



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

August 31, 2015

Michael Reschke
LaSalle Street Regional Center, LLC
120 N. LaSalle St., Ste. 3200
Chicago, IL 60602

Application: Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program

Applicant(s): LaSalle Street Regional Center, LLC

Re: Initial Regional Center Designation
LaSalle Street Regional Center, LLC ("LSRC")
RCW1430451950 / ID1430451950

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on October 31, 2014. The Form I-924 application was filed to request approval of initial regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

Effective the date of this notice, USCIS approves the Form I-924 request to designate LaSalle Street Regional Center, LLC ("LSRC") as a qualifying participant in the Immigrant Investor Program.

II. Regional Center Designation

USCIS approves the applicant's request to focus, promote economic growth, and offer capital investment opportunities in the following geographic area and industry categories:

A. Geographic Area

State	Counties			
Illinois	Cook	DeKalb	DuPage	Grundy
	Kane	Kendall	Lake	McHenry
	Will			
Indiana	Jasper	Lake	Newton	Porter
Wisconsin	Kenosha			

B. Industry Categories¹

Industry Category	NAICS code
Nonresidential Building Construction	2362
Architectural, Engineering and Related Services	5413
Traveler Accommodation	7211

III. Job Creation

USCIS approves the geographic area and industry categories noted above based on the economic impact analysis presented and reviewed in conjunction with the adjudication of this regional center proposal.

This hypothetical project does not have the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998), and therefore, USCIS's approval of the hypothetical job creation estimates presented in the Form I-924 will not be accorded deference and may not be relied upon by an individual investor when filing the Form I-526. The business plan and job creation estimates will receive a de novo review by USCIS when an individual investor files Form I-526. Once an actual project is adjudicated upon the filing of the initial Form I-526, USCIS will give deference to subsequent Forms I-526 when the critical assumptions remain materially unchanged from the initially-approved Form I-526.

When filing Form I-526, it will be the responsibility of the individual investor to submit a comprehensive, detailed and credible business plan, showing by a preponderance of the evidence that his or her investment in the new commercial enterprise will create not fewer than 10 full-time positions. If prior to filing a form I-829, the job creation estimated in the business plan submitted by the individual investor materially changes or will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

¹ USCIS issued a Policy Memorandum (PM-602-0083) on the subject of "EB-5 Adjudication Policy," dated May 30, 2013, stating that formal amendments to the regional center designation are no longer required when a regional center changes its industries of focus or geographic boundaries. A regional center may still elect to pursue a formal amendment by filing Form I-924 if it seeks certainty in advance that changes in the industries or the geographic area will be permissible prior to filing Form I-526 petitions.

IV. Guidelines for Filing Form I-526 Petitions

Each individual petition, in order to demonstrate that it is affiliated with the LSRC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6 (j)(4)(iii) and shows how the capital investment by an individual immigrant investor will create not fewer than ten (10) indirect jobs for each immigrant investor.
3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho, 22 I&N Dec. 206 (Assoc. Comm'r 1998).
4. Legally executed organizational documents of the commercial enterprise.

Note: The project reviewed with this Form I-924 application is a hypothetical project. Organizational and transactional documents associated with the new commercial enterprise (NCE) submitted with this Form I-924 have not been reviewed to determine compliance with program requirements since these documents will receive de novo review in subsequent filings (e.g., an amended Form I-924 application with a Form I-526 exemplar or the first Form I-526 petition filed by an investor under the regional center project).

V. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues 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, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

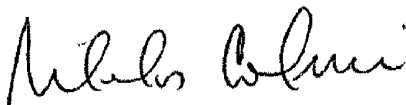
VI. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

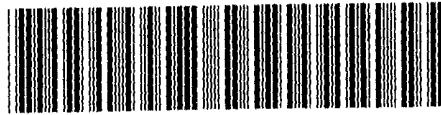
Sincerely,



Nicholas Colucci
Chief, Immigrant Investor Program

cc: Ronald Hayden
RKJ Legal LTD
1 N. LaSalle St, Ste. 1515
Chicago, IL 60602

ENDORSE HERE:



RCW1430451950

The security features listed below are not listed, exceed industry guidelines

Security Features: Results of document authentication

California Service Center
LCC NO. 7001010392
Citizenship & Immigration SVCS

FOR DEPOSIT ONLY

Security Features: Results of document authentication

California Service Center
LCC NO. 7001010392
Citizenship & Immigration SVCS

Security Features: Results of document authentication

California Service Center
LCC NO. 7001010392
Citizenship & Immigration SVCS

REC'D 08/14/07 20:10

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COPY

RECEIPT NUMBER RCW1430451950		CASE TYPE 1924 Application for Regional Center Under the Immigrant Investor Pilot Program
RECEIVED DATE October 31, 2014	APPLICATION TYPE: A (INITIAL)	REGIONAL CENTER NAME LASALLE STREET REGIONAL CENTER LLC
NOTICE DATE October 31, 2014	PAGE 1 of 1	REGIONAL CENTER ID ID1430451950
RONALD GREGORY HAYDEN RKJ LEGAL LTD RE: LASALLE STREET REGIONAL CENTER LLC 1 N LA SALLE ST STE 1515 CHICAGO IL 60602		NOTICE TYPE: Receipt Notice

Receipt Notice - This notice confirms that USCIS has accepted your "Application for Regional Center Under the Immigrant Investor Pilot Program" (Form I-924) for processing. This notice does not grant any immigration status or benefit. This notice does not grant any immigration status or benefit.

Processing Time - The current processing time for this type of case is estimated at 120 days. Unlike many other USCIS case types, verification or tracking of this case is not available on our website. We will notify you by mail when we make a decision on this case or if we need further evidence to establish your eligibility for the regional center designation.

Unique Identifier - In the top portion of this Notice, you will find a unique identifier that has been assigned to your Form I-924. Unlike a receipt number which changes with every filing, this unique identifier is permanently assigned to your approved or prospective regional center, and will be associated with any future request to amend the regional center. Please refer to your regional center's unique identifier as well as to the Form I-924 receipt number in all subsequent correspondence with USCIS regarding this application.

E-Mail Communication Regarding Your Pending Form I-924 Application - USCIS has established a direct e-mail communication tool to facilitate communication between USCIS and those applicants with pending Form I-924s. Form I-924 applicants may use the e-mail communication process to correspond with USCIS regarding pending Form I-924 applications, to include questions that may arise if USCIS issues a Request for Evidence (RFE) or a Notice of Intent to Deny (NOID). USCIS may also reach out to Form I-924 applicants via e-mail to informally ask for clarification on certain issues in order to facilitate USCIS' review, understanding, and adjudication of the Form I-924 application. USCIS may also e-mail a courtesy copy of the RFE or NOID to the e-mail address listed on the I-924 and, if applicable, to the e-mail address listed on the Form G-28 associated with the application.

Please use the following table to determine which email address has been assigned to your Form I-924.

If your unique identifier ends in the number:	Then please utilize this email address:
0, 1, or a 2	CSC-EB5-RCID0-2@dhs.gov
3, 4, or 5	CSC-EB5-RCID3-5@dhs.gov
6 or 7	CSC-EB5-RCID6-7@dhs.gov
8 or 9	CSC-EB5-RCID8-9@dhs.gov

Example: If a regional center's unique identifier is IDxxxxxxx0, then the regional center's Form I-924 has been assigned to email account CSC-EB5-RCID0-2@dhs.gov, as the unique identifier ends in "0".

E-Mail "Subject Line" Advisory - Please ensure that the subject line in your email correspondence contains the following information in this order: (1) Regional Center Unique Identifier; (2) Receipt Number; (3). Regional Center Name. Doing so will facilitate USCIS' timely handling of and response to your email correspondence.

E-mail Scope - This e-mail communication tool is to be used solely to facilitate communication between applicants with a pending Form I-924 and USCIS. The scope of the communication must relate to matters concerning the pending Form I-924. The direct e-mail communication initiative is not a forum for general policy and legal questions about adjudicative procedures or decisions, or for questions relating to either "Immigrant Petition by Alien Entrepreneur" (Form I-526), "Petition by Entrepreneur to Remove Conditions" (Form I-829), or any "Appeal or Motion" (Form I-290B). USCIS will not respond to e-mails received concerning issues unrelated to the currently pending Form I-924. For more information about how to make other EB-5 inquiries, visit the EB-5 Inquiries page on the USCIS website (www.uscis.gov). USCIS will not respond to e-mails received concerning issues unrelated to the currently pending Form I-924 via this email communication process.

General Questions - USCIS has a page entitled EB-5 Inquiries at www.uscis.gov that outlines how the public may make other inquiries on EB-5 related matters, to include inquiries that you may have after the Form I-924 has been adjudicated. This page clarifies the EB-5 inquiries that are appropriate to send to the general EB-5 mailbox (at uscis.immigrantinvestorprogram@dhs.gov), and other avenues that can be used to send questions or inquiries to USCIS that are not suitable for the general EB-5 mailbox.

Attorney Or Accredited Representative - If a valid Form G-28 is associated with the Form I-924, USCIS will need to have a viable Form G-28 e-mail address for the legal representative in order to use the e-mail process to correspond with the Form I-924 applicant. If a valid Form G-28 is associated with the Form I-924 applicant, but USCIS does not have a viable Form G-28 e-mail address, then one will need to be obtained prior to USCIS sending any out-going e-mail correspondence to the applicant which discuss issues related to the Form I-924. In such circumstance, the legal representative should provide an updated Form G-28 with a valid e-mail address by sending a pdf of a fully executed Form G-28 to the EB-5 mailbox at uscis.immigrantinvestorprogram@dhs.gov.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

U.S. CITIZENSHIP & IMMIGRATION SVC
CALIFORNIA SERVICE CENTER
P.O. BOX 30111
LAGUNA NIGUEL CA 92607-0111
Customer Service Telephone: (800) 375-5283



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U.S. Department of Homeland Security
P. O. Box 30111
Laguna Niguel, CA 92607-0111



U.S. Citizenship
and Immigration
Services

Date: 4.23.15

RKJ LEGAL LTD
STEVE KIM
1 N LASALLE ST
STE 1515
CHICAGO IL 60602

File No.: N/F
Form No:

Dear Sir/Madam:

We are unable to identify the application/petition about which you are inquiring. Please provide the information in the blanks below and return it to us along with proof of filing (front and back copy of cashed check or money order).

WAC# _____ or XPW# _____ or RCW1430451950

WSC# _____

A# _____ Form # or form type Application for Regional Center Under the Immigrant Investor Pilot Program
Complete Name LASALLE STREET REGIONAL CENTER LLC Date of Birth _____
Date of Filing October 31, 2014

Once you have filled in the information as completely as possible, please return it as the first page of your package, along with any other information you may have which will help us answer your inquiry, to the following address:

United States Citizenship and Immigration Services (USCIS)
California Service Center (CSC)
P.O. Box 30111
Laguna Niguel, CA 92607-0111

Sincerely,

SERVICE CENTER DIRECTOR

ID# C71027
USCIS Conc _____
7-804 ID application

ACTION COMPLETED
APPROVED FOR FILING
Initials: LP Date: 5/15/15
FCO/Unit: TPO

www.uscis.gov

MAY 13 2015

RKJ LEGAL

ATTORNEYS AT LAW

April 28, 2015

United States Citizenship and Immigration Services (USCIS)
California Service Center (CSC)
P.O. Box 30111
Laguna Niguel, CA 92607-0111

RE: THE PRIME GROUP, INC
LASALLE STREET REGIONAL CENTER
RECEIPT NUMBER: RCW1430451950
APPLICATION FOR REGIONAL CENTER UNDER
THE IMMIGRANT INVESTOR PILOT PROGRAM

To Whom It May Concern:

Please be advised that our office represents The Prime Group, Inc. ("Prime Group") on its Initial Application for Regional Center Designation of LaSalle Street Regional Center, LLC (the "Regional Center") originally filed on October 30, 2014 (attached Form G-28 and Receipt Notice).

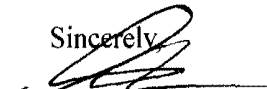
The application form stated that the approximate processing time was 120 days. Based upon this information, Prime Group negotiated with their lenders and investors on a set time schedule for payments rendered to commence the work for the initial project, which is the construction of the Hilton Hotel project detailed in the attached letter. Further delay may also adversely affect the hiring schedule of the construction team. See attached letter from Prime Group explaining the dire need to receive approval on this Regional Center.

We are writing on Prime Group's behalf in an effort to help expedite the processing of the Regional Center Application. It has been more than 6 months since the initial application was filed and we have not yet received any approval letter from USCIS.

Please expedite the processing time of the application so that Prime Group will not lose this critical project detailed in the attached letter. The only remaining obstacle for closing this project is the approval of the Regional Center.

Thank you for your time.

Sincerely,



Steve H. Kim

Cc: Senator Mark Steven Kirk
230 South Dearborn Street #3900
Chicago, IL 60604



THE PRIME GROUP, INC.

April 9, 2015

To: USCIS

Re: Regional Center Application – LaSalle Street Regional Center

Dear Sirs,

We are writing to request that the USCIS expedite the processing of our application to form the LaSalle Street Regional Center. We are at a critical stage for our project and the approval of the Regional Center is essential to us moving forward.

(b)(4)

We would appreciate your assistance in this matter.

Regards

Timothy M. French
Vice President - The Prime Group, Inc.



**Notice of Entry of Appearance
as Attorney or Accredited Representative**
Department of Homeland Security

DHS
Form G-28
OMB No. 1615-0105
Expires 02/29/2016

Name and Address of Attorney or Accredited Representative

1.a. Family Name (Last Name)
1.b. Given Name (First Name)
1.c. Middle Name
2. Name of Law Firm or Recognized Organization

3. Name of Law Student or Law Graduate

4. State Bar Number
5.a. Street Number
5.b. Street Name
5.c. Apt. ☐ Ste. ☒ Flr. ☐
5.d. City or Town
5.e. State 5.f. Zip Code
5.g. Postal Code
5.h. Province
5.i. Country

6. Daytime Phone Number () -
7. E-Mail Address of Attorney or Accredited Representative

(Check applicable items(s) below)

1. ☒ I am an attorney eligible to practice law in, and a member in good standing of, the bar of the highest court(s) of the following State(s), possession(s), territory(ies), commonwealth(s), or the District of Columbia.
1.a.
1.b. I (choose one) ☒ am not ☐ am subject to any order of any court or administrative agency disbaring, suspending, enjoining, restraining, or otherwise restricting me in the practice of law. (If you are subject to any order(s), explain fully in the space below.)
1.b.1.
2. ☐ I am an accredited representative of the following qualified nonprofit religious, charitable, social service, or similar organization established in the United States, so recognized by the Department of Justice, Board of Immigration Appeals pursuant to 8 CFR 292.2. Provide the name of the organization and the expiration date of accreditation.
2.a. Name of Recognized Organization

2.b. Date Accreditation expires
(mm/dd/yyyy) ►
3. ☐ I am associated with
3.a.
the attorney or accredited representative of record who previously filed Form G-28 in this case, and my appearance as an attorney or accredited representative is at his or her request. If you check this item, also complete number 1 (1.a. - 1.b.1.) or number 2 (2.a. - 2.b.) in Part 2 (whichever is appropriate).
4. ☐ I am a law student or law graduate working under the direct supervision of the attorney or accredited representative of record on this form in accordance with the requirements in 8 CFR 292.1(a)(2)(iv).

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

RECEIPT NUMBER RCW1430451950		CASE TYPE 1924 Application for Regional Center Under the Immigrant Investor Pilot Program
RECEIVED DATE October 31, 2014	APPLICATION TYPE: A (INITIAL)	REGIONAL CENTER NAME LASALLE STREET REGIONAL CENTER LLC
NOTICE DATE October 31, 2014	PAGE 1 of 1	REGIONAL CENTER ID ID1430451950
RONALD GREGORY HAYDEN RKJ LEGAL LTD RE: LASALLE STREET REGIONAL CENTER LLC 1 N LA SALLE ST STE 1515 CHICAGO IL 60602		NOTICE TYPE: Receipt Notice

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Please see the additional information on the back. You will be notified separately about any other cases you filed.

U.S. CITIZENSHIP & IMMIGRATION SVC
CALIFORNIA SERVICE CENTER
P.O. BOX 30111
LAGUNA NIGUEL CA 92607-0111
Customer Service Telephone: (800) 375-5283



The Prime Group, Inc.
120 North LaSalle Street
Suite 1100
Chicago, IL 60602

The Payable/Check and Trust Company
PO Box 100000
Chicago, IL 60681

DATE: October 30, 2014
CHECK NO: 34592
AMOUNT: \$6,230.00

Pay ***** Six thousand two hundred thirty dollars and no cents

US DEPT OF HOMELAND SECURITY

Michael W. Powell

THE FRONT OF THIS CHECK MUST BE PRESENTED TO THE BANK TO CASH IT

Check # 34592, Posted 11/04/14, Amount 6,230.00

FRB CLEVELAND
0410-3603-J
US Treas DG - OTCNET
11/03/2014

FOR DEPOSIT ONLY
Check # 34592, Posted 11/04/14, Amount 6,230.00

FCM/LS0451800

Check # 34592, Posted 11/04/14, Amount 6,230.00

(b)(4)



Notice of Entry of Appearance
as Attorney or Accredited Representative
Department of Homeland Security

DHS
Form G-28
OMB No. 1615-0105
Expires 02/29/2016

Part 1 Information About Attorney or Accredited Representative

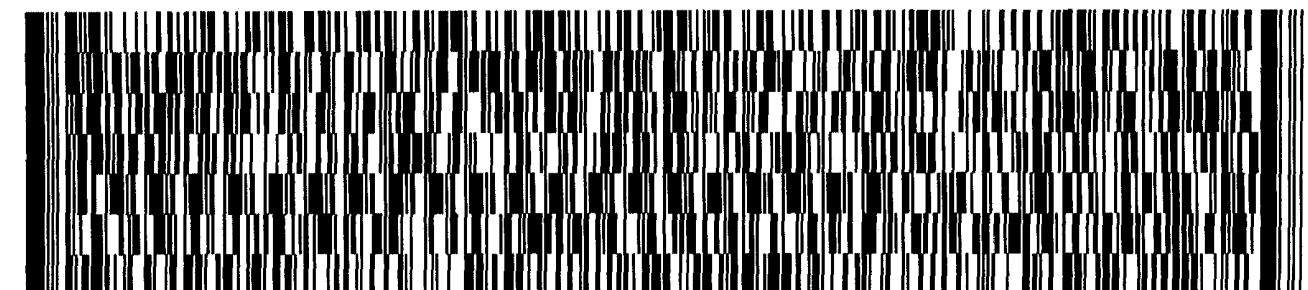
Name and Address of Attorney or Accredited Representative

1.a. Family Name (Last Name) HAYDEN
1.b. Given Name (First Name) RONALD
1.c. Middle Name GREGORY
2. Name of Law Firm or Recognized Organization
RKJ LEGAL LTD
3. Name of Law Student or Law Graduate
4. State Bar Number 06199069
5.a. Street Number 1 N
5.b. Street Name LA SALLE ST
5.c. Apt. ☐ Ste. ☒ Flr. ☐ 1515
5.d. City or Town CHICAGO
5.e. State IL 5.f. Zip Code 60602
5.g. Postal Code
5.h. Province
5.i. Country USA
6. Daytime Phone Number (3 1 2) 3 6 8 - 8 7 0 0
7. E-Mail Address of Attorney or Accredited Representative
rh@rkjlegal.com

Part 2 Eligibility Information For Attorney or Accredited Representative

(Check applicable item(s) below)

1. ☒ I am an attorney eligible to practice law in, and a member in good standing of, the bar of the highest court(s) of the following State(s), possession(s), territory(ies), commonwealth(s), or the District of Columbia.
1.a. ILLINOIS
1.b. I (choose one) ☒ am not ☐ am subject to any order of any court or administrative agency disbaring, suspending, enjoining, restraining, or otherwise restricting me in the practice of law. (If you are subject to any order(s), explain fully in the space below.)
1.b.1.
2. ☐ I am an accredited representative of the following qualified nonprofit religious, charitable, social service, or similar organization established in the United States, so recognized by the Department of Justice, Board of Immigration Appeals pursuant to 8 CFR 292.2. Provide the name of the organization and the expiration date of accreditation.
2.a. Name of Recognized Organization
2.b. Date Accreditation expires (mm/dd/yyyy) ►
3. ☐ I am associated with
3.a.
the attorney or accredited representative of record who previously filed Form G-28 in this case, and my appearance as an attorney or accredited representative is at his or her request. If you check this item, also complete number 1 (1.a. - 1.b.1.) or number 2 (2.a. - 2.b.) in Part 2 (whichever is appropriate).
4. ☐ I am a law student or law graduate working under the direct supervision of the attorney or accredited representative of record on this form in accordance with the requirements in 8 CFR 292.1(a)(2)(iv).



Part 3: Notice of Appearance as Attorney or Accredited Representative

This appearance relates to immigration matters before (select one):

1. ☒ USCIS - List the form number(s)

1.a. I-924

2. ☐ ICE - List the specific matter in which appearance is entered

2.a.

3. ☐ CBP - List the specific matter in which appearance is entered

3.a.

I hereby enter my appearance as attorney or accredited representative at the request of:

4. Select only one: ☒ Applicant ☐ Petitioner
☐ Respondent (ICE, CBP)

Name of Applicant, Petitioner, or Respondent

5.a. Family Name (Last Name)

5.b. Given Name (First Name)

5.c. Middle Name

5.d. Name of Company or Organization, if applicable

LASALLE ST REGIONAL CENTER LLC

NOTE: Provide the mailing address of Petitioner, Applicant, or Respondent and not the address of the attorney or accredited representative, **except when a safe mailing address is permitted** on an application or petition filed with Form G-28.

6.a. Street Number and Name 1 N LASALLE STREET

6.b. Apt. ☐ Ste. ☒ Flr. ☐ 1515

6.c. City or Town CHICAGO

6.d. State IL 6.e. Zip Code 60602

7. Provide A-Number and/or Receipt Number

Pursuant to the Privacy Act of 1974 and DHS policy, I hereby consent to the disclosure to the named Attorney or Accredited Representative of any record pertaining to me that appears in any system of records of USCIS, ICE, or CBP.

8.a. Signature of Applicant, Petitioner, or Respondent

8.b. Date (mm/dd/yyyy) 10/29/2014

Part 4: Signature of Attorney or Accredited Representative

I have read and understand the regulations and conditions contained in 8 CFR 103.2 and 292 governing appearances and representation before the Department of Homeland Security. I declare under penalty of perjury under the laws of the United States that the information I have provided on this form is true and correct.

1. Signature of Attorney or Accredited Representative

2. Signature of Law Student or Law Graduate

3. Date (mm/dd/yyyy) 10/29/2014

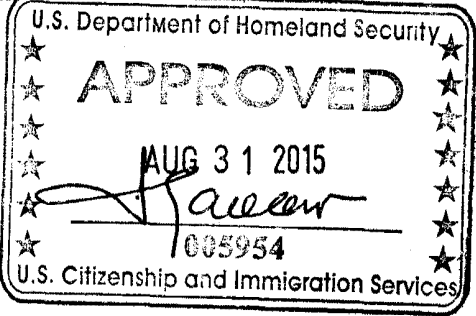

Part 5: Additional Information

1.

Department of Homeland Security
U.S. Citizenship and Immigration Services

**Form I-924, Application for Regional Center
Under the Immigrant Investor Pilot Program**

Do Not Write in This Block - for USCIS Use Only (except G-28 block below)

<p>Action Block</p> 	<p>1 </p> <p>RCW1430451950</p> <p>maging 1924 10/31/2014</p> <p><input checked="" type="checkbox"/> G-28 attached</p> <p>Attorney's State License No. Illinois 6199069</p>
--	--


Part 1. Information About Principal of the Regional Center

Name: Last	First	Middle
Reschke	Michael	W

C/O: **LaSalle Street Regional Center, LLC**

Street Address/P.O. Box: **120 N. LaSalle Street, Suite 3200**

City: Chicago	State: IL	Zip Code: 60602
----------------------	------------------	------------------------

Date of Birth (mm/dd/yyyy): 	Fax Number (include area code): NA	Telephone Number (include area code): 3129174207
---	---	---

Web site address: **NA**

Part 2. Application Type (Check one)

- ☒ a. Initial Application for Designation as a Regional Center
- ☐ b. Amendment to an approved Regional Center application. Note the previous application receipt number, if any (also attach the Regional Center's previous approval notice): _____

Part 3. Information About the Regional Center

(Use a continuation sheet, if needed, to provide information for additional management companies/agencies, Regional Center principals, agents, individuals or entities who are or will be involved in the management, oversight, and administration of the regional center.)

A. Name of Regional Center: **LaSalle Street Regional Center, LLC**

Street Address/P.O. Box: **120 N. LaSalle Street, Suite 3200**

City: Chicago	State: Illinois	Zip Code: 60602
Web site address: NA	Fax Number (include area code): NA	Telephone Number (include area code): 3129174207

REC'D 10/31/2014 10:50 AM

(b)(6)



RCW1430451950

maginger 1924 10/31/2014



RCW1430451950

maginger 1924 10/31/2014

RONALD GREGORY HAYDEN
RE: MICHAEL W RESCHKE
1 N LA SALLE ST STE 1515
CHICAGO IL 60602

RONALD GREGORY HAYDEN
RE: MICHAEL W RESCHKE
1 N LA SALLE ST STE 1515
CHICAGO IL 60602

Part 3. Information About the Regional Center (Continued)

B. Name of Managing Company/Agency: N/A

Street Address/P.O. Box:

City:

State:

Zip Code:

Web site address:

Fax Number (include area code):

Telephone Number (include area code):

C. Name of Other Agent: N/A

Street Address/P.O. Box:

City:

State:

Zip Code:

Web site address:

Fax Number (include area code):

Telephone Number (include area code):

D. Continuation, if needed, to provide information for additional management companies/agencies, regional center principals, agents, individuals or entities who are or will be involved in the management, oversight, and administration of the regional center.)

Please See the Operational Plan for LaSalle Street Regional Center, LLC, at Exhibit 2.

Part 3. Information About the Regional Center *(Continued)*

Note: If extra space is needed to complete any item, attach a continuation sheet, indicate the item number, and provide the response.

1a. Describe the structure, ownership and control of the regional center entity.

Please see the Operational Plan for LaSalle Street Regional Center, LLC, at Exhibit 2.

b. Date the Regional Center was established(mm/dd/yyyy): 09/09/2014

c. Organization Structure for the Regional Center:

- ☐ 1. Agency of a U.S. State or Territory (identify) _____
- ☐ 2. Corporation
- ☐ 3. Partnership (including Limited Partnership)
- ☒ 4. Limited Liability Company (LLC)
- ☐ 5. Other (Explain) _____

2. Has this regional center's designation ever been formally terminated by USCIS, or has the regional center ever filed a Form I-924 or regional center proposal or amendment that was denied?

☒ No ☐ Yes - Attach a copy of the adverse decision, with an explanation, the date of decision, and case number, if any.

3. Describe the geographic area of the regional center. **Note:** This area must be contiguous. Provide a map of the geographic area.

Please see the Operational Plan for LaSalle Street Regional Center, LLC, at Exhibit 2, which contains both a description and a map.

4. Describe the regional center's administration, oversight, and management functions that are or will be in place to monitor all EB-5 capital investment activities and the allocation of the resulting jobs created or maintained under the sponsorship of the regional center.

Please see the Operational Plan for LaSalle Street Regional Center, LLC, at Exhibit 2.

Part 3. Information About the Regional Center (Continued)

5. Describe the past, current, and future promotional activities for the regional center. Include a description of the budget for this activity, along with evidence of the funds committed to the regional center for promotional activities. Submit a plan of operation for the regional center that addresses how EB-5 investors will be recruited, the method(s) by which the capital investment opportunities will be offered to the investors, and how they will subscribe or commit to the investment interest.

Please see the Operational Plan for LaSalle Street Regional Center, LLC at Exhibit 2.

6. Describe whether and how the regional center is engaged in supporting a due diligence screening of its alien investor's lawful source of capital and the alien investor's ability to fully invest the requisite amount of capital. Also, describe the regional center's prospective plans in this regard if they differ from past practice.

Please see the Operational Plan for LaSalle Street Regional Center, LLC at Exhibit 2.

7. Identify each industry that has or will be the focus of EB-5 capital investments sponsored through the regional center.

Industry Category Title:

Nonresidential Building Construction

NAICS Code for the Industry Category:

2362

Is the Form I-924 application supported by an economic analysis and underlying business plan for the determination of prospective EB-5 job creation through EB-5 investments in this industry category?

☐ No - Attach an explanation

☒ Yes

Industry Category Title:

Architectural, Engineering, and Related Services

NAICS Code for the Industry Category:

5413

Is the Form I-924 application supported by an economic analysis and underlying business plan for the determination of prospective EB-5 job creation through EB-5 investments in this industry category?

☐ No - Attach an explanation

☒ Yes

Industry Category Title:

Traveler Accommodation

NAICS Code for the Industry Category:

3359

Is the Form I-924 application supported by an economic analysis and underlying business plan for the determination of prospective EB-5 job creation through EB-5 investments in this industry category?

☐ No - Attach an explanation

☒ Yes

Part 3. Information About the Regional Center *(Continued)*

8a. Describe and document the current and/or prospective structure of ownership and control of the commercial entity(s) in which the EB-5 alien investors have or will make their capital investments.

Please see the Operational Plan for LaSalle Street Regional Center, LLC at Exhibit 2.

b. Date commercial enterprise established, if any (mm/dd/yyyy): 09/15/2014

c. Organization Structure for commercial enterprise:

- ☐ 1. Corporation
- ☒ 2. Partnership (including Limited Partnership)
- ☐ 3. Limited Liability Company (LLC)
- ☐ 4. Other (Explain) _____

d. Has or will the Regional Center or any of its principals or agents have an equity stake in the commercial enterprise?

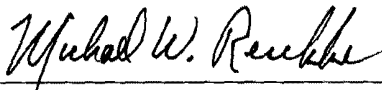
- ☐ No ☒ Yes - Attach an explanation and documentation that outlines when and under what circumstances these remittances will be paid.

e. Has or will the Regional Center or any of its principals or agents receive fees, profits, surcharges, or other like remittances through EB-5 capital investment activities from this commercial enterprise, beyond the minimum capital investment threshold required of the EB-5 alien entrepreneurs?

- ☐ No ☒ Yes - Attach an explanation and documentation that outlines when and under what circumstances these remittances will be paid.

Part 4. Applicant Signature *Read the information on penalties in the instructions before completing this section. If someone helped you prepare this petition, he or she must compete Part 5.*

I certify, under penalty of perjury under the laws of the United States of America, that this form and the evidence submitted with it are all true and correct. I authorize the release of any information from my records that U.S. Citizenship and Immigration Services needs to determine eligibility for the benefit being sought. I also certify that I have authority to act on behalf of the Regional Center.

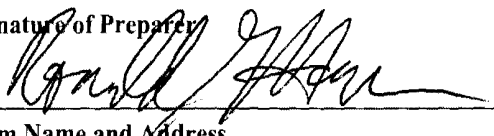
Signature of Applicant 	Daytime Phone Number <i>(Area/Country Codes)</i> 3129174207	Date (mm/dd/yyyy) 10/30/14
Printed Name of Applicant Michael W. Reschke	E-Mail Address mreschke@primegroupinc.com	
Relationship to the Regional Center Entity (Managing Member, President, CEO, etc.) Chairman and CEO		

Part 5. Signature of Person Preparing This Form, If Other Than Above (Sign Below)

I declare that I prepared this application using information provided by someone with authority to act on behalf of the Regional Center, and the answers and information provided by the Regional Center.

Attorney or Representative: In the event of a Request for Evidence (RFE), may the USCIS contact you by Fax or E-mail?

☐ No ☒ Yes

Signature of Preparer 		Printed Name of Preparer Ron Hayden	Date (mm/dd/yyyy) 10/30/2014
Firm Name and Address RKJ Legal, Ltd. 1 North La Salle Street, Ste. 1515 Chicago Illinois 60602			
Daytime Phone Number (Area/Country Codes)	Fax Number (Area/Country Codes)	E-Mail Address	
3123688700	3123680276	rh@rkjlegal.com	

Addendum

Form: I-924 (Page 1)

Part 3, Question 8.d.:

Please see the Operational Plan for LaSalle Street Regional Center, LLC, at Exhibit 2. 

(b)(4)

Part 3, Question 8.e.:

Please see the Operational Plan for LaSalle Street Regional Center, LLC (LRSC), at Exhibit 2. 

(b)(4)



ROSENBERG KIM JIMENEZ, LTD.
ATTORNEYS AT LAW

October 30, 2014

Kathy Baran
Director, California Service Center
U.S. Citizenship & Immigration Services
24000 Avila Road, 2nd Floor
Laguna Niguel, CA 92677-8111

**Re: Initial Application for Regional Center
Designation of LaSalle Street Regional
Center, LLC**

**Hypothetical Project: RCP Hotel EB5
Investors, LP**

Dear Ms. Baran:

Submitted pursuant to 8 C.F.R. § 204.6(m) is an EB-5 regional center application for LaSalle Street Regional Center, LLC ("LSRC") to participate in the immigrant investor pilot program as a USCIS-approved regional center. A signed G-28 attorney representation form is included.

LSRC will attract investment to the greater Chicago, Illinois, and will focus its investment activities in various construction and hotel-related industries as described below. Although the project exists, this letter and the attached exhibits include a general proposal and economic impacts report for a **hypothetical** project that will capitalize job-creating entities in Chicago, Illinois.

1.0 OWNERSHIP, CONTROL AND STRUCTURE OF LSRC

1.1 Request for Regional Center Designation

Mr. Michael Reschke, the chairman and CEO of LSRC, has formally requested that USCIS designate LSRC as a regional center. (**Exhibit ("Ex.") 1.**)

1.2 Regional Center Ownership, Principals and Management

(b)(4) This request and LSRC's Operational Plan describe the ownership and management of LSRC. LSRC is a limited liability company wholly-owned by The Prime Group, Inc. The Prime Group, Inc. is in turn owned by Michael Reschke [REDACTED], David Trandel [REDACTED], Scott C. Morgan [REDACTED], Warren John [REDACTED], and Edward John [REDACTED].

