



**U.S. Citizenship  
and Immigration  
Services**

**U.S. Department of Homeland Security**

U.S. Citizenship and Immigration Services  
*Immigrant Investor Program*  
131 M Street, NE, Mailstop 2235  
Washington, DC 20529

**Date:** May 20, 2021

GVC Seattle Regional Center LLC  
Attn: Steven Kay  
One Sansome St., Suite 2080  
San Francisco, CA 94104

**Application:** Form I-924  
Application for Regional Center Designation Under the Immigrant Investor Program

**Applicant(s):** GVC Seattle Regional Center LLC

**Re:** Request to Amend Regional Center Designation  
GVC Seattle Regional Center LLC  
RCW1828256522 / ID1632254539

On October 9, 2018, GVC Seattle Regional Center LLC (“the Regional Center”) filed a Form I-924 to request an amendment to its regional center designation. The Regional Center was initially approved for designation in the Immigrant Investor Program (“the Program”)<sup>1</sup> on November 8, 2017.

Specifically, the Form I-924 requests the following:

- Approval for changes to the regional center’s name, ownership, or organizational structure, or changes to the regional center’s administration that affect its oversight and reporting responsibilities, or to add or remove any of the regional center’s principals, immediately following the changed circumstances; and
- Preliminary determination of EB-5 compliance for an exemplar Form I-526, Immigrant Petition by Entrepreneur, for a new commercial enterprise.

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<sup>1</sup> Section 610 of Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. No. 102-395, 106 Stat. 1828 (1992), as amended (hereinafter the “Act”).

Effective as of the date of this notice, and as discussed further below, USCIS approves the Regional Center's request.

## **I. Regional Center Designation**

### **A. Changes to Name, Ownership, Organizational structure, Administration and Principals**

USCIS's Instructions to the Form I-924 require the applicant to submit documentation to establish the ownership, structure, control and administration, and oversight and management functions of the regional center (including the regional center entity). Additionally, the instructions require that the applicant submit a plan that demonstrates that there are (or will be) sufficient management, oversight and administrative functions in place to monitor all investment offerings and business activities.

Although the Regional Center was approved for designation based on previously-submitted information, if there are changes to: 1) the Regional Center's name, ownership, or organizational structure; 2) the regional center's administration that affect its oversight and reporting responsibilities; or 3) to add or remove any of the regional center's principals, then: the Regional Center must submit a Form I-924 amendment and request approval of such changes immediately following the changed circumstances. USCIS requires notification of such changes in order to demonstrate that the Regional Center continues to comply with the applicable laws and regulations such that it may remain designated as a regional center in the Program.

The Regional Center requested approval of changes made to the Regional Center's name, ownership, organizational structure, and administration that affect its oversight and reporting responsibilities, and to add principals. Specifically, the Regional Center requested a change in name from American Dream Fund Seattle Regional Center LLC to GVC Seattle Regional Center LLC. In addition, GVC Seattle Regional Center LLC provided evidence of a new owner, Steven Kay, as well as four new principal non-owners of the Regional Center.

After reviewing the submission, USCIS has determined that the documents submitted by the Regional Center are sufficient to justify approval of the amendment.

## **II. Preliminary Determination of EB-5 Compliance for a Form I-526 Exemplar**

Through this Form I-924 and the documents submitted, the Regional Center requests preliminary determination of EB-5 compliance for a Form I-526 exemplar. The Regional Center presented evidence asserting that 60 investors will invest \$30 million into 3G Fund 11 LLC – the new commercial enterprise (NCE). The NCE will invest in an equity interest in Mirador CWZ LLC, the job creating entity (JCE). The JCE intends to construct a 40-story residential high-rise building in Seattle, WA. The Regional Center asserts that the investment from EB-5 petitioners will create approximately 1,524 jobs. The Regional Center also asserts that the NCE will be principally doing business within a targeted employment area (TEA).<sup>2</sup>

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<sup>2</sup> Based on the evidence presented, USCIS has determined that NCE will principally be doing business within a TEA for the purposes of this exemplar filing. However, investors with related Form I-526 petitions must establish that at

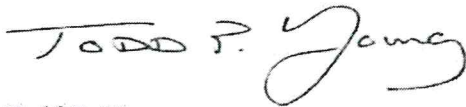
After review of the documents submitted in connection with this request, USCIS has determined that the Regional Center has demonstrated that the Form I-526 exemplar complies with EB-5 requirements. Per USCIS policy, this determination will be accorded deference in subsequent filings under the project involving the same material facts and issues, absent material change, fraud, willful misrepresentation, or a legally deficient determination. Notwithstanding this approval, investors with related Form I-526 petitions must independently demonstrate eligibility with applicable EB-5 requirements, including the requirement that he or she is eligible for the requested benefit at the time of filing the benefit request and continues to be eligible through adjudication. 8 C.F.R. § 103.2(b)(1).

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If the Regional Center has any questions concerning its designation under the Immigrant Investor Program, please contact the USCIS by email at:

[USCIS.ImmigrantInvestorProgram@uscis.dhs.gov](mailto:USCIS.ImmigrantInvestorProgram@uscis.dhs.gov)

Sincerely,



Todd P. Young  
Acting Chief, Immigrant Investor Program

cc: Daniel B. Lundy  
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the time of investment or at the time of filing the immigrant petition, as applicable, the geographic area in question qualified as a TEA. A geographic area that once qualified as a TEA may no longer qualify as employment rates or population increases over time. In addition, an immigrant investor cannot rely on previous TEA determinations made based on facts that have subsequently changed.