles	San Luis Obispo		
		Oceano CDP	7.2%
Santa Ana-Anaheim-Irvine	Orange		

Santa Barbara-Santa Maria-Goleta	Santa Barbara		
		Isla Vista CDP	10.8%
		Lompoc city	8.0%
		Montecito CDP	11.7%
		Santa Maria city	7.0%
Santa Cruz-Watsonville	Santa Cruz		
		Amesti CDP	10.3%
		Freedom CDP	9.8%
		Interlaken CDP	12.1%
		Watsonville city	13.1%
Santa Rosa-Petaluma	Sonoma		
		Guerneville CDP	7.9%
		Monte Rio CDP	8.6%
Stockton	San Joaquin		8.2%
Vallejo-Fairfield	Solano		
		Elmira CDP	8.9%
Visalia-Porterville	Tulare		9.3%
Yuba City			9.5%
	Sutter		9.6%
	Yuba		9.3%

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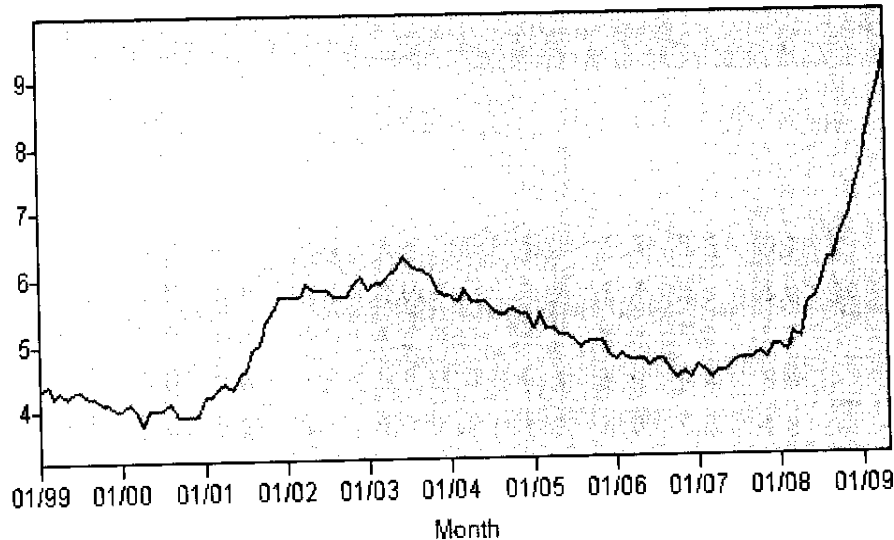
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Labor Force Statistics from the Current Population Survey

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Seasonal Adjusted
Series title: (Seas) Unemployment Rate
Labor force status: Unemployment rate
Type of data: Percent
Age: 16 years and over



Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
1999	4.3	4.4	4.2	4.3	4.2	4.3	4.3	4.2	4.2	4.1	4.1	4.0	
2000	4.0	4.1	4.0	3.8	4.0	4.0	4.0	4.1	3.9	3.9	3.9	3.9	

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Page 1 of 1 (20 results/page)

Year	Period	Area	Adjusted	Preliminary	Unemployment Rate
2009	Apr	Hesperia city	Not Adj	Prelim	15.9

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Unemployment Rates (Labor Force)

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Page 1 of 1 (20 results/page)

<input type="checkbox"/> Year	<input type="checkbox"/> Period	<input type="checkbox"/> Area	<input type="checkbox"/> Adjusted	<input type="checkbox"/> Preliminary	<input type="checkbox"/> Unemployment Rate
2009	Apr	San Bernardino city	Not Adj	Prelim	16.6

Receipt # W09000140		Application/Petition REGIONAL CENTER PROPOSAL
Notice Date March 18, 2009	Page 1 of 6	Regional Center American Redevelopment Regional Center

Linda W. Lau, Esq.
Global Immigration Law Group
350 S. Figueroa Street, Suite 760
Los Angeles, CA 90071

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 **JUN 13 2009** 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, 2nd Floor
Laguna Niguel, CA 92677

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

U.S. CITIZENSHIP AND IMMIGRATION SERVICES CALIFORNIA SERVICE CENTER Attn: EB 5 RC Proposal P.O. BOX 10590 LAGUNA NIGUEL, CA 92607-0526	 W09 000 145
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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 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 concludes 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.

In accordance with Federal Register Notice dated January 9, 2009, and effectively January 26, 2009, your case has been relocated to the California Service Center for processing.

What is the Immigrant Investor Pilot Program?

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 the specific evidence that must be submitted before consideration for eligibility for this benefit may proceed. After a review of your proposal in light of these requirements, the following information, evidence or clarification is needed to proceed.

The EB-5 program including the Regional Center or Pilot Program primarily focuses on job creation not general economic growth. Unlike other government programs which may deal in the general financial impact of investment dollars, this program is concerned with the specific impact of investment funds on creating new employment. In order to qualify as a Regional Center, the Regional Center Proposal must show the nexus between the Regional Center and job creation. It must also establish the specific activities relative to each category or industry for which the Center is requesting. Economical analyses and model which address the proposed activities are essential.

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

For your information, the Computer Disk (CD), which you provided has not been reviewed and will not be reviewed, in accordance with United States Government Network Security guidelines. If you wish the CD information to be considered, it should be submitted using a paper format.

Regional Center's Operational Plan – Amount and Source of the Regional Center's Operational Capital (8 CFR 204.6(m)(3)(iii)):

A proposal must include a detailed statement regarding the amount and source of the capital that has been committed to the Regional Center, in addition to the description of the promotional efforts taken and planned by the Regional Center's sponsors. USCIS has interpreted the words, "amount and source of capital that has been committed to the Regional Center" to mean the capital sufficient to sustain the Regional Center distinct from immigrant investors' required capital investment in a new commercial enterprise within the Regional Center.

The detailed statement that is required to meet the regulatory requirement relating to the amount and source of capital committed to the Regional Center should include:

- the exact amount of funds that have been dedicated to the Regional Center to accomplish the goals of the Pilot Program;
- the source of such funds;
- whether the amount is sufficient to sustain the Regional Center; and
- evidence that the funds have already been committed to the Regional Center.

None of the capital sustaining the Regional Center can come from immigrant investors' required threshold capital investment (as distinct from the new commercial enterprises' revenues). This separation of funds is necessary to enable the alien entrepreneur to qualify for the EB-5 immigrant investor classification.

The Development Plan does not state, indicate or include the exact amount of funds that have been or will be dedicated to accomplish the goals of the regional center, the source of funds by EB-5 immigrant investors and non EB-5 immigrant investors, whether the amount is sufficient to sustain the regional center and evidence that funds have already been committed to the regional center.

Submit evidence that clearly addresses these issues. Provide specific dollar amounts for each project in the regional center with respect to funding including the source of funding. Also, provide a prospective breakdown of the number of EB-5 and non-EB-5 immigrant investors by number and funding for each proposed project.

Regional Center's Operational Plan – Recruitment and Due Diligence (8 CFR 204.6(m)(3)(iii)):

For any individual alien investor who will be solicited by a Regional Center to invest the requisite capital into a Regional Center commercial activity, it will be incumbent on the Regional Center to engage in a due diligence process to establish that all sources of capital can be fully explained and clearly shown to have been lawfully obtained.

Submit a revised plan of proposed Regional Center operation which addresses how investors will be recruited and how the Regional Center will conduct its due diligence to accommodate the requirement that all immigrant investor funds will be lawfully obtained and describe what measures will be taken by the Regional Center to ensure and validate this. Will the submission of certain financial documents be required of foreign investors or will the Regional Center, for example, utilize a professional investigating firm to vet a potential investor's source of funds? What are your plans in this regard?

Regional Center's Operational Plan – Promotional Efforts (8 CFR 204.6(m)(3)(iii)):

USCIS interprets the words "promotional efforts" to mean an advertising or marketing program planned by the sponsors of the Regional Center that is designed to attract immigrant investors to the Regional Center. Regional Center proposals require a full description of the past, current and future promotional activities for the Regional Center. This shall include a description of the budget for this activity as well as a statement as to the source of those funds used to accomplish this necessary task.

Submit evidence that sufficiently addresses this issue including a full description of the past, current and future promotional activities for the proposed regional center.

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

8 CFR 204.6 (m)(3)(iv) requires that a proposal contain:

...a detailed prediction regarding the manner in which the regional center will have a positive impact on the regional or national economy for business services, utilities, maintenance and repair, and construction both within and without the regional center...

A detailed prediction must be provided which includes the topics of regional or national impact, household earnings, greater demand for business services, utilities, maintenance and repair, and construction both within and without the Regional Center.

The proposal should provide actual monetary predictions and address the elements listed in USCIS regulations. The economic model and analysis requested will also need to address these specific points as listed here.

The Business Approach and Structure of the Regional Center (Section 610 of Public Law 102-395):

The business aspects of the Regional Center must be fully explained as to its structure. This aspect of a proposal includes, but is not limited to, the following basic elements or samples of them as applicable to the business approach and structure to be used by the Regional Center:

- An overall Business Plan - mandatory
- Draft Operating Agreement
- Draft Partnership Agreement
- Draft Subscription Agreement
- Draft Escrow Agreements and Instructions (one for capital and one for any service fees). Such agreements usually include an "out clause" in the event of an unsuccessful visa process as a marketing tool¹ but are not required.
- List of proposed reputable financial institutions to serve as the Escrow Agent(s).
- Draft of an Offering Letter, Memorandum, Confidential Private Placement Memorandum, or similar offering made in writing to an immigrant investor through the Regional Center.
- Draft Memorandum of Understanding, Interagency Agreement, Contract, Letter of Intent, Advisory Agreement, or similar agreement to be entered into with any other party, agency or organization to engage in activities on behalf of or in the name of the Regional Center.

Evidence relating to the following has not been submitted:

- A Business Plan.
- The Articles of Incorporation.

¹ **NOTE: Under NO circumstances** may any agreement or document in support of an investor's I-526 petition offer or imply return or reimbursement of his/her capital investment should the subsequent I-829 Petition to Remove Conditions be denied by USCIS. The USCIS considers any such reimbursement provision within the period of an alien investor's conditional residence prohibited by precedent decision in Matter of Izumii.

In Matter of Ho, the Administrative Appeals Office held that a "comprehensive business plan as contemplated by the regulations should contain, at a minimum, a description of the business, its products and/or services, and its objectives." Elaborating on the contents of an acceptable business plan, the decision states the following:

"The plan should contain a market analysis, including the names of competing businesses and their relative strengths and weaknesses, a comparison of the competition's products and pricing structures, and a description of the target market/prospective customers of the new commercial enterprise. The plan should list the required permits and licenses obtained. If applicable, it should describe the manufacturing or production process, the materials required, and the supply sources. The plan should detail any contracts executed for the supply of materials and/or the distribution of products. It should discuss the marketing strategy of the business, including pricing, advertising, and servicing. The plan should set forth the business's organizational structure and its personnel's experience. It should explain the business's staffing requirements and contain a timetable for hiring, as well as job descriptions for all positions. It should contain sales, cost, and income projections and detail the bases therefor. Most importantly, the business plan must be credible."

See Matter of Ho at page 9.

Development plans relating to real estate projects should include the milestones with projected dates of completion, architectural design deadlines, estimated dates for building permit applications, estimated building permits, estimated completion dates and occupancy dates. Provide a business plan that includes these criteria.

Administrative Oversight (8 CFR 204.6(m)(6)):

The law and 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 (where applicable), improved regional productivity, job creation, and increased domestic capital investment. Therefore, in order for USCIS to determine whether an approved and designated 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 Year², commencing with the initial year as follows:

Submit a description of your plans to administer, oversee, and manage the proposed Regional Center, including but not limited to such things as to identify, assess and evaluate proposed immigrant investor projects and enterprises; how the proposed Regional Center would perform "due diligence" as to whether investment capital to be sought will consist solely of alien investor capital or a combination of alien investor capital and domestic capital; how to monitor all investment activities affiliated, through or under the sponsorship of the proposed Regional Center, and to maintain records, data and information on

² A Federal Fiscal Year runs for twelve consecutive months from October 1st to September 30th.

projects, investors, business activities, etc., in order to report to USCIS for each Federal Fiscal Year. This is known as "due diligence" and is coupled with "oversight reporting responsibilities" to be fully explained if approved and designated.

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.



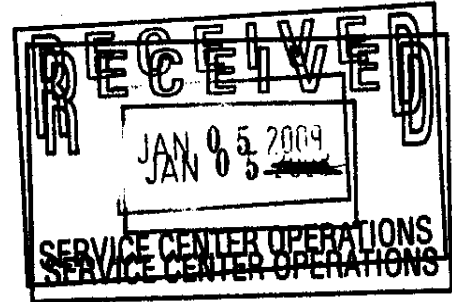
Global Immigration Law Group

A Professional Law Corporation

December 24, 2008

Via Federal Express (Tracking #8653-9895-7310)

Mr. Robert Kruzska
Deputy Chief, Service Center Operations
U.S. Citizenship & Immigration Services
20 Massachusetts Avenue N.W., Rm 2123
Washington, DC 20529



Re: Name of Proposed EB5 Regional Center: American Redevelopment
Regional Center ("AR Regional Center")
Name of Applicant: American Redevelopment Solutions, LLC

Dear Mr. Kruzska,

This office represents the above-referenced applicant in connection with the filing of American Redevelopment Regional Center Application pursuant to 8 CFR§204.6(m).


The purpose of this application is to demonstrate the viability of and qualification for establishing a regional center under the Immigration Act of 1990, Section 203(b)(5) to grant permanent residency status to qualified aliens who invest in the United States and create employment. The proposed American Redevelopment Regional Center will encompass three contiguous counties of San Bernardino, Riverside and Los Angeles in Southern California. The designation of the American Redevelopment Regional Center will provide a practical tool to expedite economic recovery, increase trade, create jobs and significantly benefit the regional center region.

Enclosed please find:

- 1) Form G-28
- 2) Executive Summary
- 3) Narrative Proposal & Development Plan of American Redevelopment Regional Center
- 4) Economic Impact Analysis Report
- 5) Targeted Employment Area Analysis
- 6) Sample Agreements for Limited Partnership
- 7) Sample Regional Center Approval Letter (with CD)

Thank you for your consideration of this application and your kind assistance.

Sincerely,


Linda W. Lau
Attorney At Law
Encl.

**Notice of Entry of Appearance
as Attorney or Representative**

Appearances - An appearance shall be filed on this form by the attorney or representative appearing in each case. Thereafter, substitution may be permitted upon the written withdrawal of the attorney or representative of record or upon notification of the new attorney or representative. When an appearance is made by a person acting in a representative capacity, his personal appearance or signature shall constitute a representation that under the provisions of this chapter he is authorized and qualified to represent. Further proof of authority to act in a representative capacity may be required. **Availability of Records** - During the time a case is pending, and except as otherwise provided in 8 CFR 103.2(b), a party to a proceeding or his attorney or representative shall be permitted to examine the record of proceeding in a Service office. He may, in conformity with 8 CFR 103.10, obtain copies of Service records or information therefrom and copies of documents or transcripts of evidence furnished by him. Upon request, he/she may, in addition, be loaned a copy of the testimony and exhibits contained in the record of proceeding upon giving his/her receipt for such copies and pledging that it will be surrendered upon final disposition of the case or upon demand. If extra copies of exhibits do not exist, they shall not be furnished free on loan; however, they shall be made available for copying or purchase of copies as provided in 8 CFR 103.10.

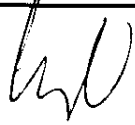
In re: American Redevelopment Regional Center	Date: 11/26/08
	File No.

I hereby enter my appearance as attorney for (or representative of), and at the request of the following named person(s):

Name: American Redevelopment Solutions, LLC	<input type="checkbox"/> Petitioner	<input checked="" type="checkbox"/> Applicant
	<input type="checkbox"/> Beneficiary	
Address: (Apt. No.) (Number & Street) (City) (State) (Zip Code)	5 Hutton Centre, Suite 1050, Santa Ana, CA 92707	
Name:	<input type="checkbox"/> Petitioner	<input type="checkbox"/> Applicant
	<input type="checkbox"/> Beneficiary	
Address: (Apt. No.) (Number & Street) (City) (State) (Zip Code)		

Check Applicable Item(s) below:

- 1. I am an attorney and a member in good standing of the bar of the Supreme Court of the United States or of the highest court of the following State, territory, insular possession, or District of Columbia
Supreme Court of California and am not under a court or administrative agency order suspending, enjoining, restraining, disbaring, or otherwise restricting me in practicing law.
Name of Court
- 2. I am an accredited representative of the following named religious, charitable, social service, or similar organization established in the United States and which is so recognized by the Board:
- 3. I am associated with _____ the attorney of record previously filed a notice of appearance in this case and my appearance is at his request. (If you check this item, also check item 1 or 2 whichever is appropriate.)
- 4. Others (Explain Fully.)

SIGNATURE 	COMPLETE ADDRESS Global Immigration Law Group 350 S. Figueroa Street, Suite 760 Los Angeles, CA 90071
NAME (Type or Print) Linda W. Lau, Esq.	TELEPHONE NUMBER Tel: (213) 830-9933 Fax: (213) 830-9930

PURSUANT TO THE PRIVACY ACT OF 1974, I HEREBY CONSENT TO THE DISCLOSURE TO THE FOLLOWING NAMED ATTORNEY OR REPRESENTATIVE OF ANY RECORD PERTAINING TO ME WHICH APPEARS IN ANY IMMIGRATION AND NATURALIZATION SERVICE SYSTEM OF RECORDS:

Linda W. Lau, Tina Bay, Patrick Benedek

(Name of Attorney or Representative)

THE ABOVE CONSENT TO DISCLOSURE IS IN CONNECTION WITH THE FOLLOWING MATTER:

All immigration matters before U.S. Department of Homeland Security, U.S. Citizenship & Immigration Services and U.S. Department of State.

Name of Person Consenting Ronald Darling, CEO	Signature of Person Consenting 	Date 11/26/08
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(NOTE: Execution of this box is required under the Privacy Act of 1974 where the person being represented is a citizen of the United States or an alien lawfully admitted for permanent residence.)

LIST OF EXHIBITS

1. Form G-28
2. Executive Summary
3. Narrative Proposal & Development Plan
4. Economic Impact Analysis Report
5. Targeted Employment Area Analysis
6. Sample Agreements
 - a) Limited Partnership Agreement
 - b) Offering Memorandum
 - c) Subscription Agreement
 - d) Risk Factor and Disclosure
 - e) Escrow Agreement
7. Sample Approval Letter of Regional Center Designation Application (with CD)

EXECUTIVE SUMMARY

Proposed Name of Regional Center. American Redevelopment Regional Center (AR Regional Center).