Ex. 2 LSRC's Operational Plan

Ex. 3 LSRC's Articles of Organization for LaSalle Street Regional Center, LLC and EIN Assignment

Ex. 4 LSRC Operating Agreement

LSRC will be managed by Michael Reschke, Mark Cynkar, Jeffrey Breaden, and Neil Stempel. Their respective titles and duties are described in **Exhibit 2**, the Operational Plan. LSRC's owner and managers have extensive experience in commercial real estate investment and development, including hotels. (**Ex. 2 pp. 7-9.**)

No other agents or entities are involved in the management, administration, or oversight of LSRC. LSRC has retained consultants specializing in business, immigration, and regional economics as listed in the Operational Plan. (**Ex. 2 pp. 9-11.**)

1.3 Point of Contact

Mr. Mark Cynkar will be the point of contact for LSRC as described in the Operational Plan. (**Ex. 2 p. 11.**)

1.4 Organizational Structure

LSRC is a Limited Liability Company, as shown by its registration and operating documents at **Exhibits 3 and 4**.

LSRC's organizational structure is described in its Operational Plan at **Exhibit 2, page 4-5**.



2.0 GEOGRAPHIC REGION AND INDUSTRIES

As fully described and mapped in LSRC's Operational Plan at **Exhibit 2 pages 2-3**, LSRC will create and operate commercial enterprises in 14 counties in the Chicago-Naperville-Elgin MSA: Cook County, DeKalb County, DuPage County, Grundy County, Kane County, Kendall County, Lake County, McHenry County, Will County, Jasper County, Lake County, Newton County, Porter County, and Kenosha County.

LSRC seeks approval in the following industrial categories as described in Mr. Michael Reschke's statement at **Exhibit 1 page 1** and the Operational Plan at **Exhibit 2 pp 5-6**:

<u>NAICS Code</u>	<u>Definition</u>
2362	Nonresidential Building Construction
5413	Architectural, Engineering, and Related Services
7211	Traveler Accommodations

LSRC will focus its investment activities in these industries, as demonstrated by its hypothetical project, discussed below.

3.0 JOB CREATION

(b)(4)

As explained below, the hypothetical new commercial enterprise, RCP Hotel EB5 Investors, LP, will loan EB-5 capital to a job-creating entity, RCP Hotel Owner, LLC, which will create a total of [REDACTED] jobs. According to the Overall Business Plan at **Exhibit 5**, RCP Hotel EB5 Investors LP, will only accept up to [REDACTED] from up to [REDACTED] EB-5 investors, ensuring that sufficient jobs are created as it will leave a buffer of [REDACTED] of jobs.

3.1 LSRC's hypothetical project: RCP Hotel EB5 Investors, LP

USCIS's memorandum titled "EB-5 Adjudications Policy," dated May 30, 2013 ("USCIS EB-5 Policy Memo"), states the following about regional center applications based on hypothetical projects:

The level of verifiable detail required for a Form I-924 to be approved and provided deference may vary depending on the nature of the Form I-924 filing. If the Form I-924 projects are "hypothetical" projects, general proposals and general predictions may be sufficient to determine that the proposed regional center will more likely than not promote economic growth, improved regional productivity, job creation, and increased domestic capital investment.

USCIS EB-5 Policy Memo at 14 (emphasis added).

(b)(4)

LSRC has prepared an overall business plan that qualifies as the requisite general proposal with general predictions based on a hypothetical project. This project consists of a new commercial enterprise, RCP Hotel EB5 Investors, LP, which will loan [REDACTED] in EB-5 capital from [REDACTED] EB-5 investors to a job-creating entity: RCP Hotel Owner, LLC. The JCE will be located in Chicago, Illinois. (**Ex. 5.**) This hypothetical project is located in a targeted employment area ("TEA"), although future projects may be. As this project is located in a TEA, the required investment for foreign investors is reduced to \$500,000 each. (**Ex. 6.**) If

LSRC engages in future projects that are not located in TEAS, it will require foreign investors to invest a minimum of \$1.0 million each.

Ex. 5 RCP Hotel EB Investors, LP Overall Business Plan

3.2 The RIMS II Economical Analysis

An economic analysis prepared by Paul Scheuren, principal and economist at Impact DataSource in Austin, Texas, forecasts total job creation of jobs from EB-5 investment. (b)(4)

Ex. 6 An EB-5 Economic Analysis of the Luxury Lifestyle Hotel within the proposed LaSalle Street Regional Center, LLC by Impact DataSource

3.2.1 Employment Forecast Year and Geographic Scope of Multipliers

The economic impacts report uses RIMS II, and forecasts job creation for 2017. (Ex. 6 pp. 17, 28-29.) The geographic scope of the multipliers is the 14-county regional center geographic area. (Ex. 6 pp. 3, 7-8.)

3.2.2 Inputs into the RIMS II Model and the Resulting Forecast

Construction, architectural and engineering expenditures and operational revenues from the job-creating entity constituted the inputs to the RIMS II model to forecast job creation, as provided in the economic impacts report. (Ex. 6 pp. 24-30.)

The expenditures and revenues are provided in the general proposal. (Ex. 5 pp. 6- 8, 27-31.) These figures were deflated using the price data from the Bureau of Economic Analysis (Ex. 6 pp. 22-23.) Projected revenues for the calendar year 2017 were used as inputs to obtain operational jobs. (Ex. 6 p. 28.)

Impact Summary

Activity (NAICS)	Employment	Economic Output	Household Earnings
Nonresidential Building Construction (2362)*	<div>(b)(4)</div>		
Architectural, engineering & related svcs (5413)*			
Hotels and motels, including casino hotels (7211)			
Total			
* Indirect and induced effects only.			
Note: Total may not sum due to rounding.			

3.2.3 Verifiable Detail and Comparison to Industry Standards

(b)(4)




4.0 MONITORING EB-5 INVESTMENT ACTIVITIES AND JOB ALLOCATION

LSRC will take extensive measures to ensure proper use of EB-5 capital and monitor job creation, as detailed in its Operational Plan. (Ex. 2 pages 12-14.)

4.1 PROMOTIONAL ACTIVITIES AND DUE DILIGENCE



4.1.1 Investor Recruitment

LSRC's Operational Plan at **Exhibit 2** describes how it will recruit EB-5 investors and promote its investment projects overseas. 

(b)(4)

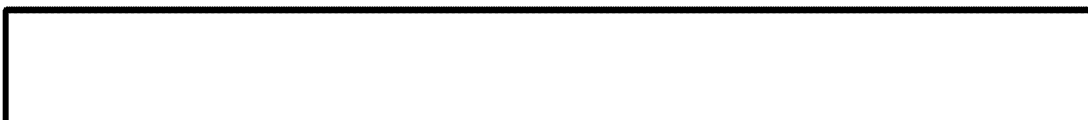


(b)(4)

An operational budget for LSRC's first year is in the Operational Plan at **Exhibit 2 p. 18**. LSRC's owner has contributed approximately  of start-up capital to LSRC. (Ex. 1 p. 3 and attachment; Ex. 2 pp. 17-18.) LSRC's future operating costs will be covered by an administrative services fee of between  that will be charged to each respective EB-5 investor separate and in addition to each respective investor's EB-5 capital investment of \$500,000. (Ex. 1 p. 2; Ex. 2 p. 5.)

4.2 Due Diligence - Lawful Sources of Funds

(b)(4)



The investment procedure for EB-5 investors is itself designed to ensure that EB-5 investors' funds derive from lawful sources. The Operational Plan describes LSRC's due diligence procedures, which include educating EB-5 investors about USCIS's requirement that all EB-5 capital come from lawful sources and the documentation required to prove these lawful sources. (Ex. 2 pp. 12- 14.)

5.0 THE PROSPECTIVE IMPACT OF LSRC's CAPITAL INVESTMENT PROJECTS

A general prediction addressing the prospective regional impact of LSRC's commercial enterprises is provided in the economic analysis by Paul Scheuren, an economist and principal at Impact DataSource. [REDACTED]

(b)(4)

[REDACTED] (Ex. 6 pp. 25-30.)

6.0 STRUCTURE, OWNERSHIP, AND CONTROL OF LSRC'S FIRST HYPOTHETICAL COMMERCIAL ENTERPRISE: RCP Hotel EB5 Investors, LP

LSRC's first commercial enterprise, RCP Hotel EB5 Investors, LP, will be a limited partnership governed by the Illinois Uniform Limited Partnership Act. EB-5 investors will be the limited partners in RCP Hotel EB5 Investors, LP which may also accept non-EB-5 capital. LSRC will be the sole general partner in RCP Hotel EB5 Investors, LP (Ex. 2 pp. 1, 3-5.)

7.0 CONCLUSION

The preponderance of the evidence demonstrates that LSRC's application for regional center designation under the Immigrant Investor Pilot Program meets all statutory requirements as well as all the regulatory requirements pursuant to 8 C.F.R. § 204.6(m).

I therefore respectfully request that USCIS favorably consider this application from LSRC and designate LSRC as an approved regional center for the geographic area, industrial category, and RIMS II economic methodology described in its Operational Plan, economic impacts report, and additional documentation.

Sincerely,



Ron Hayden

EXHIBIT LIST

LaSalle Street Regional Center, LLC ("LSRC")

- 1 Statement of Mr. Michael Reschke with bank statement for LSRC's account (October 28, 2014)
- 2 LSRC's Operational Plan (October 28, 2014)
- 3 LSRC Articles of Organization (Apr. 28, 2014)
- 4 Operating Agreement for LaSalle Street Regional Center, LLC (September, 2014)
- 5 RCP Hotel EB5 Investors, LP Overall Business Plan (October, 2014)
- 6 An EB-5 Economic Analysis of the Luxury Lifestyle Hotel within the proposed LaSalle Street Regional Center, LLC by Impact DataSource (October 28 , 2014)



ROSENBERG KIM JIMENEZ, LTD.
ATTORNEYS AT LAW

December 16, 2014

Kathy Baran
Director, California Service Center
U.S. Citizenship & Immigration Services
24000 Avila Road, 2nd Floor
Laguna Niguel, CA 92677-8111

**Re: Application for Regional Center
Designation of LaSalle Street Regional
Center, LLC,
ID1430451950
Receipt No. RCW1430451950**

Dear Ms. Baran:

On October 31, 2014, we submitted form I-924, an EB-5 regional center application for LaSalle Street Regional Center, LLC ("LSRC") to participate in the immigrant investor pilot program as a USCIS-approved regional center. My signed G-28 attorney representation form was included.

In reviewing the file, we discovered a number of typographical and other clerical errors in certain documents. Enclosed please find an updated Operational Plan and an updated Overall Business Plan. Please insert these as replacement Exhibits 2 and 4, respectively, as referenced by the Exhibit list that was attached to the original transmittal letter that accompanied the I-924 filing. A copy of that Exhibit List is also attached hereto.

Thank you very much.

Sincerely,

Ron Hayden

EXHIBIT LIST

LaSalle Street Regional Center, LLC ("LSRC")

- 1 Statement of Mr. Michael Reschke with bank statement for LSRC's account (October 28, 2014)
- 2 LSRC's Operational Plan (October 28, 2014)
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- 5 RCP Hotel EB5 Investors, LP Overall Business Plan (October, 2014)
- 6 An EB-5 Economic Analysis of the Luxury Lifestyle Hotel within the proposed LaSalle Street Regional Center, LLC by Impact DataSource (October 28 , 2014)

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

RECEIPT NUMBER RCW1430451950		CASE TYPE 1924 Application for Regional Center Under the Immigrant Investor Pilot Program
RECEIVED DATE October 31, 2014	APPLICATION TYPE: A (INITIAL)	REGIONAL CENTER NAME LASALLE STREET REGIONAL CENTER LLC
NOTICE DATE October 31, 2014	PAGE 1 of 1	REGIONAL CENTER ID ID1430451950
RONALD GREGORY HAYDEN RKJ LEGAL LTD RE: LASALLE STREET REGIONAL CENTER LLC 1 N LA SALLE ST STE 1515 CHICAGO IL 60602		NOTICE TYPE: Receipt Notice

C30264

Receipt Notice - This notice confirms that USCIS has accepted your "Application for Regional Center Under the Immigrant Investor Pilot Program" (Form I-924) for processing. This notice does not grant any immigration status or benefit. ~~This notice does not grant any immigration status or benefit.~~

Processing Time - The current processing time for this type of case is estimated at 120 days. Unlike many other USCIS case types, verification or tracking of this case is not available on our website. We will notify you by mail when we make a decision on this case or if we need further evidence to establish your eligibility for the regional center designation.

Unique Identifier - In the top portion of this Notice, you will find a unique identifier that has been assigned to your Form I-924. Unlike a receipt number which changes with every filing, this unique identifier is permanently assigned to your approved or prospective regional center, and will be associated with any future request to amend the regional center. Please refer to your regional center's unique identifier as well as to the Form I-924 receipt number in all subsequent correspondence with USCIS regarding this application.

E-Mail Communication Regarding Your Pending Form I-924 Application - USCIS has established a direct e-mail communication tool to facilitate communication between USCIS and those applicants with pending Form I-924s. Form I-924 applicants may use the e-mail communication process to correspond with USCIS regarding pending Form I-924 applications, to include questions that may arise if USCIS issues a Request for Evidence (RFE) or a Notice of Intent to Deny (NOID). USCIS may also reach out to Form I-924 applicants via e-mail to informally ask for clarification on certain issues in order to facilitate USCIS' review, understanding, and adjudication of the Form I-924 application. USCIS may also e-mail a courtesy copy of the RFE or NOID to the e-mail address listed on the I-924 and, if applicable, to the e-mail address listed on the Form G-28 associated with the application.

Please use the following table to determine which email address has been assigned to your Form I-924.

If your unique identifier ends in the number:	Then please utilize this email address:
0, 1, or 2	CSC-EB5-RCID0-2@dhs.gov
3, 4, or 5	CSC-EB5-RCID3-5@dhs.gov
6 or 7	CSC-EB5-RCID6-7@dhs.gov
8 or 9	CSC-EB5-RCID8-9@dhs.gov

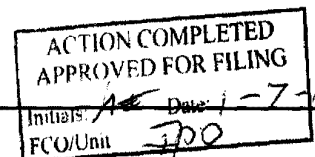
Example: If a regional center's unique identifier is IDxxxxxxx0, then the regional center's Form I-924 has been assigned to email account CSC-EB5-RCID0-2@dhs.gov, as the unique identifier ends in "0".

E-Mail "Subject Line" Advisory - Please ensure that the subject line in your email correspondence contains the following information in this order: (1) Regional Center Unique Identifier; (2) Receipt Number; (3). Regional Center Name. Doing so will facilitate USCIS' timely handling of and response to your email correspondence.

E-mail Scope - This e-mail communication tool is to be used solely to facilitate communication between applicants with a pending Form I-924 and USCIS. The scope of the communication must relate to matters concerning the pending Form I-924. The direct e-mail communication initiative is not a forum for general policy and legal questions about adjudicative procedures or decisions, or for questions relating to either "Immigrant Petition by Alien Entrepreneur" (Form I-526), "Petition by Entrepreneur to Remove Conditions" (Form I-829), or any "Appeal or Motion" (Form I-290B). USCIS will not respond to e-mails received concerning issues unrelated to the currently pending Form I-924. For more information about how to make other EB-5 inquiries, visit the EB-5 Inquiries page on the USCIS website (www.uscis.gov). USCIS will not respond to e-mails received concerning issues unrelated to the currently pending Form I-924 via this email communication process.

General Questions - USCIS has a page entitled EB-5 Inquiries at www.uscis.gov that outlines how the public may make other inquiries on EB-5 related matters, to include inquiries that you may have after the Form I-924 has been adjudicated. This page clarifies the EB-5 inquiries that are appropriate to send to the general EB-5 mailbox (at uscis.immigrantinvestorprogram@dhs.gov), and other avenues that can be used to send questions or inquiries to USCIS that are not suitable for the general EB-5 mailbox.

Attorney Or Accredited Representative - If a valid Form G-28 is associated with the Form I-924, USCIS will need to have a viable Form G-28 e-mail address for the legal representative in order to use the e-mail process to correspond with the Form I-924 applicant. If a valid Form G-28 is associated with the Form I-924 applicant, but USCIS does not have a viable Form G-28 e-mail address, then one will need to be obtained prior to USCIS sending any out-going e-mail correspondence to the applicant which discuss issues related to the Form I-924. In such circumstance, the legal representative should provide an updated Form G-28 with a valid e-mail address by sending a pdf of a fully executed Form G-28 to the EB-5 mailbox at uscis.immigrantinvestorprogram@dhs.gov.



Please see the additional information on the back. You will be notified separately about any other cases you filed.

U.S. CITIZENSHIP & IMMIGRATION SVC
CALIFORNIA SERVICE CENTER
P.O. BOX 30111
LAGUNA NIGUEL CA 92607-0111
Customer Service Telephone: (800) 375-5283

JAN 06 2015





U.S. Citizenship
and Immigration
Services

Date: 12/18/14.

RON HAYDEN
ROSENBERG KIM JIMENEZ LTD
C/O LASALLE STREET REGIONAL CENTER LLC
1 NORTH LASALLE ST STE 1515
CHICAGO IL 60602



File No.: N/A
Form No: _____

Dear Sir/Madam:

We are unable to identify the application petition about which you are inquiring. Please provide the information in the blanks below and return it to us along with proof of filing (front and back copy of cashed check or money order).

~~WAC#~~ _____ or ~~XPW#~~ _____ or

~~WSC#~~ _____ RCW 1430451950

A# _____ Form # or form type 1-924

Complete Name LaSalle Street Regional Center LLC Date of Birth _____

Date of Filing 10/31/2014

Once you have filled in the information as completely as possible, please return it as the first page of your package, along with any other information you may have which will help us answer your inquiry, to the following address:

United States Citizenship and Immigration Services (USCIS)
California Service Center (CSC)
P.O. Box 30111
Laguna Niguel, CA 92607-0111

Sincerely,

SERVICE CENTER DIRECTOR

C30264

ID# _____
USCIS Conc. _____
4-1 04 ID app

www.uscis.gov

The location of LSRC's first hypothetical project is located in a targeted economic area ("TEA"). For projects located in TEAs, the required minimum investment from EB-5 investors is reduced to \$500,000. Accordingly, LSRC's first hypothetical project will require a minimum \$500,000 investment. For any future projects that are not located in TEAs, LSRC will require a minimum \$1,000,000 EB-5 investment from each EB-5 investor. Should LSRC undertake future projects located within a TEA, those projects will require only a \$500,000 investment from EB-5 investors.

LSRC commenced operations with [REDACTED] These funds were contributed by (b)(4)
The Prime Group, Inc., owner of LSRC. [REDACTED] These
funds are from the operation of The Prime Group, Inc., an Illinois corporation
founded in 1980.

10/30/2014
Date

Michael W. Reschke
Michael W. Reschke



Completed Wire Details

Debit Information

Wire type: Domestic wire
Account: THE PRIME GROUP INC - OPER - *0131
Security code:
Effective date: 10/27/2014
Amount: [REDACTED] (b)(4)
Currency: USD
Entered by: LSMITH
Entry date/time: 10/27/2014 03:00:14 PM (ET)
Transmitted by: MBERGMAN
Transmit date/time: 10/27/2014 03:07 PM (ET)
Status: CONFIRMED
Confirmation number: 3593926293
Reference number: [REDACTED] (b)(4)

Recipient Information

Bank ID type: ABA
Bank ID: [REDACTED] (b)(4)
Recipient account:
Bank name: JPMORGAN CHASE BANK, NA
Bank address 1: CHICAGO
Bank address 2: IL
Bank address 3:
Recipient name: LASALLE STREET REGIONAL CENTER LLC
Recipient address 1: CHICAGO
Recipient address 2: IL
Recipient address 3:
Additional information for recipient:

First Intermediary Information

Bank ID type:
Bank ID:
Intermediary account:
Bank name:
Bank address 1:
Bank address 2:
Bank address 3:

Second Intermediary Information

Bank ID type:
Bank ID:
Intermediary account:
Bank name:

Bank address 1:

Bank address 2:

Bank address 3:

Wire Initiator Information

Wire initiator name: THE PRIME GROUP, INC
Wire initiator address 1: C/O THE PRIME GROUP, INC
Wire initiator address 2: 120 N LASALLE ST SUITE 3200
Wire initiator address 3: CHICAGO, IL 606022416

Approval History Information

Approval status: 2 of 2 received

<i>Action</i>	<i>User ID</i>	<i>Date</i>	<i>Time</i>
Enter Request	LSMITH	10/27/2014	03:00:14 PM (ET)
Approve Request	LSMITH	10/27/2014	03:00:14 PM (ET)
Approve Request	MBERGMAN	10/27/2014	03:07:33 PM (ET)

**STATEMENT OF MR. MICHAEL RESHCKE
CHAIRMAN AND CEO OF
LASALLE STREET REGIONAL CENTER, LLC**

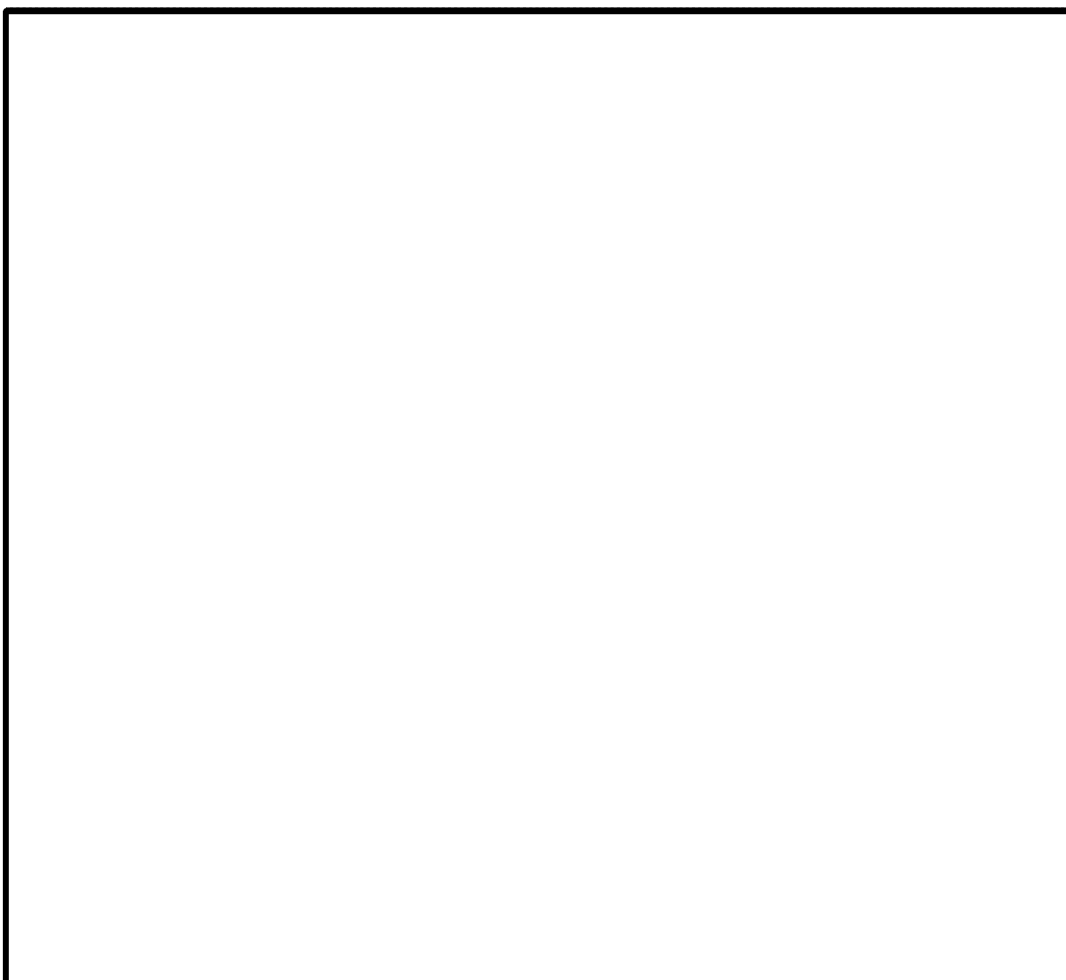
This is a formal request for USCIS designation of LaSalle Street Regional Center, LLC ("LSRC") as a regional center approved for participation in the EB-5 Immigrant Investor Program based on a hypothetical project, RCP Hotel EB5 Investors, LP. RCP Hotel EB5 Investors, LP will accept EB-5 capital and loan it to RCP Hotel Owner, LLC. The LLC may also accept direct EB-5 and non-EB-5 investment.

(b)(4) LSRC is a limited-liability company registered in Illinois, and is owned by The Prime Group, Inc. The Prime Group, Inc. is in turn owned by Michael Reschke [REDACTED], David Trandel ([REDACTED]), Scott C. Morgan ([REDACTED]), Warren John [REDACTED], and Edward John [REDACTED]. Mark Cynkar, Jeffrey Breaden, Neil Stempel, and I will manage and oversee all of LSRC's activities in compliance with EB-5 law and policy. We have extensive experience in commercial real estate investment and development, including hotels, as further outlined in the Operational Plan. We will oversee all of LSRC's activities but may appoint other officers as needed in the future. LSRC has also retained consultants with expertise in securities and immigration law to assist with both securities and immigration compliance.

LSRC's geographic area will consist of the 14 counties in the Chicago-Naperville-Elgin MSA: Cook County, DeKalb County, DuPage County, Grundy County, Kane County, Kendall County, Lake County, McHenry County, Will County, Jasper County, Lake County, Newton County, Porter County, and Kenosha County. LSRC will positively impact the economy of this geographic area by raising capital and sponsoring new commercial enterprises that will create jobs and generate revenue. LSRC will sponsor projects in the NAICS industry categories of 2362: Nonresidential Building Construction; 5413: Architectural, Engineering, and Related Services; and 7211: Traveler Accommodation.

(b)(4)

(b)(4)



LSRC is submitting its first commercial enterprise as a “hypothetical” project. The new commercial enterprise, RCP Hotel EB5 Investors, LP, is a limited partnership. As described in the economic analysis created by Paul Scheuren, principal and economist at Impact DataSource, the project will create [redacted] new jobs from EB-5 investment.

(b)(4)

LSRC and its principals will receive fees and distributions from its projects. LSRC will receive a subscription or administrative fee over and above the EB-5 minimum capital investment of \$500,000. [redacted]

(b)(4)



[redacted]. As general partner, LSRC will have an interest in each of its limited partnerships and will receive distributions. In addition, the general partner will receive an administrative fee of [redacted] from each limited partner upon subscription and an annual asset management fee from the limited partnership. The profits, interests and all fees will be described in the investment and organizational instruments for each limited partnership. [redacted]



***LaSalle Street Regional Center
LLC, Operational Plan***

October 16, 2014

Operational Plan

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Executive Summary

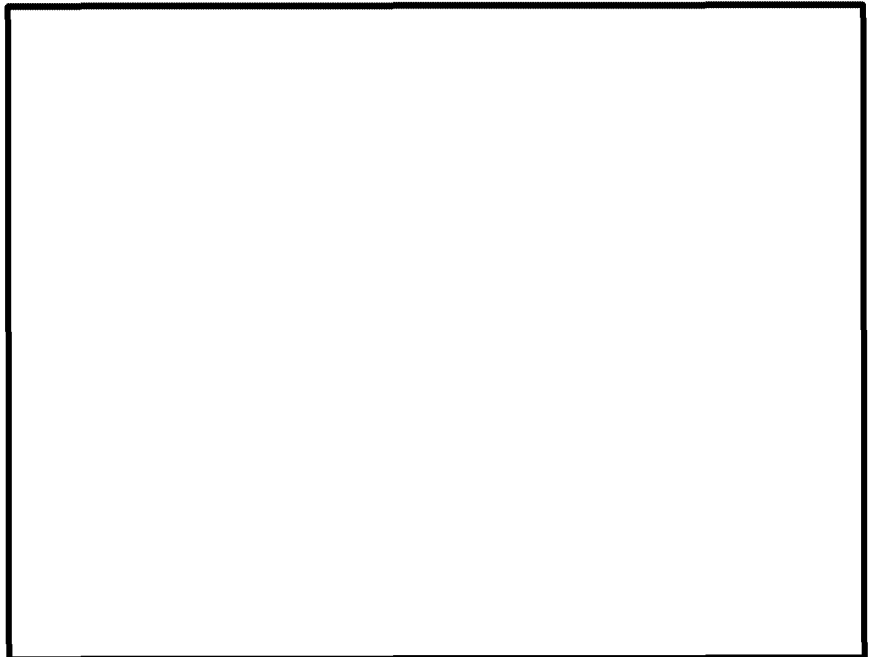
OWNERSHIP AND MANAGEMENT

LSRC is a limited liability company owned by The Prime Group, Inc. ("PGI"). The Prime Group, Inc. is owned by Michael Reschke, David Trandel, Scott Morgan, Warren John, and Edward John. Michael Reschke will serve as the chairman and chief executive officer of LSRC. Mark K. Cynkar will serve as the chief financial officer. Jeffrey P. Breaden will serve as the Senior Vice President. Neil Stempel will serve as the Senior Vice President for Development.

GEOGRAPHIC AREA AND INDUSTRIES

LSRC will create and operate commercial enterprises in the following counties in the Chicago-Naperville-Elgin MSA: Cook County, DeKalb County, DuPage County, Grundy County, Kane County, Kendall County, Lake County, McHenry County, Will County, Jasper County, Lake County, Newton County, Porter County, and Kenosha County. LSRC will sponsor projects in the NAICS industry categories of 2362: Nonresidential Building Construction; 5413: Architectural, Engineering, and Related Services; and 7211: Traveler Accommodation.

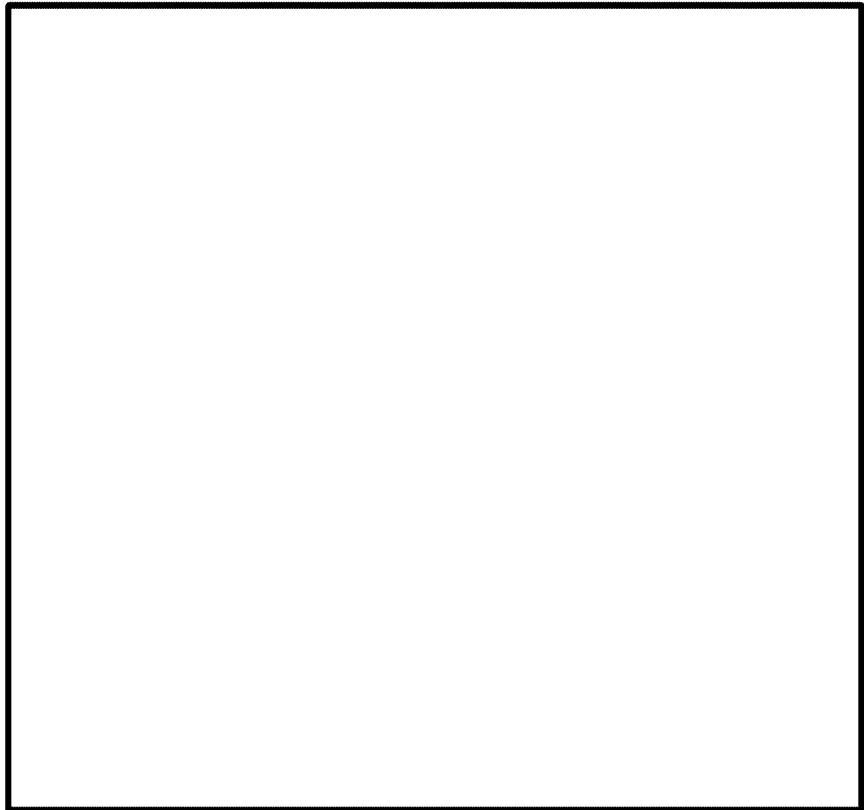
ORGANIZATIONAL STRUCTURE



(b)(4)

DUE DILIGENCE

(b)(4)



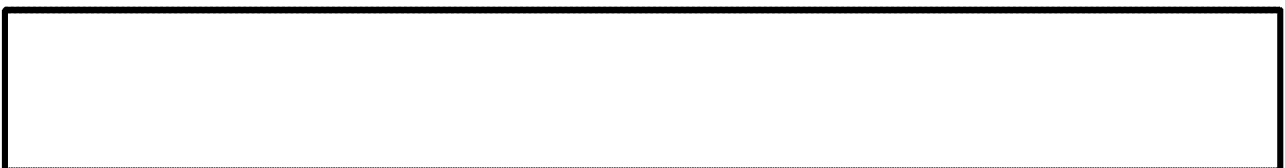
PROMOTIONAL EFFORTS

Regional Center Structure and Industries

Geographic Area

LSRC will attract EB-5 investment in commercial enterprises located in the following counties in the Chicago-Naperville-Elgin MSA: Cook County, DeKalb County, DuPage County, Grundy County, Kane County, Kendall County, Lake County, McHenry County, Will County, Jasper County, Lake County, Newton County, Porter County, and Kenosha County. The following map demonstrates LSRC's geographic area along with the proposed location of the Project:

(b)(4)



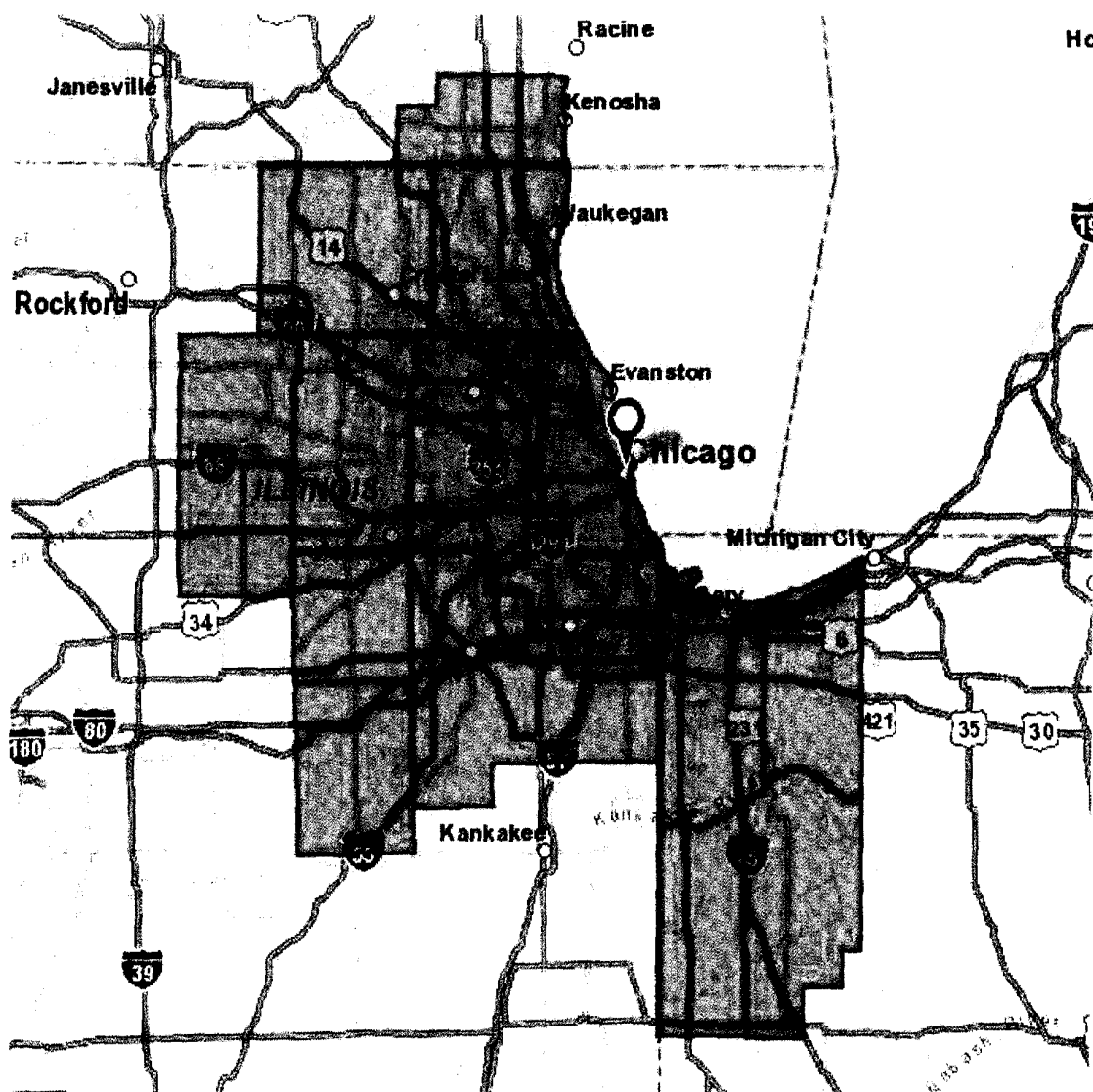


Figure 1: Geographic Area of LaSalle Street Regional Center, LLC

Chicago is located roughly 60 miles from Wisconsin and 25 miles from Indiana. Interstates 90, 90, and 88 are the city's main connections to the greater Chicago area. The functional economy of the Chicago area reasonably includes the counties that make up the Chicago-Naperville-Elgin MSA, as the Chicago area businesses rely on suppliers and business in this 14-county region. The Project will likely rely on suppliers from this 14-county region.

