

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



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

Date: September 8, 2023

Gulf States Regional Center, LLC
1835 Main Street, Ste. 101
Weston, FL 33326

Application: Form I-956F
Application for Approval of an Investment in a Commercial Enterprise

Applicant(s): Gulf States Regional Center, LLC
ID1201750575

Re: Initial I-956F, Application for Approval of an Investment in a Commercial Enterprise
INF2260000709

On August 1, 2022, Gulf States Regional Center, LLC (“the Regional Center”) filed a Form I-956F to request an Initial I-956F, Application for Approval of an Investment in a Commercial Enterprise in accordance with section 203(b)(5)(F) of the Immigration and Nationality Act (“INA”). The Regional Center was initially approved for designation in the Regional Center Program (“the Program”)¹ on March 28, 2013.

Specifically, the Form I-956F requests the following:

- Determination of EB-5 compliance for initial I-956F, Application for Approval of an Investment in a Commercial Enterprise.

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

¹ INA § 203(b)(5)(E) and its predecessor at Sec. 610 of the Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriations Act of 1993, Pub. L. 102-395 (repealed by the EB-5 Reform and Integrity Act of 2022, Div. BB of the Consolidated Appropriations Act, 2022, Pub. L. No. 117-103).

I. Determination of EB-5 Compliance for an initial I-956F, Application for Approval of an Investment in a Commercial Enterprise

Through this Form I-956F and the documents submitted, the Regional Center requests determination of EB-5 compliance for an initial I-956F, Application for Approval of an Investment in a Commercial Enterprise. The Regional Center presented evidence asserting that *Pathways 4S NOLA QP Fund LLC*, the new commercial enterprise (“NCE”) associated with this filing, together with *Pathways 4S NOLA Fund, LLC*², will pool a combined \$56,800,000 from 71 immigrant investors³. The NCE will invest in an equity interest in *Pathways 4S NOLA QP Fund Holdings, LLC*, which will make a Series B preferred interest investment into *Two Canal Middle Holdings, LLC*, which is the 100% Series B Interest holder and manager of *Two Canal Lower Holding, LLC*, which is the 100% owner of *Two Canal Owner, LLC*, the “project company,” and the job-creating entity (“JCE”). The JCE will use the pooled investment to repay bridge financing utilized for the development of the Four Seasons Hotel at the World Trade center building located at Two Canal Street, New Orleans. The Regional Center asserts construction activity will last longer than 2 years.

After review of the documents submitted in connection with this request, USCIS has determined that the Regional Center has demonstrated that the initial I-956F, Application for Approval of an Investment in a Commercial Enterprise complies with EB-5 requirements.

USCIS approves the Form I-956F based on evidence submitted indicating that the investment from EB-5 petitioners will create approximately 4,443 total jobs, of which, 71 direct jobs and 639 indirect/induced jobs will be allocated to the 71 immigrant investors⁴.

USCIS also approves the Regional Center’s assertion that the NCE/JCE is principally doing business within a high unemployment area.

² A separate contemporaneous application for Form I-956F (INF2260000710)

³ Both “Pathways 4S NOLA QP Fund, LLC” & “Pathways 4S NOLA Fund, LLC” raised a combined \$29.2M from 56 immigrant investors prior to June 30, 2021.

⁴ INA § 203(b)(5)(E)(iv)(I) permits aliens seeking admission to satisfy only up to 90 percent of the job creation requirement with jobs that are estimated to be created indirectly through investment. An employee of the new commercial enterprise or job-creating entity may be considered to hold a job that has been directly created. If the jobs estimated to be created are created by construction activity lasting less than 2 years, Applicants may satisfy only up to 75 percent of the job creation requirement with jobs that are estimated to be created indirectly through investment. INA § 203(b)(5)(E)(iv)(II). If the number of direct jobs estimated to be created has been determined by an economically and statistically valid methodology, and such direct jobs are created by construction activity lasting less than 2 years, the number of such jobs that may be considered direct jobs for purposes of clause (iv) shall be calculated by multiplying the total number of such jobs estimated to be created by the fraction of the 2-year period that the construction activity lasts. INA § 203(b)(5)(E)(v)(II)(cc).

Gulf States Regional Center, LLC

ID1201750575

INF2260000709

Page 3

The designation of the proposed area as a high unemployment area is valid until two years from filing of date of I-956F⁵.

The approval of an I-956F shall be binding for purposes of the adjudication of subsequent Forms I-526E, Immigrant Petition by Regional Center Investor, filed by immigrants investing in the same offering described in this I-956F application, and of petitions by the same immigrants filed under INA § 216A unless—

- (I) the applicant engaged in fraud, misrepresentation, or criminal misuse;
- (II) such approval would threaten public safety or national security;
- (III) there has been a material change that affects eligibility;
- (IV) the discovery of other evidence affecting program eligibility was not disclosed by the applicant during the adjudication process; or
- (V) the previous adjudication involved a material mistake of law or fact.

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

Sincerely,



Alissa L. Emmel
Chief Immigrant Investor Program

cc: Laura F. Reiff, Esq.
Greenberg Traurig, LLP
1750 Tysons Blvd., Ste. 1000
McLean, VA 221102

⁵ An immigrant investor who has invested the required amount of capital in a targeted employment area designated as a high unemployment area during the period in which the area is designated will not be required to increase the amount of investment due to the expiration of the designation.