Website The website is www.arregionalcenter.com.

Regional Center Applicant. The applicant, American Redevelopment Solutions, LLC, was established on November 17, 2008 for the purpose of developing and managing commercial properties with professional &/or medical offices, retail &/or food services.

(b)(4) AR Regional Center's management team has over 20 years of combined experience in project & property management, and acquisition & development of real estate properties.

Regional Center Boundary. AR Regional Center will encompass the three contiguous counties of San Bernardino, Riverside and Los Angeles in Southern California.

Proposed Sample Regional Center Projects

Primary Contact. The primary contact for AR Regional Center is Mr. Ronald Darling, CEO of American Redevelopment Solutions, LLC and he can be reach by telephone at (714) 384-4250 and by email at redarling@yahoo.com

The immigrant counsel for AR Regional Center is Linda Lau, Esq. of Global Immigration Law Group. She can be reached by telephone at (213) 830-9933 ext 108 or cellular phone at (213) 700-4023 and by email at Linda@globallawgroup.net

Activities of the Regional Center.

American Redevelopment Solutions, LLC is committed to bringing together the common goals of the California Redevelopment Law and the Immigrant Investor Visa Pilot Program by providing quality services to identify, evaluate and select investment projects. AR Regional Center projects will not only create a significant economic impact but also job opportunities in areas of great economic need which have been designated as redevelopment areas.

American Redevelopment Solutions, LLC, will match the needs of the designated redevelopment areas with the needs of the foreign investor. In addition to the investment incentives established in the California Community Redevelopment Law, foreign investors will have the additional incentive to invest in these redevelopment areas as part of the Immigrant Visa Pilot Program. The foreign investor will not only have the opportunity to meet the requirements of the Immigrant Visa Pilot Program, but the investor will be able to invest in a beneficial and worthwhile project which will help change the face of the entire community.

American Redevelopment Solutions, LLC will work with each redevelopment agency to locate investment projects which meet the needs of both the redevelopment agency and the immigrant investor. This will mean that American Redevelopment Solutions, LLC will provide investment opportunities in a variety of projects based on the needs of the redevelopment agency.

Job Creation. Based upon an economic study utilizing RIMS II methodology, it is estimated that 686 jobs will be created as a result of the development of the sample projects of similar type and size within the regional center. There will be 363 direct/primary and 323 indirect/secondary jobs in total.

Targeted Employment Area (TEA). The geographic focus of AR Regional Center will encompass a three-county area of California comprised of Riverside, San Bernardino and Los Angeles counties.

In accordance with 8 CFR 204.6(i), the California Employment Development Department (EDD) at the instruction of Office of Business, Transportation and Housing Agency (BTH) has identified cities, counties, metropolitan statistical areas (MSAs) and geopolitical subdivisions (census tracts) that meet the "high unemployment" definition and therefore qualify for the \$500,000 minimum investment threshold. The two sample proposed projects are located in San Bernardino and Hesperia cities of San Bernardino County. Based on the 2008 State of California report by EDD entitled Federal Immigration Act of 1990 Investor Visa Program and the most recent available statistics, both cities of San Bernardino and Hesperia were listed and identified by the EDD as \$500,000 qualifying areas.

The proposed projects are located in San Bernardino and Hesperia cities of San Bernardino County in Southern California. Both cities qualify as Targeted Employment Areas based on their high rate of unemployment. According to the Bureau of Labor Statistics of the United States Department of Labor, the United States had an unemployment rate of 6.7% in November 2008, while the cities of San Bernardino and Hesperia were surveyed as having an unemployment rate of 12.3% and 11.8% respectively for the same period. Thus, based upon the most recent data, the unemployment rates of San Bernardino and Hesperia were at least 150% greater than the national average.

It is concluded that San Bernardino and Hesperia both qualify under the INA as high unemployment areas. Thus alien investors participating in any projects in San Bernardino or Hesperia only need to investing \$500,000 in capital.

(b)(4)

For other projects to be developed within the boundary of the regional center, they will be located in TEA as well as in the redevelopment zones. Unemployment data will be provided along with each investor's I-526 filing to demonstrate the unemployment rate of the project location is at least 150% greater than the national average.

Promotional Efforts.

Funding of the Regional Center. Projects developed under the regional center will be funded through a combination of domestic private equity, institutional financing, investment tax credits, tax increment bonding, grant funds, and immigrant investments.

The Investment Entities. American Redevelopment Solutions, LLC will establish a number of limited partnerships that will serve as the investment entities within AR Regional Center. American Redevelopment Solutions, LLC will be the General Partner holding 70% interest of each LP. Immigrant investors and other investors will contribute their capital to limited partnerships, which will collectively hold 30% interest of each LP.

Sample Limited Partnership Agreements. Standard agreements to be used in the operation of the regional center activities are included within the application. These include a Limited Partnership Agreement, Subscription Agreement, Offering Memorandum, Escrow Agreement, Risk Factor and Disclosures.

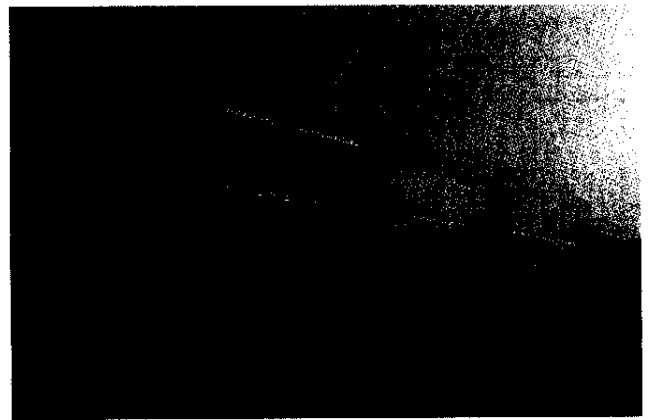
Investment and Fee Escrow Accounts. The investment funds will be deposited into an escrow account in the United States. These funds shall be released to the development entity upon approval of the Immigrant Petition by Alien Entrepreneur (I-526) or earlier.

A separate fee escrow account shall be established for associated service fees related to investment administration, due diligence, and legal services in the processing of the visa applications.

Regional Center Responsibilities. The administration, management and oversight of AR Regional Center will be in compliance with 8 CFR§204.6(m)(6) in monitoring all investment activity, data, and information in order to report to USCIS on a regular basis. These responsibilities are outlined in the attached model regional Center designation approval letter drafted for the review of USCIS.

Investor Management Responsibilities. Individual investors will be expected to provide advice to the General Partner of the limited partnership on significant financial, management, and project related issues. Individual investor will also be engaged in policy formulation activities and have the fullest extent of rights, powers and duties relating to management that are normally granted to limited partners under the Uniform Limited Partnership Act.

AMERICAN REDEVELOPMENT REGIONAL CENTER



DEVELOPMENT PLAN

PROVIDING GROWTH FOR COMMUNITIES IN NEED

Development Plan

1. OVERVIEW

- 1.1 Introduction
- 1.2 Overview
- 1.3 What is Redevelopment?
- 1.4 The Role of American Redevelopment Solutions, LLC
- 1.5 Designated Regional Center Geographic

2. PROFILE OF TARGETED AREA

- 2.1 General Information
- 2.2 Economic Profile – Riverside County
- 2.3 Economic Profile – San Bernardino County
- 2.4 Economic Profile – Los Angeles County
- 2.5 Demographic Information
 - (1) Current Population
 - (2) Population's Characteristics
 - (3) Current Economic Conditions
 - (4) Demographic Analysis
- 2.6 Workforce – Expansion, Development and Training
- 2.7 Quality of Life Impact
- 2.8 Regional Economic Development Stakeholders
 - (1) As of 2007, there are over 100 designated redevelopment agencies within Riverside, San Bernardino and Los Angeles Counties whose mission is to promote economic growth within the specified geographic areas.

3. MARKETING

- 3.1 Mission Statement
- 3.2 Promotional Marketing Strategy
- 3.3 Marketing Evaluation

4 FUNDING

- 4.1 Capital Contributions
- 4.2 Investment Entities – Limited Partnerships
- 4.3 Investment and Escrow Accounts
- 4.4 Investor Management Responsibilities

5. **APPLICANT, AMERICAN REDEVELOPMENT SOLUTIONS, LLC.**
 - 5.1 American Redevelopment Solutions, LLC – Company Background
 - 5.2 AMERICAN REDEVELOPMENT SOLUTIONS, LLC Development Management Team
 - (1) Ronald E. Darling, Chief Executive Officer
 - (2) Spencer Rose, Consultant
 - (3) Ryan J. Borzouei, Consultant
 - (4) Linda Lau, Esq., Global Immigration Law Group, Immigration Counsel
 - (5) Dr. Hart Hodges, Consultant

6. **LAND USE PLAN AND DESIGN CONCEPT**
 - (1) Office Building Proposal – Professional and Medical Office
 - (a) Executive Summary
 - (b) Project Highlights
 - (i) Excellent Location
 - (ii) Southeast Industrial Park – Redevelopment Project
 - (iii) Tenant Demand
 - (iv) Loma Linda University Medical Center
 - (v) Residential Growth
 - (c) Market Overview – Medical Office
 - (i) National
 - (ii) West Coast
 - (d) Project Data
 - (i) Project Description
 - (ii) Existing Site Description
 - (iii) Environmental & Geotechnical
 - (iv) Entitlement Status
 - (2) Retail Building Proposal
 - (a) Executive Summary
 - (b) Hesperia Redevelopment Agency
 - (c) Location Overview
 - (d) Recent Development Headlines in Hesperia
 - (e) Full Demographic Profile
 - (f) Market Overview – Retail
 - (i) Riverside – San Bernardino Metro Area

7. CONCLUSION

OVERVIEW OF REGIONAL CENTER

1.1 INTRODUCTION

American Redevelopment Solutions, LLC submits this application for approval as a Regional Center to promote economic growth through increased regional productivity, creation of new jobs, increased economic growth, and increased capital investment within the specific defined geographic area.

American Redevelopment Solutions, LLC is committed to bringing together the common goals of the California Redevelopment Law and the Immigrant Investor Visa Pilot Program by providing quality services to identify, evaluate, and select investment projects within the defined geographic area. AR Regional Center projects will create a significant economic impact and which will meet the job creation requirements of the Immigrant Investor Pilot Program in areas of great economic need which have been designated as redevelopment areas.

1.2 OVERVIEW

The California Redevelopment Law was passed to provide local agencies with a framework to entice private investors to invest in deteriorated economic areas which are plagued with a lack of jobs, lack of business opportunities, higher crime rate, poor housing availability, or other challenging social conditions, in order to reverse the downward spiral of those communities by revitalizing the area. The program has shown that by bringing in more jobs, more businesses, and better housing, the entire community revitalizes. Where graffiti covered empty buildings once stood, new businesses and residents who take pride in their community are left. As a result, crimes rates in these redeveloped communities decrease significantly, and the positive economic benefit for the community is enormous as people have the ability to find employment and decent housing within their community. However, while the program provides local redevelopment agencies with the ability to offer certain incentives, the

actual redevelopment of these designated blighted areas must come from private investors.

The Immigrant Investor Visa Pilot Program was designed to encourage private foreign investment to “promote economic growth, improve regional productivity, job creation, and increase domestic capital investment.” In other words, the Pilot Program’s goals are identical to the goals of the California Redevelopment Law. Both programs are focused on increasing economic growth and the creation of jobs. Nowhere is the need for private investment than in these designated redevelopment areas. The impact from the private investment in the redevelopment areas goes far beyond the mere creation of jobs and economic growth, this investment changes the entire community and the lives of so many who reside within the redevelopment area boundaries.

American Redevelopment Solutions, LLC, will match the needs of the designated redevelopment areas with the needs of the foreign investor. In addition to the investment incentives established in the California Community Redevelopment Law, foreign investors will have the additional incentive to invest in these redevelopment areas as part of the Immigrant Visa Pilot Program. All parties will benefit. The foreign investor will not only have the opportunity to meet the requirements of the Immigrant Visa Pilot Program, but the investor will be able to invest in a beneficial and worthwhile project which will help change the face of the entire community.

1.3 WHAT IS REDEVELOPMENT?

Redevelopment is a tool created by state law to assist local governments in eliminating blight from a designated area, as well as to achieve the goals of development, construction and rehabilitation of residential, commercial, industrial and retail districts.

After World War II, the country first began experiencing the effects of urban flight in which middle class and wealthier residents began moving out of the centralized urban areas, choosing to move out to the suburbs, taking their businesses and tax dollars with them. This movement soon left behind deteriorating neighborhoods with limited business opportunities and

higher crime rates as the lack of opportunities brought frustration to those remaining.

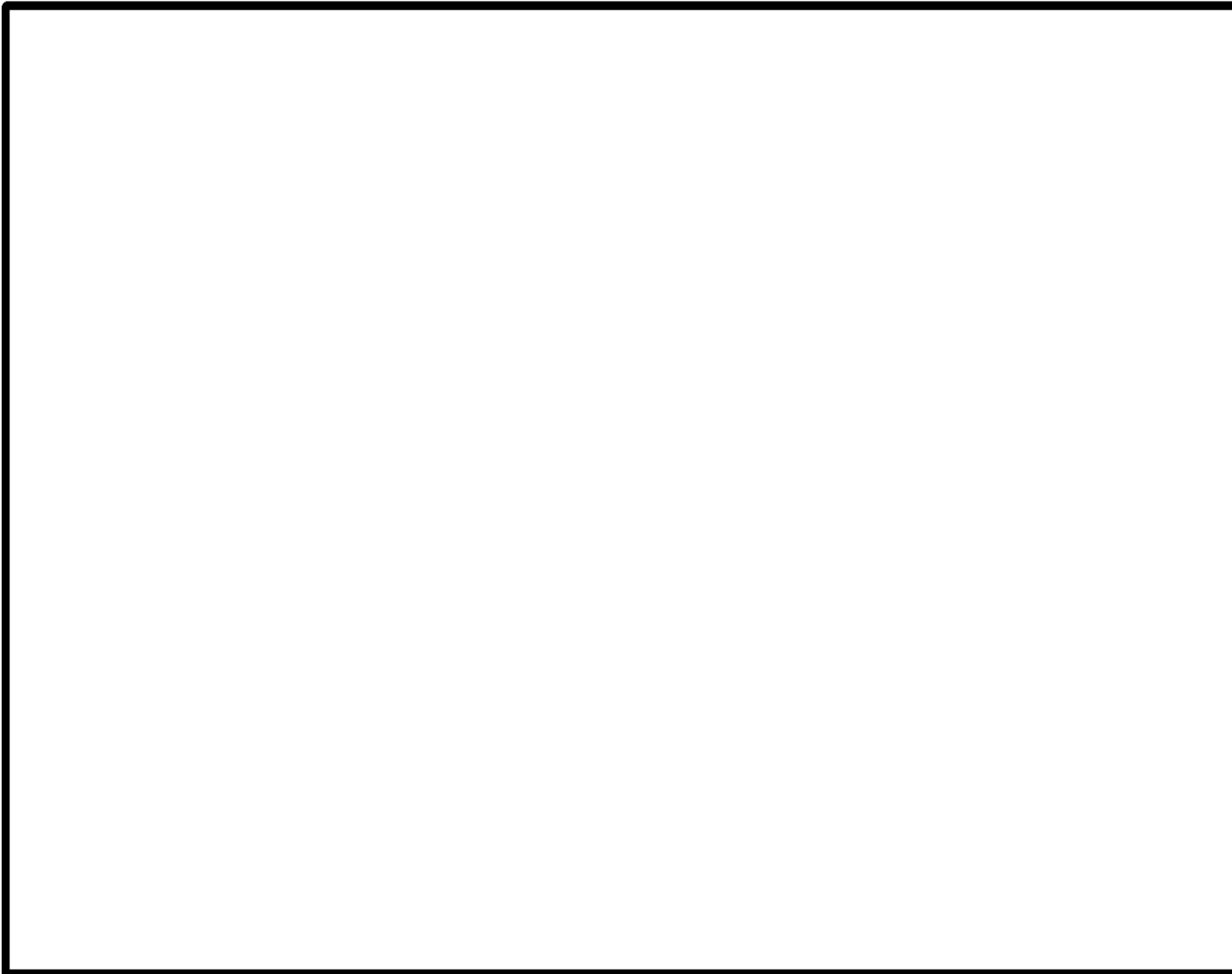
Therefore in 1952, California passed the California Community Redevelopment Law which established a program in which local agencies were provided tools to not only identify these deteriorated areas, but also with which to entice private investment into these deteriorated geographic areas to reverse the negative impacts suffered by the communities left behind. Redevelopment is a locally driven activity that assists local governments in revitalizing their communities. Redevelopment encourages new development, creates jobs and generates tax revenues in declining urbanized areas by developing partnerships between local governments and private entities.

State law gives a local government (city or county) the authority to form a redevelopment agency with the specific goal of revitalizing a deteriorated area. The first step to being designated as a redevelopment area is to meet the requirements of a “blighted” or deteriorated area. The proposed project goes to public hearing and not only is the geographic area defined, but a proposal for redevelopment is submitted. A survey is conducted by the local governing agency to determine if the area meets the necessary requirements. After a public debate and hearing is held, the specific redevelopment area is adopted. A local Redevelopment Agency is established to oversee the redevelopment of the designated area and to develop plans to encourage private investors to invest into the area. The exact geographic area for each approved redevelopment area is identified and mapped. Records of these specific areas are maintained by the California Redevelopment Agency. It becomes the goal of the local Redevelopment Agency to implement its plans to entice private investment in the designated areas.