Organizational Structure


(b)(4)



Figure 1: LSRC's organizational structure.

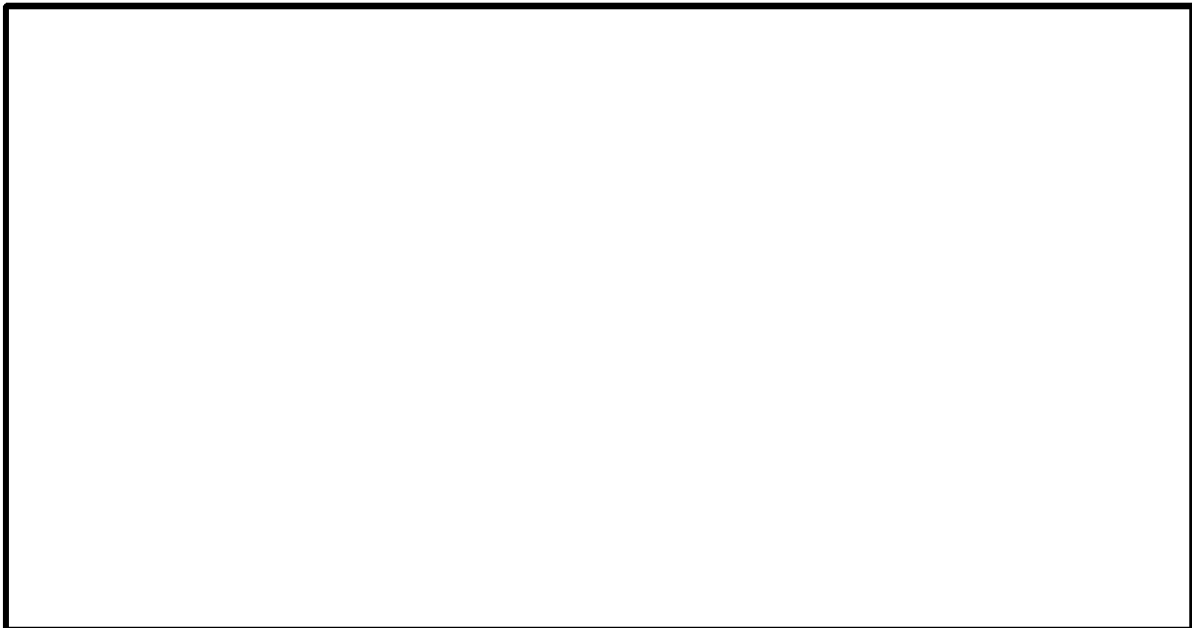
Investment Structure

(b)(4)

A large rectangular area that has been completely redacted, leaving a blank white space within a black border.

Fees, Profits, and Other Remittances

(b)(4)

A large rectangular area that has been completely redacted, leaving a blank white space within a black border.

Industries

LSRC will create and operate commercial enterprises in the following counties in the Chicago-Naperville-Elgin MSA: Cook County, DeKalb County, DuPage County, Grundy County, Kane County, Kendall County, Lake County, McHenry County, Will County, Jasper County, Lake County, Newton County, Porter County, and Kenosha County. LSRC will sponsor projects in the

NAICS industry categories of 2362: Nonresidential Building Construction; 5413: Architectural, Engineering, and Related Services; and 7211: Traveler Accommodation.

LSRC seeks approval in the following industrial categories:

<u>NAICS Code</u>	<u>Definition</u>
2362	Nonresidential Building Construction
5413	Architectural, Engineering, and Related Services
7211	Traveler Accommodations

2362 Nonresidential Building Construction

This industry group comprises establishments primarily responsible for the construction (including new work, additions, alterations, maintenance, and repairs) of nonresidential buildings. This industry group includes nonresidential general contractors, nonresidential for-sale builders, nonresidential design-build firms, and nonresidential project construction management firms.

5413 Architectural, Engineering, and Related Services

This industry comprises establishments primarily engaged in planning and designing residential, institutional, leisure, commercial, and industrial buildings and structures by applying knowledge of design, construction procedures, zoning regulations, building codes, and building materials and establishments primarily engaged in applying physical laws and principles of engineering in the design, development, and utilization of machines, materials, instruments, structures, processes, and systems. The assignments undertaken by these establishments may involve any of the following activities: provision of advice, preparation of feasibility studies, preparation of preliminary and final plans and designs, provision of technical services during the construction or installation phase, inspection and evaluation of engineering projects, and related services.

7211 Traveler Accommodation

This industry comprises establishments primarily engaged in providing short-term lodging in facilities known as hotels, motor hotels, resort hotels, and motels. The establishments in this industry may offer food and beverage services, recreational services, conference rooms and convention services, laundry services, parking, and other services.

Executive Management

LSRC is a manager-managed LLC that will be managed as follows:

Michael W. Reschke, Chairman and Chief Executive Officer (CEO)

Since 1982, Mr. Reschke has served as the Chairman and Chief Executive Officer of The Prime Group, Inc. and its various affiliates ("Prime"). Prime is one of the preeminent real estate development and investment companies in the country. Prime's vast real estate development and investment experience includes all types of institutional-quality real estate, ranging from award-winning office towers to luxury residential housing.

Since 1982, Prime and its affiliates have developed, redeveloped and acquired over \$11.0 billion of institutional-quality commercial and residential real estate across the following product types:

	Square Feet (Units)	Investment (000's)
Office	19,300,000	\$ 3,000,000
Industrial	7,000,000	250,000
Retail	12,000,000	2,200,000
Multi-Family	(15,000)	1,700,000
Condominium	(1,500)	900,000
Senior Housing	(6,000)	1,000,000
Hotel	(1,300)	650,000
Land Development	N/A	400,000
Total		\$ 11,100,000

During the 1990's, Prime achieved the unique distinction of being the founding shareholder of five publicly-traded real estate companies, each one being the successor-in-interest to various

operating divisions of Prime. In 1994, Prime organized two publicly-traded real estate companies – Prime Retail, Inc. and Ambassador Apartment, Inc. – which became successors-in-interest to Prime’s retail and multi-family divisions. In 1997, Prime again organized two publicly-traded real estate companies – Brookdale Living Communities, Inc. and Prime Group Realty Trust – which became successors-in-interest to Prime’s senior housing and office/industrial divisions. Finally, as part of Prime Retail’s acquisition of The Horizon Group, Inc. in 1998, Prime created Horizon Group Properties, Inc. through a spin-off to shareholders.

In 1997, Ambassador Apartments, Inc. was acquired by Apartment Investment and Management Company, Inc. (“AIMCO”) in a stock-for-stock merger. In 2000, Brookdale Living Communities, Inc. was acquired by Fortress Real Estate Investments following a friendly cash tender offer. Prime Retail, Inc. and Prime Group Realty Trust were separately sold in cash-for-stock merger transactions in 2003 and 2005, respectively.

Mr. Reschke continues to manage and direct the private real estate development and investment activities of Prime, and is based at Prime’s headquarters at 321 North Clark Street, Suite 2500, Chicago, Illinois 60610 (phone 312-917-4201; fax 312-917-1511).

From 2000 until 2003, Mr. Reschke served on the board of World Business Chicago – a public-private non-profit organization founded in 2000 to promote and market the City of Chicago on a national basis to business leaders looking for a place to start, expand, or relocate their businesses. Currently, Mr. Reschke serves on the board of the Real Estate Roundtable in Washington, D.C. and the American Liver Foundation (Chicago Chapter). Mr. Reschke also is a current member of the Urban Land Institute, the Economic Club of Chicago, and the Chicago Development Council.

Mr. Reschke is a summa cum laude graduate from Northern Illinois University, receiving a Bachelor of Science degree in Accounting with Honors in 1977. Mr. Reschke also is a summa cum laude graduate from the University of Illinois College of Law, receiving a Juris Doctorate degree in 1980. Mr. Reschke is licensed to practice law in the State of Illinois and is a Certified Public Accountant.

Mark K. Cynkar, Chief Financial Officer

Mr. Mark K. Cynkar joined Prime in October 1989 and has served as Senior Vice President and Chief Financial Officer of Prime since December 1996, prior to which Mr. Cynkar served as Prime’s Senior Vice President and Director of Taxation. Prior to joining Prime, Mr. Cynkar had eleven years of tax experience with the public accounting firms of Ernst & Young and Coopers & Lybrand. Mr. Cynkar is a Certified Public Accountant and a member of The American Institute

of Certified Public Accountants and The Illinois CPA Society. Mr. Cynkar holds a B.S. in Commerce and a M.S. in Taxation from De Paul University.

Jeffrey P. Breaden, Senior Vice President

Mr. Jeffrey P. Breaden serves as Senior Vice President of The Prime Group, Inc. Mr. Breaden oversees financial structuring, project underwriting, execution of financial transactions, and asset management. He has been with The Prime Group, Inc. since 2004. Prior to joining The Prime Group, Inc., Mr. Breaden served as Vice President of HIGroup, LLC, where he directed approximately \$2.5 billion of asset sales and finance transactions. Mr. Breaden received a B.A. in history and economics from Northwestern University.

Neil Stempel, Senior Vice President for Development

Neil Stempel is Senior Vice President of Development with The Prime Group, Inc. With over 30 years of experience in architecture, construction management and real estate development, Mr. Stempel is responsible for overseeing the development of Prime's hospitality, residential, commercial, and mixed-use projects from due diligence through occupancy. Prior to joining Prime in 2007, he managed the development of senior living facilities with Brookdale Living Communities, Inc. Earlier in his career, Mr. Stempel was associated with internationally renowned architecture firm and later an ENR top-50 contractor. He has practiced architecture in the United States, Europe, and the Middle East, and has managed a Chicago-based construction company.

Mr. Stempel holds a Bachelor of Architecture from Syracuse University and a Master of Management from the Kellogg School of Management at Northwestern University, and has taught architectural design and construction technology in Boston and Chicago. He is a registered architect, a member of both the American Institute of Architects and the National Council of Architectural Registration Boards, a LEED Accredited Professional and licensed real estate broker. In addition, Mr. Stempel has served on the boards of numerous educational and civic organizations.

Consultants

Paul Scheuren, Economist

Paul Scheuren is an economist and one of Impact DataSource's Principals. His advanced research and analytical skills as well as expertise in Excel and other software programs make

him uniquely qualified to provide the most insightful and useful economic analysis and research. He has been the lead on several large projects at Impact DataSource and coordinates work on all large projects. He honed his research skills at Clemson University where he completed several in-depth statistical research projects including a research paper concerning internal U.S. migration presented by his co-author at the North American Regional Science Council annual conference. Prior to joining Impact DataSource, Paul worked as a compensation analyst at the Texas Association of School Boards where he supported compensation consulting projects and helped streamline data analysis for a statewide salary survey.

Paul has a Master of Arts in Economics from Clemson University as well as a Bachelor of Business Administration in actuarial science from Temple University

Thomas Rosenberg, RKJ Legal, Ltd., General, Immigration and Securities Counsel

Thomas Rosenberg is a managing partner at RKJ Legal, Ltd. RKJ Legal is a boutique international business, investment, immigration and consulting firm which was founded to provide legal and related services to all-sized businesses and individuals participating within the global marketplace. Based in the United States, the firm maintains a commitment to foster the development of a “global mind-set” among the business and investment communities. Mr. Thomas Rosenberg and Mr. Steve Kim are the managing partners, acting as General Counsels to the Sunpin Massachusetts Regional Center to provide legal insight and guidance in the company’s development activities. RKJ Legal is focused primarily in a variety of areas of practice including renewable energy law, international trade & investment, immigration, and construction law.

RKJ Legal has developed a unique blend of legal and business knowledge, and employs it to assist domestic, foreign and international companies to establish and develop business enterprises throughout international markets. Representing clients ranging from small to large-sized businesses, investors and individuals in their international business pursuits, RKJ has developed a focus on foreign direct investment into the U.S. In addition to assisting U.S. businesses with the sale and distribution of their products abroad and the protection and licensing of their intellectual property, their lawyers select and work with foreign counsel to assist in the establishment of overseas facilities and operations, including joint ventures with foreign partners.

Ronald Hayden, RKJ Legal, Ltd., Business Attorney

Ronald Hayden advises on a range of corporate and commercial issues including mergers and acquisitions, takeovers, private equity investments and general corporate and securities law. Hayden also advises real estate developers on issues concerning every stage of the real estate cycle, including acquisition, disposition, construction, leasing, financing, zoning, administrative compliance, eminent domain, and environmental matters. Hayden also has a complex commercial litigation portfolio, involved in state and federal court practice. Previously, Mr. Hayden served at the Chicago firm of Mayer, Brown & Platt (now Mayer Brown) in both the Commercial Litigation and Environmental practice areas of the firm.

Mr. Hayden is a native Chicagoan and attended Northwestern University (B.A. 1982) and Valparaiso University School of Law (J.D. 1988). Following law school, he completed a clerkship at the U.S. District Court for the Western District of Louisiana (Judge Little).

Martin J. Lawler, Immigration Attorney

Martin J. Lawler is a California immigration law specialist with more than thirty years' experience. Mr. Lawler has significant knowledge and experience in EB-5 matters. He is the author of *Professionals: A Matter of Degree*, a treatise on business visas. *Professionals*, published by the American Immigration Lawyers Association (AILA) and now in its fifth edition, is a leading text on visas for professionals. Martin also has authored many book chapters and articles. He has been featured on CNBC as an expert on the EB-5 visa program. He has written op-ed immigration-related pieces for the Wall Street Journal, and was a guest speaker on National Public Radio's Science Friday program about visas for scientists. EB-5 Magazine found Martin is one of the top 25 EB-5 lawyers in the US.

Martin has lectured on various visa matters, including engagements at Harvard University, American Immigration Lawyers Association (AILA) annual and other conferences, the American Law Institute, the San Francisco Bar Association, and the American Chemical Society, among other venues. Martin has been a member of AILA's EB-5 investor visa committee from 2008 to 2010, and 2013 to 2014. Martin is the 1996 recipient of the AILA Jack Wasserman Memorial Award for excellence in immigration litigation. He also has received a number of AILA presidential awards. He is Martindale-Hubbell A-rated and is listed in Best Lawyers in America.

Point of Contact

The point of contact for LSRC is Mark K. Cynkar. His contact information is as follows:

Address: LaSalle Street Regional Center, LLC

120 N. LaSalle Street, Suite 3200
Chicago, IL 60602
Phone: 312-917-4207
Email: mcynkar@primegroupinc.com

Investor Due Diligence

Lawful Source of Capital and Ability to Invest

LSRC will implement a due diligence procedure to ensure that each EB-5 investor has sufficient funds from lawful sources to contribute the requisite capital. Pursuant to this procedure, LSRC will provide to each potential EB-5 investor a list of documents that the investor must submit to USCIS to verify that his or her capital derives from lawful sources.

(b)(4)

Identity and Admissibility

(b)(4)

Investment Procedure

LSRC's procedure for accepting EB-5 capital is also designed to ensure that LSRC, its commercial enterprises, and its investment projects comply with both immigration and securities laws. At

this time, the EB-5 investor is also provided with a list of information and documentation that will be required to establish that his or her capital comes from lawful sources.

The investment procedure is as follows:

(b)(4)

Project Oversight

The managers of LSRC bring extensive experience in hotel and real estate development and construction. They are well-qualified to identify future commercial projects in the hotel and real estate industry for LSRC and to monitor the use of EB-5 capital and job creation in LSRC's projects.

LSRC will track data, provide oversight, and maintain documentation and information to provide to EB-5 investors for I-526 and I-829 petitions and the USCIS. Michael Reschke, as Chairman and CEO, [REDACTED]

(b)(4)

[REDACTED]

(b)(4)

[REDACTED]

Monitoring the Use of EB-5 Capital

LSRC will use the following methods to monitor its investment projects' use of EB-5 capital and creation of jobs, and to maintain documentation and information for USCIS and for EB-5 investors to submit in their I-526 and I-829 petitions.

(b)(4)

[REDACTED]

(b)(4)

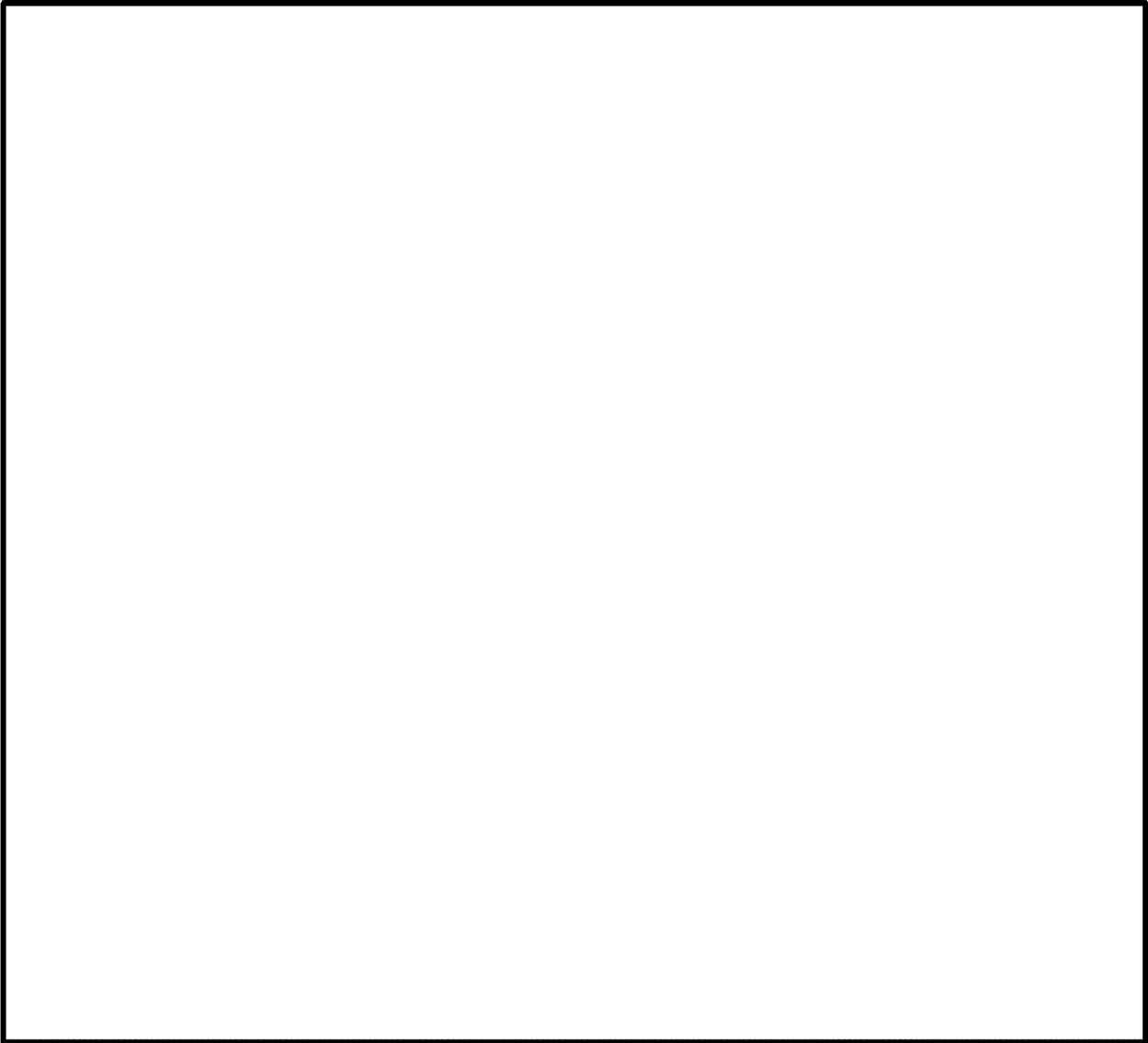


Allocation of Jobs and Tracking Job Creation

(b)(4)

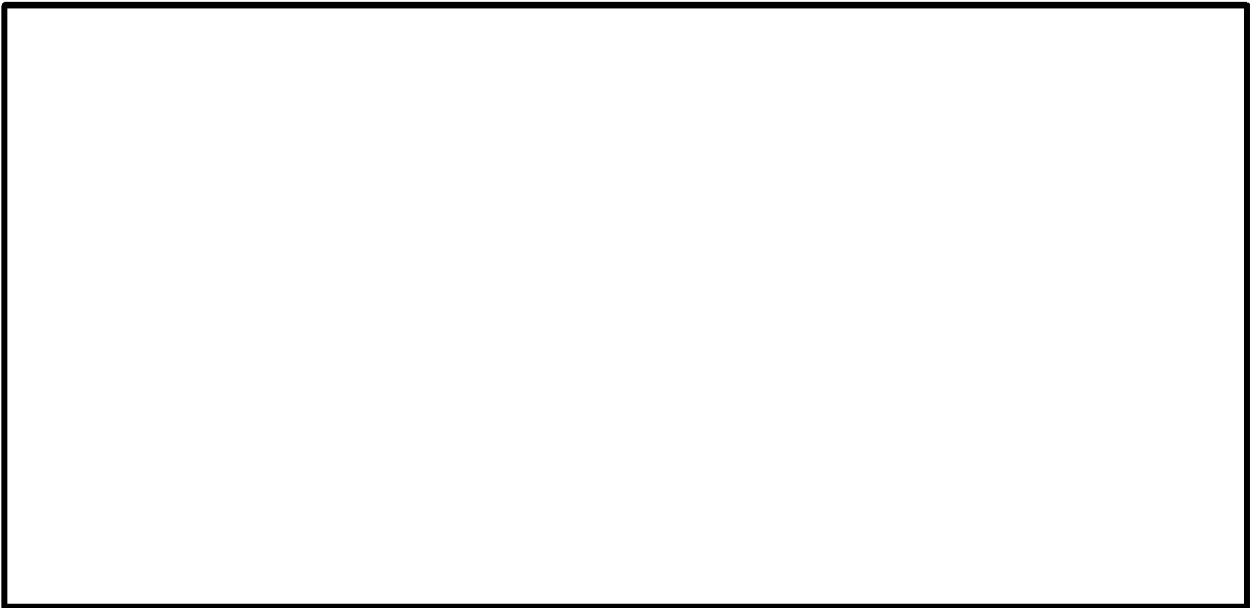


(b)(4)



Evaluation of Future Investment Projects

(b)(4)



(b)(4)

Promotional Activities

Overall Strategy

(b)(4)

Past and Current Promotional Activities

(b)(4)

Marketing Budget

(b)(4)

(b)(4)



See LSRC's operational budget on the following page:

[illegible]

~~(b)(4)~~

ADDENDUM A

**LASALLE STREET REGIONAL CENTER, LLC
LIST OF DOCUMENTS FOR EB-5 INVESTOR
TO PROVE SOURCE AND PATH OF FUNDS**

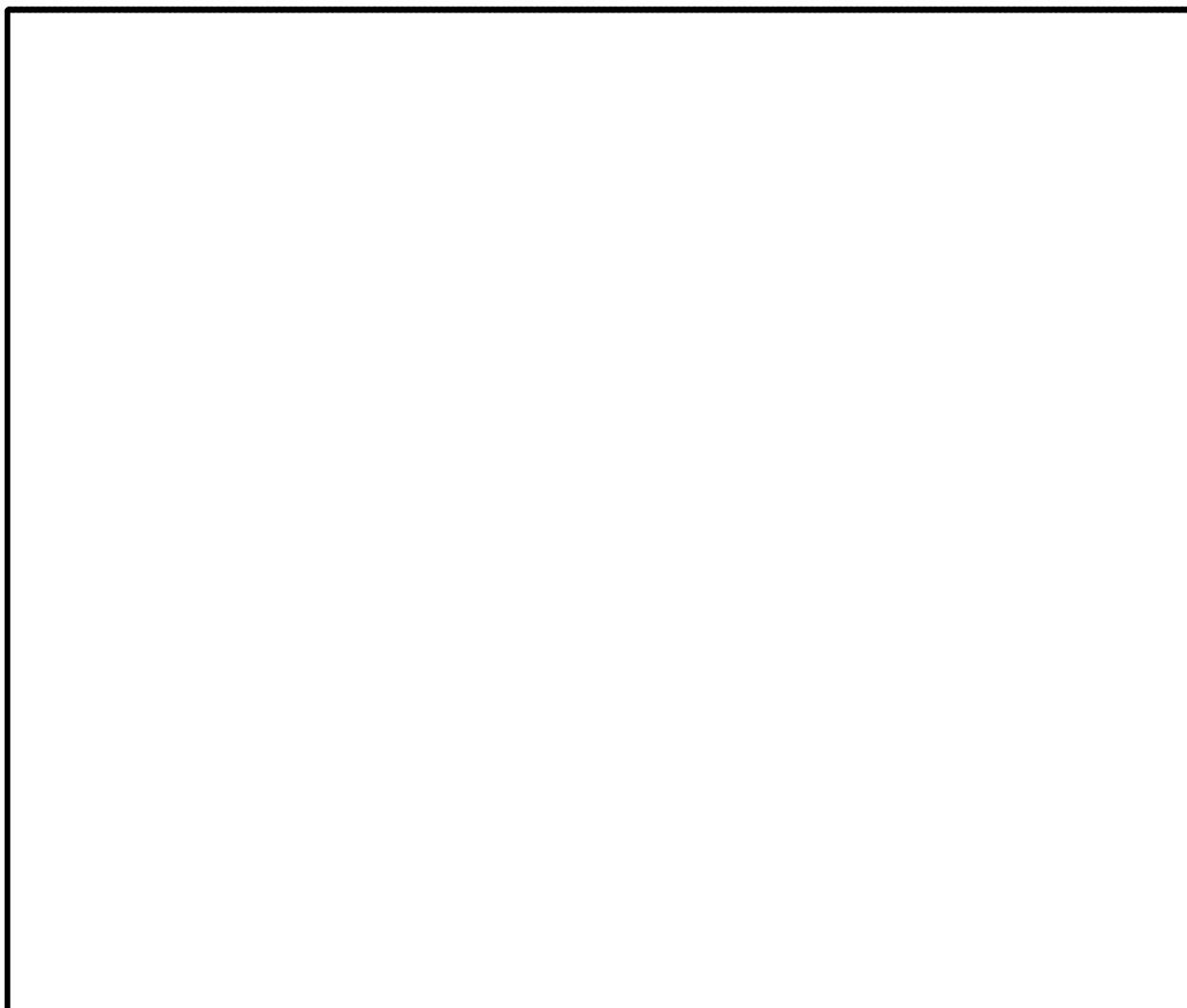
GENERAL RULE

US Citizenship and Immigration Services' regulations require investors to prove the invested capital comes from a lawful source.

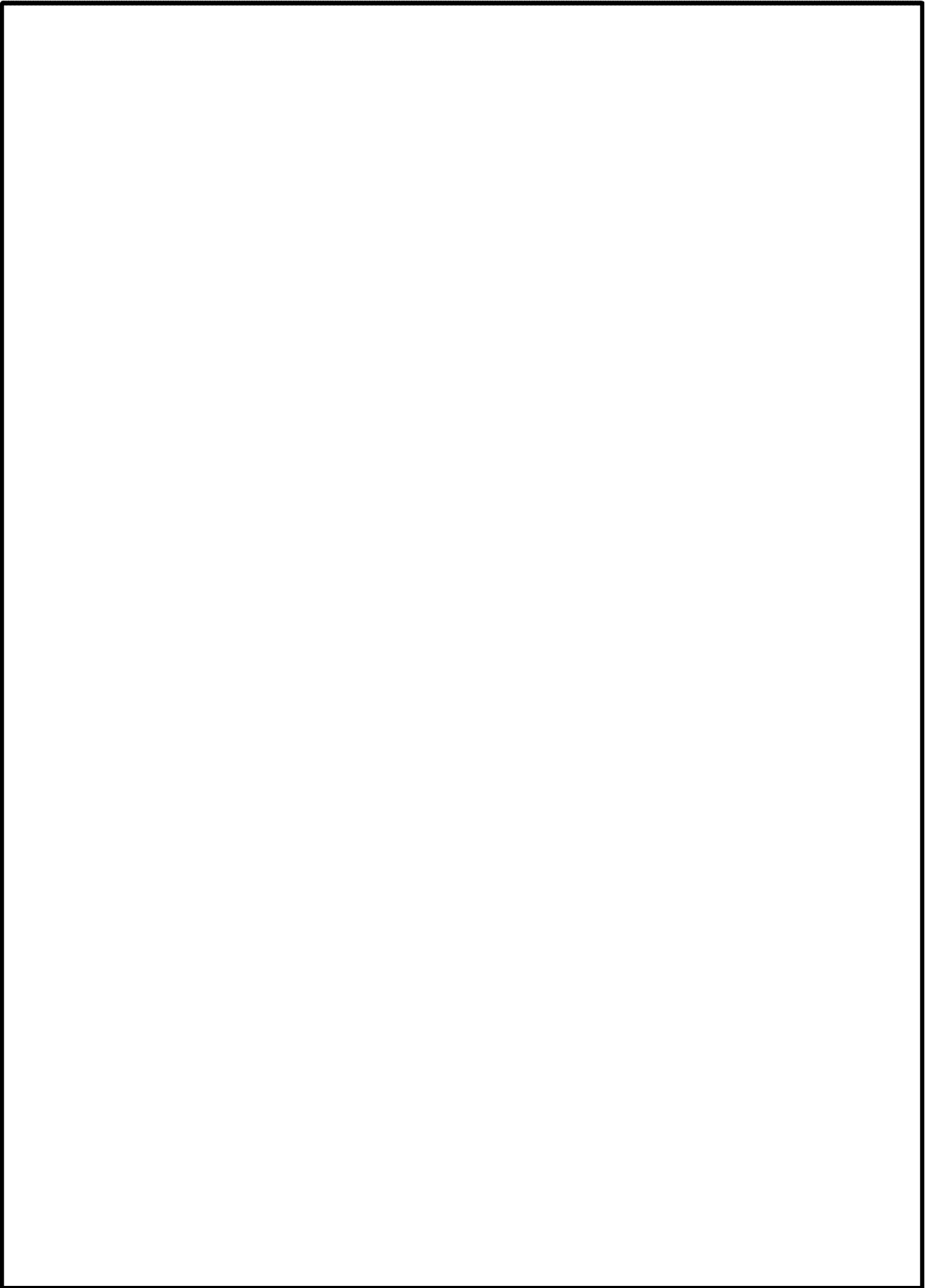
Please provide LaSalle Street Regional Center, LLC with a few paragraphs explaining how the funds were gained, when and by what means (e.g., sale of a piece of real estate, savings over time). Also, please explain the path of the funds from the source to the LaSalle Street Regional Center, LLC escrow account to assist LaSalle Street Regional Center, LLC in understanding the documents provided.

