



U.S. Citizenship
and Immigration
Services

March 9, 2015

Mr. Henry Liebman
American Life Ventures—ALV Everett Regional Center – Designation Terminated
270 South Hanford Street, Suite 100
Seattle, WA 98134

Notice of Termination

This letter shall serve as notification that U.S. Citizenship and Immigration Services (USCIS) has terminated the designation of American Life Ventures—ALV Everett Regional Center (“ALV”) as a regional center under the Immigrant Investor Program (“Program”) pursuant to Title 8 of the Code of Federal Regulations (8 CFR) section 204.6(m)(6).

The regulation at 8 CFR § 204.6(m)(6) provides:

Termination of participation of regional centers. To ensure that regional centers continue to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, or increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis, on a cumulative basis, and/or as otherwise requested by USCIS, using a form designated for this purpose. USCIS will issue a notice of intent to terminate the participation of a regional center in the pilot program if a regional center fails to submit the required information or upon a determination that the regional center no longer serves the purpose of promoting economic growth, including increased export sales, improved regional productivity, job creation, and increased domestic capital investment. The notice of intent to terminate shall be made upon notice to the regional center and shall set forth the reasons for termination. The regional center must be provided 30 days from receipt of the notice of intent to terminate to offer evidence in opposition to the ground or grounds alleged in the notice of intent to terminate. If USCIS determines that the regional center's participation in the Pilot Program should be terminated, USCIS shall notify the regional center of the decision and of the reasons for termination. As provided in 8 CFR 103.3, the regional center may appeal the decision to USCIS within 30 days after the service of notice.

On October 17, 2014, USCIS issued to ALV a Notice of Intent to Terminate (NOIT) to American Life Ventures—ALV Everett Regional Center, which afforded ALV 30 days from



receipt of the notice to offer evidence in opposition to the grounds alleged in the NOIT. The evidence submitted in response to the NOIT was received on November 21, 2014.

Reasons for Termination

Thus, pursuant to 8 CFR 204.6(m)(6) and for the reasons set forth in the NOIT, USCIS has determined that ALV no longer serves the purpose of promoting economic growth, including increased export sales, improved regional productivity, job creation, or increased domestic capital investment. Specifically, in the NOIT Response, ALV provided statements that it has tried to find a suitable project in Everett, WA but has not yet succeeded. ALV emphasizes: “In short, a great deal of pre-developemnt work must be done before we can in good conscience offer an investment opportunity to potential EB-5 investors.” ALV presents some pre-development efforts it has undertaken between 2007 to present.

USCIS recognizes and appreciates the work that must be conducted to maintain the regional center designation. However, after carefully evaluating the materials submitted with the NOIT Response, USCIS has determined that ALV failed to demonstrate that it is ready to now sponsor a project and, also, ALV did not provide any marketing related information to demonstrate that it has been sharing with prospective investors. Indeed, USCIS found only one webpage that mentions American Life Ventures, which states: ALV Everett Regional Center exists and is under American Life, Inc.

ALV has had more than seven years to find a suitable *actual* project and file Form I-924 Amendment but has not done so. ALV has not provided preponderance of evidence to contest the grounds alleged in the NOIT. Accordingly, USCIS terminates American Life Ventures—ALV Everett Regional Center’s participation in the Program because ALV no longer serves the purpose of promoting economic growth.

Procedure to Appeal the Decision to Terminate

If you disagree with this decision, or if you have additional evidence that shows this decision is incorrect, you may file a motion or an appeal to this decision by filing a completed Form I-290B, Notice of Appeal or Motion, along with the appropriate filing fee. A copy is enclosed. You may also include a brief or other written statement and additional evidence in support of your motion or appeal. The Form I-290B must be filed within 33 days from the date of this notice. If a motion or appeal is not filed within 33 days, this decision is final.

You must send your completed Form I-290B and supporting documentation with the appropriate filing fee to the address indicated below.

If using the U.S. Postal Service:
USCIS

P.O. Box 21100
Phoenix, AZ 85036

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ID (formerly 1031910141)
RCW1336051470

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If using USPS Express Main/Courier:
USCIS

Attn: 290B
1820 E. Skyharbor Circle S
Suite 100
Phoenix, AZ 85034

Your motion or appeal must be filed on Form I-290B and must be accompanied by a fee of \$630.00. The check or money order used for the Form I-290B filing fee must be drawn from a bank or other financial institution located in the United States and must be payable to U.S. Department of Homeland Security.

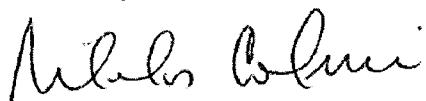
In support of your appeal, you may submit a brief or other written statement for consideration at the time of initial filing of the Form I-290B or within 30 calendar days of filing. If you are filing an appeal of this decision, you may, if necessary and for good cause, request additional time to submit a brief or other statement by submitting a written explanation for the need for additional time. Any brief, written statement or other evidence in support of an appeal that is not filed concurrently with Form I-290B, including any request for additional time for the submission of a brief must be sent directly to the Administrative Appeals Office (AAO) at:

USCIS
Administrative Appeals Office
20 Massachusetts Avenue, NW
Mail Stop 2090
Washington DC 20529-2090

The appeal of the termination may not be filed directly with the AAO. The appeal of the termination must be filed in accordance with the Form I-290B instructions and at the address indicated above.

For more information about the filing requirements for appeals and motions, please see 8 C.F.R. § 103.3 or 103.5, or visit the USCIS website at www.uscis.gov.

Sincerely,



Nicholas Colucci
Chief, Immigrant Investor Program

Enclosure:(1) Form I-290B with instructions
(2) Notice of Intent to Terminate issued on October 17, 2014

cc: Lincoln Stone
Stone & Grzegorek LLP
800 Wilshire Blvd., Suite 900
Los Angeles, CA 90017