1.4 THE ROLE OF AMERICAN REDEVELOPMENT SOLUTIONS, LLC

There are currently over 100 active redevelopment agencies contained within the three designated counties, all of which are overseen by the local city council, county board of supervisors or a separate appointed board -- all accountable to the public. Because they are locally

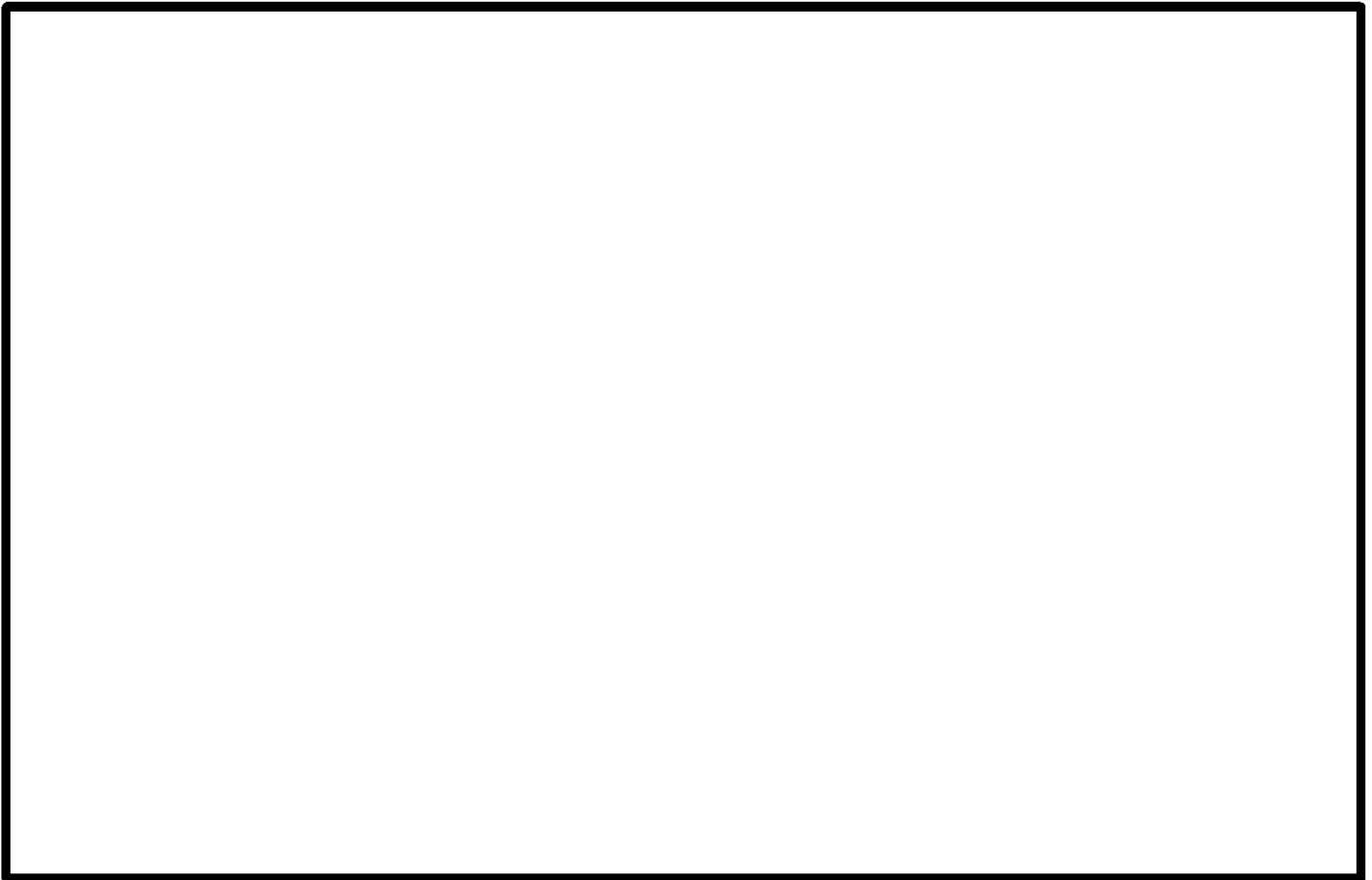
(b)(4) governed and their boards are comprised of local elected or appointed officials, redevelopment agencies are in the best position to identify what a community needs and to work with private investors on local projects to meet those needs. Redevelopment agencies are unique in that they exist solely to reduce unfavorable economic and social conditions in existing communities.



1.5 DESIGNATED REGIONAL CENTER GEOGRAPHIC AREA

American Redevelopment Solutions, LLC applies for approval of a regional center for the Redevelopment Areas contained in the three

- (b)(4) contiguous counties of San Bernardino, Riverside and Los Angeles Counties. The Regional Center will be limited only to the geographic areas of the identified counties which have been designated as redevelopment areas. Attached as Exhibit A is a map identifying the three contiguous counties which are the subject of this application.



Additionally, based on its population and its unemployment rate, many of the areas within these three counties will qualify as Targeted Employment Areas (TEA) for purposes of participating in the Regional Center Pilot Program operated by the U.S. Citizenship and Immigration Services (USCIS) which will provide even additional benefits for the investors.

PROFILE OF TARGETED AREA

2.1 GENERAL INFORMATION

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2.8 REGIONAL ECONOMIC DEVELOPMENT STAKEHOLDERS

(1) As of 2007, there are over 100 designated redevelopment agencies within San Bernardino, Riverside and Los Angeles Counties whose mission is to promote economic growth within the specified geographic areas. Some of the more active agencies are:

- *Banning City Redevelopment Agency
- *Calimesa Redevelopment Agency
- *Coechella Redevelopment Agency
- *Desert Hot Springs Redevelop. Agency
- *Hemet Redevelopment Agency
- *Indio Redevelopment Agency
- *Lake Elsinore Redevelopment Agency
- *Murrieta Redevelopment Agency
- *Palm Desert Redevelopment Agency
- *Riverside County Redevelopment Agency
- *San Jacinto Redevelopment Agency
- *Apple Valley Redevelopment Agency
- *Chino Redevelopment Agency
- *Grand Terrace Redevelopment Agency
- *Highland Redevelopment Agency
- *Loma Linda Redevelopment Agency
- *Needles Redevelopment Agency
- *Rialto Redevelopment Agency
- *Twenty Nine Palms Redevelop. Agency
- *Victorville Redevelopment Agency
- *Agoura Hills Redevelopment Agency
- *Arcadia Redevelopment Agency
- *Avalon Redevelopment Agency
- *Bell Gardens Redevelop. Agency
- *Burbank Redevelopment Agency
- *Claremont Redevelopment Agency
- *Culver City Redevelopment Agency
- *Duarte Redevelopment Agency
- *Glendale Redevelopment Agency
- *Inglewood Redevelopment Agency
- *La Mirado Redevelopment Agency
- *La Verne Redevelopment Agency
- *Beaumont Redevelopment Agency
- *Cathedral City Redevelopment Agency
- *Corona Redevelopment Agency
- *Redlands Redevelopment Agency
- *Indian Wells Redevelopment Agency
- *La Quinta Redevelopment Agency
- *Moreno Valley Redevelopment Agency
- *Norco Redevelopment Agency
- *Perris Redevelopment Agency
- *Riverside City Redevelopment Agency
- *Temecula Redevelopment Agency
- *Barstow Redevelopment Agency
- *Chino Hills Redevelopment Agency
- *Hesperia Redevelopment Agency
- *Inland Valley Redevelopment Agency
- *Montclair Redevelopment Agency
- *Rancho Cucamonga Redevelop Agency
- *San Bernardino Co. Redevelop Agency
- *Upland Redevelopment Agency
- *Yucca Valley Redevelopment Agency
- *Alhambra Redevelopment Agency
- *Artesia Redevelopment Agency
- *Baldwin Park Redevelop. Agency
- *Bell Redevelopment Agency
- *Cerritos Redevelopment Agency
- *Covina Redevelopment Agency
- *Downey Redevelopment Agency
- *El Monte Redevelopment Agency
- *Hawaiian Gardens Redev. Agency
- *Irwindale Redevelopment Agency
- *La Puente Redevelopment Agency
- *Lakewood Redevelopment Agency

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- *Lancaster Redevelopment Agency
- *Long Beach Redevelopment Agency
- *Los Angeles County Redev. Agency
- *Monrovia Redevelopment Agency
- *Monterey Park Redevelop. Agency
- *Palmdale Redevelopment Agency
- *Pomona Redevelopment Agency
- *Redondo Beach Redevelop. Agency
- *San Dimas Redevelopment Agency
- *Santa Clarita Redevelop. Agency
- *Santa Monica Redevelop. Agency
- *S. El Monte Redevelopment Agency
- *S. Pasadena Redevelopment Agency
- *Torrance Redevelopment Agency
- *West Covina Redevelopment Agency
- *Whittier Redevelopment Agency

- *Lawndale Redevelopment Agency
- *Los Angeles City Redev. Agency
- *Lynwood Redevelopment Agency
- *Montebello Redevelopment Agency
- *Norwalk Redevelopment Agency
- *Pico Rivera Redevelop. Agency
- *R. Palos Verde Redevelop. Agency
- *Rosemead Redevelopment Agency
- *San Gabriel Redevelopment Agency
- *Santa Fe Springs Redev. Agency
- *Signal Hill Redevelopment Agency
- *South Gate Redevelopment Agency
- *Temple City Redevelop. Agency
- *Walnut Improvement Agency
- *W. Hollywood Redevelop. Agency

Index 4 – Listing of Redevelopment Agencies Within Riverside, San Bernardino and Los Angeles Counties.



MARKETING

3.1 MISSION STATEMENT

AR Regional Center aims to attract aliens with the requisite capital who see the EB-5 process as a desirable means of acquiring U.S. permanent resident status, and who wish to be involved in pioneering development efforts in a designated redevelopment area which will act as a catalyst for change and growth. Prospective applicants will be introduced to the vision of AR Regional Center: to expand and create new economic opportunities for the residents of Riverside, San Bernardino and Los Angeles region through exciting, socially conscious sustainable development that serves the specific needs of individual patrons as well as the community at large. These development projects will grant qualified individuals the opportunity to obtain permanent U.S. residence based on their investment in the AR Regional Center. Prospective applicants will see that the EB-5 process is straightforward, and that AR Regional Center is a promising target for capital investment. Typical EB-5 projects require an investment resulting in the creation of full-time employment for at least ten (10) U.S. citizens or authorized workers.

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3.2 PROMOTIONAL MARKETING STRATEGY





3.3 MARKETING EVALUATION

Successful economic development will require internal and external branding. The internal branding strategy will be designed to educate, remind and reinforce regional leaders and the community at large that the Tri-County area of Riverside, San Bernardino, and Los Angeles Counties is an economically viable region and a quality community in which to settle down and raise a family. Greater confidence in the economy's ability to sustain a growing bedroom community will inevitably attract investment in local businesses and housing.

FUNDING

4.1 CAPITAL CONTRIBUTIONS

AR Regional Center will provide necessary capital for the various projects by working with the Redevelopment Agencies to obtain favorable economic benefits to establish the projects, as well as concessions which will aid in the expedition of the government approval process for the developments. AR Regional Center, will match foreign investor needs with the needs of the redevelopment projects as well as obtaining additional private equity, institutional financing, bonding, grant funds, and investment tax credits to obtain the necessary capital with which to fund the projects.

4.2 INVESTMENT ENTITIES – LIMITED PARTNERSHIPS

AR Regional Center will establish a number of Limited Partnerships (LP) under California corporate law that will serve as the investment entities for the development of the projects for the AR Regional Center. Construction of each specified project for AR Regional Center will be handled separately, with AR Regional Center acting as the General Partner holding a 70% interest of each LP. Immigrant investors will contribute their

capital to limited partnerships, which will collectively hold 30% interest of each LP. Construction and development costs for each LP will determine the amount of investment and the number of investors required.

4.3 INVESTMENT AND ESCROW ACCOUNTS

Limited Partnership investment funds will be deposited into an escrow account with an approved escrow company in the United States. These funds shall be released to the development entity upon approval of the Immigrant Petition By Alien Entrepreneur (Form I-526).

A fee escrow account will be established for associated services and fees related to due diligence in the processing of the visa application. A portion of the fee escrowed amount shall be released within ten days of escrow opening, with the balance remaining in escrow until approval of the Immigrant Petition By Alien Entrepreneur (Form I-526) unless an earlier release is required for use by the project.

4.4 INVESTOR MANAGEMENT RESPONSIBILITIES

Individual investors will be expected to participate in an annual meeting to provide advice to the General Partner of the investment Limited Partnerships on significant financial, management, and project related issues. Additionally, these investors will be engaged in policy formulation activities and have the fullest extent of rights, powers and duties relating to management that are normally granted to limited partners under the Uniform Limited Partnership Act.

APPLICANT INFORMATION

5.1 AMERICAN REDEVELOPMENT SOLUTIONS, LLC - COMPANY

BACKGROUND

American Redevelopment Solutions, LLC is a development company founded in August, 2008 for the purpose of designing, planning and developing economically viable commercial enterprises within Redevelopment Agencies in order to assist in the growth of communities in need. American Redevelopment Solutions, LLC believes in the sustainable

revitalization of communities through commercially viable and environmentally responsible development. American Redevelopment Solutions, LLC will partner with highly respected and experienced developers and construction companies known in the specific area of development which is needed for each project, as well as work with the Redevelopment Agencies to complete projects and developments which are not only successful businesses, but which are also targeted to create a positive impact in the community for which the redevelopment is being sought.

5.2 DEVELOPMENT MANAGEMENT TEAM of AMERICAN REDEVELOPMENT SOLUTIONS, LLC

(1) Ronald E. Darling, Chief Executive Officer

Ronald E. Darling is a California licensed real estate broker and a corporate attorney in his twenty-second year of practice. Mr. Darling began his career with the Los Angeles, and Orange County offices of McKenna, Conner & Cuneo. Mr. Darling received his undergraduate degree from the University of California at Irvine in 1983. Mr. Darling is a 1986 graduate of Loyola Law School, Los Angeles, where he was a member of the St. Thomas Moore Law Honor Society, and an articles editor on the International Law Review.

Mr. Darling was born and raised in Southern California and thus grew up gaining knowledge as to the various particular needs and nature of the Southern California communities. Mr. Darling has been active in the real estate community and has long held an interest in real estate investment. He has acquired and managed investment property since 1986 and has held his real estate broker's license for California since 1992.

Mr. Darling began his involvement with the Immigrant Investor Pilot Program in the early 1990's when the program first began. He has represented both the investors as well as businesses which have offered investment opportunities pursuant to the terms of the program. In light of the economic issues being presented, Mr. Darling is merging his interest

and knowledge of Southern California real estate, his business and real estate legal experience, and his knowledge of the needs of the Immigrant Investor Pilot Program to build a successful regional center which meets the needs of the individual investors as well as meets the very essence of the Immigrant Investor Pilot Program which is to allow for the development of projects in communities which have a need for economic revitalization.

(2) Spencer Rose, Consultant

As a Senior Associate for Equity Office Properties, Mr. Rose is responsible for financial analysis, underwriting, and due diligence for all acquisition, disposition, and development activity in the Southern California region. Mr. Rose is further responsible for lease analysis and assists in performance review relating to Equity's existing 11+ million square foot portfolio of commercial assets.

Prior to joining Equity Office, Mr. Rose worked in acquisitions and development at Parker Properties in Orange County. At Parker, Mr. Rose was actively involved in all aspects of the development process ranging from market research, feasibility analysis, design, marketing and leasing. Prior to Parker, Mr. Rose worked in site acquisitions for World Savings Bank where he acquired retail land sites to facilitate the development of new savings and lending branch offices.

Mr. Rose earned his bachelors degree from the University of California, Berkeley and his MBA and MRED (Master in Real Estate Development) degrees from the University of Southern California. Mr. Rose is actively involved in ULI, ICSC, and NAIOP.

(3) Ryan J. Borzouei, Consultant

Mr. Borzouei has specialized in analyzing the feasibility, and profitability of real estate acquisitions. Mr. Borzouei began his career as a research analyst for InteCap, a division of Charles River & Associates, where he was involved in all aspects of economic research and consulting for economic impact studies and property valuations. After spending some time as a senior consultant for Ernst & Young, LLP, he became an asset

Management Analyst for BlackRock, assisting with the management of a \$350 million portfolio of investment properties.

Mr. Borzouei was recruited to work for KPMG, LLP's Economic Valuations Services to provide real estate valuation consulting services for real estate investment firms. After gaining experience with KPMG, Mr. Borzouei became an Acquisition Analyst for Birtcher Anderson Realty, a real estate investment firm, providing value added advisory services and responsible for securing financing for large commercial projects ranging from \$15-\$75 million including performing property and market research and preparing business plans and acquisition strategies.

Mr. Borzouei earned his bachelors degree from the University of California, San Diego and his MBA (Master of Business Administration, Real Estate and Finance) degree from the University of Southern California. Spencer is actively involved in ULI and NAIOP.

**(4) Linda Lau, Esq., Global Immigration Law Group,
Immigration Counsel**

Linda Lau is an attorney whose focus is on business immigration. She holds a B.A. degree from the University of California at Berkeley and an M.S. degree from University of Michigan, Ann Arbor. She received her J.D. degree from the UCLA School of Law. Ms. Lau has represented hundreds of businesses over the course of 20 years of practice. She provides legal representation to domestic and international companies and represents firms in the connection with the transfer and employment of executive, managers, and professional on both a temporary and permanent basis in compliance with employer sanctions laws. Ms. Lau advises companies and individuals on the development of significant immigrant investor projects.

(5) Dr. Hart Hodges, Economist

Dr. Hart Hodges is the director of the Center for Economic and Business Research and an assistant professor of economics at Western Washington University. Before coming to Western Washington, Hart spent several years with an economic consulting firm in Alaska and before that

was a financial planner for the City of Portland, OR. Hart has also served as the natural resource damage assessment economist for the U.S. Department of the Interior and was a research associate at World Resources Institute in Washington, DC. Hart received his Ph.D. in 1994 from the University of Washington and his Masters in Environmental Management from Duke University in 1987. He started his career at Western Washington University in 2000 and was appointed director of the Center for Economic and Business Research in 2001. His research interests include natural resource and environmental economics, applied business research, and health economics.