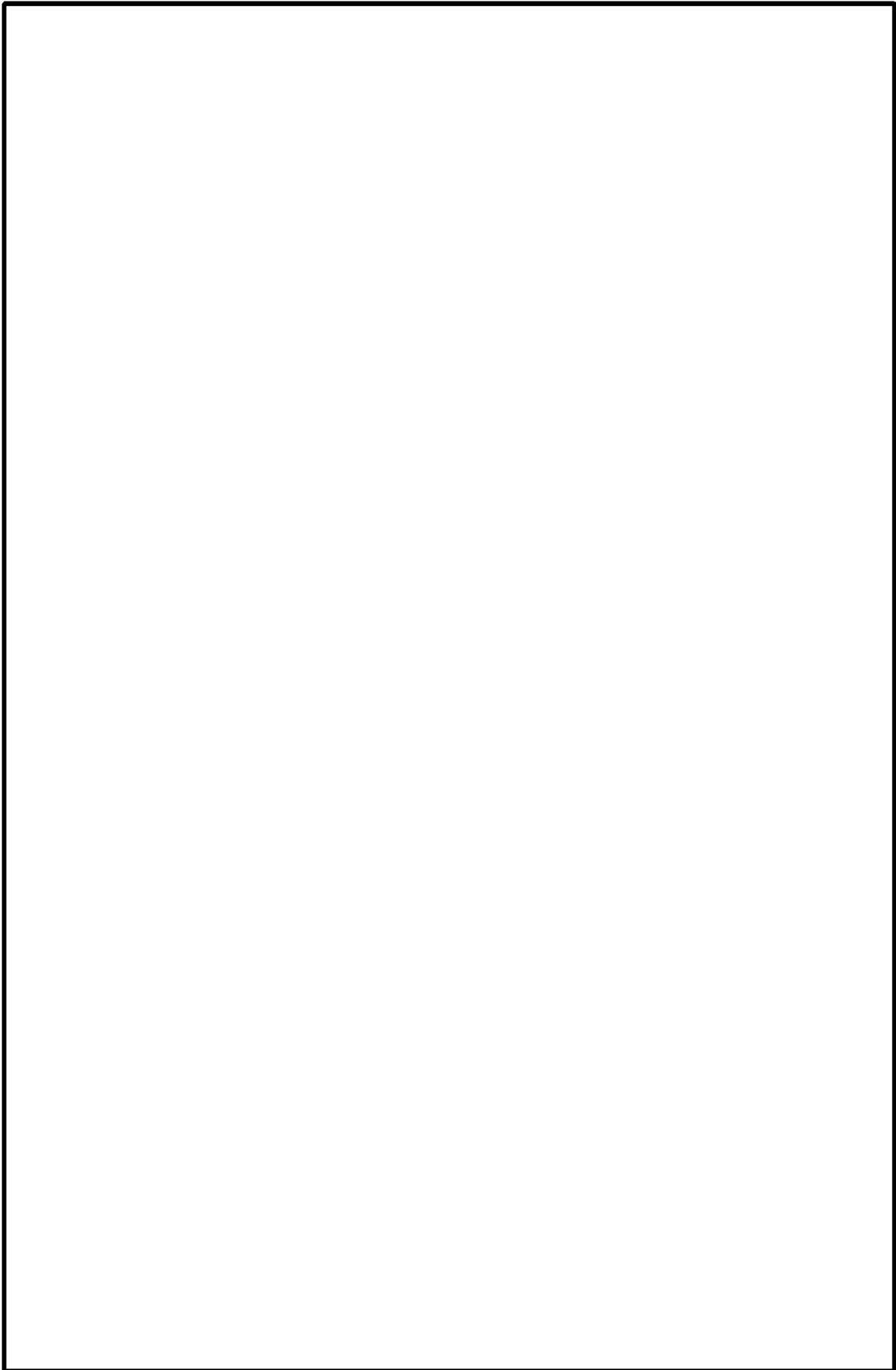
Please send LaSalle Street Regional Center, LLC the following financial, tax and other documents:

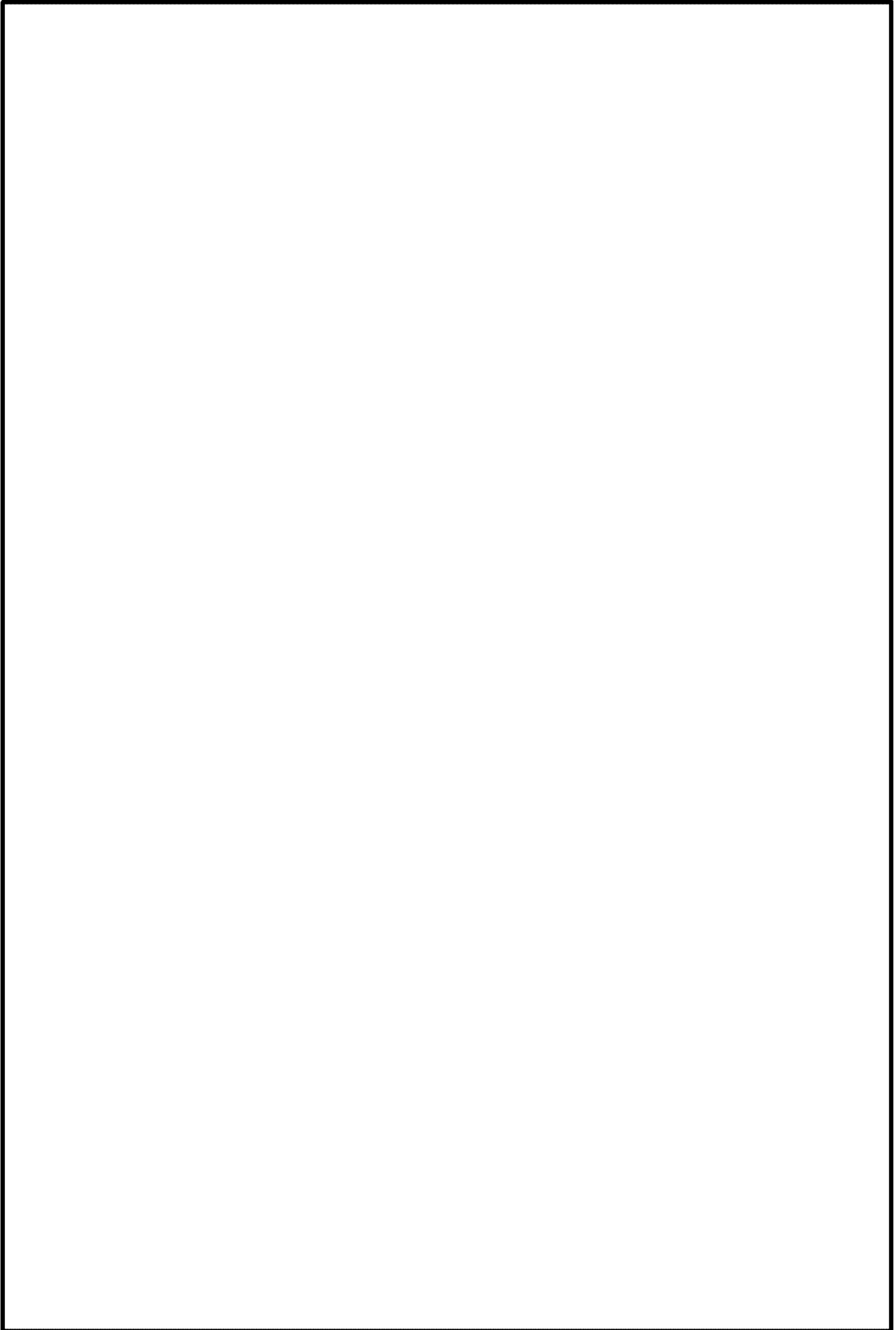
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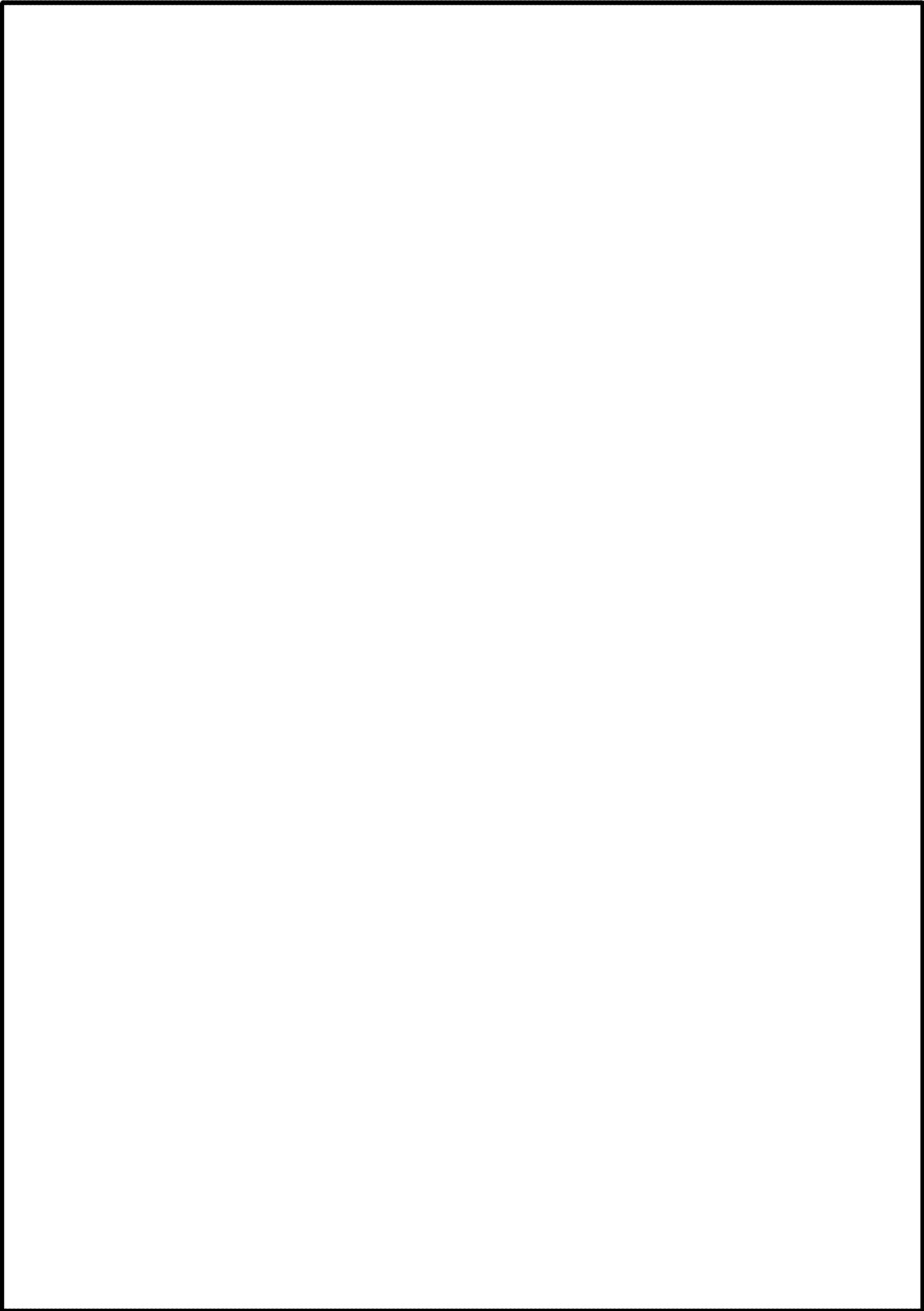


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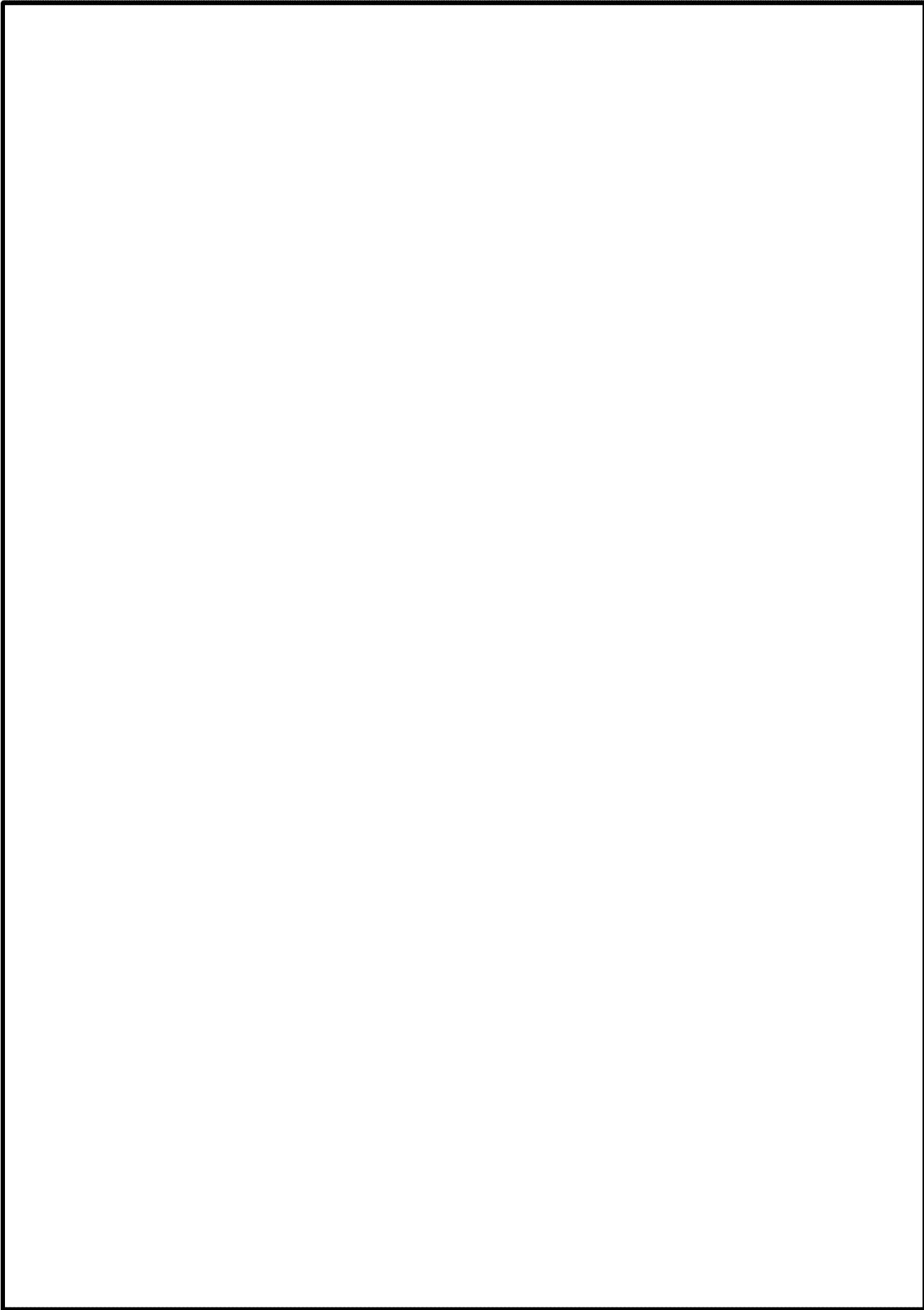


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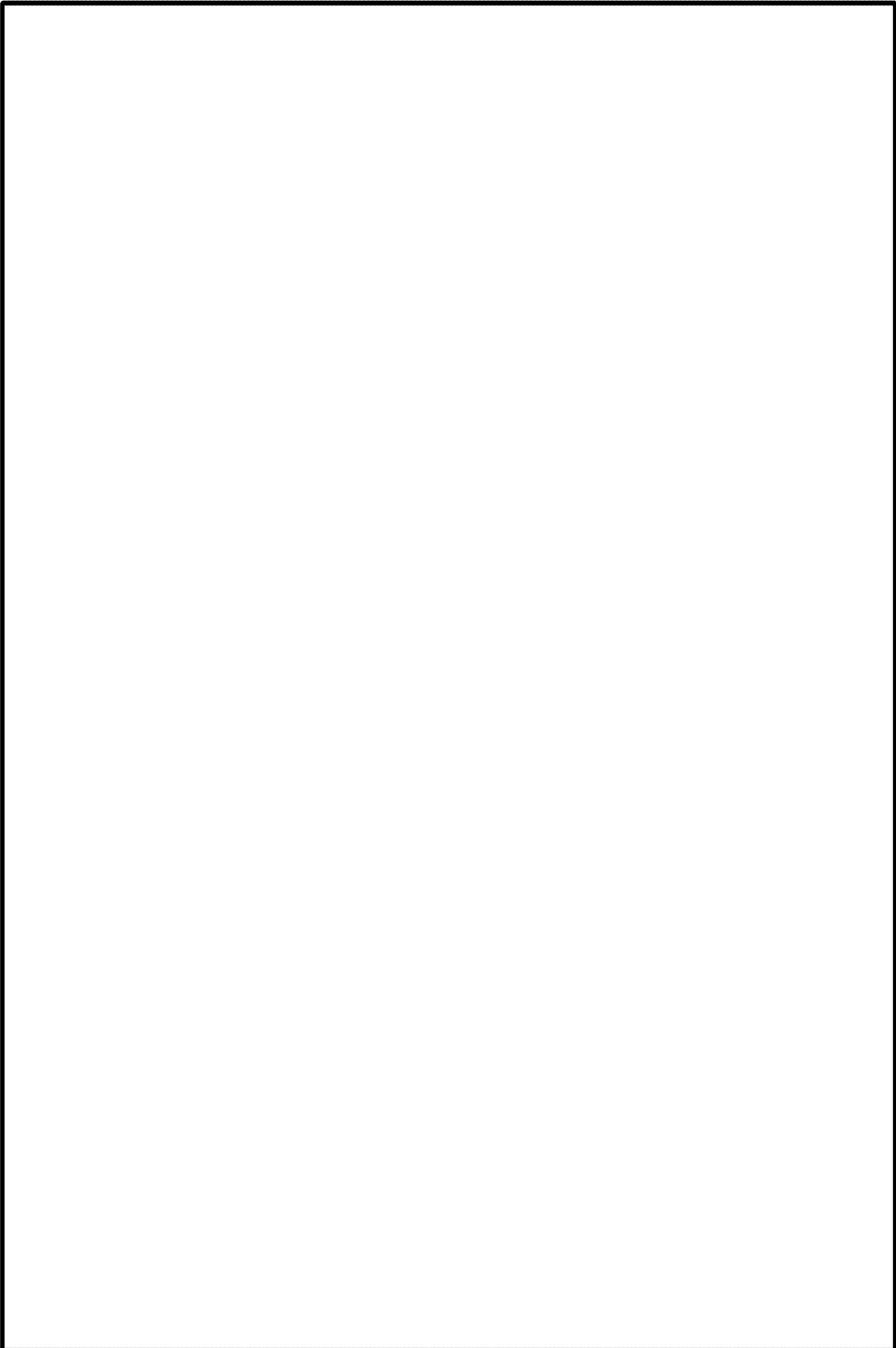
ADDENDUM B

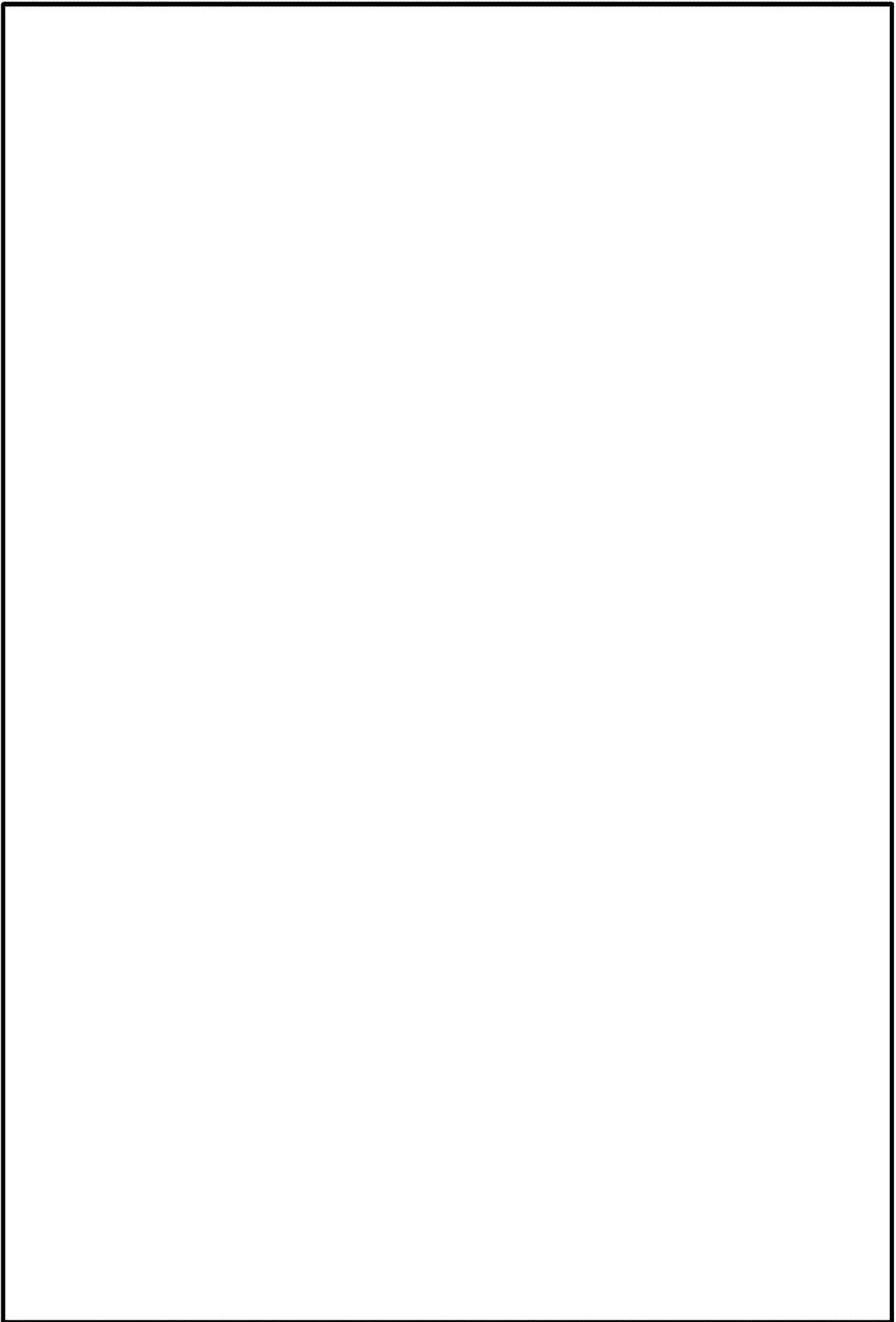
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ADDENDUM B



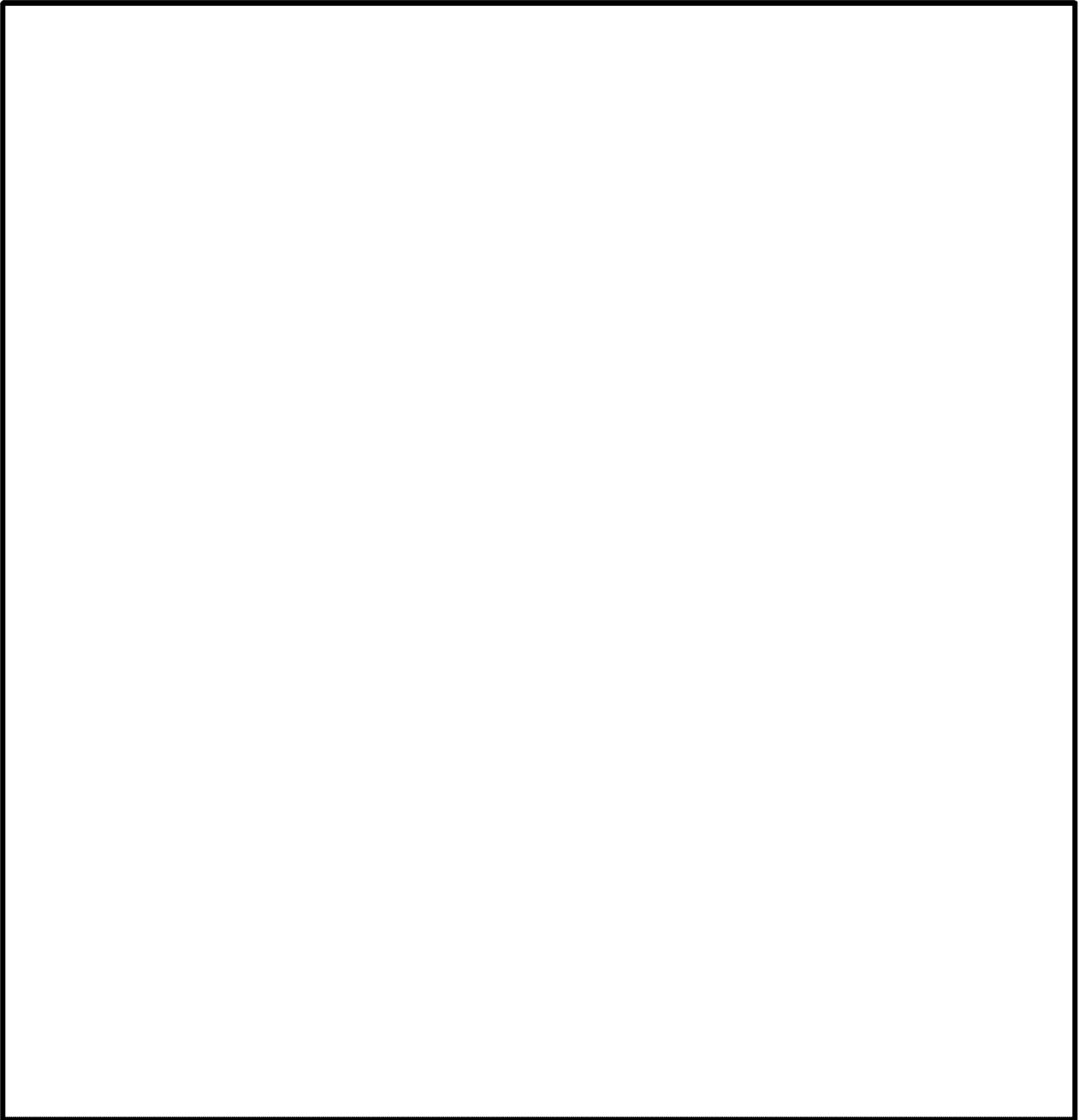
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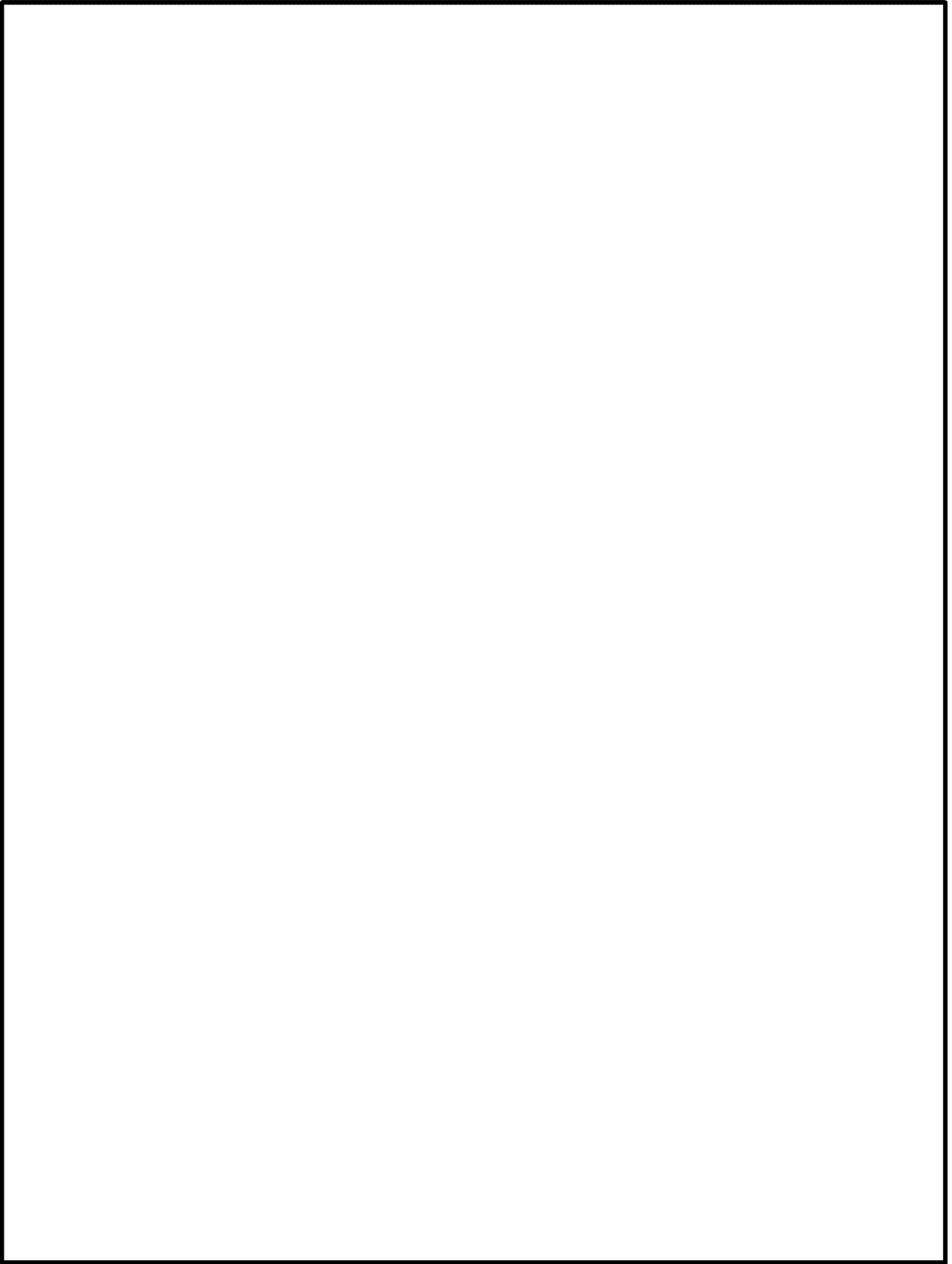
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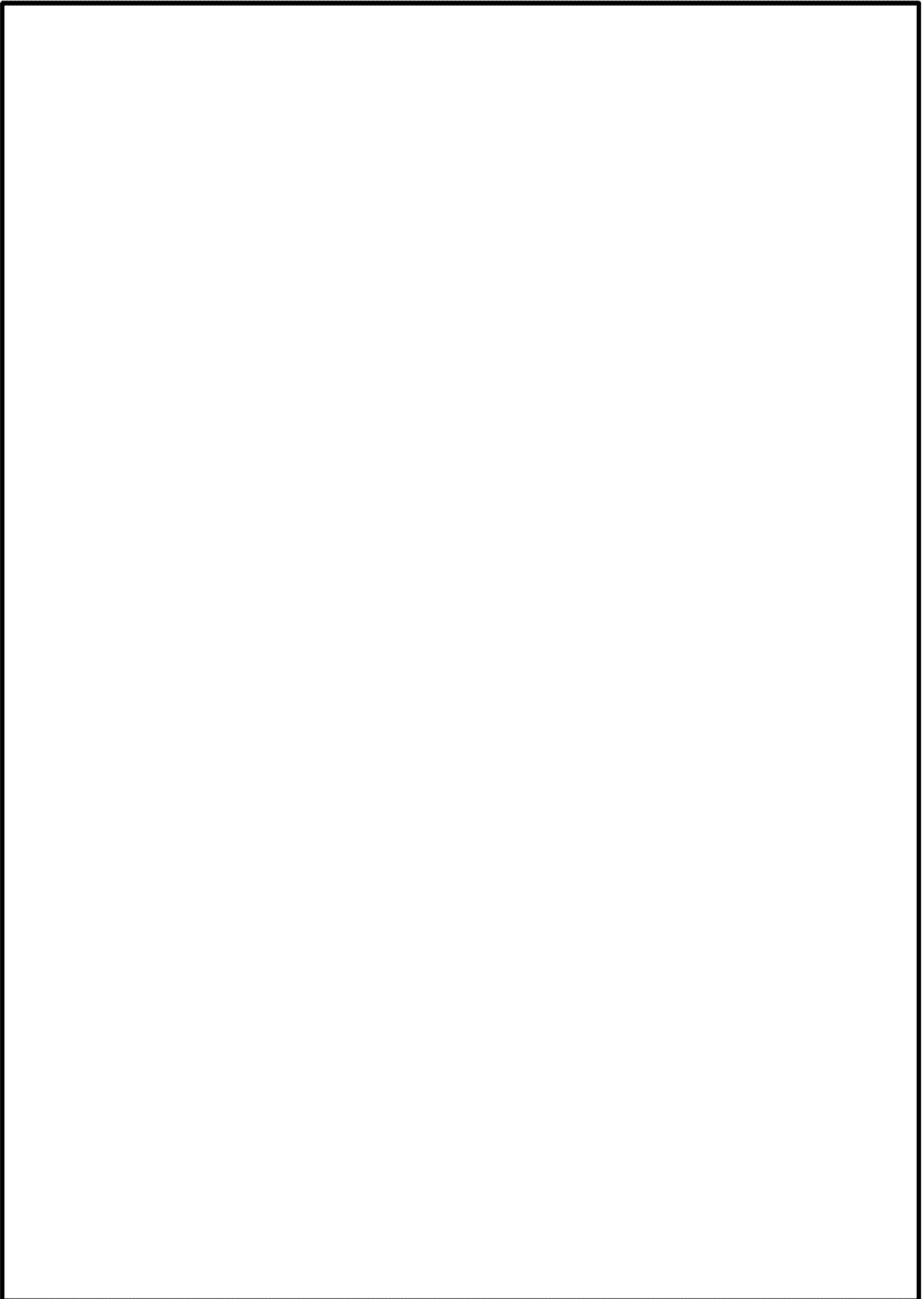


