



U.S. Citizenship
and Immigration
Services

HOOPRD 70/6.2.8

MAY 1 2007

Mr. Timothy R. Sheehy
President
Metropolitan Milwaukee Association of Commerce
756 North Milwaukee Street, Suite 400
Milwaukee, WI 53202

Re: Metropolitan Milwaukee Association of Commerce Regional Center

Pursuant to Section 610 of the Appropriations Act of 1993, the Metropolitan Milwaukee Association of Commerce (MMAC) application for designation by U.S. Citizenship and Immigration Services for designation as a Regional Center to participate in the Immigrant Investor Pilot Program is approved. This approval and designation is for a MMAC Regional Center (MMAC-RC) whose contiguous geographic area encompasses the following seven (7) counties of southeastern Wisconsin: Kenosha, Milwaukee, Ozaukee, Racine, Walworth, Washington, and Waukesha.

The new commercial enterprise investment focus of the MMAC-RC will concentrate within its geographic area on the following seven (7) targeted clusters of economic activity:

1. Business and Professional
2. Financial Activities and Business Process Services
3. Health Services and Medical Technology
4. Manufacturing
5. Printing and Printing Support
6. Wholesale Trade and Distribution
7. Hospitality (Hotels, Restaurants, and Entertainment)

As such, aliens seeking immigrant visas through the Immigrant Investor Pilot Program may file individual petitions with USCIS for investments into the financing and development of projects and commercial enterprises in the above cited seven (7) target clusters of economic activity within the approved MMAC-RC's geographic area.

The geographic focus of MMAC-RC coverage area is comprised of both small urban and rural areas, as well as those census tracts within the larger urban and metropolitan areas of the cities of Racine and Milwaukee which have been designated as a Targeted Employment Area (TEA) by

the State of Wisconsin as defined in 8 CFR 204.6(e). Therefore, the minimum capital contribution threshold for any individual immigrant investment through the MMAC-RC into a new commercial enterprise located in a designated Rural Area or TEA within the MMAC-RC geographic area shall be not less than \$500,000.

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

However, where indirect job creation is claimed based on a multiplier rooted in underlying new "direct jobs" (or preservation of existing direct jobs in a troubled business) in support of an immigrant investor's individual I-526 petition affiliated with the MMAC-RC, then to be credited with either the projected creation or preservation of any underlying new or preserved "direct" jobs for qualifying employees, the petition must be supported by:

- In the case of investment made into a troubled business as defined at 8 CFR 204.6(e), probative evidence of the number of full time (35 hours per week) qualified employees for the 1 to 2 years prior to filing the petition whose positions shall be preserved/maintained throughout the alien's period of conditional residency. Such evidence should include copies of quarterly state employment tax reports, Forms W-2, Forms I-9, and any other pertinent employment records sufficient to demonstrate the number of "direct" qualifying pre-existing full time jobs in the specified troubled business have been preserved/maintained, and any other pertinent employment records sufficient to demonstrate the number of employees before the investment.
- To be credited with projected creation of new "direct" jobs for "qualifying employees" upon filing the I-526 petition, then the petition must be supported by a comprehensive detailed business plan and supporting financial, marketing and related data and analysis providing a reasonable basis for projecting creation of the new direct jobs.

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

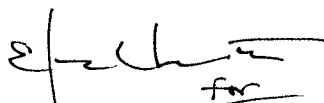
1. A copy of this letter of approval and designation.
2. A copy of the final approved regional center narrative proposal and business plan.

3. A copy of the job creation methodology required in 8 CFR 204.6(j)(4)(iii), as contained in the regional center's economic analysis which has been approved by USCIS in its final version, which reflects that investment by an individual alien investor of at least \$500,000 into a commercial enterprise in a targeted economic cluster within the geographic area of the MMAC-RC will preserve and/or create full-time employment positions, either directly or indirectly, for not fewer than ten qualified employees.
4. A legally executed copy of:
 - a. the Memorandum of Understanding
 - b. the Escrow Agreement and instructions
 - c. the Subscription Agreement

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

If you have any questions concerning the MMAC Regional Center approval and designation under the Immigrant Investor Pilot Program, please contact the USCIS Foreign Trader, Investor and Regional Center Program.

Sincerely,



Christina Poulos
Acting Chief
Service Center Operations