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PROPOSED PROJECTS

6. LAND USE PLAN AND DESIGN CONCEPT



(1) Office Building Proposal –Professional and Medical Office

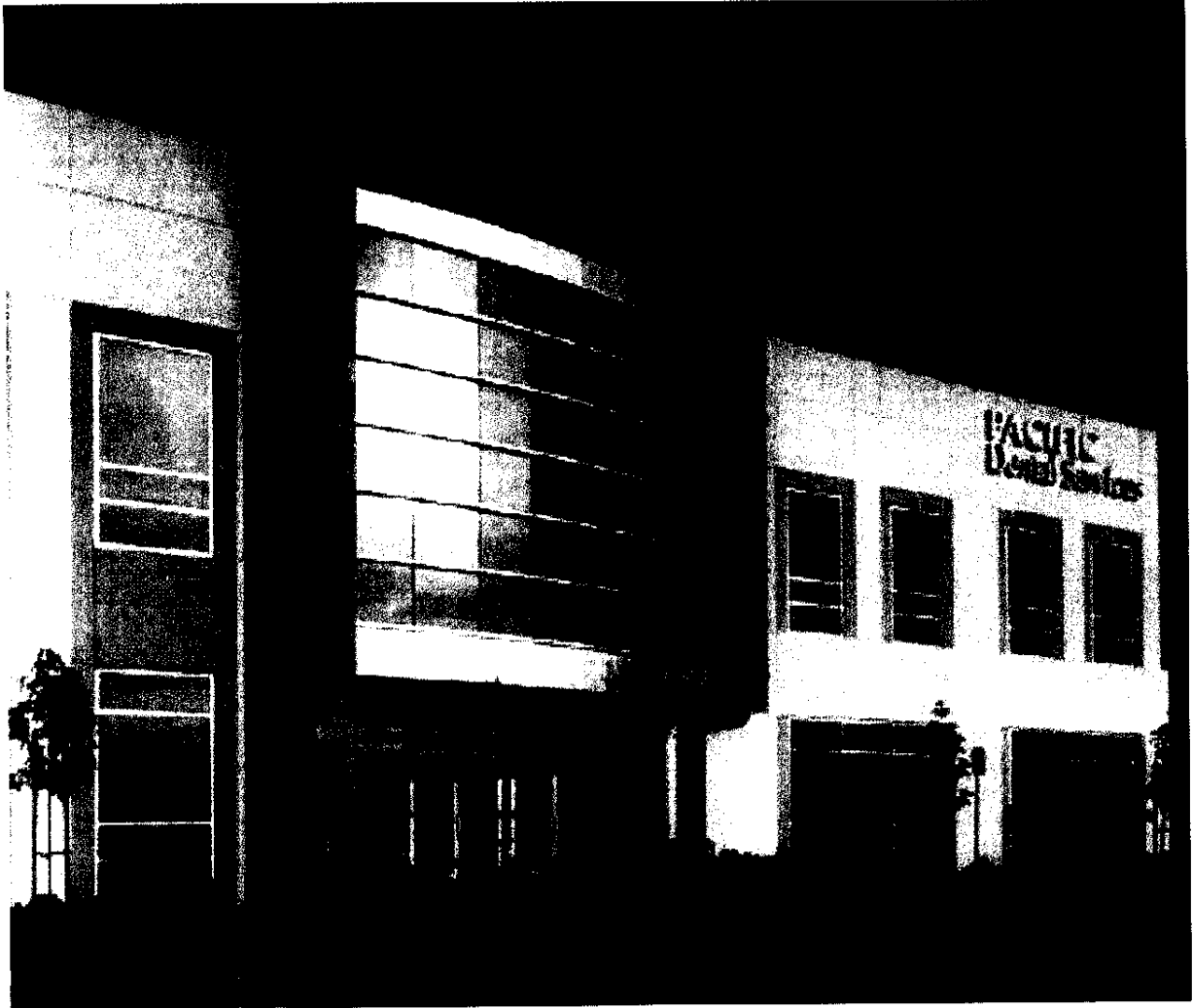


Figure 1 - Professional and Medical Office

Southeast Industrial Park
Redevelopment Project
San Bernardino, CA

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(2) Retail Building Proposal



Figure 8 - Retail Building Proposal

Retail Development
Redevelopment Zone

Hesperia, CA

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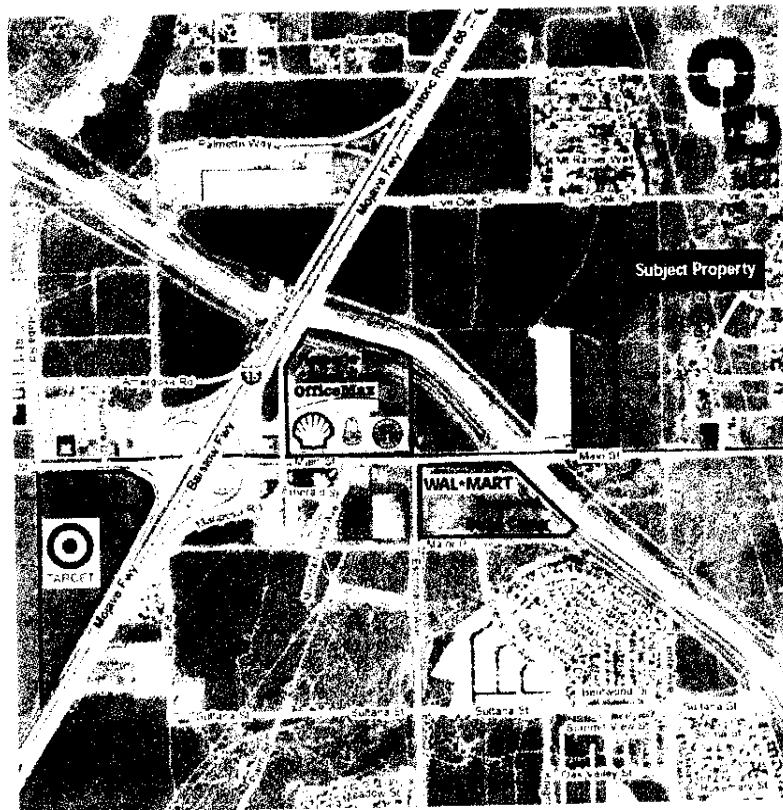
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(d) Recent Business Development Headlines in Hesperia

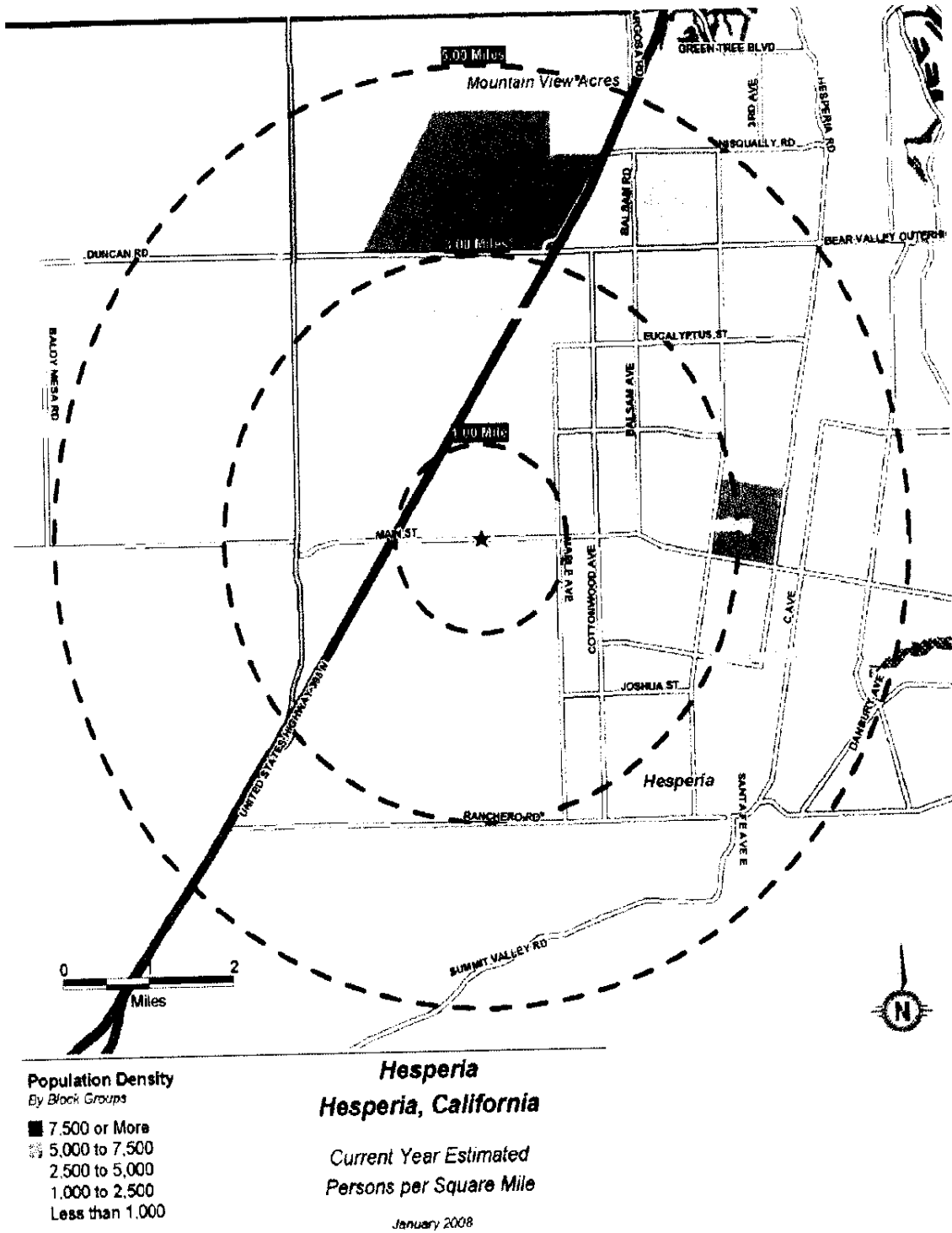
- **84 Lumber Returns to the Victor Valley with Hesperia Site**
Another prestigious name was added to the City's business directory with 84 Lumber breaking ground.
- **7/1/07 New Businesses Open All Over City**
Development on a variety of new commercial centers continues around the City. Residents can look forward to a variety of new retail businesses and restaurants opening.
- **Home Depot and Wal-Mart Announce Plans for Hesperia**
Both will anchor new center.
- **Gateway Center on Target**
New center to be anchored by Target.
- **Lennox Plaza, Coming Soon**
New retail and business center.

Figure 11 – Hesperia Retail Map



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Figure 13 - Population Density Map



(e) Full Demographic Profile⁵

Hesperia Hesperia, California		1.00 mi radius	3.00 mi radius	5.00 mi radius
POPULATION	2005 Estimated Population	3,109	27,352	85,394
	2010 Projected Population	3,522	31,477	97,037
	2000 Census Population	2,899	23,277	73,792
	1990 Census Population	2,036	19,242	53,717
	Historical Annual Growth 1990 to 2005	3.5%	2.8%	3.9%
	Projected Annual Growth 2005 to 2010	2.7%	3.0%	2.7%
HOUSEHOLDS	2005 Est. Households	959	8,150	25,555
	2010 Proj. Households	1,046	9,045	27,966
	2000 Census Households	873	7,289	23,188
	1990 Census Households	645	6,144	17,571
	Historical Annual Growth 1990 to 2005	3.2%	2.2%	3.0%
	Projected Annual Growth 2005 to 2010	1.8%	2.2%	1.9%
AGE	2005 Est. Population 0 to 9 Years	17.1%	15.3%	15.9%
	2005 Est. Population 10 to 19 Years	18.1%	18.5%	18.6%
	2005 Est. Population 20 to 29 Years	16.1%	12.7%	13.1%
	2005 Est. Population 30 to 44 Years	22.1%	21.3%	21.3%
	2005 Est. Population 45 to 59 Years	16.5%	18.9%	18.0%
	2005 Est. Population 60 to 74 Years	7.0%	9.3%	9.0%
	2005 Est. Population 75 Years Plus	3.0%	4.0%	4.2%
	2005 Est. Median Age	28.6	32.0	31.2
MARITAL STATUS & SEX	2005 Est. Male Population	49.1%	49.6%	49.4%
	2005 Est. Female Population	50.9%	50.4%	50.6%
	2005 Est. Never Married	21.6%	22.3%	24.1%
	2005 Est. Now Married	48.5%	55.9%	54.7%
	2005 Est. Separated or Divorced	15.2%	10.9%	10.5%
	2005 Est. Widowed	14.7%	10.9%	10.6%
INCOME	2005 Est. HH Income \$200,000 or More	0.9%	1.5%	1.2%
	2005 Est. HH Income \$150,000 to 199,999	2.0%	1.0%	1.1%
	2005 Est. HH Income \$100,000 to 149,999	6.3%	7.6%	7.5%
	2005 Est. HH Income \$75,000 to 99,999	11.2%	12.4%	12.2%
	2005 Est. HH Income \$50,000 to 74,999	24.1%	24.2%	22.2%
	2005 Est. HH Income \$35,000 to 49,999	11.8%	17.5%	17.7%
	2005 Est. HH Income \$25,000 to 34,999	14.8%	11.2%	11.7%
	2005 Est. HH Income \$15,000 to 24,999	19.4%	15.7%	13.1%
	2005 Est. HH Income \$0 to 14,999	9.8%	9.0%	13.4%
	2005 Est. Average Household Income	\$ 58,306	\$ 64,961	\$ 61,207
	2005 Est. Median HH Income	\$ 44,302	\$ 47,891	\$ 46,145
	2006 Est. Per Capita Income	\$ 17,364	\$ 18,372	\$ 18,437
	2005 Est. Number of Businesses	43	701	2,192
2005 Est. Total Number of Employees	382	5,011	16,280	

⁵ Source: Applied Geographic Solutions.

Hesperia Hesperia, California		1.00 mi radius	3.00 mi radius	5.00 mi radius
RACE	2005 Est. White Population	76.1%	77.3%	73.6%
	2005 Est. Black Population	3.9%	3.7%	5.9%
	2005 Est. Asian & Pacific Islander	1.6%	1.6%	2.6%
	2005 Est. American Indian & Alaska Native	1.3%	1.3%	1.2%
	2005 Est. Other Races Population	16.8%	16.2%	16.8%
HISPANIC	2005 Est. Hispanic Population	1,133	9,975	31,183
	2005 Est. Hispanic Population Percent	36.5%	36.5%	36.5%
	2010 Proj. Hispanic Population Percent	41.0%	41.1%	41.1%
	2000 Hispanic Population Percent	31.0%	30.9%	31.0%
EDUCATION (Adults 25 or Older)	2005 Est. Adult Population (25 Years or Older)	1,764	16,329	50,239
	2005 Est. Elementary (0 to 8)	8.4%	9.9%	9.7%
	2005 Est. Some High School (9 to 11)	13.1%	11.6%	11.6%
	2005 Est. High School Graduate (12)	23.9%	25.7%	25.1%
	2005 Est. Some College (13 to 16)	21.7%	21.4%	21.6%
	2005 Est. Associate Degree Only	7.4%	7.2%	7.4%
	2005 Est. Bachelor Degree Only	17.1%	15.6%	16.0%
	2005 Est. Graduate Degree	8.4%	8.5%	8.7%
	2005 Est. Total Housing Units	1,011	6,556	26,616
HOUSING	2005 Est. Owner Occupied Percent	55.7%	73.5%	70.2%
	2005 Est. Renter Occupied Percent	39.1%	21.7%	25.8%
	2005 Est. Vacant Housing Percent	5.2%	4.8%	4.0%
	2000 Homes Built Before 1949	0.1%	1.3%	0.9%
HOMES BUILT BY YEAR	2000 Homes Built 1999 to 2000	0.4%	1.6%	1.8%
	2000 Homes Built 1995 to 1998	9.2%	7.4%	7.1%
	2000 Homes Built 1990 to 1994	25.0%	14.1%	21.6%
	2000 Homes Built 1980 to 1989	39.3%	43.8%	41.6%
	2000 Homes Built 1970 to 1979	16.3%	22.1%	17.8%
	2000 Homes Built 1960 to 1969	7.2%	5.8%	5.2%
	2000 Homes Built 1950 to 1959	2.6%	3.8%	4.0%
	2000 Homes Built Before 1949	0.1%	1.3%	0.9%
HOME VALUES	2000 Home Value \$1,000,000 or More	-	0.0%	0.3%
	2000 Home Value \$500,000 to \$999,999	1.3%	0.1%	0.0%
	2000 Home Value \$400,000 to \$499,999	-	0.1%	0.1%
	2000 Home Value \$300,000 to \$399,999	0.8%	0.8%	0.4%
	2000 Home Value \$200,000 to \$299,999	1.1%	1.7%	1.8%
	2000 Home Value \$150,000 to \$199,999	3.8%	7.7%	8.8%
	2000 Home Value \$100,000 to \$149,999	31.5%	34.8%	39.5%
	2000 Home Value \$50,000 to \$99,999	59.4%	53.3%	47.6%
	2000 Home Value \$25,000 to \$49,999	1.9%	1.2%	1.1%
	2000 Home Value \$0 to \$24,999	0.3%	0.3%	0.4%
	2000 Median Home Value	\$ 95,350	\$ 99,028	\$ 103,579
	2000 Median Rent	\$ 551	\$ 566	\$ 536

Hesperia Hesperia, California		1.00 mi. radius	3.00 mi. radius	5.00 mi. radius
LABOR FORCE	2005 Est. Labor Population Age 16+	2,227	20,008	62,029
	2005 Est. Civilian Employed	53.8%	55.5%	54.7%
	2005 Est. Civilian Unemployed	4.3%	3.7%	3.7%
	2005 Est. in Armed Forces	-	0.1%	0.1%
	2005 Est. not in Labor Force	41.9%	40.6%	41.5%
	2005 Labor Force: Males	48.0%	49.2%	48.9%
2005 Labor Force: Females	52.0%	50.8%	51.2%	
OCCUPATION	2000 Occupation: Population Age 16+	956	8,819	27,180
	2000 Mgmt., Business, & Financial Operations	7.9%	8.3%	8.4%
	2000 Professional and Related	11.8%	12.8%	14.1%
	2000 Service	13.4%	15.5%	17.0%
	2000 Sales and Office	31.8%	27.4%	25.9%
	2000 Farming, Fishing, and Forestry	-	0.0%	0.2%
	2000 Construction, Extraction, & Maintenance	14.2%	16.2%	15.2%
	2000 Production, Transport, & Material Moving	21.0%	19.6%	19.1%
	2000 Percent White Collar Workers	51.5%	48.5%	48.4%
	2000 Percent Blue Collar Workers	48.5%	51.5%	51.6%
TRANSPORTATION TO WORK	2000 Drive to Work Alone	76.2%	76.4%	75.4%
	2000 Drive to Work in Carpool	18.0%	17.6%	18.1%
	2000 Travel to Work by Public Transportation	1.5%	0.6%	0.7%
	2000 Drive to Work on Motorcycle	0.2%	0.3%	0.3%
	2000 Walk or Bicycle to Work	0.3%	1.0%	1.2%
	2000 Other Means	2.4%	0.5%	0.9%
	2000 Work at Home	1.4%	3.7%	3.3%
	2000 Travel to Work in 14 Minutes or Less	18.4%	17.9%	21.2%
TRAVEL TIME	2000 Travel to Work in 15 to 29 Minutes	26.6%	26.6%	27.8%
	2000 Travel to Work in 30 to 59 Minutes	36.0%	33.2%	29.3%
	2000 Travel to Work in 60 Minutes or More	19.1%	22.2%	21.6%
	2000 Average Travel Time to Work	39.0	38.0	38.9
	2005 Est. Total Household Expenditure (in Millions)	\$ 45.4	\$ 424.7	\$ 1,278.2
CONSUMER EXPENDITURE	2005 Est. Apparel	\$ 2.0	\$ 18.7	\$ 56.6
	2005 Est. Contributions & Gifts	\$ 2.7	\$ 25.7	\$ 77.1
	2005 Est. Education & Reading	\$ 1.0	\$ 9.7	\$ 29.6
	2005 Est. Entertainment	\$ 2.5	\$ 23.2	\$ 69.7
	2005 Est. Food, Beverages & Tobacco	\$ 7.3	\$ 67.7	\$ 204.3
	2005 Est. Furnishings And Equipment	\$ 1.8	\$ 16.9	\$ 50.7
	2005 Est. Health Care & Insurance	\$ 3.3	\$ 31.0	\$ 93.1
	2005 Est. Household Operations & Shelter & Utilities	\$ 13.9	\$ 130.1	\$ 391.9
	2005 Est. Miscellaneous Expenses	\$ 0.7	\$ 6.7	\$ 20.0
	2005 Est. Personal Care	\$ 0.6	\$ 5.9	\$ 17.9
	2005 Est. Transportation	\$ 9.5	\$ 89.0	\$ 267.4

Index 10 Asking Rents by Region

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7. CONCLUSION

The Redevelopment is one of the most effective ways to breathe new life into deteriorated areas plagued by social, physical, environmental or economic conditions which act as a barrier to new investment by private enterprise. Through redevelopment, a project area will receive focused attention and financial investment to reverse deteriorating trends, create jobs and revitalize the business climate.