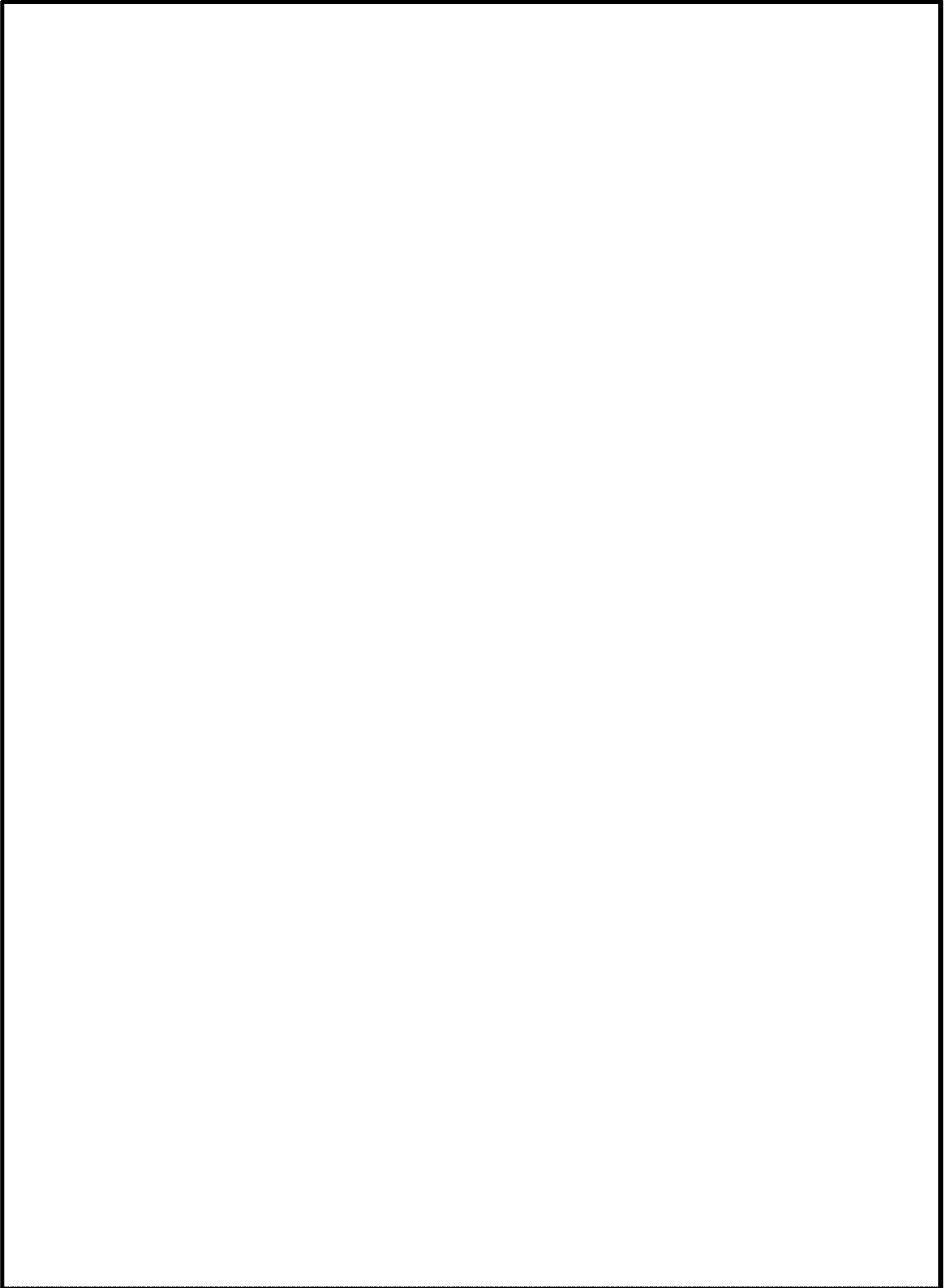
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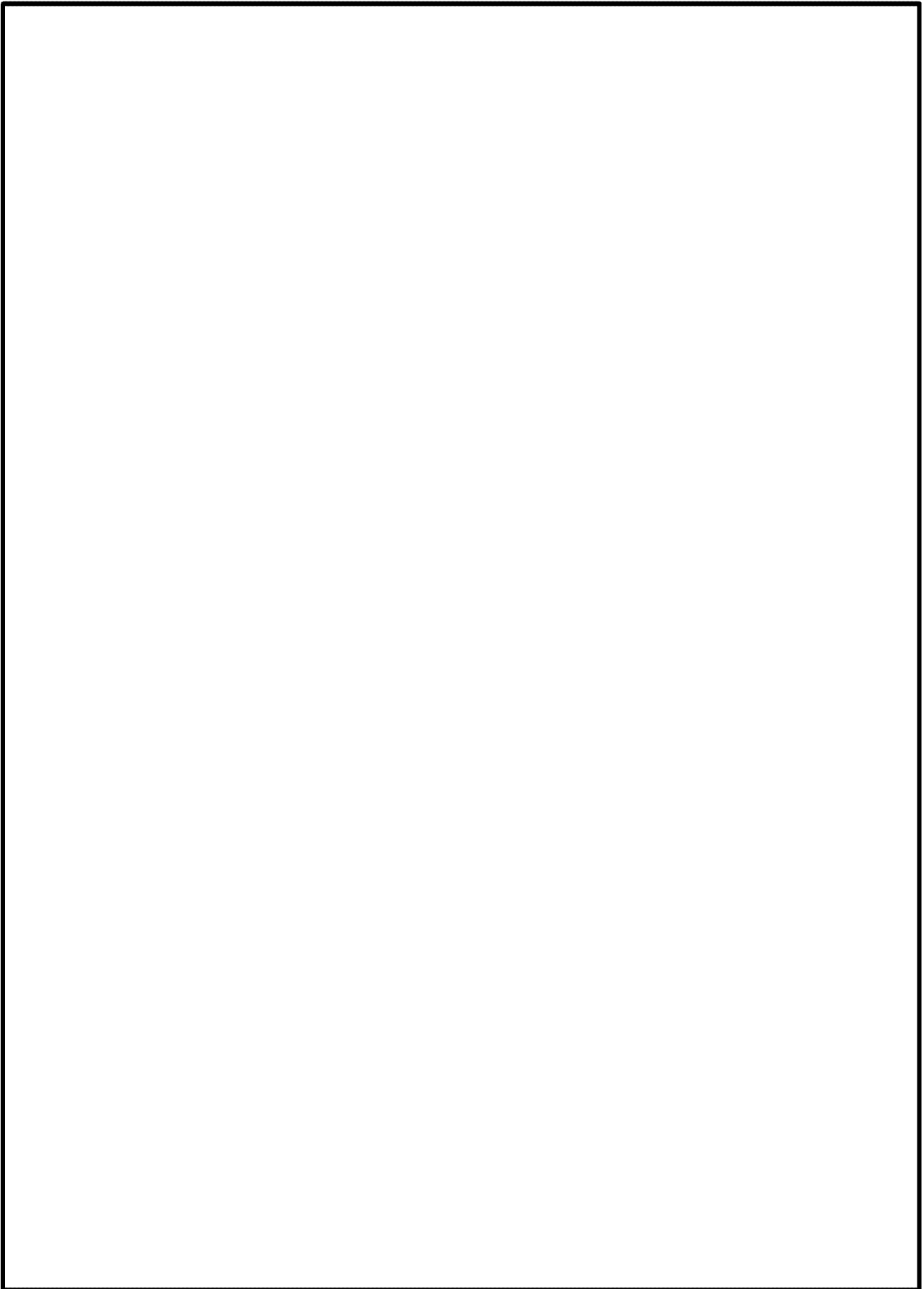
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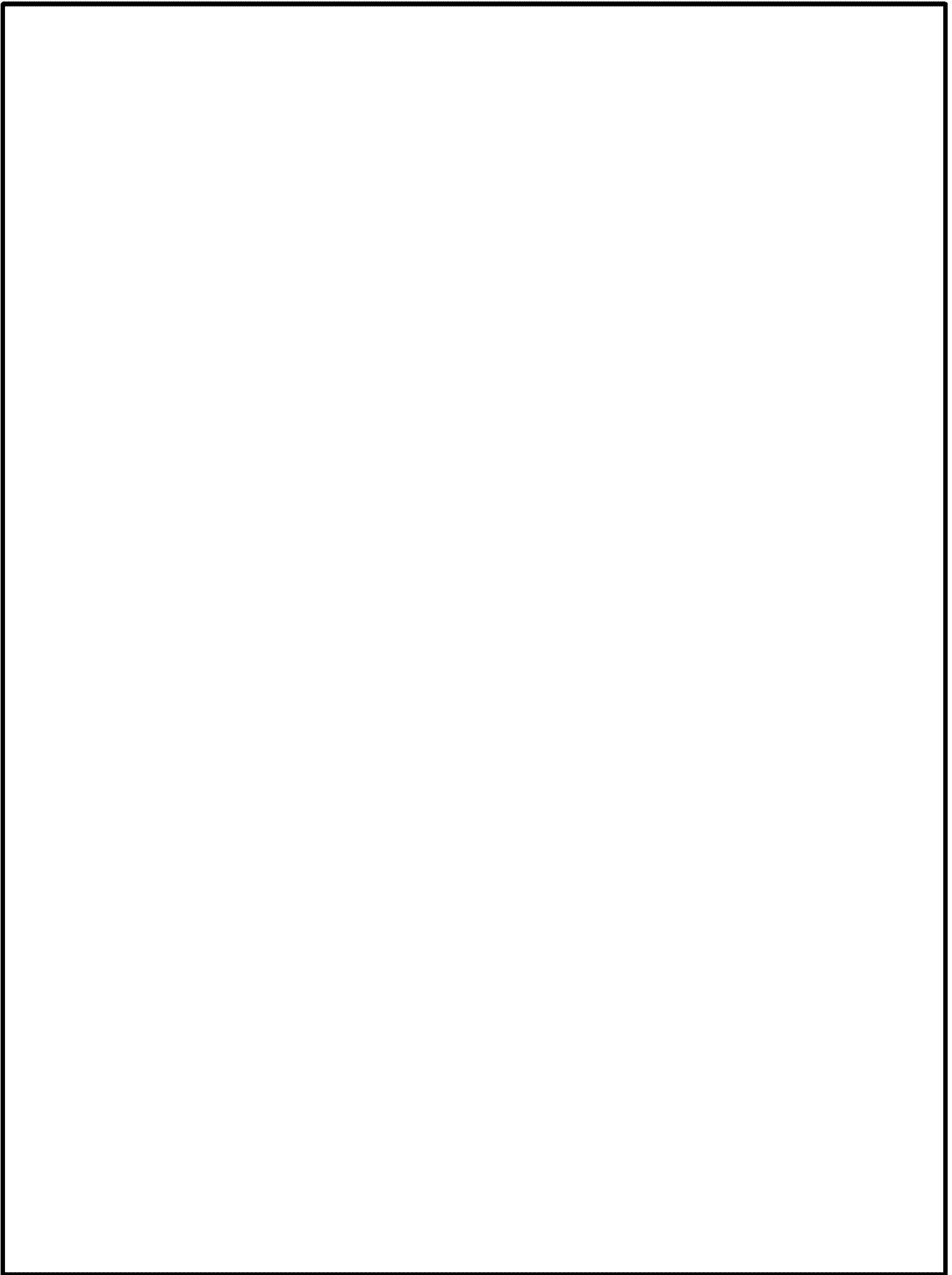
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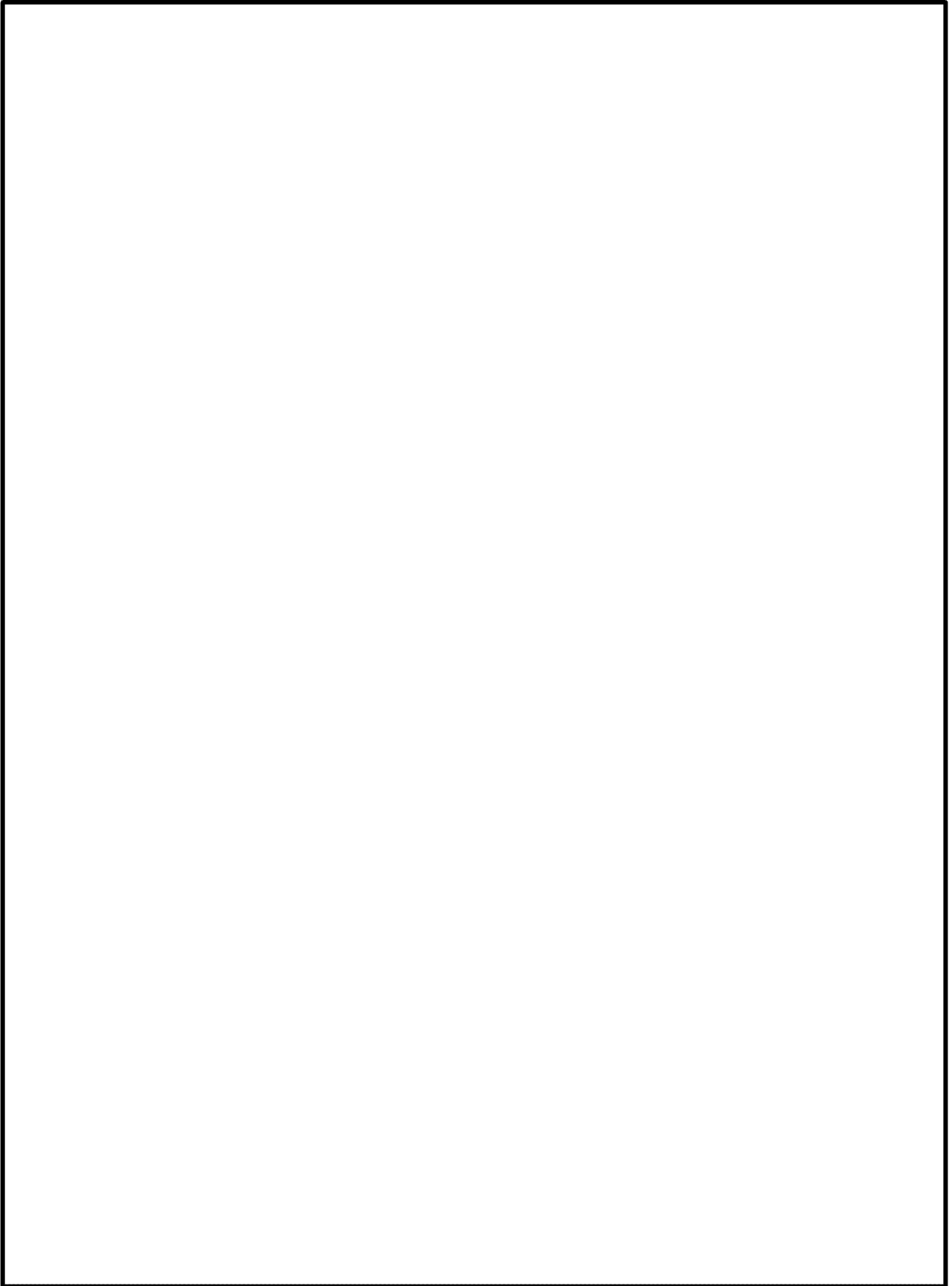
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ADDENDUM B



Main office:

Peter Joseph, Executive Director
2237 North Lawndale Avenue, Unit 3
Chicago, Illinois 60647
Telephone: 773.899.0563
Email: peter.joseph@iiusa.org
www.iiusa.org
"Creating Jobs Through Investments"

K. David Andersson, President
Robert C. Divine, Vice President
Robert G. Honts, Secretary-Treasurer
Michael Gibson, Director
William P. Gresser, Director
Patrick F. Hogan, Director
Henry Liebman, Director
Denyse Sabagh, Director
William J. Stenger, Director

**SUGGESTED PRACTICES FOR REGIONAL CENTERS WHEN
DEALING WITH RECRUITERS/AGENTS**

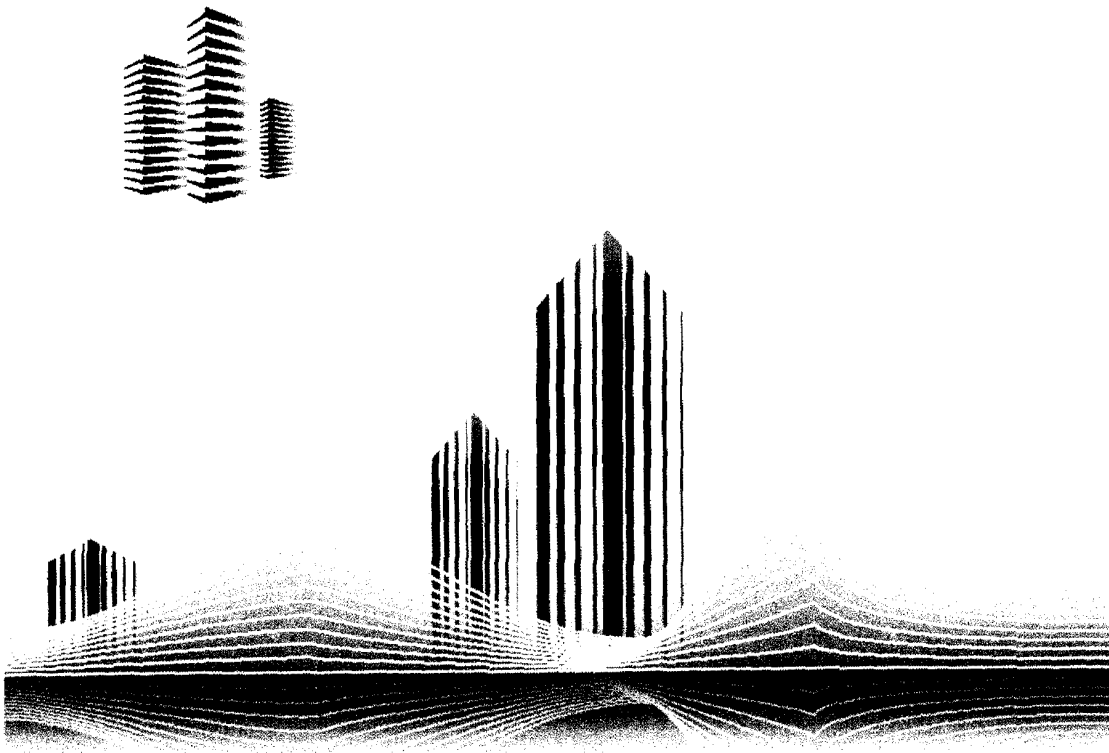
The following are merely suggested practices that Regional Centers may or may not wish to consider when working with recruiting agencies and law firms. The following suggested practices are for the purpose of helping preserve the integrity of the EB-5 Program.

1. Choose agents who are proficient in the English language, and who are familiar with emigration services
2. Ask for resumes of agents, principals of company, and attorneys
3. Meet them personally (Have them visit your office and visit their office)
4. Verify recruiter's knowledge of the EB-5 program
5. Find out how and to whom they plan to present projects and perform due diligence
6. Define terms of working relationship (Watch out for exorbitant legal fees to be charged to potential investors)
7. Educate them as to what is permissible/lawful when selling a project
8. Approve all RC publicity materials and advertisements prior to publication (English version and translation)
9. Include disclaimers in all RC printed materials with regards to translation into other languages
10. Request to see agreements with other agents who may assist their firm with recruiting efforts and visa cases (if necessary, include language that would decrease your center's liability as to their "recruiting behavior" i.e.: misrepresentation of terms of project, or USCIS laws, policies, procedures)
11. Develop policies and procedures, i.e.: "Recruiter Manual"

November 2014

RCP Hotel EB5 Investors, LP

Overall Business Plan



208 S. LaSalle Street
Chicago, Illinois 60603
(312) 917-1500

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1.0 Project Overview

1.1 Executive Summary

RCP Hotel EB5 Investors, LP ("RCP-EB5" or "NCE") is a Limited Partnership formed for the purpose of funding and developing a project in Chicago, Illinois, which is sponsored by LaSalle Street Regional Center, LLC ("LSRC"). Although the project exists, LSRC is presenting it as a hypothetical project in support of its I-924 regional center application to U.S. Citizenship and Immigration Services ("USCIS") pursuant to the EB-5 Immigrant Investor Program. As defined by the USCIS (in its EB-5 Adjudications Policy Memorandum dated May 30, 2013), the contents herein constitute a "general proposal" which details how the investment project will result in the creation of jobs consistent with the economic methodology approved by USCIS as part of LSRC's regional center designation.

RCP-EB5 will receive at-risk equity investment from EB-5 investors who will be admitted as limited partners. RCP-EB5 will then provide a loan to RCP Hotel Owner, LLC ("RCP Owner" or "JCE"), who will use the funds for the acquisition of the upper floors 18 through 22, roof, and ground floor of a mixed-use property for the purpose of constructing, owning, and operating a 234-room, luxury hotel in Chicago, Illinois ("Project").

Total Project cost is estimated to be \$70 million. The Project will be funded through 46 EB-5 investors with each EB-5 investor contributing \$500,000, as the Project location qualifies as a Targeted Employment Area ("TEA"). Total EB-5 investment will be \$23 million and the remaining amount will be acquired through a senior loan, and owner equity contribution.

It is estimated that the development of the Project will be completed within 22 months beginning with the administrative phase in September of 2014. The grand opening of the Hotel is projected to be in July of 2016. For detailed construction cost estimates, please see Section 1.6 and for the development timeline, please see Section 1.7.

According to the economic analysis provided by Impact DataSource, entitled *An EB-5 Economic Analysis of the Luxury Lifestyle Hotel within the proposed LaSalle Street Regional Center, LLC*, the Project will create an estimated 740.5 total direct, indirect, and induced jobs in the regional center area. Jobs will come from direct, indirect, and induced employment from the operations of the Project as well as indirect and induced jobs from construction. Please refer to the economic report for greater detail.

From a revenue and income perspective, the Project is expected to create approximately \$126.74 million of revenue in 5 years with \$7.81 million in net income. For more information, please refer to Section 3.0 in the business plan.

1.1.1 Index of Matter of Ho Content

Although this general proposal describes a hypothetical project, it nonetheless addresses each of the requirements detailed in *Matter of Ho*, 22 I&N 206 (Assoc. Comm'r 1998) as follows:

Item	Plan Section
Description of the business, its products and/or service, and its objectives.	1.2 & 1.3
Market analysis, including the names of competing businesses and their relative strengths and weaknesses.	2.0
Comparison of the competition's products and pricing structures.	2.2
Description of the target market / prospective customers of the new commercial enterprise.	2.1
List of required permits and licenses obtained.	1.7
Description of the manufacturing or production process, the materials required, and the supply sources.	N/A
Contracts executed for the supply of materials and/or the distribution of products if applicable.	N/A
Marketing strategy of the business, including pricing, advertising, and servicing.	2.3
Business's organizational structure and its personnel's experience.	5.0
Business's staffing requirements and a timetable for hiring, as well as job description for all positions (job creation is based on financial revenues and capital expenditures of the Project as evidenced by the economic report by Impact DataSource dated May 7, 2014).	4.0
Sales, cost, and income projections and detail the bases therefore.	3.0

1.2 Project Description

The Project is the renovation, operation and management of a 234-room luxury hotel in Chicago, which is located in Cook County, Illinois. The Hotel will consist of a total area of 140,000 square feet ("SF"). Amenities will include a full service restaurant, a lounge/bar, conference facilities, and recreational facilities. The Hotel will be developed, owned and operated by RCP Owner. The objective of the Project is to create new jobs in Chicago and to generate profit for the NCE and its investors.

The following is a table that breaks down the different components of the Project:

Project Components/ Amenities	
Project Component	Area (SF)
Hotel Rooms and Common Area (234 rooms x 450 SF)	125,000
Restaurant/Bar	3,000
Fitness Center/spa	4,000
Meeting Spaces	8,000
Total	140,000

The operation of the Project will involve the primary industry of Traveler Accommodation (NAICS 7211). Secondary construction industries include Nonresidential Building Construction (NAICS 2362) and Architectural, Engineering, and Related Services (NAICS 5413). Below are the 2012 industry definitions.

Primary Industries

Traveler Accommodation (NAICS 7211)

Since there are no 2012 industry definitions available for NAICS 7211, the following definition is for NAICS 721110.

Hotels (Except Casino Hotels) and Motels (NAICS 72251)¹

This industry comprises establishments primarily engaged in providing short-term lodging in facilities known as hotels, motor hotels, resort hotels, and motels. The establishments in this industry may offer food and beverage services, recreational services, conference rooms and convention services, laundry services, parking, and other services.

Secondary Industries

Nonresidential Building Construction (NAICS 2362)²

This industry group comprises establishments primarily responsible for the construction (including new work, additions, alterations, maintenance, and repairs) of nonresidential buildings. This industry group includes nonresidential general contractors, nonresidential for-sale builders, nonresidential design-build firms, and nonresidential project construction management firms.

Architectural, Engineering, and Related Services (NAICS 5413)³

This industry group comprises establishments engaged in the industries of Architectural Services (NAICS 54131), Landscape Architectural Services (NAICS 54132), Engineering Services (NAICS 54133), Drafting Services (NAICS 54134), Building Inspection Services (NAICS 54135), Geophysical Surveying and Mapping Services (NAICS 54136), Surveying and Mapping (except Geophysical) Services (NAICS 54137), and Testing Laboratories (NAICS 54138).

1.3 Objectives

The objective of the Project is to utilize EB-5 funds to create new business and new jobs in the State of Illinois, as well to create profit for the investors.

¹ <http://www.census.gov/cgi-bin/sssd/naics/naicsrch?code=721110&search=2012%20NAICS%20Search>

² <http://www.census.gov/cgi-bin/sssd/naics/naicsrch?code=2362&search=2012%20NAICS%20Search>

³ <http://www.census.gov/cgi-bin/sssd/naics/naicsrch?code=5413&search=2012%20NAICS%20Search>

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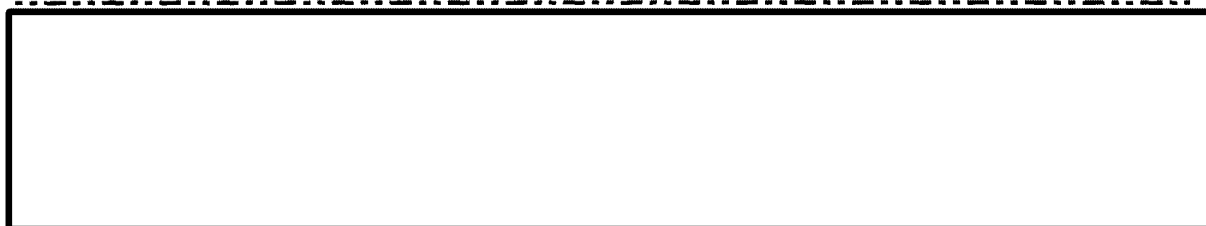


1.4 Project Highlights

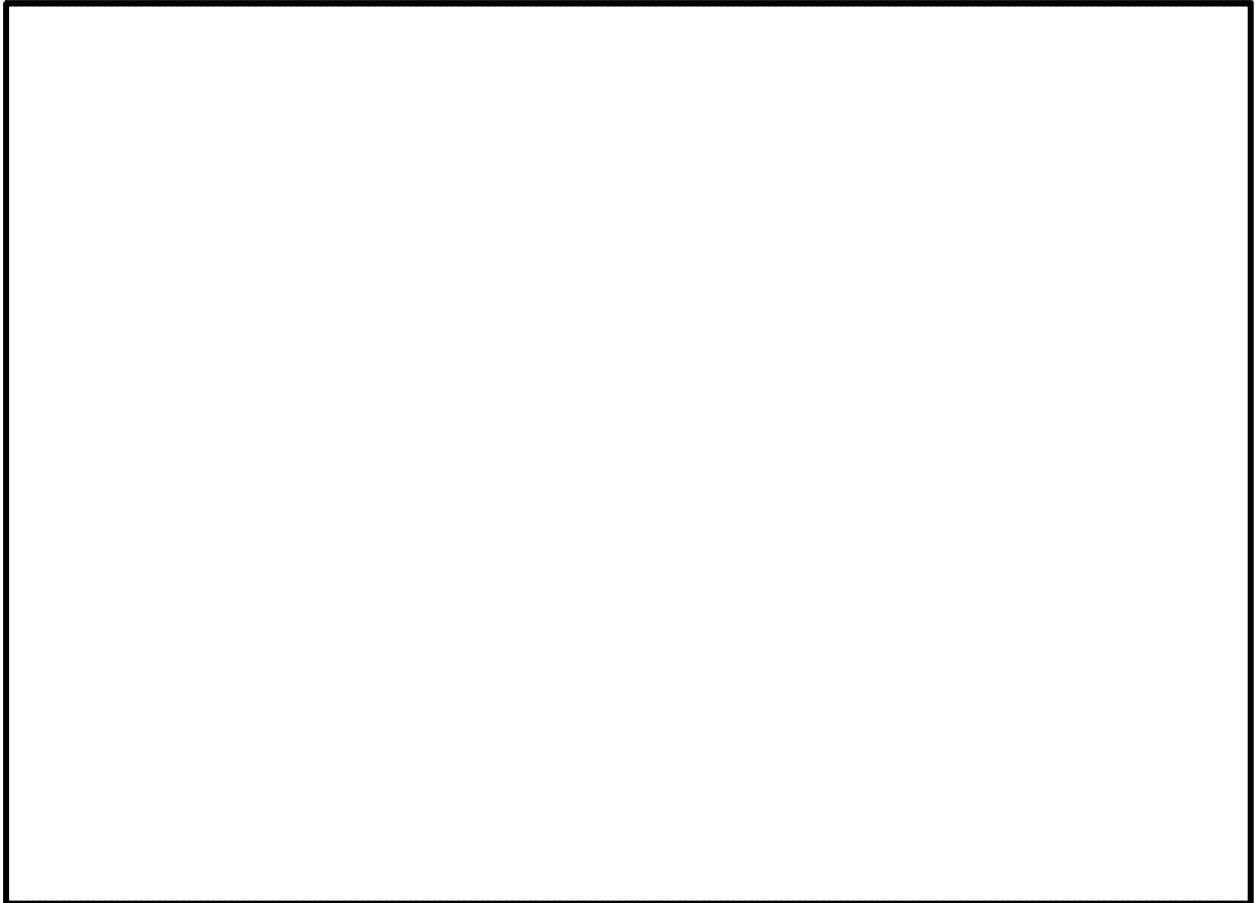
- Project located in the heart of the business district in Chicago or the Chicago Loop. The Loop is surrounded by restaurants, markets, drug stores, service centers, libraries, and hospitals. Guests staying at the hotel will receive the full Chicago experience because of its prime location.
- The Project location is easily accessible by public transportation such as bus, train, Amtrak, and subway.
- The Project will have a variety of amenities such as a full service luxury restaurant offering 3 meals per day, a fitness center, and meeting spaces to cater to those traveling on business.
- The Project location is very close to tourist attractions such as parks and museums.
- Millennium Park is a 3-minute drive and 11-minute walk from the Project location, and Grant Park is also walking distance and features its landmark Buckingham fountain.
- The School of the Art Institute of Chicago is walking distance from the Project location. The school regularly refers their visiting potential students and their families to nearby accessible hotels in the mid to luxury range.
- The Project location is also walking distance from Chicago's financial district, which houses landmark companies such as the Chicago Board of Trade or CME Group. The Project is also walking distance from the Federal Reserve Bank of Chicago.
- The Project location is a 6-minute drive from the Magnificent Mile, which is the mile stretch of Michigan Avenue that contains a mixture of upscale retailers, prestigious residential and commercial buildings, and financial services, catering primarily to tourists and affluent residents.

1.5 Investment Structure

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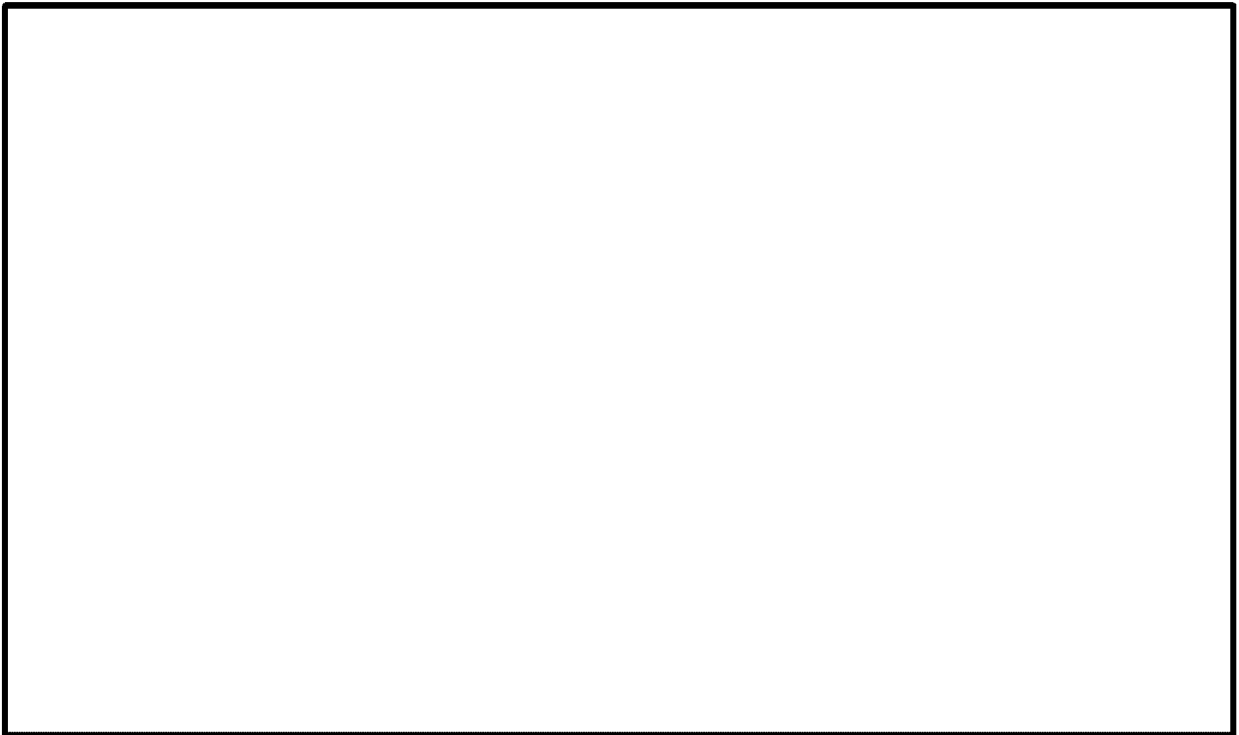


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1.6 Project Cost and Funding

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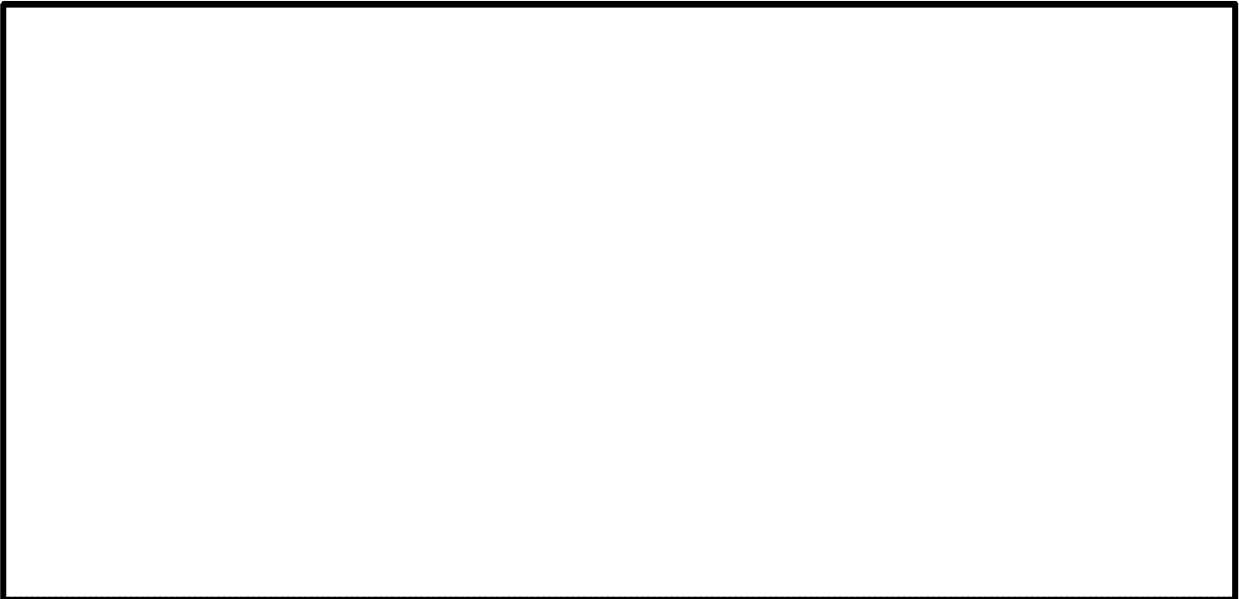


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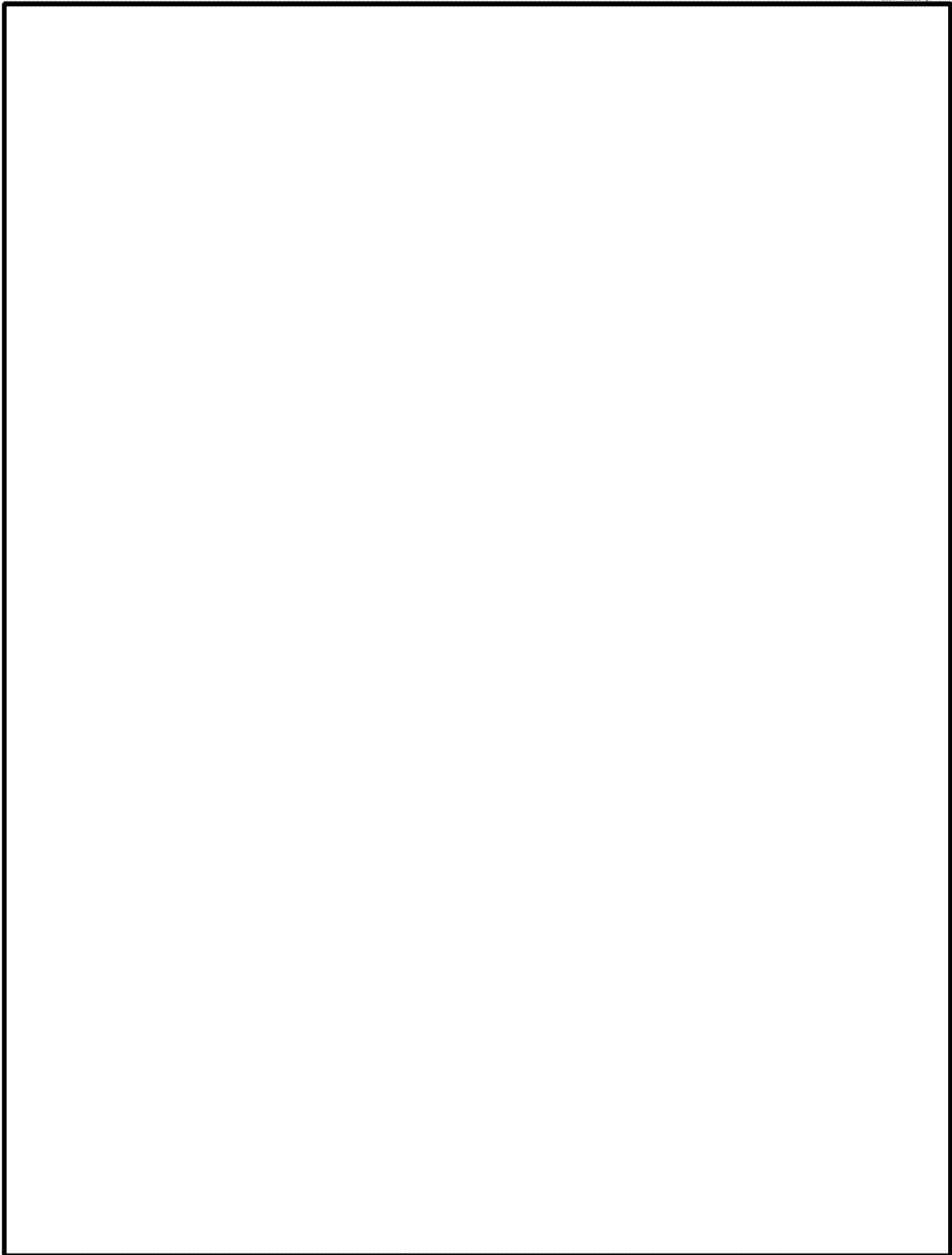
Project Funding

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1.6.1 Project Cost Verification

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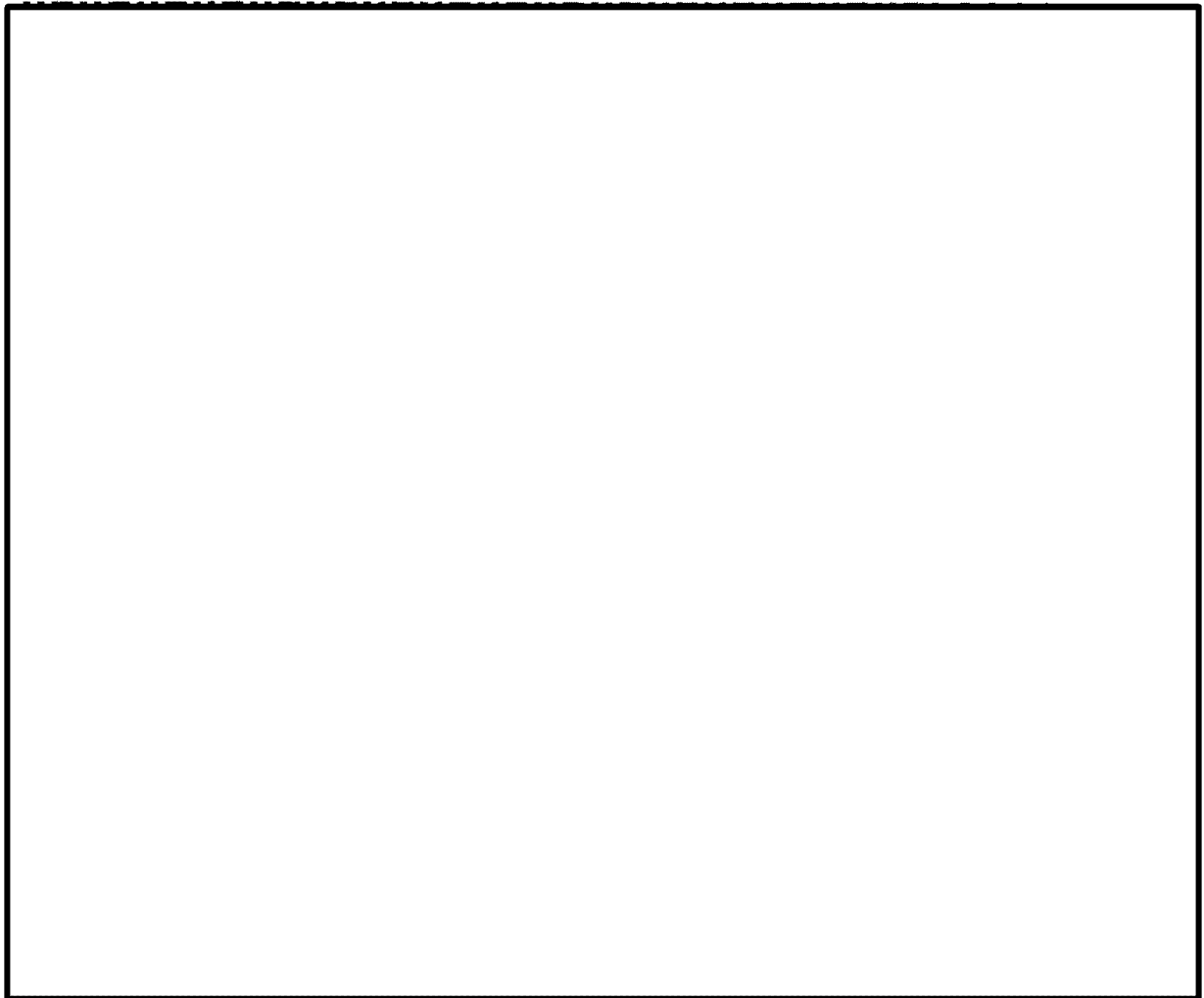


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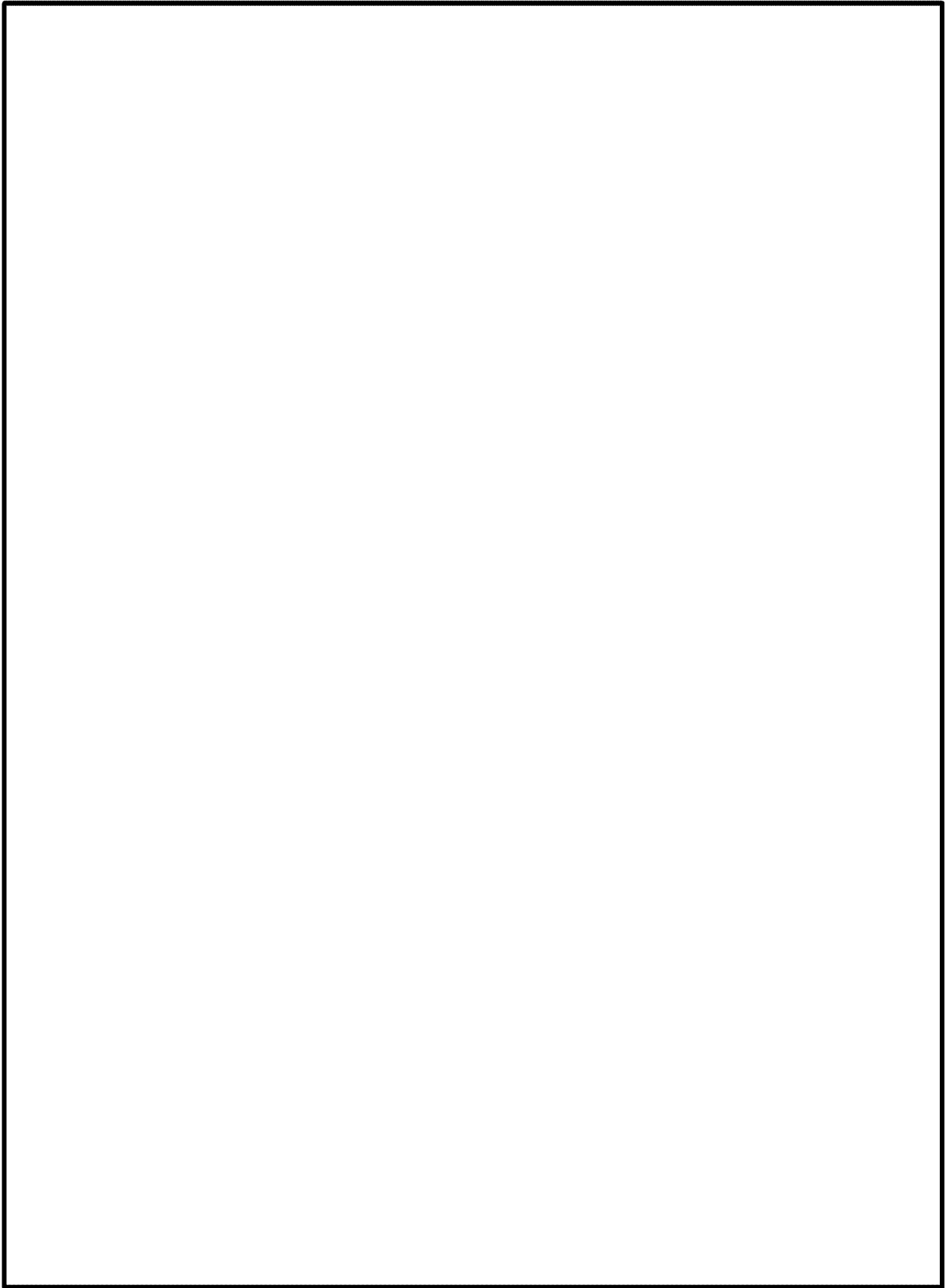


1.7 Development Timeline

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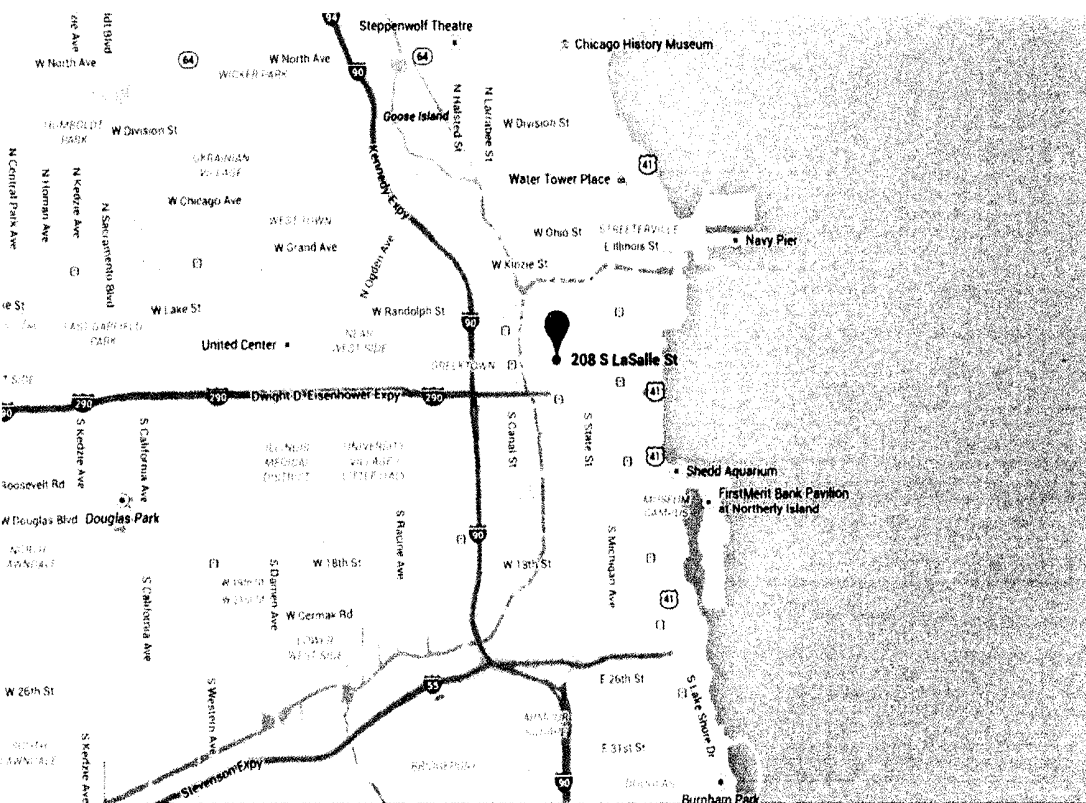
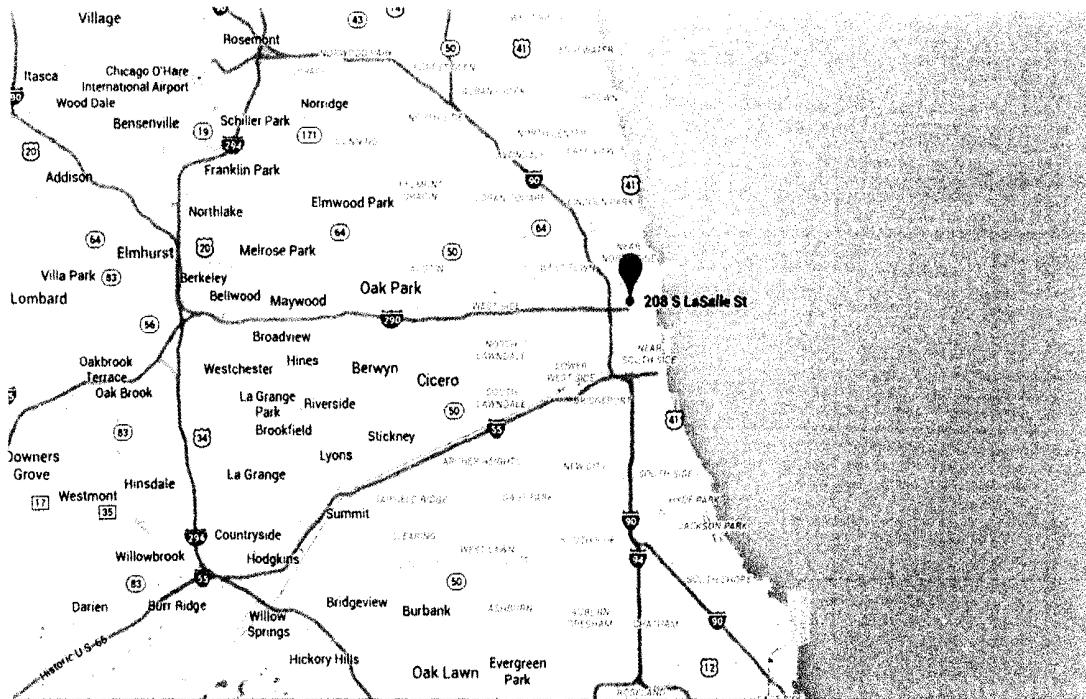


1.8 Project Location

The Project is located at 208 S. LaSalle Street, in the heart of the central business district of Chicago, Illinois, also called the Chicago Loop ("The Loop"). The Loop is home to Chicago's commercial core, City Hall, and the seat of Cook County. The community area is bounded on the west and north by the Chicago River, on the east by Lake Michigan, and on the south by Roosevelt Road, although the commercial core has expanded into adjacent community areas. As a business center, the Loop hosts the Chicago Board of Trade at the foot of LaSalle Street, now called the CME Group. The Loop is home to Grant Park, the State Street shopping district, and the Art Institute of Chicago. Other major cultural institutions that call this area home include the Chicago Symphony Orchestra, the Lyric Opera of Chicago, the Goodman Theatre, the Joffrey Ballet, the central public Harold Washington Library, and the Chicago Cultural Center.

In what is now the Loop Community Area on the south bank of the Chicago River, near today's Michigan Avenue Bridge, the U.S. Army erected Fort Dearborn in 1803. It was the first settlement in the area sponsored by the United States. In 1908, Chicago addresses were made uniform by naming the intersection of State Street and Madison Street in the Loop as the division point for designating addresses, North, South, East, or West on the Chicago street grid.

The ensuing maps provide an overview of the Project location:





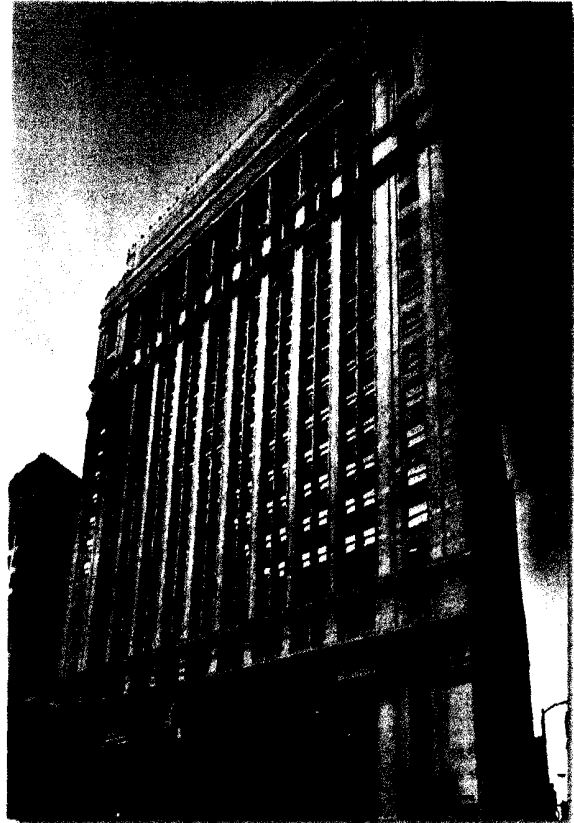
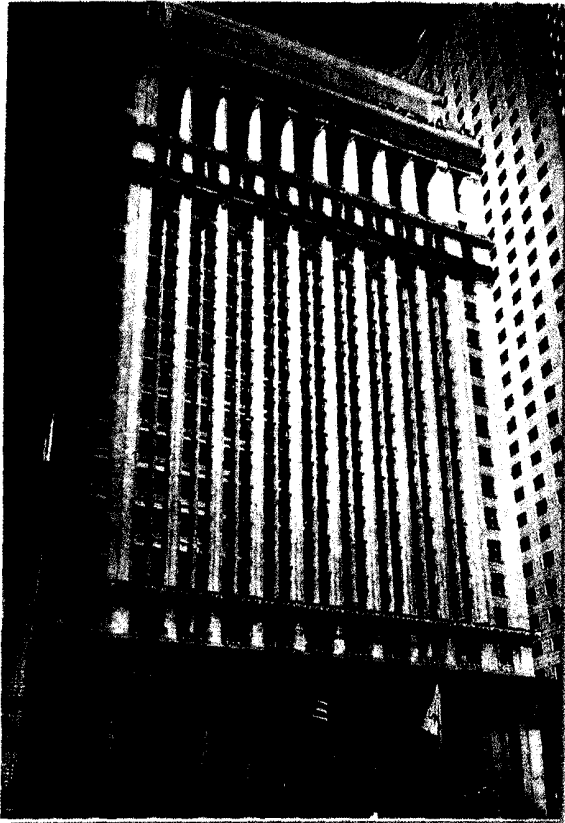
**Maps acquired from Google Maps*

1.9 Project Photos and Site Plans

Project Photos

Hotel Exterior

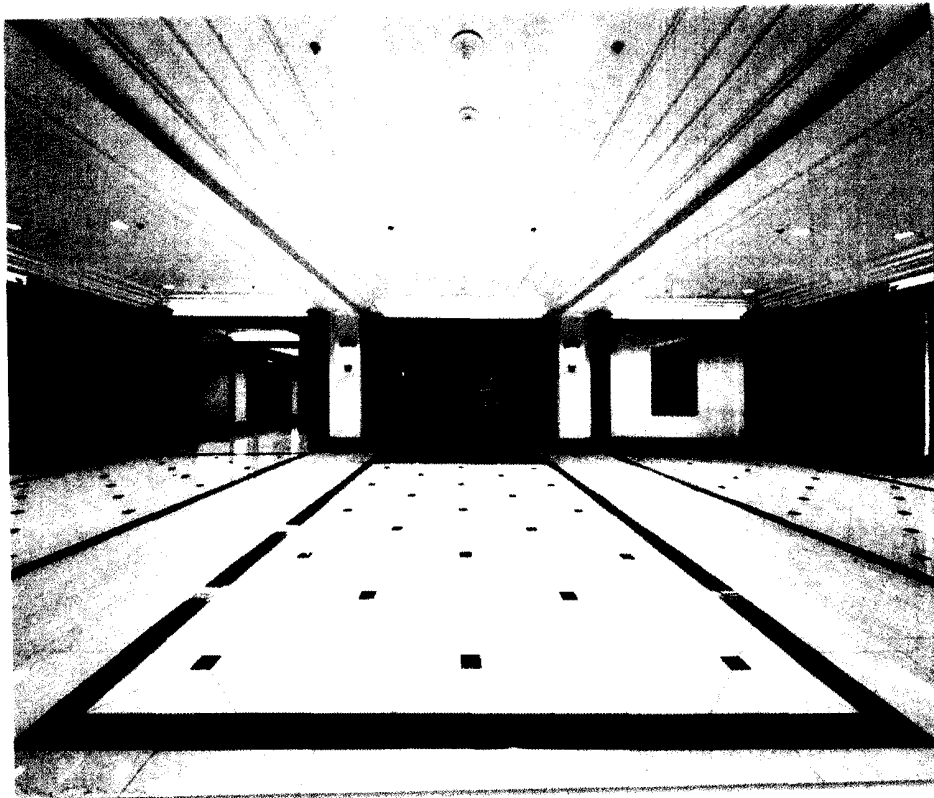


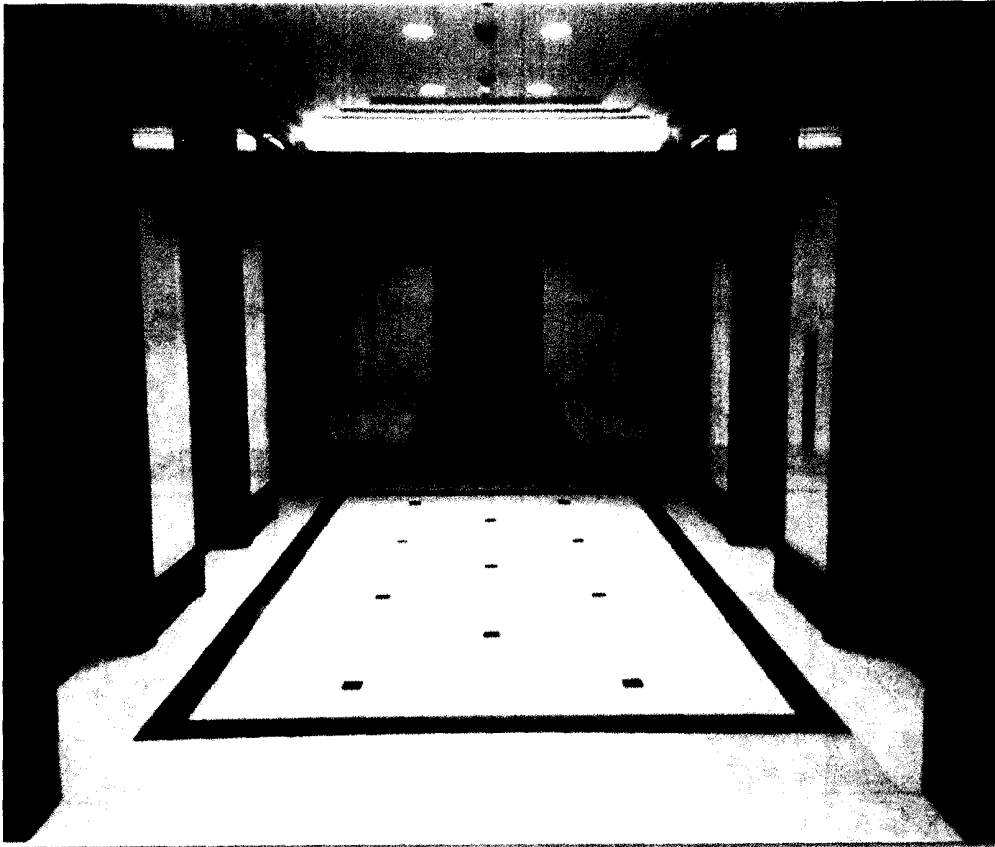


Hotel Entrance



Hotel Interior



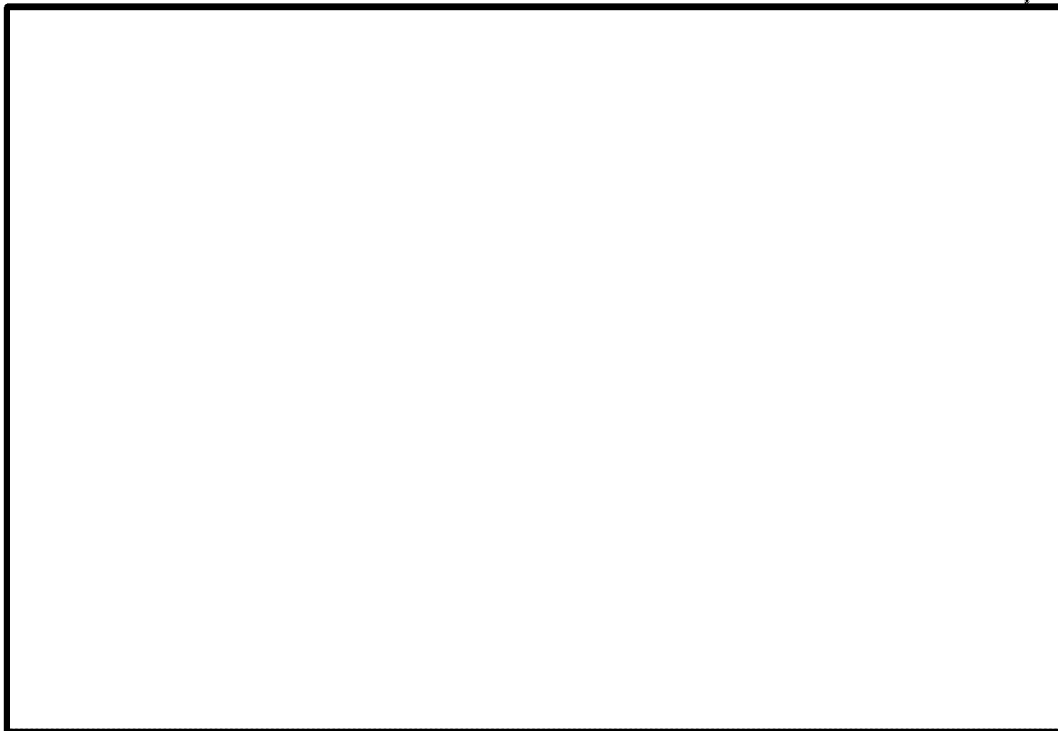




Project Site Plans

Ground Floor 1

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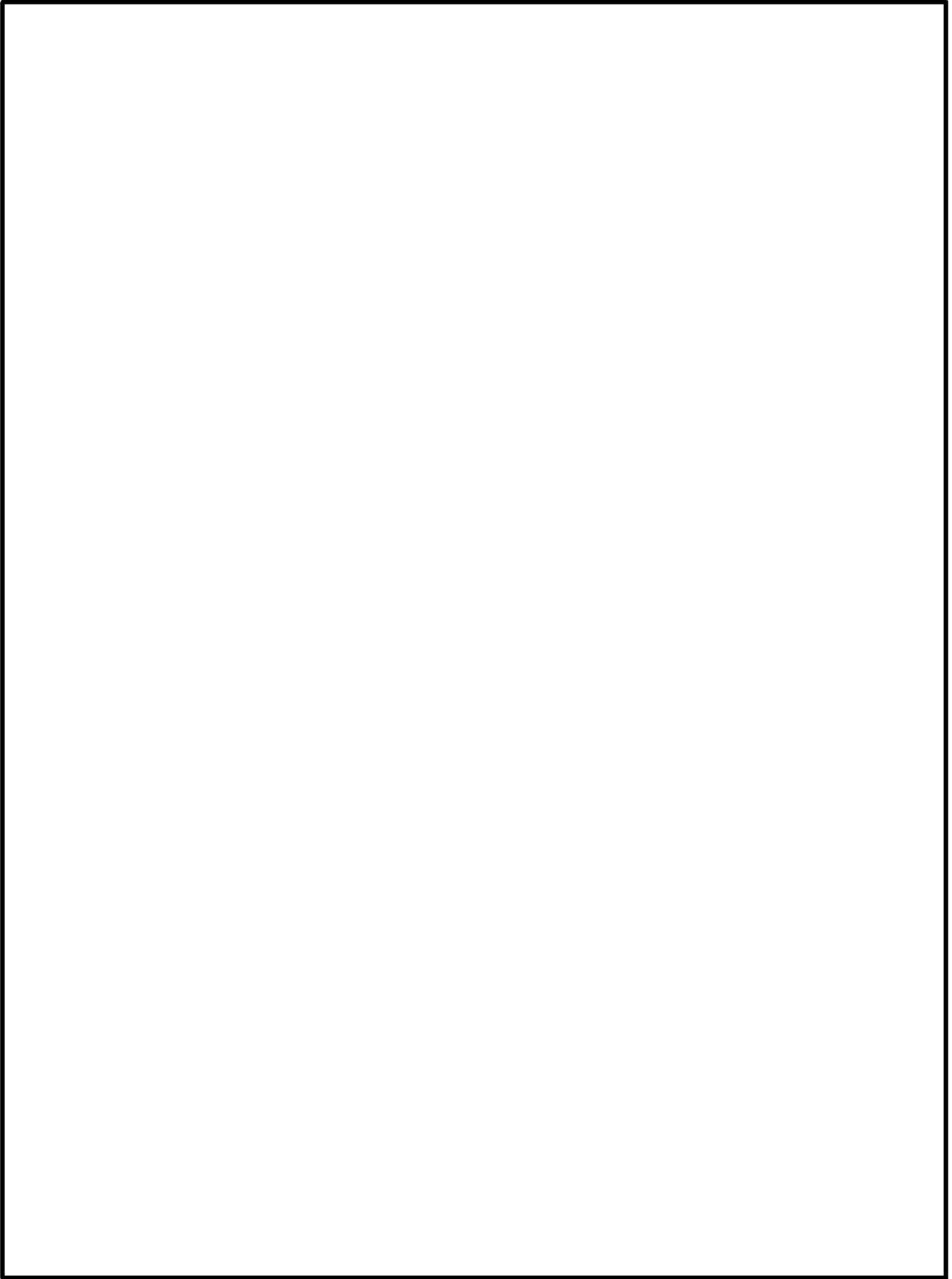