Redevelopment enables communities to grow inward, not just outward. Redevelopment helps encourage new housing and businesses to locate within already developed areas. It helps reduce crime and long commutes, promotes affordable housing, and preserves the environment. Moreover, these revitalization efforts have positive effects that spill over the project area boundaries and improve the entire community.

There are hundreds of communities throughout California with neighborhoods and business districts that are struggling economically and socially. The abandoned gas station, dilapidated housing project, or a vacant strip mall that is continually vandalized are all examples of deteriorated and blighted areas. Redevelopment serves as a catalyst for private investment by providing the initial plan for the entire geographic area and seed money that ultimately breathes new life into areas in need of economic development and new opportunity.

In a time of economic turbulence with the forecasts of recession reported by experts in increasing numbers, funds necessary to revitalize these blighted areas is often difficult to obtain. This need creates numerous investment opportunities which not only meet the needs of these deteriorated communities, but also which meets the requirements of the Immigrant Visa Pilot Program, bringing foreign investment funds to areas which are most in need.

The need of the redevelopment agencies to locate private investors to invest in blighted economic areas, and the need of the foreign investor to locate investment opportunities in economically blighted areas in order to meet the requirements of the Pilot Program, create an opportunity to establish a symbiotic relationship in which the needs of both parties are met. More importantly, the real winners of the formation of this symbiotic relationship developed by American Redevelopment Solutions, LLC

between the foreign investor and the redevelopment agencies will not only be the residents of the revitalized communities but to all Californians who benefit from the economic growth and the reduction in crime rates caused by these investments.

As stated by U.S. Senator Patrick Leahy in his speech on March 12, 2008 when introducing his bill to make permanent the Immigrant Visa Pilot Program: "Making this program permanent would promote long term investment in our industries and in our economy. With the country on the brink of a recession, we should be doing all we can to increase jobs and provide additional access to capital to our local economies. In 2007, alone, investment through the Regional Centers totaled \$500 million dollars with the creation of 10,000 new American jobs, and the USCIS officials have estimated that direct investment through the program will double in 2008. American Redevelopment Regional Center will help make this prediction a reality.

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- Exhibit A Map identifying the three contiguous counties – San Bernardino, Riverside and Los Angeles.

CLIFFORD W. GRAVES
GENERAL MANAGER

CITY OF LOS ANGELES

CALIFORNIA



ANTONIO VILLARAIGOSA
MAYOR

COMMUNITY DEVELOPMENT
DEPARTMENT

1200 W. 7TH STREET
LOS ANGELES, CA 90017

April 6, 2006

C.F. Number: 05-2760
Council District No.: All
Contact Persons and
Extensions:
Michael J. Yuzon Ext. 4-7392
Clifford Weiss Ext. 4-9364

Honorable Antonio Villaraigosa
Mayor, City of Los Angeles
Room 300, City Hall

Attention: June Lagmay, Legislative Coordinator

COMMITTEE TRANSMITTAL: RECOMMENDATIONS FOR THE ESTABLISHMENT WITHIN THE CITY OF LOS ANGELES OF ONE OR MORE DESIGNATIONS AS A REGIONAL CENTER UNDER TERMS OF THE U.S. IMMIGRANT INVESTOR PILOT PROGRAM

Recommendations:

The General Manager, Community Development Department (CDD) requests that:

1. Your Office process this transmittal through the appropriate City Council Committee and to the City Council for review and approval;
2. The City Council authorizes the General Manager, Community Development Department or his designee, to announce to all interested parties that the City of Los Angeles will provide a letter of support for any valid application to the U.S. Citizenship and Immigration Services Agency for a designation as a Regional Center, provided that the application meets such requirements as established by the City through the CDD and detailed herein;
3. The City Council authorizes the General Manager, CDD or his designee to issue a letter of support on behalf of the City of Los Angeles for any valid Regional Center application that conforms to the requirements established by the CDD. The Council further directs the General Manager, CDD, to notify the Mayor and City Council of all such letters of support issued along with a copy of the relevant application, and to notify the Mayor and City Council of all approved Regional Center designations.
4. The City Council instructs the General Manager, CDD, to report to the Mayor and Council annually on the status of any active Regional Centers, including information on investments made, companies formed and jobs created.
5. This transmittal be approved and forwarded to the Mayor and that the Mayor concurs with the actions of the City Council.

Fiscal Impact Statement

No additional funding is required to enable the CDD to promulgate the criteria for City support of a Regional Center application, for the review of such applications, or for the review of data supplied by the entities managing such approved Regional Centers. Staff resources for those duties, which are largely funded through the Community Development Block Grant, are anticipated to be minimal. There will be no impact on the City's General Fund.

Background

On February 7, 2006, the City Council, with the concurrence of the Mayor (Council File No. 05-2760) instructed the General Manager, CDD, with the assistance of the Workforce Investment Board, to report back on the steps necessary for the City to be designated as a Regional Center under the terms of the Federal Immigrant Investor Pilot Program. Subsequent to the approval of that action, the General Manager, CDD determined that the appropriate lead entity for the report back and any required follow-up actions would be the Economic Development Division, as this program has primarily an economic development focus. The Workforce Development Division and the Workforce Investment Board will work with the EDD staff as needed.

In 1992 Congress enacted legislation authorizing the creation of a pilot program to encourage increased immigrant investment in the U.S. economy. As a reward for such investment, participating immigrants would be granted conditional resident status in the U.S. for two (2) years upon verification that they invested \$1 million (or \$500,000 in certain high-unemployment areas) in a U.S. business that created at least ten (10) jobs. If the investor meets the Program requirements, they can apply for permanent legal resident status. Ten thousand (10,000) immigrant visas per year were set-aside for potential Program participants. The Immigrant Investor Pilot Program (the "Program") is intended to amass and pool capital for targeted investments and ultimately to create jobs. The immigrant investor visa category is called EB-5.

Regional Center designations were allowed under terms of the Program. Regional Centers were designated by the Immigration and Naturalization Service (now the U.S. Citizenship and Immigration Service [USCIS]) and could include a state, region, county, city or some portion thereof. Regional Centers were designed to focus on a particular industry cluster or other regional economic development need, and designations could be sought by public agencies, non-profit or for-profit entities. For foreign investors, the advantage in investing within a Regional Center is that job creation could be indirect and measured statistically.

In 2002 Congress amended the statutes governing the Program to allow Regional Centers to be designated based on a "general proposal" for promotion of economic growth that contains "general predictions" regarding industries or companies to be attracted and jobs to be created. This reduced the Regional Center approval process from years to months. The amendment also reduced confusion about the investor qualifications and the methodology for evaluating the proposed investments. That confusion had caused multi-year delays in approving immigrant investor applications and nearly caused the failure of the Program.

There have been a number of Regional Centers designated since 1992, but few that are still active. Of the earlier designations, those managed by the State of Hawaii, the Golden Rainbow Freedom Fund (privately operated) in the northwest, the State of Vermont, and the California Military Bases (CMB) Export LLC in California are still active. Regional Centers designated since 2002 include: the California Consortium for Agricultural Export (privately operated); the Philadelphia Industrial Development Corporation (non-profit); the South Dakota International Business Institute (privately operated); the Iowa Department of Economic Development (public agency); the Capitol Area Regional Center JOB Fund LLC (private company); and the Redevelopment Agency of the City of Vernon (public agency).

In 2005 the U.S. Government Accountability Office (GAO) released a report on the Immigrant Investor Program. Although some practitioners in the immigration law field have questioned some of the GAO's findings, the report highlighted the following problems in the Program's administration:

- Only 6,024 EB-5 visas were issued between 1992 and 2005, although 130,000 visas were available during that period. Only 653 investors were ultimately granted permanent resident status.
- The low rate of participation resulted largely from confusion among potential investors regarding the Program's financial qualifications, an onerous application process, and lengthy delays – occasionally years long. USCIS staff assigned to the program were poorly trained or unqualified to review the financial data received from the investors.
- Regulations required by Congress in 2002 to be adopted by the USCIS have yet to be promulgated. The delay was largely attributed to the low priority given the Program after the USCIS was made part of the Department of Homeland Security.
- Asians made up 83% of the applicants approved for EB-5 visas. Investments in California made up 41% of the total nationwide investments. Investments have been made primarily in the following industries: hotels; manufacturing; real estate companies; retail sales; farms; import/export; restaurants and technology companies.
- The GAO was unable to determine or even estimate the number of jobs directly or indirectly created via the Program investments.

Regional Center Survey

CDD staff conducted a survey of active Regional Center programs throughout the country in order to determine what the City could expect from a Regional Center designation in terms of direct benefits, program costs, and resources required; to determine how various entities operate their programs; and to attempt to determine the best operating model for the City.

A questionnaire was sent to all Regional Center entities identified through a review of available documents, as well as an Internet search. CDD received responses from four Regional Center entities, as well as from Abacus, LLC, a firm that specializes in obtaining Regional Center designations and attracting investor capital. Responses were received from the Gateway Freedom Fund, California Consortium of Agricultural Export, the Philadelphia Industrial Development Corporation, and the Iowa Department of Economic Development. Information was also received from Mr. Lincoln Stone, a local attorney and expert on the Immigrant Investor Program.

The survey revealed the following key issues:

- Rather than a broad focus on a geographic area, most Regional Centers focused on particular industries or needs, including: revitalization of closed military bases; agricultural products; tourism; and manufacturing.
- Most Regional Center operating entities have a full time staff of 5-10.
- Job creation is typically tracked through close monitoring by the agency of the business investments. The privately managed Regional Centers usually have a direct financial interest in the companies they attract, allowing for direct knowledge of jobs created. Indirect job creation is estimated through various economic models using either standard or unique software programs.
- The private and non-profit Program operators fund their operations either through fees for services or direct participation in the businesses that receive the investor dollars.

- Operational difficulties reported include: marketing the program; learning the intricacies of immigration law; attracting the right kind of investments; bureaucratic delays in obtaining the designation and in processing the EB-5 applications; and the lack of understanding of economic development on the part of the USCIS staff who process the applications.
- The Program operators unanimously report being pleased with the results of the Program, particularly in the years since the Regional Center designations were allowed. Interest in the Program by foreign investors, particularly those in China and Korea appears high despite the delays associated with the application process. Industry-focused Regional Centers report excellent success in attracting capital to their communities.

Discussion and Recommendations

Based on an evaluation of the data and discussions with outside experts, CDD does not recommend that the City directly apply for designation as a Regional Center. The reasons primarily concern the lack of program funding and the staffing requirements for such a program. Regional Center designations do not include any administrative funds. Therefore, funding for staff, marketing and operations would come either from existing grant funds or from the City's General Fund. Nearly all CDD operations are funded through either the CDBG or WIA grants, which have diminished greatly in recent years and whose future is uncertain. The program could potentially be run by another City entity, such as the Mayor's Office of International Trade, but that would also require a grant or a General Fund allocation. Charging a fee for services to immigrant investors would not be practical since it is unclear whether the demand for the services would produce fees sufficient to staff and operate a viable program.

As our research indicates, however, it is unnecessary for the City to operate the Program. The City could follow the model used by other municipalities and states and encourage private entities – either non-profit or for-profit, to apply for Regional Center designations and manage the program under the City's oversight. We have been informed that there are a number of such entities willing to participate and who are only awaiting City action on this issue. Two firms have already expressed such interest to CDD staff.

There is a significant potential to create multiple Regional Centers within the City, each concentrating on a different industry cluster. This would allow for a more focused strategy and a stronger application, rather than submitting an application based on a particular geography with a general goal of economic development.

CDD recommends that the City advertise to interested parties its interest in promoting the creation of Regional Centers within City boundaries. The City would submit a letter of support to the USCIS for the Regional Center application(s) after review of the proposal and a determination that it met certain requirements, as delineated below. Although such a letter of support from the local government is not a requirement for approval of a designation, it would significantly enhance the application and would almost certainly be sought by the entity submitting an application.

It is recommended that the minimum requirements for City support of a Regional Center application would include:

1. The proposed Regional Center would be located primarily in one or more of the City's economic development incentive zones, including State Enterprise Zones, Federal Empowerment Zone, Federal Renewal Community area, and Community Redevelopment Agency Project Areas.
2. Should the proposed Regional Center be located outside one or more of the above zones, it would also receive approval if its boundaries included primarily low to moderate-income census tracts.

April 6, 2006

3. The Regional Center proposal conforms to overall City economic development and land use priorities, or demonstrates that the Regional Center designation would otherwise benefit the City's economy.
4. The Regional Center managing entity would be required to report to the City, through the CDD, all direct and indirect job creation and provide documentation to substantiate such claims, and/or the statistical methodology used to calculate indirect job creation.
5. The Regional Center managing entity would be required to report to the City, through the CDD, all immigrant investor economic development proposals. The City would not normally pass judgment on individual projects or investments; however, the City would retain the right to comment on projects or proposed investments that would appear to violate City laws, land use regulations or policies. All construction or other land use projects will be subject to City zoning, construction, business permit and land use regulations.
6. The Regional Center managing entity would be required to ensure, through contracts or Memoranda of Understanding (MOU) with the immigrant investor, that WorkSource Career Centers would be given the *first* opportunity to fill all direct jobs created below the level of executive or positions requiring college degrees.
7. Upon receipt of a Regional Center designation, the managing entity would be required to report progress and activities annually to the City through the CDD. The CDD would report to the Mayor and Council annually once the first Regional Center designation is approved.

CDD believes that City oversight as described above can be accomplished with existing staff and resources. It would allow private and non-profit institutions to assume the responsibility of promoting and managing the program with minimal involvement of local government. We strongly believe that this is the best approach and will result in considerable benefits to the City and its economy.

Upon approval of this transmittal by the City Council and concurrence by the Mayor, the CDD will begin outreach efforts to economic development and immigration law practitioners and other interested parties to promote the City's interest in supporting Regional Center applications.

CLIFFORD W. GRAVES
General Manager

CG:SM:MJY:CJW

**The Economic Impact Analysis Report
of
American Redevelopment Regional Center**

Prepared for
American Redevelopment Solutions LLC

On December 23, 2008

Prepared by
Dr. Hart Hodges,
Assistant Professor of Economics &
Director of Center for Economic and Business Research
Western Washington University

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HART HODGES

VITAE

EDUCATION

Ph.D. in Economics, University of Washington; Seattle, Washington (1994)

Primary field: Natural Resource and Environmental Economics

Secondary field: Industrial Organizations, Microeconomics, and Econometrics

Masters in Environmental Management, Duke University; Durham North Carolina (1987)

Field: Natural Resource Economics

Resource area: Water Resource Systems Analysis

B.A., Williams College, Williamstown, Massachusetts (1985)

Major: American Studies

Minor: Environmental Studies

ACADEMIC APPOINTMENTS and PROFESSIONAL EXPERIENCE

Western Washington University

Director, Center for Economic and Business Research, 2003 – present

Assistant Professor, Department of Economics, 2003 – present

Interim Director, Center for Economic and Business Research, 2001 – 2003

Visiting Assistant Professor, Department of Economics, 2000 – 2003

Course taught:

Forecasting

Health Economics

Environmental Economics, Senior Seminar

History of Economic Thought

Microeconomics – MBA Program

Managerial Economics

Natural Resource Economics

Introductory microeconomics

Introductory macroeconomics

Northern Economics, Inc. (consulting firm)

Senior Economist, 1998 – 2001

Sample of projects managed:

- Analysis of restoration costs as a measure of damages to the Skokomish River estuary. Analysis included review of natural resource damage assessment regulations, techniques used in non-market valuation, and Habitat Equivalency Analysis. In conjunction with ENTRIX, Inc., for Morisset, Shlosser, Ayer, and Jozwiak.
- Alaska Rural Energy Plan, Phase 2B: Analyzed options for reducing the cost of electricity and heat in rural Alaska and for improving the reliability of electricity in rural Alaska – for Alaska Industrial Development and Export Authority, U.S. Department of Agriculture, and Denali Commission.
- Design and conduct load research sample of residential and commercial customers for Chugach Electric Association.
- Alaska Visitor Statistics Program IV: Quantify the number of visitors and residents entering Alaska by all modes and major points of entry; develop surveys, prepare sample plan, and conduct interviews to determine the number and composition of visitors by entry mode, trip purpose, and place of origin to assess visitor expenditure patterns and satisfaction with all major components of the Alaska experience, and to identify characteristics and interests of first time and repeat visitors; for the Alaska Department of Community and Economic Development, Division of Tourism.
- Market study for construction aggregates in Alaska, British Columbia, and the Western U.S.; outlined the flow of construction aggregates, forecasted prices, and contacted major suppliers to discuss opportunities for the development of aggregate resources in Alaska; for Sealaska Corporation.
- Market study and preliminary business plan for development and commercialization of energy storage and hydrogen production system: Identify power cost, need for energy storage, and market opportunities for hydrogen in Alaska, and make cash flow predictions for operable systems in different regions; for the SRT group of Miami, Florida.
- Impact Study for 1997-98 Bristol Bay Fishing Disasters: Identify impacts to Lake and Peninsula and Bristol Bay boroughs and document state and federal disaster assistance efforts, for the Lake and Peninsula and Bristol Bay boroughs.