Ground Floor 2

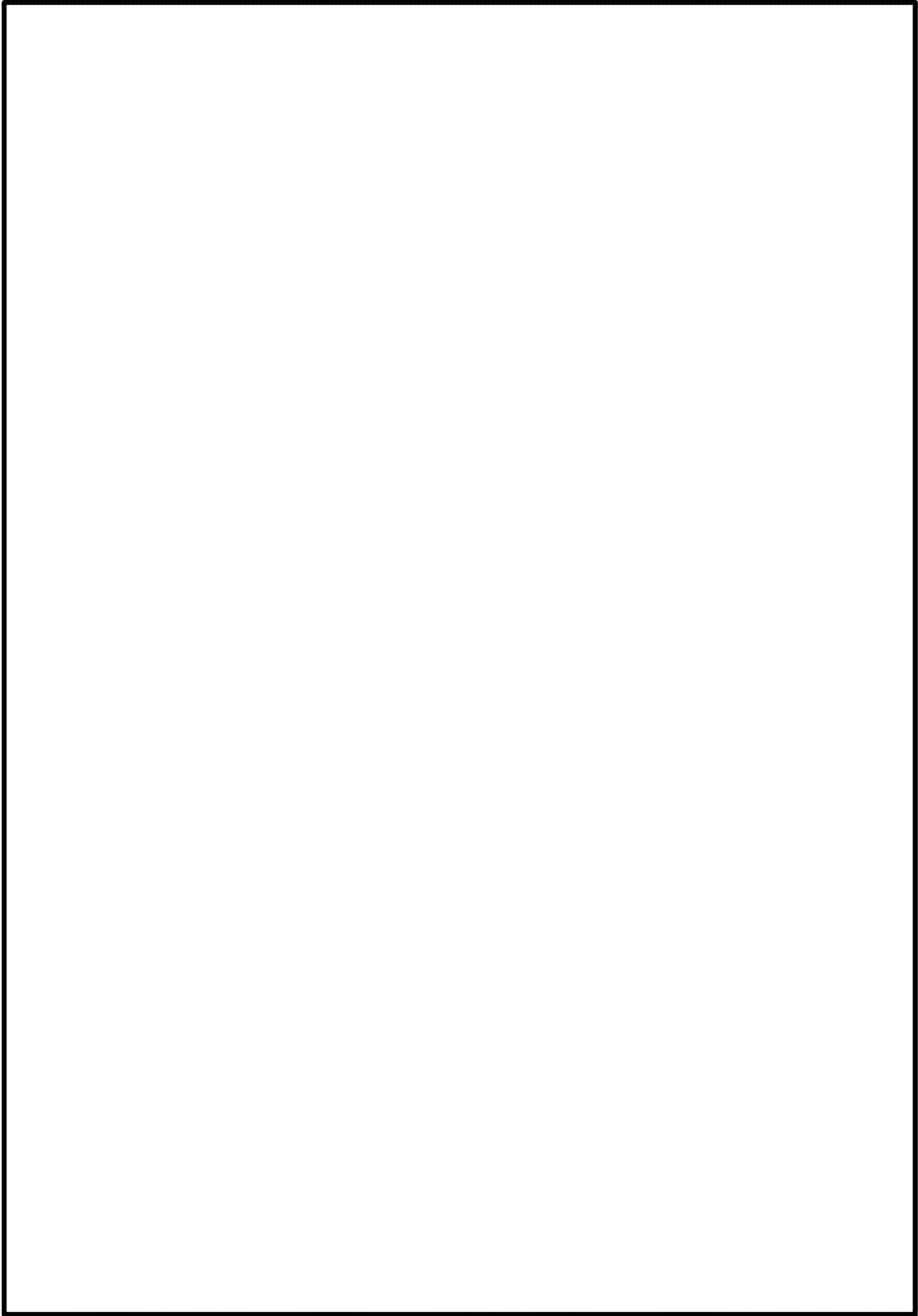
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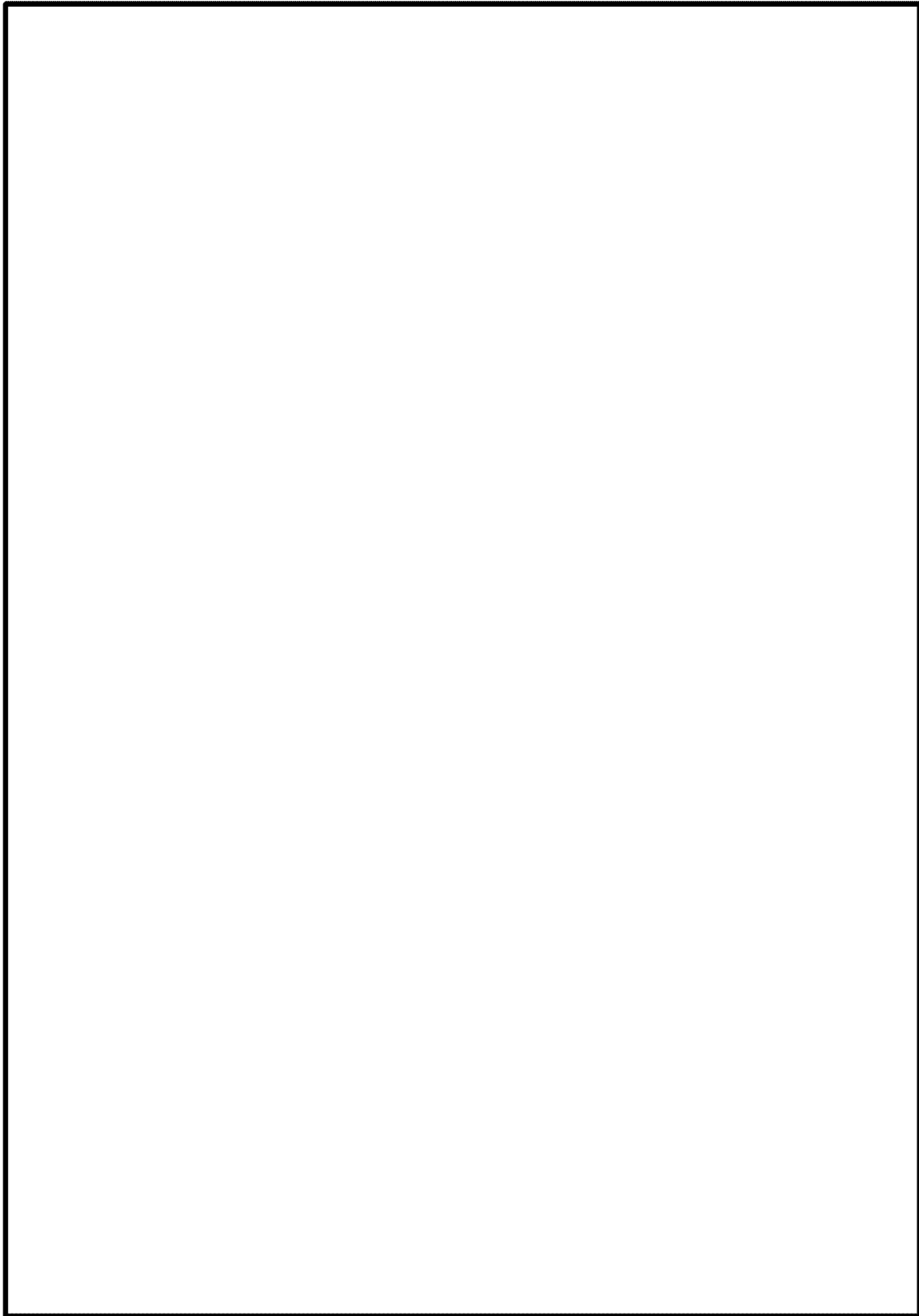
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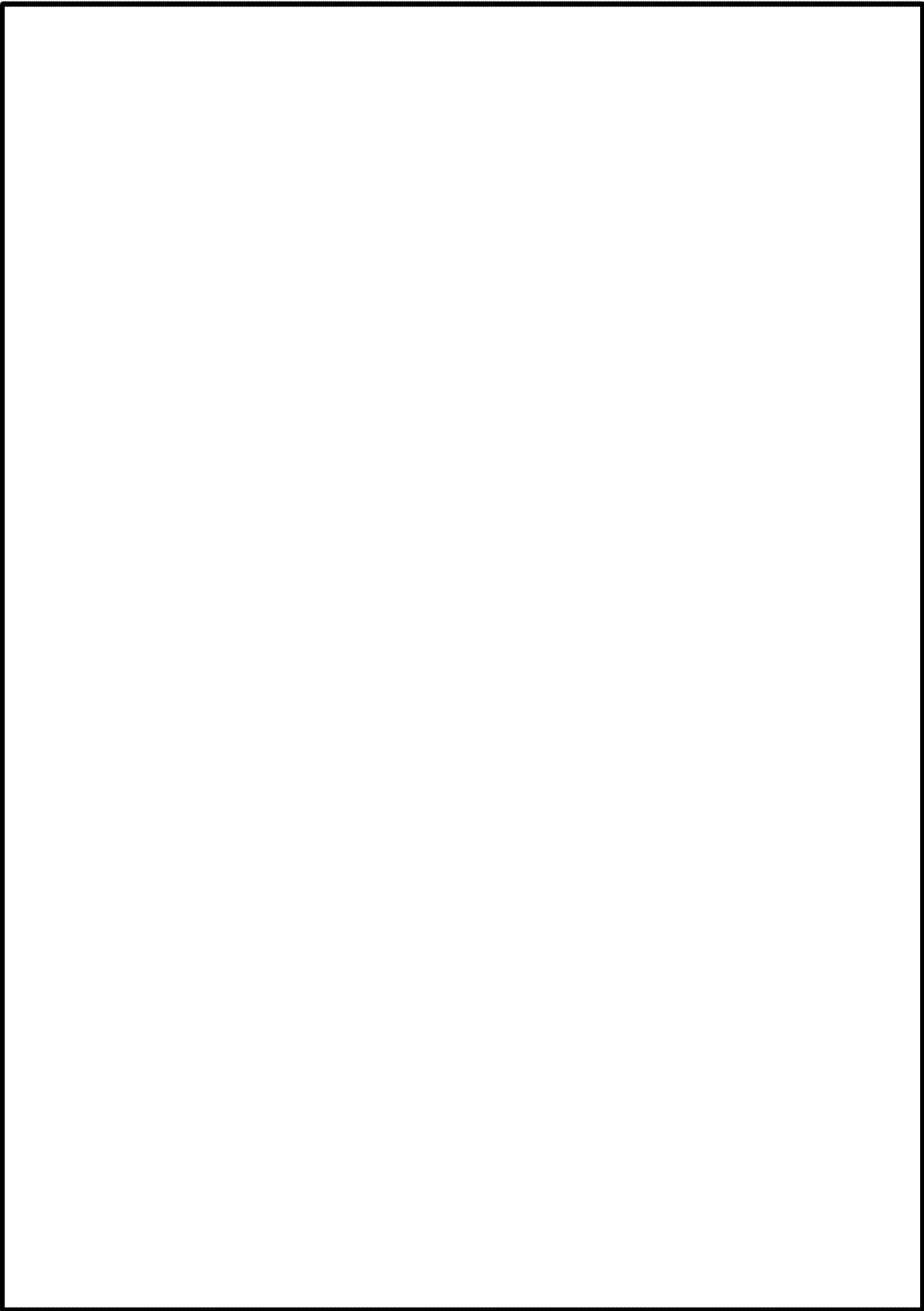


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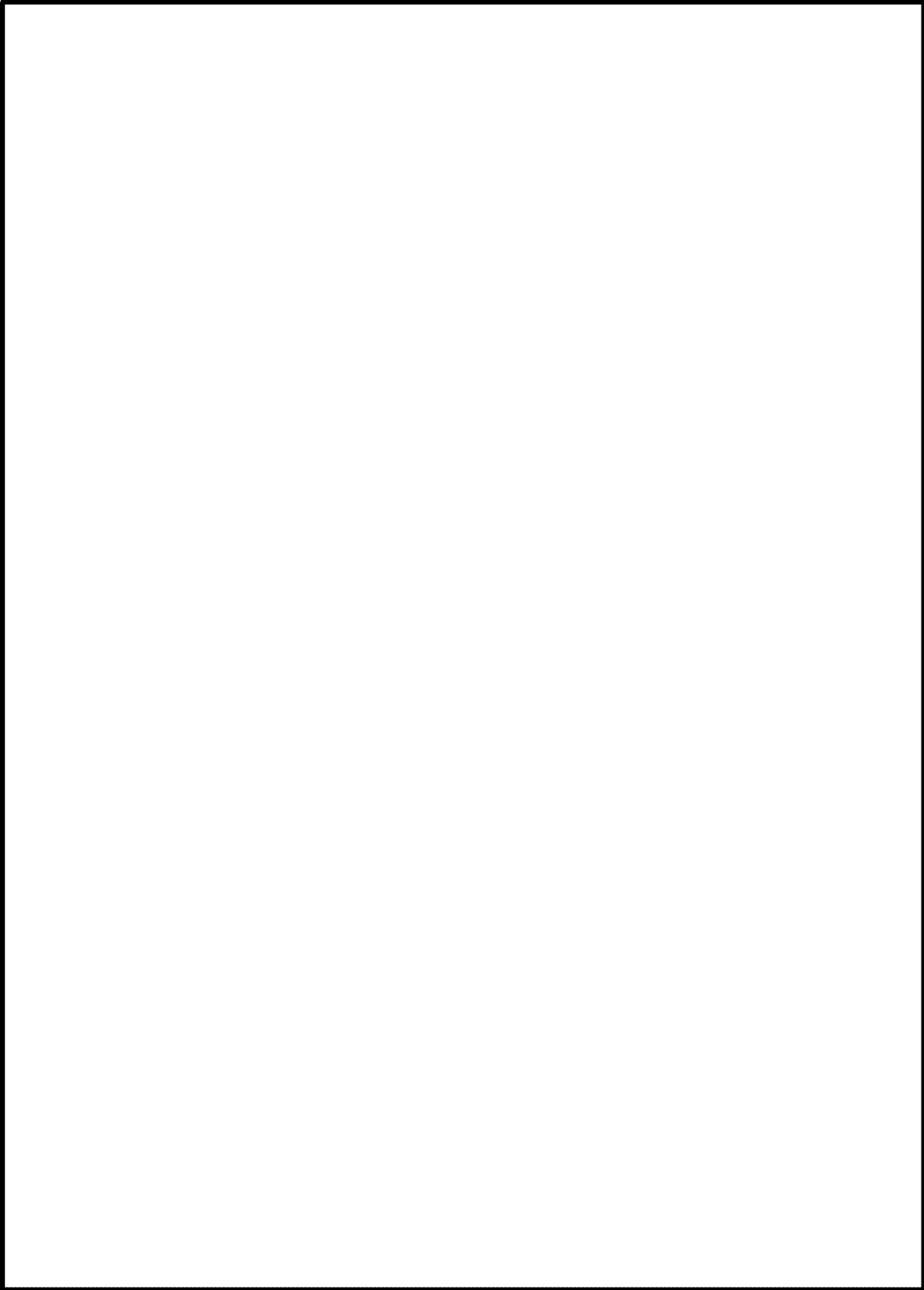


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2.0 Market Analysis

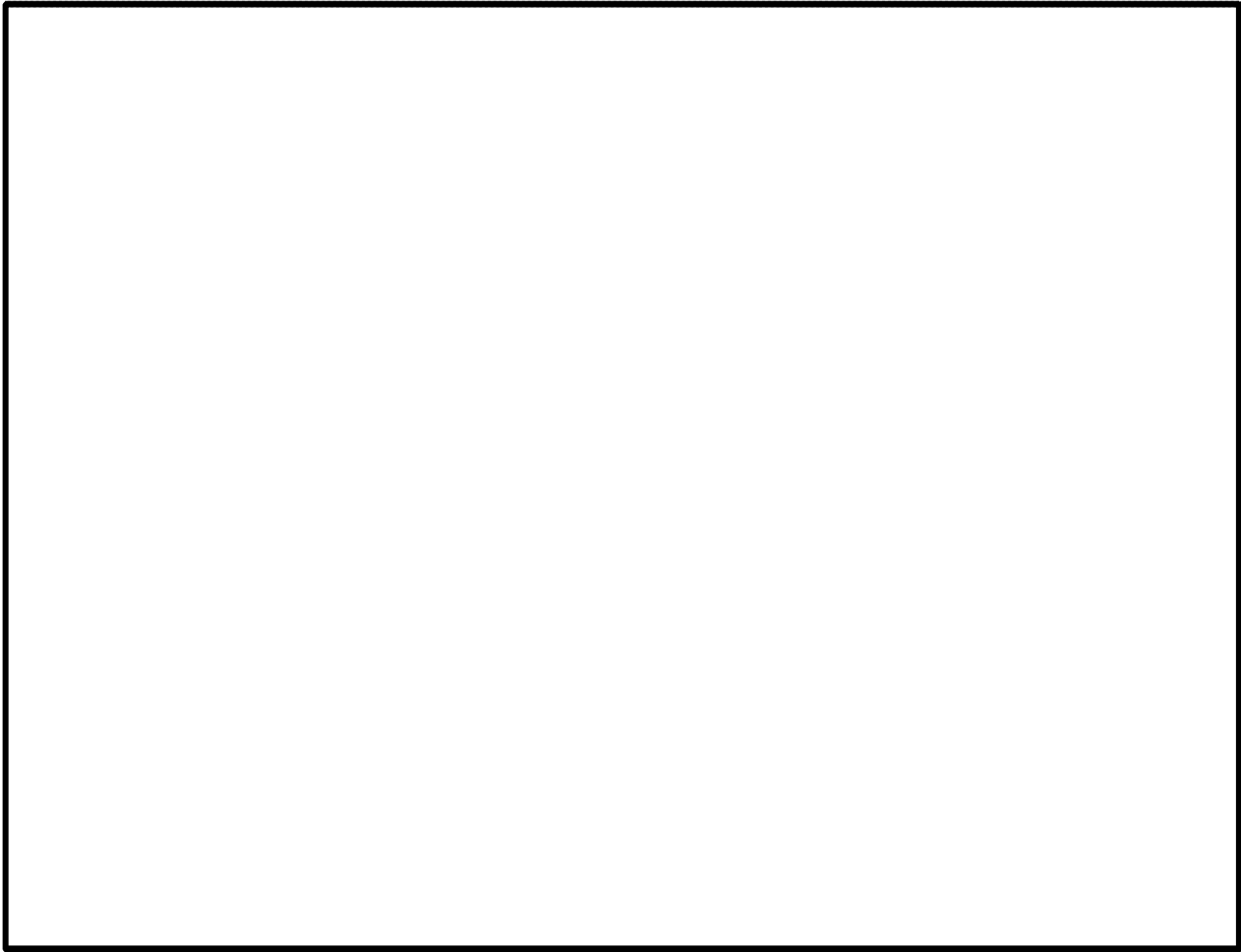
2.1 Target market Analysis

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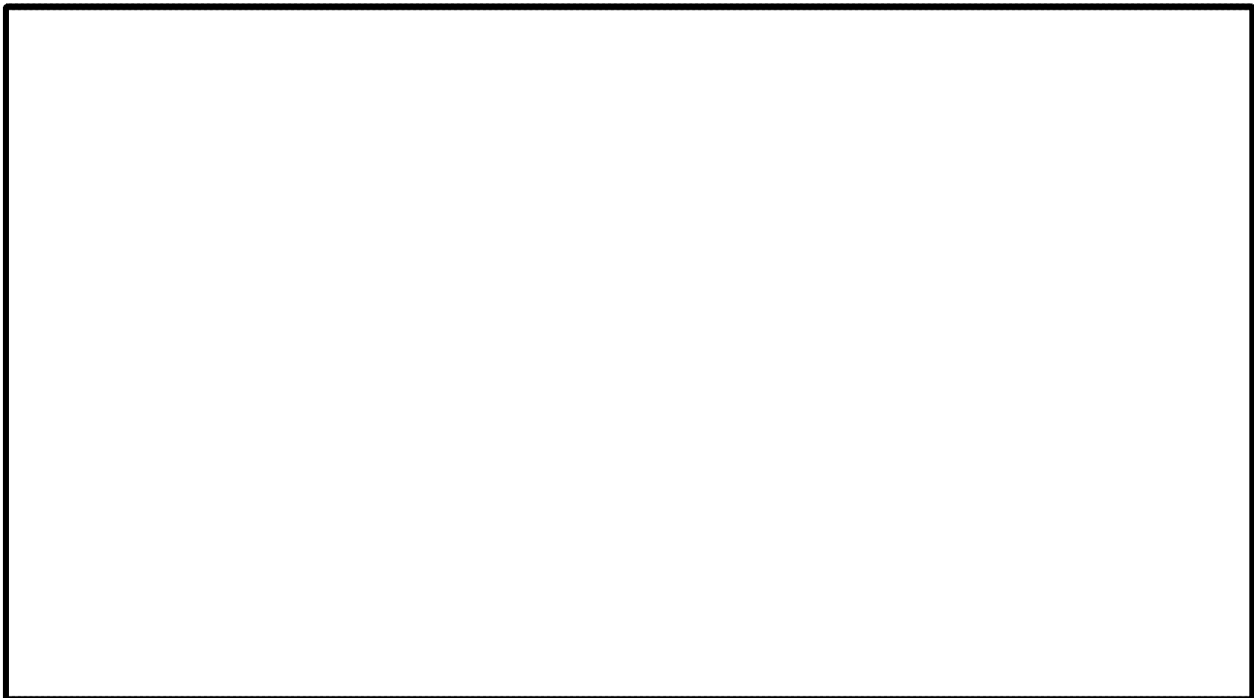


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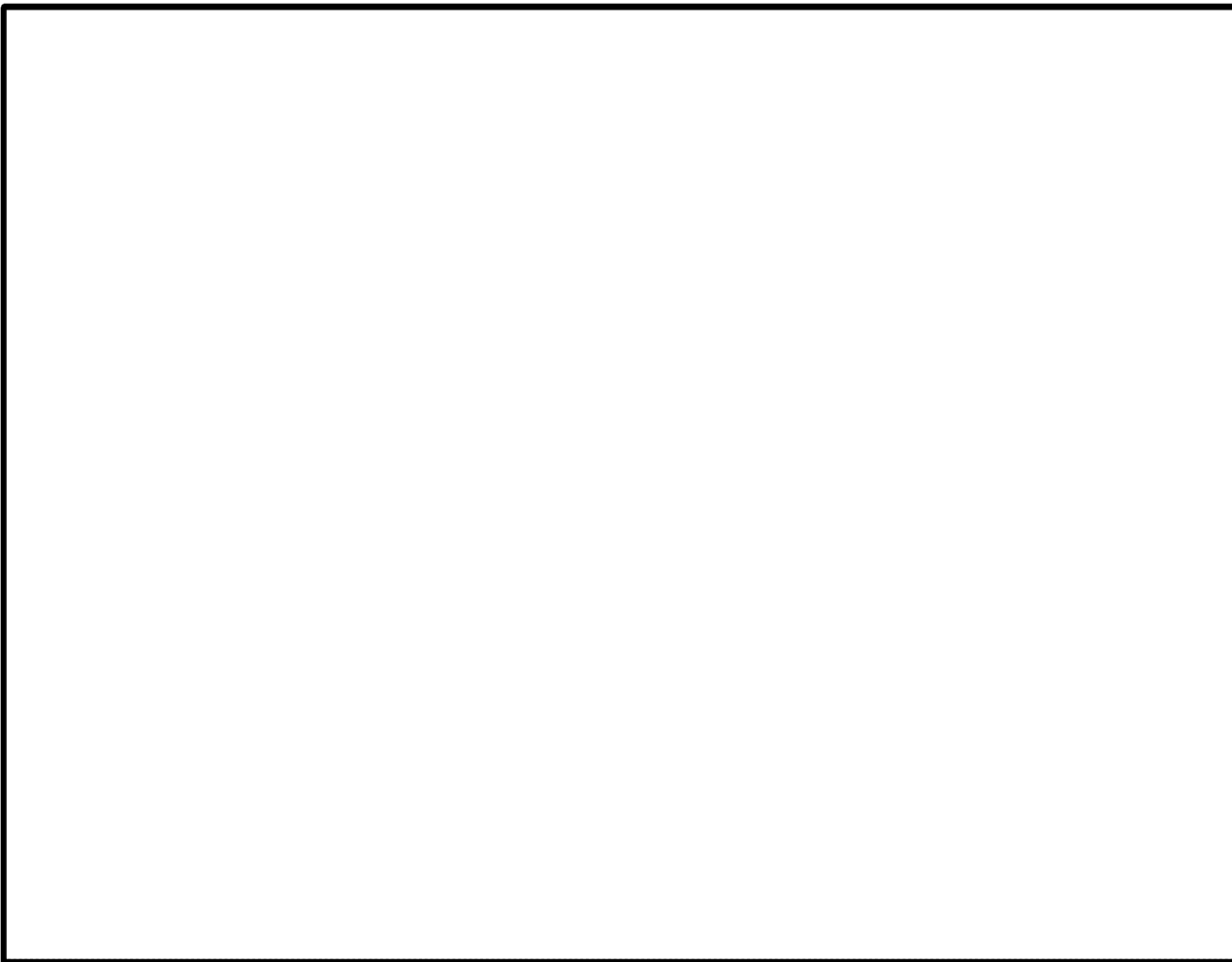


2.2 Market Competitor Analysis

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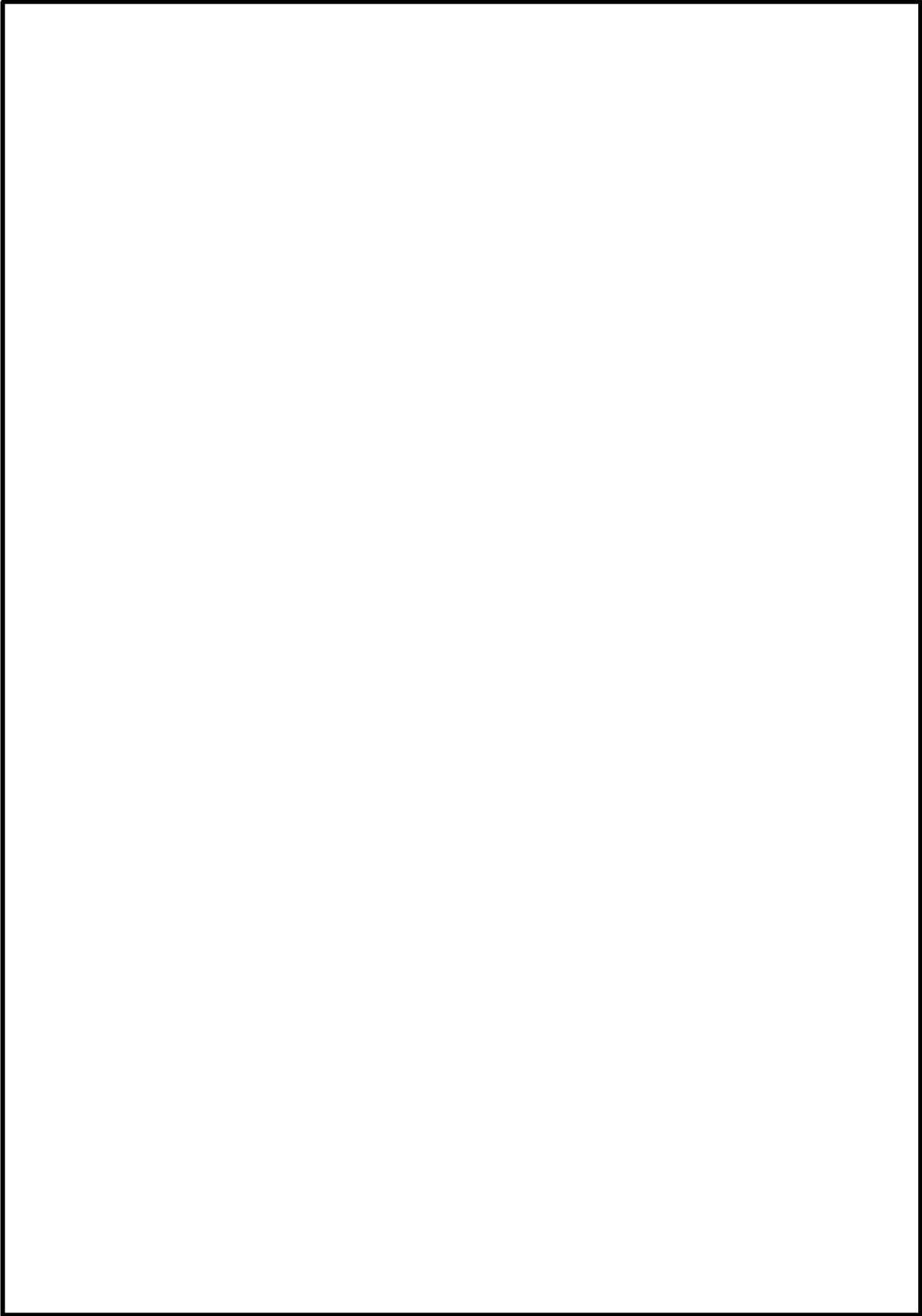


2.3 Marketing Strategy

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3.0 Financial Projections

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4.0 Job Creation

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5.0 Organizational Structure

5.1 Management Team

Michael W. Reschke - Chairman and Chief Executive Officer

Since 1982, Mr. Reschke has served as the Chairman and Chief Executive Officer of The Prime Group, Inc. and its various affiliates ("Prime"). Prime is one of the preeminent real estate development and investment companies in the country. Prime's vast real estate development and investment experience includes all types of institutional-quality real estate, ranging from award-winning office towers to luxury residential housing.

Since 1982, Prime and its affiliates have developed, redeveloped and acquired over \$10.1 billion of institutional-quality commercial and residential real estate across the following product types:

	Square Feet (Units)	Investment (000's)
Office	19,300,000	\$ 3,000,000
Industrial	7,000,000	250,000
Retail	12,000,000	2,200,000
Multi-Family	(15,000)	1,700,000
Condominium	(1,500)	900,000
Senior Housing	(6,000)	1,000,000
Hotel	(1,300)	650,000
Land Development	N/A	400,000
Total		\$ 10,100,000

During the 1990's, Prime achieved the unique distinction of being the founding shareholder of five publicly-traded real estate companies, each one being the successor-in-interest to various operating divisions of Prime. In 1994, Prime organized two publicly-traded real estate companies - Prime Retail, Inc. and Ambassador Apartment, Inc. - which became successors-in-interest to Prime's retail and multi-family divisions. In 1997, Prime again organized two publicly-traded real estate companies - Brookdale Living Communities, Inc. and Prime Group Realty Trust - which became successors-in-interest to Prime's senior housing and office/industrial divisions. Finally, as part of Prime Retail's acquisition of The Horizon Group, Inc. in 1998, Prime created Horizon Group Properties, Inc. through a spin-off to shareholders.

In 1997, Ambassador Apartments, Inc. was acquired by Apartment Investment and Management Company, Inc. ("AIMCO") in a stock-for-stock merger. In 2000, Brookdale Living Communities, Inc. was acquired by Fortress Real Estate Investments following a friendly cash tender offer. Prime

Retail, Inc. and Prime Group Realty Trust were separately sold in cash-for-stock merger transactions in 2003 and 2005, respectively.

Mr. Reschke continues to manage and direct the private real estate development and investment activities of Prime, and is based at Prime's headquarters at 321 North Clark Street, Suite 2500, Chicago, Illinois 60610 (phone 312-917-4201; fax 312-917-1511).

From 2000 until 2003, Mr. Reschke served on the board of World Business Chicago – a public-private non-profit organization founded in 2000 to promote and market the City of Chicago on a national basis to business leaders looking for a place to start, expand, or relocate their businesses. Currently, Mr. Reschke serves on the board of the Real Estate Roundtable in Washington, D.C. and the American Liver Foundation (Chicago Chapter). Mr. Reschke also is a current member of the Urban Land Institute, the Economic Club of Chicago, and the Chicago Development Council.

Mr. Reschke is a summa cum laude graduate from Northern Illinois University, receiving a Bachelor of Science degree in Accounting with Honors in 1977. Mr. Reschke also is a summa cum laude graduate from the University of Illinois, College of Law, receiving a Juris Doctorate degree in 1980. Mr. Reschke is licensed to practice law in the State of Illinois and is a Certified Public Accountant.