Economist and Financial Analyst – City of Portland, Oregon, Office of Finance and Administration (1996- 1998)

Natural Resource Damage Assessment Economist, U.S. Department of Interior, Office of Environmental Policy and Compliance, Portland, Oregon (1995 – 1996)

Assistant Professor at the University of Puget Sound, Tacoma, Washington (1993 – 1995)

Course taught:

Environmental Economics
 Mathematical Economics
 Introductory Micro and Macroeconomics
 Intermediate Micro and Macroeconomics

**Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center**

(b)(4) INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/ (dollars)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
1111A0 Oilseed farming						
1111B0 Grain farming						
111200 Vegetable and melon farming						
1113A0 Fruit farming						
111335 Tree nut farming						
111400 Greenhouse and nursery production						
111910 Tobacco farming						
111920 Cotton farming						
1119A0 Sugarcane and sugar beet farming						
1119B0 All other crop farming						
112100 Cattle ranching and farming						
112300 Poultry and egg production						
112A00 Animal production, except cattle and poultry and eggs						
113A00 Forest nurseries, forest products, and timber tracts						
113300 Logging						
114100 Fishing						
114200 Hunting and trapping						
115000 Agriculture and forestry support activities						
211000 Oil and gas extraction						
212100 Coal mining						
212210 Iron ore mining						
212230 Copper, nickel, lead, and zinc mining						
2122A0 Gold, silver, and other metal ore mining						
212310 Stone mining and quarrying						
212320 Sand, gravel, clay, and refractory mining						
212390 Other nonmetallic mineral mining						
213111 Drilling oil and gas wells						
213112 Support activities for oil and gas operations						
21311A Support activities for other mining						
2211A0 Power generation and supply						
221200 Natural gas distribution						
221300 Water, sewage and other systems						
230000 Construction						
311111 Dog and cat food manufacturing						
311119 Other animal food manufacturing						
311211 Flour milling						
311212 Rice milling						
311213 Malt manufacturing						
311221 Wet corn milling						
311222 Soybean processing						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.

- Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
- Each entry in column 2 represents the total dollar change in earnings of households employed by all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
- Each entry in column 3 represents the total change in number of jobs that occurs in all industries for each additional 1 million dollars of output delivered to final demand by the industry corresponding to the entry. Because the employment multipliers are based on 2006 data, the output delivered to final demand should be in 2006 dollars.
- Each entry in column 4 represents the total dollar change in value added that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
- Each entry in column 5 represents the total dollar change in earnings of households employed by all industries for each additional dollar of earnings paid directly to households employed by the industry corresponding to the entry.
- Each entry in column 6 represents the total change in number of jobs in all industries for each additional job in the industry corresponding to the entry.

NOTE.--Multipliers are based on the 1997 Benchmark Input-Output Table for the Nation and 2006 regional data. Appendix B identifies the industries corresponding to the entries.

SOURCE.--Regional Input-Output Modeling System (RIMS II), Regional Product Division, Bureau of Economic Analysis.

**Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center**

INDUSTRY	Multiplier
311223 Other oilseed processing	
311225 Fats and oils refining and blending	
311230 Breakfast cereal manufacturing	
311310 Sugar manufacturing	
311320 Confectionery manufacturing from cacao beans	
311330 Confectionery manufacturing from purchased chocolate	
311340 Nonchocolate confectionery manufacturing	
311410 Frozen food manufacturing	
311420 Fruit and vegetable canning and drying	
311511 Fluid milk manufacturing	
311512 Creamery butter manufacturing	
311513 Cheese manufacturing	
311514 Dry, condensed, and evaporated dairy products	
311520 Ice cream and frozen dessert manufacturing	
311611 Animal, except poultry, slaughtering	
311612 Meat processed from carcasses	
311613 Rendering and meat byproduct processing	
311615 Poultry processing	
311700 Seafood product preparation and packaging	
31181A Bread and bakery product, except frozen, manufacturing	
311813 Frozen cakes and other pastries manufacturing	
311821 Cookie and cracker manufacturing	
311822 Mixes and dough made from purchased flour	
311823 Dry pasta manufacturing	
311830 Tortilla manufacturing	
311911 Roasted nuts and peanut butter manufacturing	
311919 Other snack food manufacturing	
311920 Coffee and tea manufacturing	
311930 Flavoring syrup and concentrate manufacturing	
311941 Mayonnaise, dressing, and sauce manufacturing	
311942 Spice and extract manufacturing	
311990 All other food manufacturing	
312110 Soft drink and ice manufacturing	
312120 Breweries	
312130 Wineries	
312140 Distilleries	
312210 Tobacco stemming and redrying	
312221 Cigarette manufacturing	
312229 Other tobacco product manufacturing	

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.

1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.

2. Each entry in column 2 represents the total dollar change in earnings of households employed by all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.

3. Each entry in column 3 represents the total change in number of jobs that occurs in all industries for each additional 1 million dollars of output delivered to final demand by the industry corresponding to the entry. Because the employment multipliers are based on 2006 data, the output delivered to final demand should be in 2006 dollars.

4. Each entry in column 4 represents the total dollar change in value added that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.

5. Each entry in column 5 represents the total dollar change in earnings of households employed by all industries for each additional dollar of earnings paid directly to households employed by the industry corresponding to the entry.

6. Each entry in column 6 represents the total change in number of jobs in all industries for each additional job in the industry corresponding to the entry.

NOTE.--Multipliers are based on the 1997 Benchmark Input-Output Table for the Nation and 2006 regional data. Appendix B identifies the industries corresponding to the entries.

SOURCE.--Regional Input-Output Modeling System (RIMS II), Regional Product Division, Bureau of Economic Analysis.

**Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center**

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INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/ (dollars)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
313100 Fiber, yarn, and thread mills						
313210 Broadwoven fabric mills						
313220 Narrow fabric mills and schiffli embroidery						
313230 Nonwoven fabric mills						
313240 Knit fabric mills						
313310 Textile and fabric finishing mills						
313320 Fabric coating mills						
314110 Carpet and rug mills						
314120 Curtain and linen mills						
314910 Textile bag and canvas mills						
314992 Tire cord and tire fabric mills						
31499A Other miscellaneous textile product mills						
315111 Sheer hosiery mills						
315119 Other hosiery and sock mills						
315190 Other apparel knitting mills						
315200 Cut and sew apparel manufacturing						
315900 Accessories and other apparel manufacturing						
316100 Leather and hide tanning and finishing						
316200 Footwear manufacturing						
316900 Other leather product manufacturing						
321113 Sawmills						
321114 Wood preservation						
32121A Veneer and plywood manufacturing						
32121B Engineered wood member and truss manufacturing						
321219 Reconstituted wood product manufacturing						
321911 Wood windows and door manufacturing						
321912 Cut stock, resawing lumber, and planing						
321918 Other millwork, including flooring						
321920 Wood container and pallet manufacturing						
321991 Manufactured home, mobile home, manufacturing						
321992 Prefabricated wood building manufacturing						
321999 Miscellaneous wood product manufacturing						
322110 Pulp mills						
3221A0 Paper and paperboard mills						
322210 Paperboard container manufacturing						
32222A Coated and laminated paper and packaging material						
32222B Coated and uncoated paper bag manufacturing						
322225 Flexible packaging foil manufacturing						
322226 Surface-coated paperboard manufacturing						
322231 Die-cut paper office supplies manufacturing						
322232 Envelope manufacturing						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.

1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
2. Each entry in column 2 represents the total dollar change in earnings of households employed by all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
3. Each entry in column 3 represents the total change in number of jobs that occurs in all industries for each additional 1 million dollars of output delivered to final demand by the industry corresponding to the entry. Because the employment multipliers are based on 2006 data, the output delivered to final demand should be in 2006 dollars.
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NOTE.-Multipliers are based on the 1997 Benchmark Input-Output Table for the Nation and 2006 regional data. Appendix B identifies the industries corresponding to the entries.

SOURCE.-Regional Input-Output Modeling System (RIMS II), Regional Product Division, Bureau of Economic Analysis.

RIMS II Multipliers (1997/2006)
Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/ (dollars)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
322233 Stationery and related product manufacturing						
322291 Sanitary paper product manufacturing						
322299 All other converted paper product manufacturing						
32311A Commercial printing						
323116 Manifold business forms printing						
323117 Books printing						
323118 Blankbook and looseleaf binder manufacturing						
323121 Tradebinding and related work						
323122 Prepress services						
324110 Petroleum refineries						
324121 Asphalt paving mixture and block manufacturing						
324122 Asphalt shingle and coating materials manufactur						
324191 Petroleum lubricating oil and grease manufacturi						
324199 All other petroleum and coal products manufactu						
325110 Petrochemical manufacturing						
325120 Industrial gas manufacturing						
325130 Synthetic dye and pigment manufacturing						
325180 Other basic inorganic chemical manufacturing						
325190 Other basic organic chemical manufacturing						
325211 Plastics material and resin manufacturing						
325212 Synthetic rubber manufacturing						
325221 Cellulosic organic fiber manufacturing						
325222 Noncellulosic organic fiber manufacturing						
325311 Nitrogenous fertilizer manufacturing						
325312 Phosphatic fertilizer manufacturing						
325314 Fertilizer, mixing only, manufacturing						
325320 Pesticide and other agricultural chemical manufacturing						
325400 Pharmaceutical and medicine manufacturing						
325510 Paint and coating manufacturing						
325520 Adhesive manufacturing						
325611 Soap and other detergent manufacturing						
325612 Polish and other sanitation good manufacturing						
325613 Surface active agent manufacturing						
325620 Toilet preparation manufacturing						
325910 Printing ink manufacturing						
325920 Explosives manufacturing						
325991 Custom compounding of purchased resins						
325992 Photographic film and chemical manufacturing						
325998 Other miscellaneous chemical product manufac						
326110 Plastics packaging materials, film and sheet						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

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1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
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Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/	Earnings/2/	Employment/3/	Value-added/4/	Earnings/5/	Employment/6/
326120 Plastics pipe, fittings, and profile shapes						
326130 Laminated plastics plate, sheet, and shapes						
3261A0 Foam product manufacturing						
326160 Plastics bottle manufacturing						
326192 Resilient floor covering manufacturing						
32619A Plastics plumbing fixtures and all other plastics products						
326210 Tire manufacturing						
326220 Rubber and plastics hose and belting manufacturing						
326290 Other rubber product manufacturing						
327111 Vitreous china plumbing fixture manufacturing						
327112 Vitreous china and earthenware articles manufacturing						
327113 Porcelain electrical supply manufacturing						
327121 Brick and structural clay tile manufacturing						
327122 Ceramic wall and floor tile manufacturing						
32712A Clay refractory and other structural clay products						
327125 Nonclay refractory manufacturing						
327213 Glass container manufacturing						
32721A Glass and glass products, except glass containers						
327310 Cement manufacturing						
327320 Ready-mix concrete manufacturing						
327331 Concrete block and brick manufacturing						
327332 Concrete pipe manufacturing						
327390 Other concrete product manufacturing						
327410 Lime manufacturing						
327420 Gypsum product manufacturing						
327910 Abrasive product manufacturing						
327991 Cut stone and stone product manufacturing						
327992 Ground or treated minerals and earths manufacturing						
327993 Mineral wool manufacturing						
327999 Miscellaneous nonmetallic mineral products						
331111 Iron and steel mills						
331112 Ferroalloy and related product manufacturing						
331210 Iron, steel pipe and tube from purchased steel						
331221 Rolled steel shape manufacturing						
331222 Steel wire drawing						
331311 Alumina refining						
331312 Primary aluminum production						
331314 Secondary smelting and alloying of aluminum						
331315 Aluminum sheet, plate, and foil manufacturing						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.

1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
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RIMS II Multipliers (1997/2006)
Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/	Earnings/2/	Employment/3/	Value-added/4/	Earnings/5/	Employment/6/
(b)(4)						
331316 Aluminum extruded product manufacturing						
331319 Other aluminum rolling and drawing						
331411 Primary smelting and refining of copper						
331419 Primary nonferrous metal, except copper and aluminum						
331421 Copper rolling, drawing, and extruding						
331422 Copper wire, except mechanical, drawing						
331423 Secondary processing of copper						
331491 Nonferrous metal, except copper and aluminum, shaping						
331492 Secondary processing of other nonferrous						
331510 Ferrous metal foundries						
33152A Aluminum foundries						
33152B Nonferrous foundries, except aluminum						
332111 Iron and steel forging						
332112 Nonferrous forging						
332114 Custom roll forming						
33211A All other forging and stamping						
332211 Cutlery and flatware, except precious, manufactur						
332212 Hand and edge tool manufacturing						
332213 Saw blade and handsaw manufacturing						
332214 Kitchen utensil, pot, and pan manufacturing						
332311 Prefabricated metal buildings and components						
332312 Fabricated structural metal manufacturing						
332313 Plate work manufacturing						
332321 Metal window and door manufacturing						
332322 Sheet metal work manufacturing						
332323 Ornamental and architectural metal work manufacturing						
332410 Power boiler and heat exchanger manufacturing						
332420 Metal tank, heavy gauge, manufacturing						
332430 Metal can, box, and other container manufactur						
33299A Ammunition manufacturing						
332994 Small arms manufacturing						
332995 Other ordnance and accessories manufacturing						
332500 Hardware manufacturing						
332600 Spring and wire product manufacturing						
332710 Machine shops						
332720 Turned product and screw, nut, and bolt manufacturing						
332811 Metal heat treating						
332812 Metal coating and nonprecious engraving						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

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 1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
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 NOTE.--Multipliers are based on the 1997 Benchmark Input-Output Table for the Nation and 2006 regional data. Appendix B identifies the industries corresponding to the entries.
 SOURCE.--Regional Input-Output Modeling System (RIMS II), Regional Product Division, Bureau of Economic Analysis.

RIMS II Multipliers (1997/2006)
Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/ (dollars)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
332813 Electroplating, anodizing, and coloring metal						
332910 Metal valve manufacturing						
332991 Ball and roller bearing manufacturing						
332996 Fabricated pipe and pipe fitting manufacturing						
332997 Industrial pattern manufacturing						
332998 Enameled iron and metal sanitary ware manufacturing						
332999 Miscellaneous fabricated metal product manufacturing						
333111 Farm machinery and equipment manufacturing						
333112 Lawn and garden equipment manufacturing						
333120 Construction machinery manufacturing						
333131 Mining machinery and equipment manufacturing						
333132 Oil and gas field machinery and equipment						
333210 Sawmill and woodworking machinery						
333220 Plastics and rubber industry machinery						
333291 Paper industry machinery manufacturing						
333292 Textile machinery manufacturing						
333293 Printing machinery and equipment manufacturing						
333294 Food product machinery manufacturing						
333295 Semiconductor machinery manufacturing						
333298 All other industrial machinery manufacturing						
33331A Automatic vending, commercial laundry and drycleaning machinery						
333313 Office machinery manufacturing						
333314 Optical instrument and lens manufacturing						
333315 Photographic and photocopying equipment manufacturing						
333319 Other commercial and service industry machinery manufacturing						
333411 Air purification equipment manufacturing						
333412 Industrial and commercial fan and blower manufacturing						
333414 Heating equipment, except warm air furnaces						
333415 AC, refrigeration, and forced air heating						
333511 Industrial mold manufacturing						
333512 Metal cutting machine tool manufacturing						
333513 Metal forming machine tool manufacturing						
333514 Special tool, die, jig, and fixture manufacturing						
333515 Cutting tool and machine tool accessory manufacturing						
33351A Rolling mill and other metalworking machinery						
333611 Turbine and turbine generator set units manufacturing						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.

1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
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6. Each entry in column 6 represents the total change in number of jobs in all industries for each additional job in the industry corresponding to the entry.

NOTE.--Multipliers are based on the 1997 Benchmark Input-Output Table for the Nation and 2006 regional data. Appendix B identifies the industries corresponding to the entries.

SOURCE.--Regional Input-Output Modeling System (RIMS II), Regional Product Division, Bureau of Economic Analysis.

(b)(4) RIMS II Multipliers (1997/2006)
Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/ (dollars)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
33361A Speed changers and mechanical power transmission equipment						
333618 Other engine equipment manufacturing						
333911 Pump and pumping equipment manufacturing						
333912 Air and gas compressor manufacturing						
333913 Measuring and dispensing pump manufacturing						
333921 Elevator and moving stairway manufacturing						
333922 Conveyor and conveying equipment manufacturing						
333923 Overhead cranes, hoists, and monorail systems						
333924 Industrial truck, trailer, and stacker manufacturing						
333991 Power-driven handtool manufacturing						
333992 Welding and soldering equipment manufacturing						
333993 Packaging machinery manufacturing						
333994 Industrial process furnace and oven manufacturing						
333995 Fluid power cylinder and actuator manufacturing						
333996 Fluid power pump and motor manufacturing						
33399A Scales, balances, and miscellaneous general purpose machinery						
334111 Electronic computer manufacturing						
334112 Computer storage device manufacturing						
334113 Computer terminal manufacturing						
334119 Other computer peripheral equipment manufacturing						
334210 Telephone apparatus manufacturing						
334220 Broadcast and wireless communications equipment						
334290 Other communications equipment manufacturing						
334300 Audio and video equipment manufacturing						
334411 Electron tube manufacturing						
334413 Semiconductors and related device manufacturing						
33441A All other electronic component manufacturing						
334510 Electromedical apparatus manufacturing						
334511 Search, detection, and navigation instruments						
334512 Automatic environmental control manufacturing						
334513 Industrial process variable instruments						
334514 Totalizing fluid meters and counting devices						
334515 Electricity and signal testing instruments						
334516 Analytical laboratory instrument manufacturing						
334517 Irradiation apparatus manufacturing						
33451A Watch, clock, and other measuring and controlling device manufacturing						
334611 Software reproducing						
334612 Audio and video media reproduction						
334613 Magnetic and optical recording media manufacturing						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.
 1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
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 6. Each entry in column 6 represents the total change in number of jobs in all industries for each additional job in the industry corresponding to the entry.
 NOTE.--Multipliers are based on the 1997 Benchmark Input-Output Table for the Nation and 2006 regional data. Appendix B identifies the industries corresponding to the entries.
 SOURCE.--Regional Input-Output Modeling System (RIMS II), Regional Product Division, Bureau of Economic Analysis.

RIMS II Multipliers (1997/2006)
Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

INDUSTRY (b)(4)	Multiplier	
	Final Demand	Direct Effect
335110 Electric lamp bulb and part manufacturing		
335120 Lighting fixture manufacturing		
335211 Electric housewares and household fan manufacturing		
335212 Household vacuum cleaner manufacturing		
335221 Household cooking appliance manufacturing		
335222 Household refrigerator and home freezer manufacturing		
335224 Household laundry equipment manufacturing		
335228 Other major household appliance manufacturing		
335311 Electric power and specialty transformer manufacturing		
335312 Motor and generator manufacturing		
335313 Switchgear and switchboard apparatus manufacturing		
335314 Relay and industrial control manufacturing		
335911 Storage battery manufacturing		
335912 Primary battery manufacturing		
335921 Fiber optic cable manufacturing		
335929 Other communication and energy wire manufacturing		
335930 Wiring device manufacturing		
335991 Carbon and graphite product manufacturing		
335999 Miscellaneous electrical equipment manufacturing		
336110 Automobile and light truck manufacturing		
336120 Heavy duty truck manufacturing		
336211 Motor vehicle body manufacturing		
336212 Truck trailer manufacturing		
336213 Motor home manufacturing		
336214 Travel trailer and camper manufacturing		
336300 Motor vehicle parts manufacturing		
336411 Aircraft manufacturing		
336412 Aircraft engine and engine parts manufacturing		
336413 Other aircraft parts and equipment		
336414 Guided missile and space vehicle manufacturing		
33641A Propulsion units and parts for space vehicles and guided missiles		
336500 Railroad rolling stock manufacturing		
336611 Ship building and repairing		
336612 Boat building		
336991 Motorcycle, bicycle, and parts manufacturing		
336992 Military armored vehicles and tank parts manufacturing		
336999 All other transportation equipment manufacturing		

(Continued)

Region Definition:

*Includes Government enterprises.

1. Each entry in column 1 represents the total dollar of final demand by the industry corresponding to the entry.

2. Each entry in column 2 represents the total dollar of output delivered to final demand by the industry corresponding to the entry.

3. Each entry in column 3 represents the total change in value added delivered to final demand by the industry corresponding to the entry. Because the employment multipliers are based on 2006 data, the value added should be in 2006 dollars.

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RIMS II Multipliers (1997/2006)
Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

INDUSTRY (b)(4)	Multiplier					
	Final Demand				Direct Effect	
	Output/1/ (jobs)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
337110 Wood kitchen cabinet and countertop manufacturing						
337121 Upholstered household furniture manufacturing						
337122 Nonupholstered wood household furniture manufacturing						
337124 Metal household furniture manufacturing						
337127 Institutional furniture manufacturing						
33712A Other household and institutional furniture						
337211 Wood office furniture manufacturing						
337212 Custom architectural woodwork and millwork						
337214 Office furniture, except wood, manufacturing						
337215 Showcases, partitions, shelving, and lockers						
337910 Mattress manufacturing						
337920 Blind and shade manufacturing						
339111 Laboratory apparatus and furniture manufacturing						
339112 Surgical and medical instrument manufacturing						
339113 Surgical appliance and supplies manufacturing						
339114 Dental equipment and supplies manufacturing						
339115 Ophthalmic goods manufacturing						
339116 Dental laboratories						
339910 Jewelry and silverware manufacturing						
339920 Sporting and athletic goods manufacturing						
339930 Doll, toy, and game manufacturing						
339940 Office supplies, except paper, manufacturing						
339950 Sign manufacturing						
339991 Gasket, packing, and sealing device manufactur						
339992 Musical instrument manufacturing						
339994 Broom, brush, and mop manufacturing						
339995 Burial casket manufacturing						
33999A Buttons, pins, and all other miscellaneous manufacturing						
420000 Wholesale trade						
4A0000 Retail trade						
481000 Air transportation						
482000 Rail transportation						
483000 Water transportation						
484000 Truck transportation						
485A00 Transit and ground passenger transportation						
486000 Pipeline transportation						
48A000 Scenic and sightseeing transportation and sup activities for transportation						
492000 Couriers and messengers						
493000 Warehousing and storage						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.
 1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
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RIMS II Multipliers (1997/2006)
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American Redevelopment Regional Center

INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/	Earnings/2/	Employment/3/	Value-added/4/	Earnings/5/	Employment/6/
511110 Newspaper publishers						
511120 Periodical publishers						
511130 Book publishers						
5111A0 Database, directory, and other publishers						
511200 Software publishers						
512100 Motion picture and video industries						
512200 Sound recording industries						
513100 Radio and television broadcasting						
513200 Cable networks and program distribution						
513300 Telecommunications						
514100 Information services						
514200 Data processing services						
52A000 Monetary authorities and depository credit intermediation						
522A00 Nondepository credit intermediation and activities						
523000 Securities, commodity contracts, investments						
524100 Insurance carriers						
524200 Insurance agencies, brokerages, and related services						
525000 Funds, trusts, and other financial vehicles						
531000 Real estate						
S00800 Owner-occupied dwellings						
532100 Automotive equipment rental and leasing						
532A00 General and consumer goods rental except tapes and discs						
532230 Video tape and disc rental						
532400 Machinery and equipment rental and leasing						
533000 Lessors of nonfinancial intangible assets						
541100 Legal services						
541200 Accounting and bookkeeping services						
541300 Architectural and engineering services						
541400 Specialized design services						
541511 Custom computer programming services						
541512 Computer systems design services						
54151A Other computer related services, including management						
541610 Management consulting services						
5416A0 Environmental and other technical consulting services						
541700 Scientific research and development services						
541800 Advertising and related services						
541920 Photographic services						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.
 1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
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(b)(4)

RIMS II Multipliers (1997/2006)
Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/ (dollars)	Earnings/2/ (dollars)	Employment/3/ (jobs)	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
541940 Veterinary services						
5419A0 All other miscellaneous professional and technical services						
550000 Management of companies and enterprises						
561300 Employment services						
561500 Travel arrangement and reservation services						
561100 Office administrative services						
561200 Facilities support services						
561400 Business support services						
561600 Investigation and security services						
561700 Services to buildings and dwellings						
561900 Other support services						
562000 Waste management and remediation services						
611100 Elementary and secondary schools						
611A00 Colleges, universities, and junior colleges						
611B00 Other educational services						
621A00 Offices of physicians, dentists, and other health practitioners						
621600 Home health care services						
621B00 Other ambulatory health care services						
622000 Hospitals						
623000 Nursing and residential care facilities						
624400 Child day care services						
624A00 Social assistance, except child day care services						
711100 Performing arts companies						
711200 Spectator sports						
711A00 Promoters of performing arts and sports and agents for public figures						
711500 Independent artists, writers, and performers						
712000 Museums, historical sites, zoos, and parks						
713940 Fitness and recreational sports centers						
713950 Bowling centers						
713A00 Other amusement, gambling, and recreation industries						
7211A0 Hotels and motels, including casino hotels						
721A00 Other accommodations						
722000 Food services and drinking places						
8111A0 Automotive repair and maintenance, except car washes						
811192 Car washes						
811200 Electronic equipment repair and maintenance						
811300 Commercial machinery repair and maintenance						

(Continued)

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

- *Includes Government enterprises.
1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
 2. Each entry in column 2 represents the total dollar change in earnings of households employed by all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
 3. Each entry in column 3 represents the total change in number of jobs that occurs in all industries for each additional 1 million dollars of output delivered to final demand by the industry corresponding to the entry. Because the employment multipliers are based on 2006 data, the output delivered to final demand should be in 2006 dollars.
 4. Each entry in column 4 represents the total dollar change in value added that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
 5. Each entry in column 5 represents the total dollar change in earnings of households employed by all industries for each additional dollar of earnings paid directly to households employed by the industry corresponding to the entry.
 6. Each entry in column 6 represents the total change in number of jobs in all industries for each additional job in the industry corresponding to the entry.
- NOTE.--Multipliers are based on the 1997 Benchmark Input-Output Table for the Nation and 2006 regional data. Appendix B identifies the industries corresponding to the entries.
- SOURCE.--Regional Input-Output Modeling System (RIMS II), Regional Product Division, Bureau of Economic Analysis.

RIMS II Multipliers (1997/2006)
Table 1.5 Total Multipliers for Output, Earnings, Employment, and Value Added by Detailed Industry
American Redevelopment Regional Center

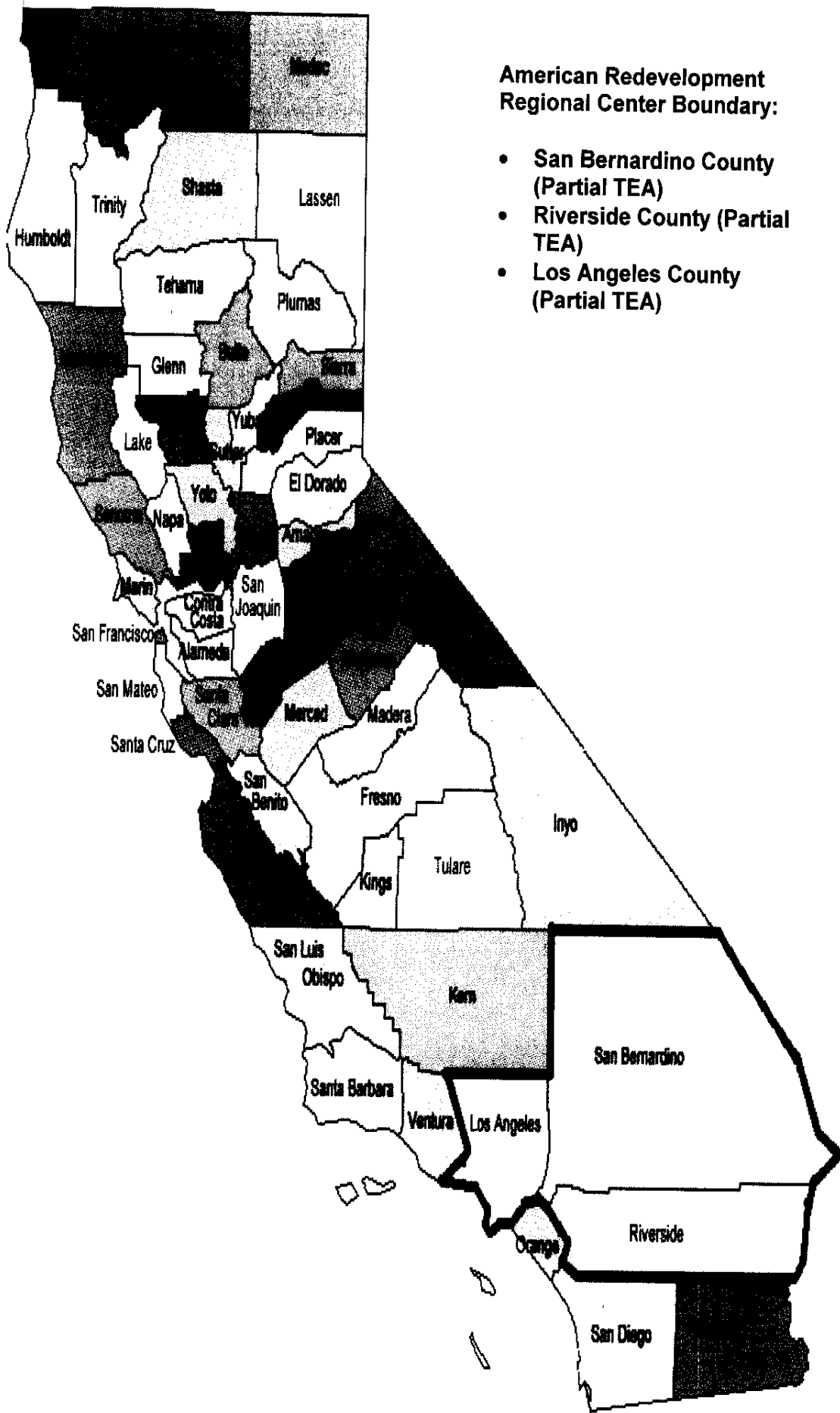
INDUSTRY	Multiplier					
	Final Demand				Direct Effect	
	Output/1/	Earnings/2/	Employment/3/	Value-added/4/ (dollars)	Earnings/5/ (dollars)	Employment/6/ (jobs)
811400 Household goods repair and maintenance						
812100 Personal care services						
812200 Death care services						
812300 Drycleaning and laundry services						
812900 Other personal services						
813100 Religious organizations						
813A00 Grantmaking and giving and social advocacy organizations						
813B00 Civic, social, professional and similar organizations						
491000 Postal service						
S00A00 Other government enterprises						
H00000 Households						

Region Definition: Los Angeles, CA; Riverside, CA; San Bernardino, CA

*Includes Government enterprises.

1. Each entry in column 1 represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
2. Each entry in column 2 represents the total dollar change in earnings of households employed by all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
3. Each entry in column 3 represents the total change in number of jobs that occurs in all industries for each additional 1 million dollars of output delivered to final demand by the industry corresponding to the entry. Because the employment multipliers are based on 2006 data, the output delivered to final demand should be in 2006 dollars.
4. Each entry in column 4 represents the total dollar change in value added that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.
5. Each entry in column 5 represents the total dollar change in earnings of households employed by all industries for each additional dollar of earnings paid directly to households employed by the industry corresponding to the entry.
6. Each entry in column 6 represents the total change in number of jobs in all industries for each additional job in the industry corresponding to the entry.

NOTE.--Multipliers are based on the 1997 Benchmark Input-Output Table for the Nation and 2006 regional data. Appendix B identifies the industries corresponding to the entries.
SOURCE.--Regional Input-Output Modeling System (RIMS II), Regional Product Division, Bureau of Economic Analysis.



TARGETED EMPLOYMENT AREA (TEA)

The Immigration and Nationality Act ("INA") and implementing regulations allow alien entrepreneurs to be eligible to obtain U.S. permanent resident status by investing US\$500,000 in a new commercial enterprise located in a targeted employment area ("TEA) in the U.S. INA Sec. 205(b)(5)(B) defines a TEA as "a rural area or an area which has experienced high unemployment of at least 150 percent of the national average rate."

The geographic focus of American Redevelopment Regional Center is within the three-county area of California comprised of San Bernardino and Riverside and Los Angeles counties. In accordance with 8 CFR 204.6(i), the California Office of Business, Transportation and Housing Agency (BTH) with the assistance of California Employment Development Department (EDD) has identified the cities, counties, metropolitan statistical areas (MSAs) and geopolitical subdivisions (census tracts) that meet the "high unemployment" definition and therefore qualify for the \$500,000 minimum investment threshold. Certain cities of Riverside County and San Bernardino County were identified by the EDD as \$500,000 qualifying areas.

A report entitled "Federal Immigration Act of 1990, Investor Visa Program" identifying TEA qualifying areas in California is published by California Employment Development Department (EDD) annually. Attached as Supplement A is a copy of the report dated May 2008 indicating certain cities of Riverside and San Bernardino Counties are both TEA qualifying areas with both San Bernardino and Hesperia all included as TEA.

High Unemployment Rates in San Bernardino and Hesperia, CA

The proposed regional center projects are located in cities of San Bernardino and Hesperia in San Bernardino County, California. Both cities qualify as a Targeted Employment Area based on their high rates of unemployment. According to the Bureau of Labor Statistics of the United States Department of Labor, the United States had an unemployment rate of 6.7% in November 2008, while City of San Bernardino and City of Hesperia were surveyed as having an unemployment rates of 12.3% and 11.8% respectively for the same period. Thus, based upon the most recent data, the unemployment rates of San Bernardino and Hesperia were over 150% greater than the national average. See Table 1, below, for the average national unemployment rate as reported by U.S.

Department of Labor, Bureau of Labor Statistics (<http://data.bls.gov>), and Table 2 and 3 for the monthly unemployment rates of San Bernardino and Hesperia as reported by California Employment Development Department.

Table 1, U.S. National Unemployment Rate from January to November 2008 (Data Extracted from Bureau of Labor Statistics)

2008	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov
National Unemployment Rate (%)	4.9	4.8	5.1	5.0	5.5	5.5	5.7	6.1	6.1	6.5	6.7
150% of National Unemployment Rate	7.35	7.2	7.65	7.5	8.25	8.25	8.55	9.15	9.15	9.75	10

Table 2, Unemployment Rates of City of San Bernardino from January to November 2008 (Data Extracted from California Employment Development Department)

2008	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov
Unemployment Rate (%)	8.8	8.7	9.3	9.1	9.9	10.8	11.6	11.8	11.7	12.4	12.3
Does it exceed the 150% of National Average Unemployment Rate?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Does San Bernardino qualify as TEA?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Table 3, Unemployment Rates of City of Hesperia from January to October 2008 (Data Extracted from California Employment Development Department)

2008	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov
Unemployment Rate (%)	8.4	8.3	8.9	8.7	9.5	10.3	11.1	11.2	11.2	11.8	11.8
Does it exceed the 150% of National Average Unemployment Rate?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Does San Bernardino qualify as TEA?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Thus, it is concluded that cities of San Bernardino and Hesperia both qualify under the INA as high unemployment area. As a Targeted Employment Area, alien investors may participate in the immigrant investor program by investing \$500,000 in capital in the proposed projects.

FEDERAL Immigration Act of 1990

INVESTOR VISA PROGRAM

May 2008

CONGRESS PASSED THE IMMIGRATION ACT OF 1990 that includes a program permitting foreign investors to obtain permanent residence in the United States. This is an amendment to the Immigration and Naturalization Act (INA). Section 203(b)(5) of the INA provides an immigrant investor visa category aimed at generating an inflow of foreign capital and creating jobs for U.S. workers. The law allows 10,000 permanent visas (“green cards”) each year for qualifying immigrant investors. The INA requires a capital investment of \$1 million for all areas in California, except in rural, high unemployment, or targeted areas where a lower investment threshold of \$500,000 may be made. In all cases, the investment must also create full-time employment for at least 10 U.S. citizens or other legal residents—other than members of the investor’s family. Investors (and qualified family members) may be granted conditional permanent residence status for two years if they meet and document the investment criteria. With timely filing to remove the conditional status, a permanent green card may be issued. Five years after the initial grant of conditional permanent residence, an investor may apply for U.S. citizenship. “High unemployment” is defined as 150 percent of the annual national average unemployment rate. The current qualifying rate is 6.9 percent. In accordance to 8 CFR §204.6(i), the California Employment Development Department (EDD) has been designated to identify the cities, counties, metropolitan statistical areas (MSAs) and geopolitical subdivisions (census tracts) that meet the “high unemployment” definition and therefore qualify for the \$500,000 minimum investment threshold. Though the rate changes often, the qualifying areas are identified at one point in time and published annually. A list of qualifying areas and census tracts can be found below. Census tract numbers for corresponding addresses can be found at <http://factfinder.census.gov/servlet/BasicFactsServlet>.

Program Highlights

- 10,000 new green cards available nationwide each year
- Permanent green card in only 2 years
- Citizenship possible in 5 years

Program Requirements

- Minimum investment of \$500,000 or \$1 million
- Creation of 10 full-time jobs for U.S. citizens

Qualifying Targeted Areas in California

- 292 Cities and Census Designated Places, 83 of these did not qualify at the MSA or County Level
- 33 Counties, 21 of these are Rural
- 11 MSAs
- 1,567 Census Tracts, 1080 of these are in Non-Qualifying Counties

Qualifying Unemployment Rate for Targeted Areas

- 6.9 percent or greater

IMMIGRATION ACT OF 1990 FOREIGN INVESTOR PROVISIONS

QUALIFYING AREAS
(Unemployment Rate 6.9% or greater)

Source: Employment Development Department
Labor Market Information Division
Local Area Unemployment Statistics
2007 Annual Average Unemployment Rates

METROPOLITAN STATISTICAL AREAS (MSA) (BOLD IF QUALIFYING)	COUNTIES COVERED (BOLD IF QUALIFYING)	QUALIFYING CITIES and CENSUS DESIGNATED PLACES	RATE
Bakersfield	Kern		8.3%
Chico	Butte		
		Biggs city	8.4%
		Concow CDP	7.5%
		Gridley city	15.2%
		Magalia CDP	8.6%
		Oroville city	9.3%
		Palermo CDP	9.8%
		South Oroville CDP	11.7%
		Thermalito CDP	12.9%
El Centro	Imperial		18.0%
Fresno	Fresno		8.6%
Hanford-Corcoran	Kings		8.7%
Los Angeles-Long Beach-Glendale	Los Angeles		
		Bell Gardens city	8.2%
		Commerce city	9.3%
		Compton city	8.9%
		Cudahy city	7.1%
		East Compton CDP	8.9%
		East Los Angeles CDP	7.0%
		Florence Graham CDP	10.0%
		Huntington Park city	7.7%
		Industry city	8.6%
		Lake Los Angeles CDP	7.2%
		Lancaster city	7.2%
		Littlerock CDP	7.0%
		Lynwood city	8.2%
		Maywood city	7.5%
		Paramount city	7.5%
		West Compton CDP	8.1%
		Westmont CDP	10.2%
		Willowbrook CDP	9.1%

Madera	Madera		7.6%
Merced	Merced		10.1%
Modesto	Stanislaus		8.8%
Napa	Napa		
		American Canyon city	6.9%
Oakland-Fremont-Hayward	Alameda		
		Cherryland CDP	7.9%
		Oakland city	7.4%
	Contra Costa		
		Bay Point CDP	9.4%
		Bayview Montalvin CDP	8.7%
		Bethel Island CDP	8.4%
		Crockett CDP	9.2%
		Knightsen CDP	8.9%
		Moraga town	7.4%
		Pittsburg city	7.7%
		Richmond city	7.9%
		Rollingwood CDP	10.6%
		San Pablo city	9.9%
Oxnard-Thousand Oaks-Ventura	Ventura		
		Fillmore city	7.2%
		Piru CDP	8.9%
		Santa Paula city	8.4%
Redding	Shasta		7.5%
Riverside-San Bernardino-Ontario	Riverside		
		Banning city	7.1%
		Beaumont city	7.6%
		Blythe city	7.4%
		Cabazon CDP	16.2%
		Coachella city	10.1%
		Desert Hot Springs city	8.4%
		Hemet city	7.9%
		Highgrove CDP	7.6%
		Homeland CDP	12.1%
		Idyllwild Pine Cove CDP	7.9%
		Lakeland Village CDP	9.7%
		Lakeview CDP	6.9%
		Mecca CDP	12.4%
		Moreno Valley city	7.2%
		Murrieta Hot Springs CDP	13.4%
		Perris city	9.9%
		Quail Valley CDP	9.9%
		Romoland CDP	9.8%
		Rubidoux CDP	8.8%
		San Jacinto city	9.6%
		Sun City CDP	7.2%
		Winchester CDP	8.9%

San Bernardino		
	Adelanto city	8.7%
	Barstow city	7.1%
	Bloomington CDP	8.0%
	Bluewater CDP	7.1%
	Hesperia city	7.4%
	Highland city	7.2%
	Lenwood CDP	10.3%
	Muscoy CDP	12.6%
	Nebo Center CDP	13.2%
	Rialto city	7.4%
	San Bernardino city	7.8%
	Twentynine Palms Base CDP	6.9%
	Victorville city	6.9%
Sacramento-Arden-Arcade-Roseville	El Dorado	
	Georgetown CDP	9.2%
	Placerville city	7.8%
	South Lake Tahoe city	7.1%
Sacramento		
Placer		
	Foresthill CDP	7.7%
	Lincoln city	9.1%
Yolo		
	West Sacramento city	9.3%
	Woodland city	7.0%
Salinas	Monterey	7.2%
San Diego-Carlsbad-San Marcos	San Diego	
	Imperial Beach city	7.6%
	National City city	9.2%
San Fran-San Mateo-Redwood City	Marin	
San Francisco		
San Mateo		
	East Palo Alto city	9.4%
	North Fair Oaks CDP	7.9%
San Jose-Sunnyvale-Santa Clara	Santa Clara	
	Gilroy city	7.3%
	San Martin CDP	11.6%
	San Benito	7.2%
San Luis Obispo-Paso Robles	San Luis Obispo	
	Oceano CDP	7.2%
Santa Ana-Anaheim-Irvine	Orange	

Santa Barbara-Santa Maria-Goleta	Santa Barbara		
		Isla Vista CDP	10.8%
		Lompoc city	8.0%
		Montecito CDP	11.7%
		Santa Maria city	7.0%
Santa Cruz-Watsonville	Santa Cruz		
		Amesti CDP	10.3%
		Freedom CDP	9.8%
		Interlaken CDP	12.1%
		Watsonville city	13.1%
Santa Rosa-Petaluma	Sonoma		
		Guerneville CDP	7.9%
		Monte Rio CDP	8.6%
Stockton	San Joaquin		8.2%
Vallejo-Fairfield	Solano		
		Elmira CDP	8.9%
Visalia-Porterville	Tulare		9.3%
Yuba City			9.5%
	Sutter		9.6%
	Yuba		9.3%



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Labor Force Statistics from the Current Population Survey

Series Id:	LNS14000000
Seasonal Adjusted	
Series title:	(Seas) Unemployment Rate
Labor force status:	Unemployment rate
Type of data:	Percent
Age:	16 years and over

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
1998	4.6	4.6	4.7	4.3	4.4	4.5	4.5	4.5	4.6	4.5	4.4	4.4	
1999	4.3	4.4	4.2	4.3	4.2	4.3	4.3	4.2	4.2	4.1	4.1	4.0	
2000	4.0	4.1	4.0	3.8	4.0	4.0	4.0	4.1	3.9	3.9	3.9	3.9	
2001	4.2	4.2	4.3	4.4	4.3	4.5	4.6	4.9	5.0	5.3	5.5	5.7	
2002	5.7	5.7	5.7	5.9	5.8	5.8	5.8	5.7	5.7	5.7	5.9	6.0	
2003	5.8	5.9	5.9	6.0	6.1	6.3	6.2	6.1	6.1	6.0	5.8	5.7	
2004	5.7	5.6	5.8	5.6	5.6	5.6	5.5	5.4	5.4	5.5	5.4	5.4	
2005	5.2	5.4	5.2	5.1	5.1	5.0	5.0	4.9	5.1	5.0	5.0	4.8	
2006	4.7	4.7	4.7	4.7	4.7	4.6	4.7	4.7	4.5	4.4	4.5	4.4	
2007	4.6	4.5	4.4	4.5	4.5	4.6	4.7	4.7	4.7	4.8	4.7	5.0	
2008	4.9	4.8	5.1	5.0	5.5	5.5	5.7	6.1	6.1	6.5	6.7		

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Year	Period	Area	Adjusted	Preliminary	Unemployment Rate
2008	Jan	San Bernardino city	Not Adj	Not Prelim	8.8
2008	Feb	San Bernardino city	Not Adj	Not Prelim	8.7
2008	Mar	San Bernardino city	Not Adj	Not Prelim	9.3
2008	Apr	San Bernardino city	Not Adj	Not Prelim	9.1
2008	May	San Bernardino city	Not Adj	Not Prelim	9.9
2008	Jun	San Bernardino city	Not Adj	Not Prelim	10.8
2008	Jul	San Bernardino city	Not Adj	Not Prelim	11.6
2008	Aug	San Bernardino city	Not Adj	Not Prelim	11.8
2008	Sep	San Bernardino city	Not Adj	Not Prelim	11.7
2008	Oct	San Bernardino city	Not Adj	Not Prelim	12.4
2008	Nov	San Bernardino city	Not Adj	Prelim	12.3

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2008	Jan	Hesperia city	Not Adj	Not Prelim	8.4
2008	Feb	Hesperia city	Not Adj	Not Prelim	8.3
2008	Mar	Hesperia city	Not Adj	Not Prelim	8.9
2008	Apr	Hesperia city	Not Adj	Not Prelim	8.7
2008	May	Hesperia city	Not Adj	Not Prelim	9.5
2008	Jun	Hesperia city	Not Adj	Not Prelim	10.3
2008	Jul	Hesperia city	Not Adj	Not Prelim	11.1
2008	Aug	Hesperia city	Not Adj	Not Prelim	11.2
2008	Sep	Hesperia city	Not Adj	Not Prelim	11.2
2008	Oct	Hesperia city	Not Adj	Not Prelim	11.8
2008	Nov	Hesperia city	Not Adj	Prelim	11.8

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LIMITED PARTNERSHIP AGREEMENT

OF

REDEVELOPMENT OPPORTUNITIES I LIMITED PARTNERSHIP

A California Limited Partnership

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**LIMITED PARTNERSHIP AGREEMENT
OF
REDEVELOPMENT OPPORTUNITIES I LIMITED PARTNERSHIP
A California Limited Partnership**

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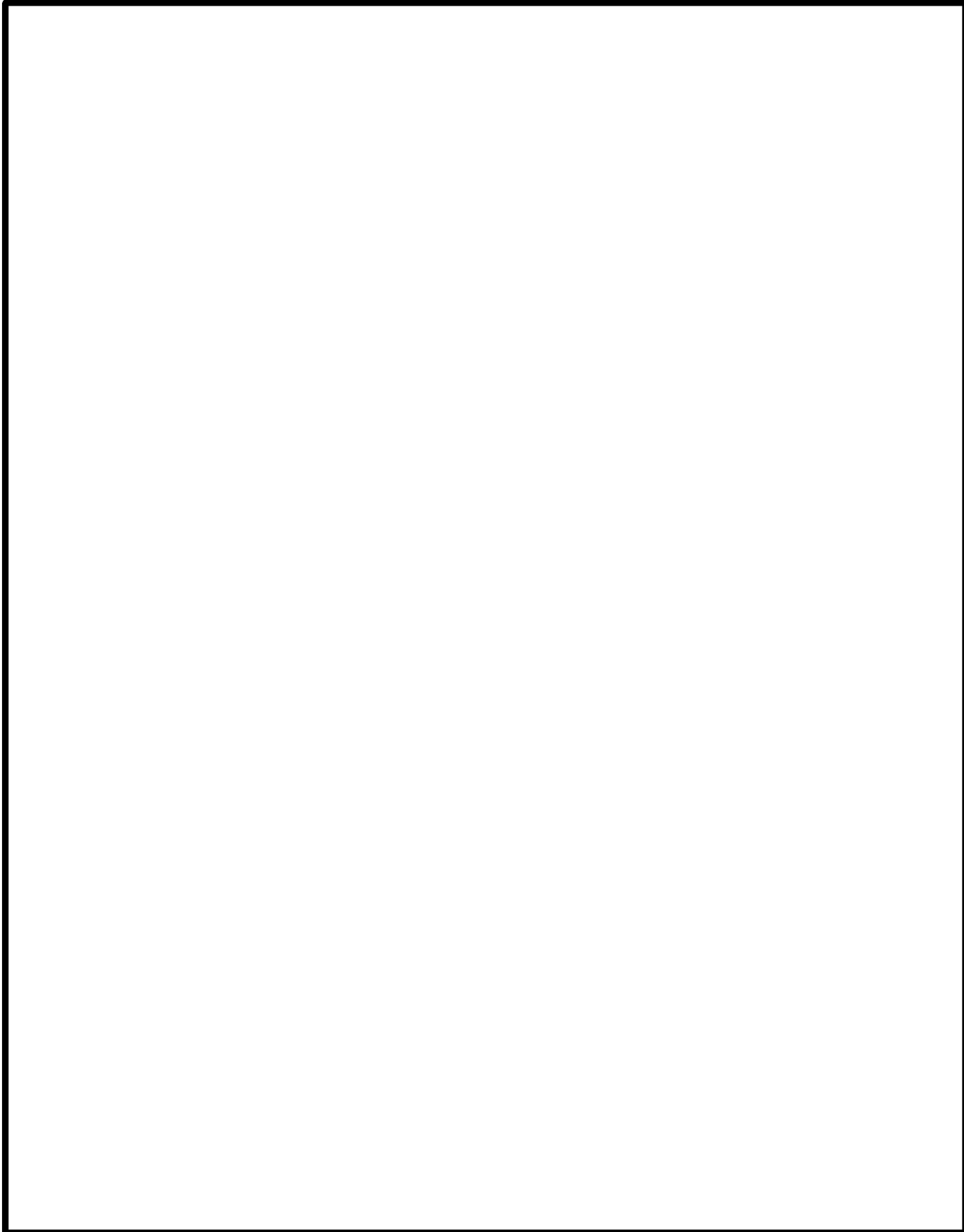
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INTRODUCTION

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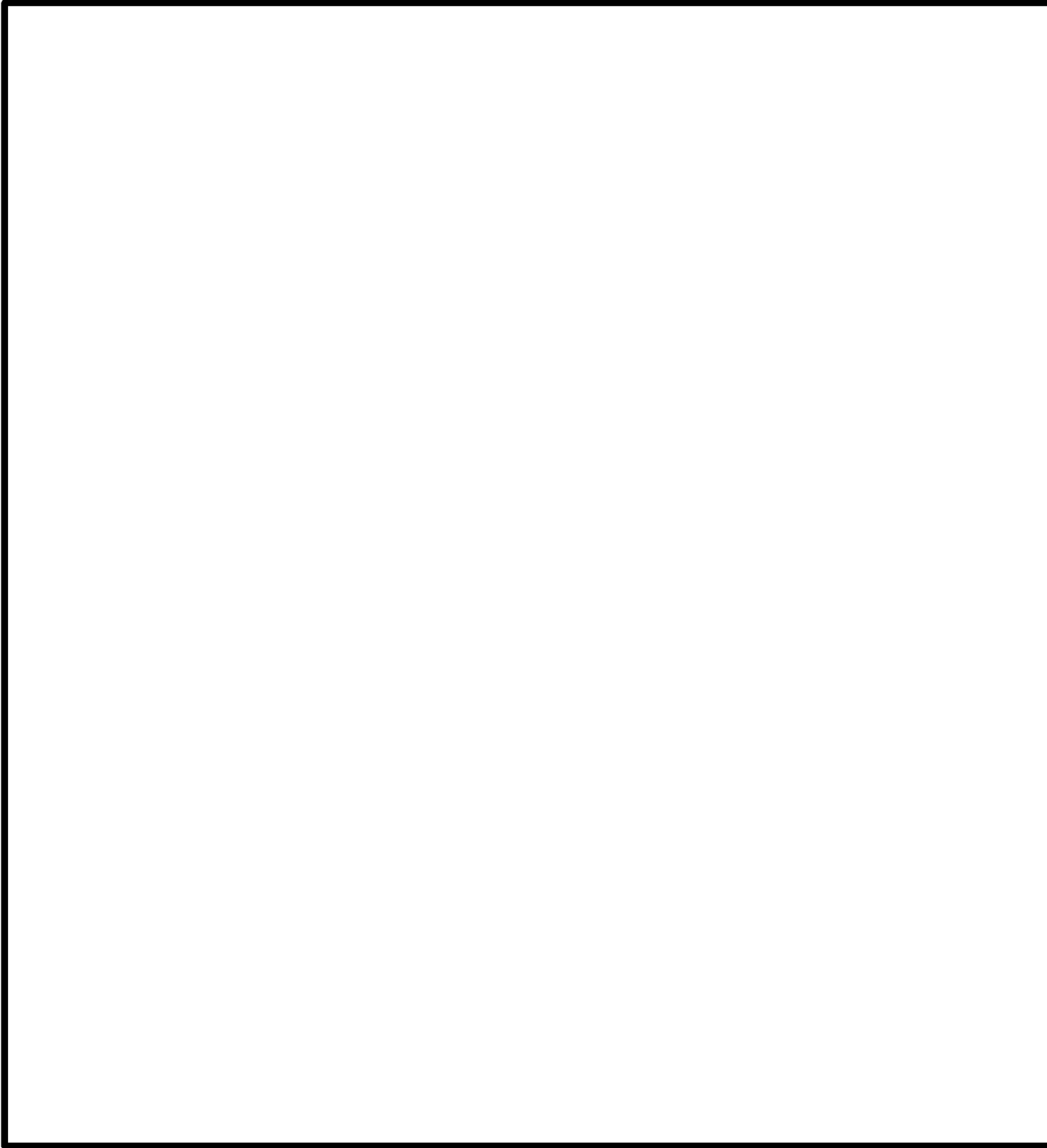
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Redevelopment Opportunities I Limited Partnership

ESCROW AGREEMENT

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RISK FACTORS AND DISCLOSURES

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