Mark C. Cynkar - Chief Financial Officer

Mr. Mark K. Cynkar joined Prime in October 1989 and has served as Senior Vice President and Chief Financial Officer of Prime since December 1996, prior to which Mr. Cynkar served as Prime's Senior Vice President and Director of Taxation. Prior to joining Prime, Mr. Cynkar had eleven years of tax experience with the public accounting firms of Ernst & Young and Coopers & Lybrand. Mr. Cynkar is a Certified Public Accountant and a member of The American Institute of Certified Public Accountants and The Illinois CPA Society. Mr. Cynkar holds a B.S. in Commerce and a M.S. in Taxation from De Paul University.

Jeffrey P. Breaden - Senior Vice President

Mr. Jeffrey P. Breaden serves as Senior Vice President of The Prime Group, Inc. Mr. Breaden oversees financial structuring, project underwriting, execution of financial transactions, and asset management. He has been with The Prime Group, Inc. since 2004. Prior to joining The Prime Group, Inc., Mr. Breaden served as Vice President of HIGroup, LLC, where he directed approximately \$2.5 billion of asset sales and finance transactions. Mr. Breaden received a B.A. in history and economics from Northwestern University.

Neil Stempel - Senior Vice President/Development

Neil Stempel is Senior Vice President of Development with The Prime Group, Inc. With over 30 years of experience in architecture, construction management, and real estate development, Mr. Stempel is responsible for overseeing the development of Prime's hospitality, residential, commercial, and mixed-use projects from due diligence through occupancy. Prior to joining Prime in 2007, he managed the development of senior living facilities with Brookdale Living Communities, Inc. Earlier in his career, Mr. Stempel was associated with an internationally renowned architecture firm and later an ENR top-50 contractor. He has practiced architecture in the United States, Europe, and the Middle East, and has managed a Chicago-based construction company.

Mr. Stempel holds a Bachelor of Architecture from Syracuse University and a Master of Management from the Kellogg School of Management at Northwestern University, and has taught architectural design and construction technology in Boston and Chicago. He is a registered architect, a member of both the American Institute of Architects and the National Council of Architectural Registration Boards, a LEED Accredited Professional, and licensed real estate broker. In addition, Mr. Stempel has served on the boards of numerous educational and civic organizations.

5.2 Consultants

Rosenberg Kim & Jimenez Ltd. – Immigration and Securities Counsel

Rosenberg Kim & Jimenez, Ltd (RKJ Legal) was founded to provide legal and related services to all-sized businesses and individuals participating within the global marketplace. Based in the United States, the firm maintains a commitment to foster the development of a “global mind-set” among the business and investment communities. Mr. Thomas Rosenberg and Mr. Steve Kim are the managing partners, acting as general counsels to Prime Group to provide legal insight and guidance in the company’s development activities. RKJ Legal is focused primarily in a variety of areas of practice including renewable energy law, international trade, immigration, and construction law.

Immigration & Regulatory Law

RKJ has developed a unique blend of legal and business knowledge, and employs it to assist domestic, foreign and international companies to establish and develop business enterprises throughout international markets.

RKJ represents clients ranging from mid to large-sized American manufacturing companies to small businesses and individuals in their international business pursuits. In addition to assisting U.S. businesses with the sale and distribution of their products abroad and the protection and licensing of their intellectual property, their lawyers select and work with foreign counsel to assist in the establishment of overseas facilities and operations, including joint ventures with foreign partners.

RKJ also represents many overseas clients in U.S. legal matters. Their attorneys help international companies establish or purchase facilities and commence operations in the United States. They also handle personnel, benefits, taxation, immigration, litigation, labor relations, distribution, intellectual property, and various aspects of counseling foreign clients in connection with their U.S. plans and operations.

Impact DataSource, LLC - Economist

Impact DataSource is a 20-year-old Austin, Texas economic consulting, research and analysis firm. The company has conducted over 2,500 economic impact analyses of firms, projects, and activities in most industry groups and in more than 30 states. Impact DataSource has completed economic analyses for several successful regional center projects under the USCIS EB-5 program.

In addition, Impact DataSource has prepared and customized over 50 economic impact models for its clients to perform their own analyses of economic development projects. These clients include the New Mexico Economic Development and the Metro Orlando (Florida) Economic Development Commission.

The New Mexico Department of Economic Development uses Impact DataSource's computer model to project the economic impact of new or expanding firms in the state and costs and benefits for the State of New Mexico and each local taxing district. The model also calculates the amount of eligible state and local incentives, and calculates a rate of return and payback period for these incentives.

The People of Impact DataSource:

Impact DataSource's team includes the following members:

- Jerry Walker, principal/economist,
- Paul Scheuren, principal/economist, and
- Michael Kester, economist

Appendix

About Bizminer data

About the Data

Raw data analyzed for BizMiner reports is sourced from an array of the nation's government and private statistical sources. None of these raw data sources creates the final measures reflected in BizMiner industry profiles. In total, BizMiner accesses over a billion sourced data points from 15 million business operations for each of its twice annual updates covering a 3-5 year time series. Historical data and BizMiner algorithms are used to inform and test projections for non-reporting firms. Data elements are sourced specifically from:

- IRS SOI Corporation Income Tax Returns
- IRS SOI Corporation Tax Book
- IRS SOI 1040 Schedule C Income Tax Returns
- IRS SOI Statistics of Income- Individual Tax Statistics
- US Economic Census of Manufactures
- US Census Economy Overview
- US Census Annual Survey of Manufactures
- US Census Annual Retail Trade Survey
- US Census Annual Wholesale Trade Survey
- US Census Quarterly Financial Reports
- US Census County Business Patterns
- Bureau of Labor Statistics Monthly Employment Reports
- Bureau of Labor Statistics Monthly Unemployment Reports
- US Census Wholesale Trade Report
- US Census Quarterly (New Housing) Sales by Price and Financing
- US Census Total Construction Spending
- US Census Retail Trade Report
- US Census Quarterly Services Survey
- Commercial Real Estate Survey
- Credit Reporting Agencies
- InfoGroup, Inc.
- Business Directories

While 100% firm coverage is desirable for analysis purposes, the greatest value of Bizminer reports rests in discerning patterns of activity, which are reflected in the large samples used to develop our reports. The overall current coverage of the databases surpasses 13 million active business operations at any point in time.

As is the case with any databases this large, some errors are inevitable. Some firms are missed and specific information on others is lacking from the database. Not all information received is uniform or complete, resulting in the need to develop projection algorithms for specific industry segments and metrics in some report series. No representation is made as to the accuracy of the databases utilized or the results of subsequent analyses. Neither the Brandow Company nor its resellers has undertaken independent primary research to confirm the accuracy of the data utilized in the Profile analyses. Neither the Brandow Company nor its resellers are responsible for conclusions drawn or decisions made based upon this data or analysis. In no event will the Brandow Company or its resellers be liable for any damages, direct, indirect, incidental or consequential resulting from the use of the information contained in Bizminer reports.

About Hoover's Data

Hoover's Data is derived from Dun and Bradstreet, a publicly traded company that is considered the world's leading source of commercial information and insight on businesses, enabling companies to decide with confidence for more than 170 years. Today, D&B's global commercial database contains more than 200 million business records. Enhanced by D&B's proprietary DUNSRight™ Quality Process, the D&B database provides consumers with unparalleled quality business information -- the foundation of D&B's global solutions that consumers rely on to make critical business decisions.

D&B provides solutions that meet a diverse set of global consumer needs. Consumers use D&B Risk Management Solutions™ to mitigate credit and supplier risk, increase cash flow and drive increased profitability; D&B Sales & Marketing Solutions™ to increase revenue from new and existing customers; and to convert prospects into clients faster by enabling business professionals to research companies, executives and industries.

- D-U-N-S® Number - Created in 1962, the Data Universal Numbering System or D-U-N-S® Number is D&B's copyrighted, proprietary means of identifying business entities on a location-specific basis. Assigned and maintained solely by D&B, this unique nine-digit identification number has been assigned to over 200 million businesses worldwide.
- Worldwide Network™— an unparalleled alliance of commercial information providers covering more than 190 countries creating the most comprehensive source of local and global business information.
- DUNSRight™—the most comprehensive and rigorous patented process that transforms business information into decision-ready insight.
- Global Database—the largest single source of local and global business information and actionable insight.

About STR Data

STR's commitment to confidentiality and accuracy has set the industry standard since, as the story goes, Randy and Carolyn Smith, co-founders of STR, launched the company more than 25 years ago

from the kitchen table of their home. Today, from its headquarters outside of Nashville, Tennessee, the company gathers lodging industry supply, demand and performance data from hotels located in more than 160 countries. Over 49,000 hotels globally, representing over 6.6 million rooms, are currently using the STAR Report or Hotel Survey to benchmark their hotel's performance versus a competitive set or market. Over the years, STR has also created numerous products to benefit non-hoteliars that gauge market performance, supply and demand, and forecasts. One of these products is the Hotel Census Database, which houses the information of more than 161,000 hotels worldwide and growing. This database was STR's first product and put them on the map.

In 2008 and 2009, STR experienced extreme growth and at the request of its clients, expanded its benchmarking efforts outside North America with the creation of STR Global. STR Global was formed through a merger between STR, The Bench, and Deloitte's HotelBenchmark. STR Global provides service to all areas outside of North America, while STR continues to provide service to North America. During this same time period, STR also formed the STR family of companies, which includes STR Analytics and Hotel News Now. By joining forces and expanding their reach, the STR family of companies has become an all-encompassing global company that provides data, analysis, research and news to the hotel industry. STR also founded the annual Hotel Data Conference, which brings hotel industry leaders together to discuss the latest trends, evaluate the current market, and present forecasts for the coming year.



OFFICE OF THE SECRETARY OF STATE

JESSE WHITE • Secretary of State

SEPTEMBER 09, 2014

0497914-1

THE PRIME GROUP INC
120 N LASALLE ST STE 3200
CHICAGO, IL 60602-0000

RE LASALLE STREET REGIONAL CENTER, LLC

DEAR SIR OR MADAM:

IT HAS BEEN OUR PLEASURE TO APPROVE AND PLACE ON RECORD THE ARTICLES OF ORGANIZATION THAT CREATED YOUR LIMITED LIABILITY COMPANY. WE EXTEND OUR BEST WISHES FOR SUCCESS IN YOUR NEW VENTURE.

PLEASE NOTE! THE LIMITED LIABILITY COMPANY MUST FILE AN ANNUAL REPORT PRIOR TO THE FIRST DAY OF THIS ANNIVERSARY MONTH NEXT YEAR. FAILURE TO TIMELY FILE WILL RESULT IN A \$300 PENALTY AND/OR DISSOLUTION/REVOCATION. A PRE-PRINTED ANNUAL REPORT WILL BE MAILED TO THE REGISTERED AGENT AT THE ADDRESS ON OUR RECORDS APPROXIMATELY 45 DAYS BEFORE THE DUE DATE.

FOR A LIMITED LIABILITY COMPANY THAT INTENDS TO PROVIDE CERTAIN PROFESSIONAL SERVICES FOR WHICH INDIVIDUALS ARE REQUIRED TO BE LICENSED, A CERTIFICATE OF REGISTRATION MUST BE OBTAINED FROM THE ILLINOIS DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION. IF THE LLC IS SO REGISTERED, THE CURRENT ADDRESS FROM WHICH THE PROFESSIONAL SERVICES ARE PROVIDED MUST ALSO BE ON RECORD WITH THIS OFFICE.

MANY OF OUR SERVICES ARE AVAILABLE AT OUR CONTINUOUSLY UPDATED WEBSITE. VISIT WWW.CYBERDRIVEILLINOIS.COM TO VIEW THE STATUS OF THIS COMPANY, PURCHASE A CERTIFICATE OF GOOD STANDING, OR EVEN FILE THE ANNUAL REPORT REFERRED TO IN THE EARLIER PARAGRAPH.

SINCERELY YOURS,

JESSE WHITE
SECRETARY OF STATE
DEPARTMENT OF BUSINESS SERVICES
LIMITED LIABILITY DIVISION
(217) 524-8008

Form **LLC-5.5**
May 2012
Secretary of State
Department of Business Services
Limited Liability Division
501 S. Second St., Rm. 351
Springfield, IL 62756
217-524-8008
www.cyberdriveillinois.com

Payment must be made by certified check, cashier's check, Illinois attorney's check, C.P.A.'s check or money order payable to Secretary of State.

Illinois
Limited Liability Company Act
Articles of Organization



LC0011845

This space for use by Secretary of State.

Filing Fee: \$500
Approved:

FILE # **04979141**
This space for use by Secretary of State.

FILED
SEP 09 2014
JESSE WHITE
SECRETARY OF STATE

HAB

1. Limited Liability Company Name: LaSalle Street Regional Center, LLC
The LLC name must contain the words Limited Liability Company, L.L.C. or LLC and cannot contain the terms Corporation, Corp., Incorporated, Inc., Ltd., Co., Limited Partnership or L.P.
2. Address of Principal Place of Business where records of the company will be kept: (P.O. Box alone or c/o is unacceptable.)
120 North LaSalle Street, Suite 3200
Chicago, IL 60602
3. Articles of Organization effective on: (check one)
☒ the filing date
☐ a later date (not to exceed 60 days after the filing date): _____
Month, Day, Year
4. Registered Agent's Name and Registered Office Address:
Registered Agent: The Prime Group, Inc.
First Name Middle Initial Last Name
Registered Office: 120 North LaSalle Street, Suite 3200
(P.O. Box alone or c/o is unacceptable.) Number Street Suite #
Chicago IL 60602
City ZIP Code
- Note: The registered agent must reside in Illinois. If the agent is a business entity, it must be authorized to act as agent in this state.
5. Purpose(s) for which the Limited Liability Company is organized:
The transaction of any or all lawful business for which Limited Liability Companies may be organized under this Act.
(LLCs organized to provide professional services must list the address(es) from which those services will be rendered if different from item 2. If more space is needed, use additional sheets of this size.)

6. The duration of the company is perpetual unless otherwise stated. If the operating agreement provides for a dissolution date, enter that date here: _____
Month, Day, Year

LLC-5.5

7. (Optional) Other provisions for the regulation of the internal affairs of the Company: (If more space is needed, attach additional sheets of this size.)

8. The Limited Liability Company: (Check either a or b below.)

a. ☐ is managed by the manager(s) (List names and addresses.)

b. ☒ has management vested in the member(s) (List names and addresses.)

The Prime Group, Inc. - 120 North LaSalle Street, Suite 3200, Chicago, IL 60602

9. Name and Address of Organizer(s):

I affirm, under penalties of perjury, having authority to sign hereto, that these Articles of Organization are to the best of my knowledge and belief, true, correct and complete.

Dated September 9, 2014
Month & Day Year

1. 
Signature

Alexis Gimpert, organizer
Name (type or print)

Name if a Corporation or other Entity, and Title of Signer

2.
Signature

Name (type or print)

Name if a Corporation or other Entity, and Title of Signer

1. 161 N. Clark Street, Suite 2700
Number Street

Chicago
City/Town

IL 60601
State ZIP Code

2.
Number Street

City/Town

State ZIP Code

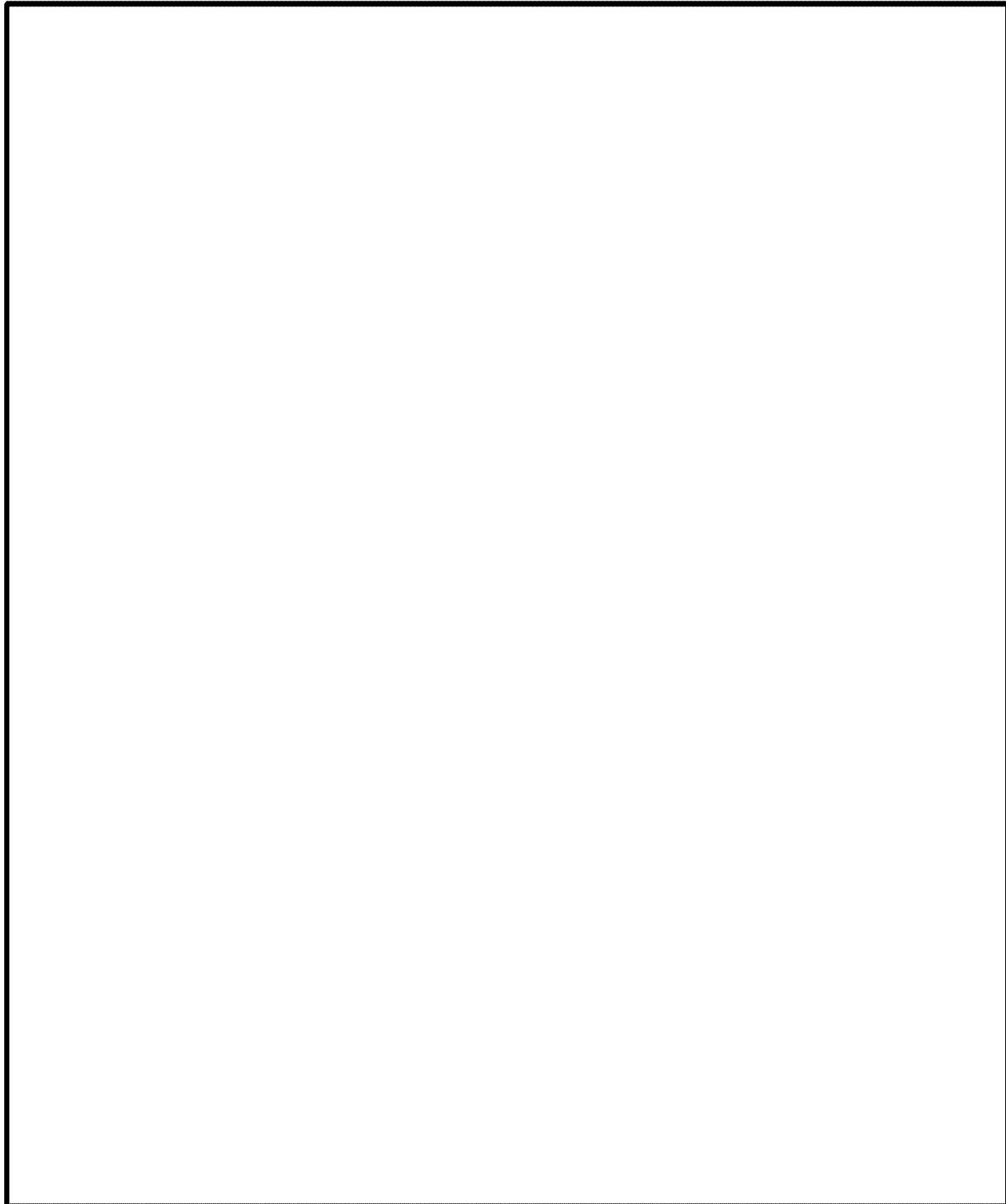
Signatures must be in black ink on an original document. Carbon copy, photocopy or rubber stamp signatures may only be used on conformed copies.

**OPERATING AGREEMENT OF
LASALLE STREET REGIONAL CENTER, LLC**

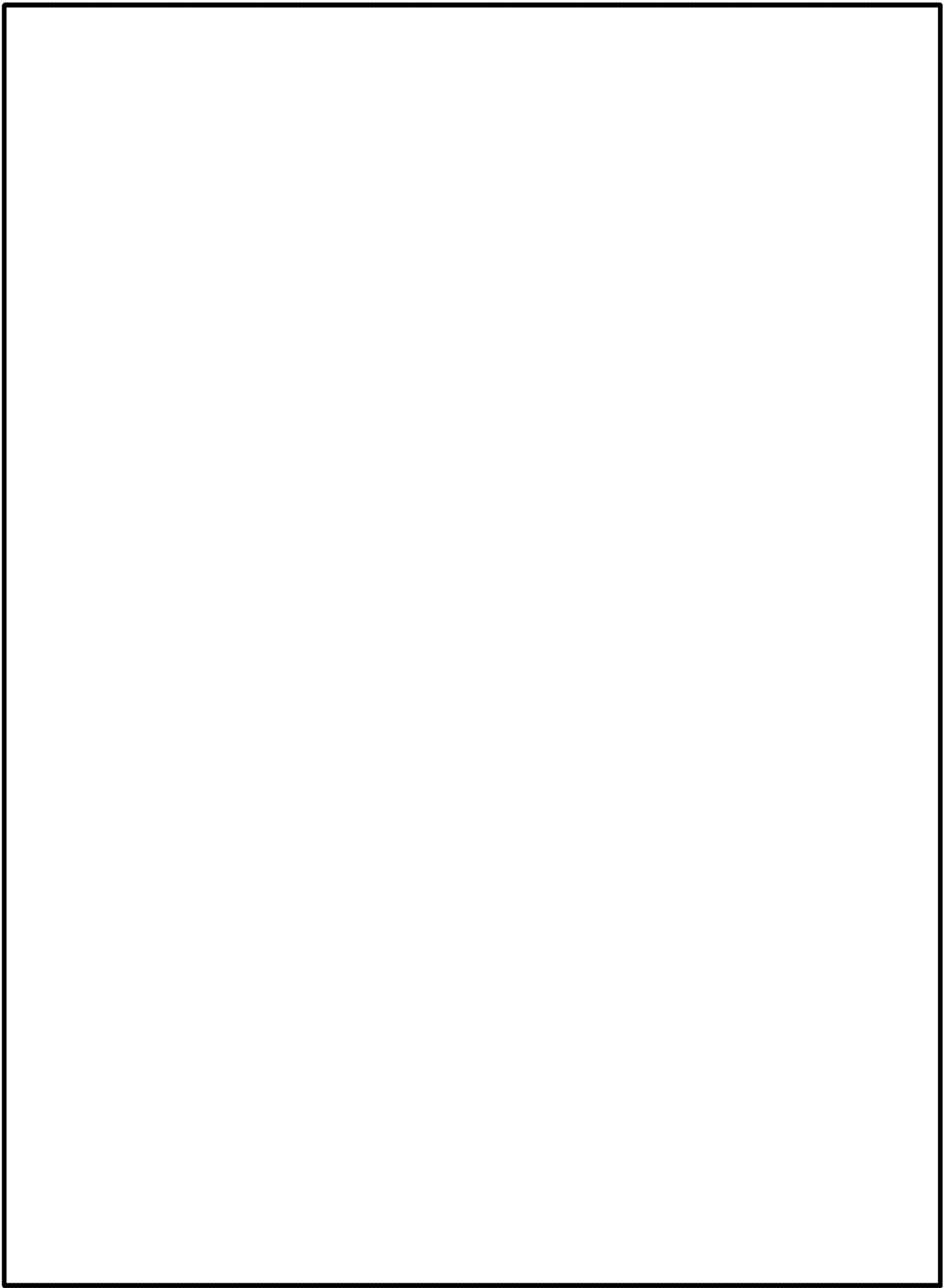
THIS OPERATING AGREEMENT of LaSalle Street Regional Center, LLC, an Illinois limited liability company, is dated as of September 9, 2014, by The Prime Group, Inc. an Illinois corporation (the "Member").

RECITALS

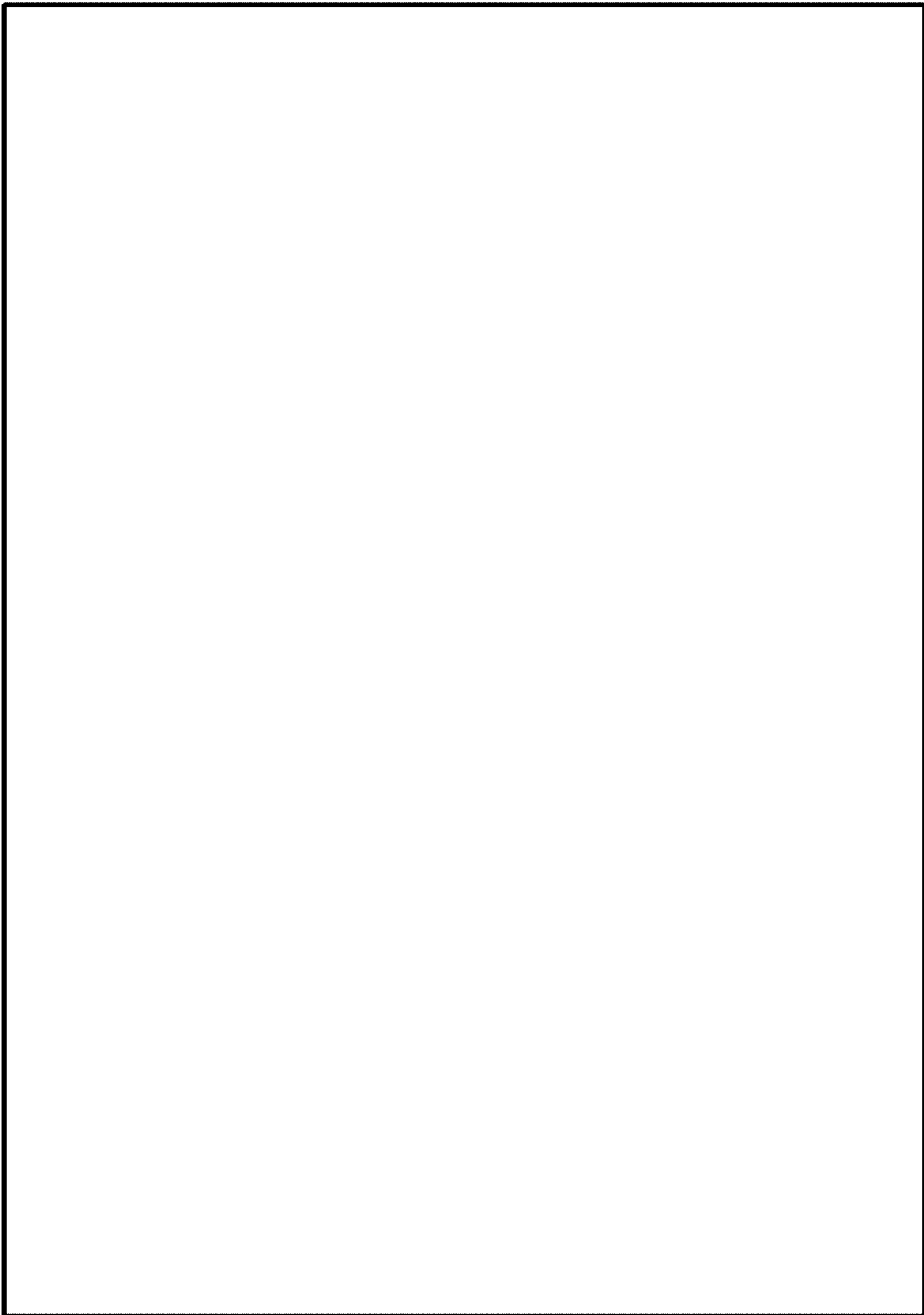
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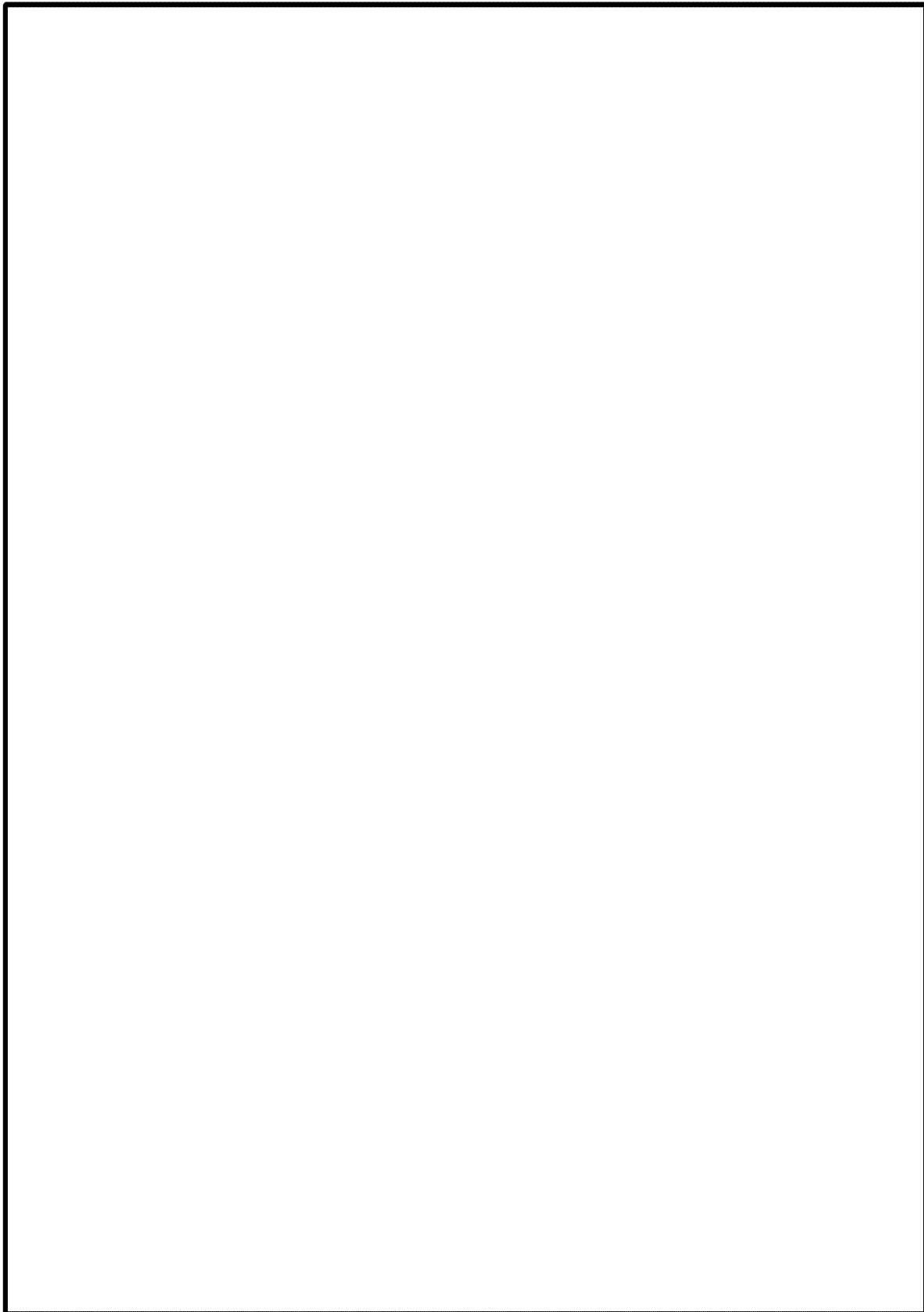
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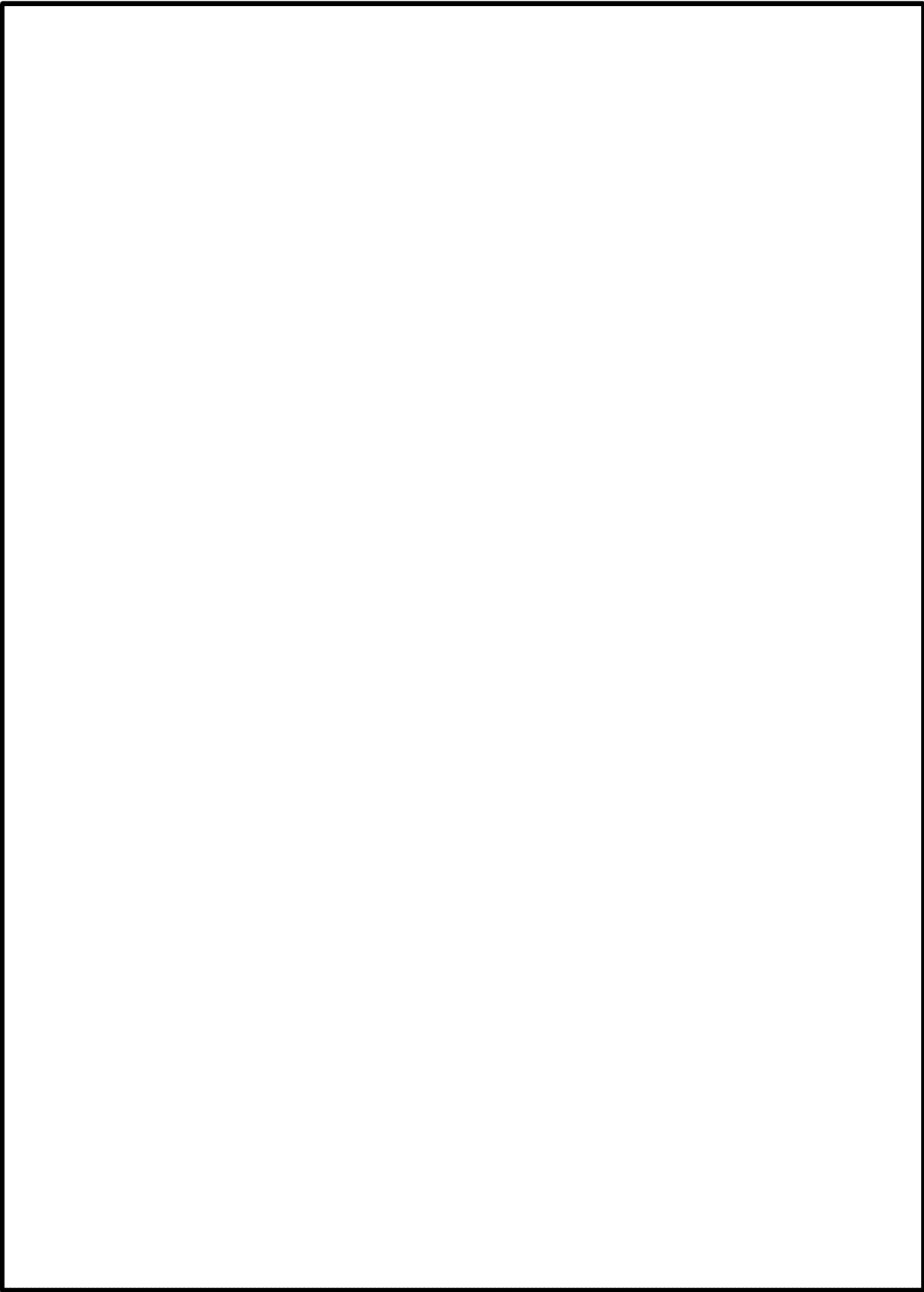
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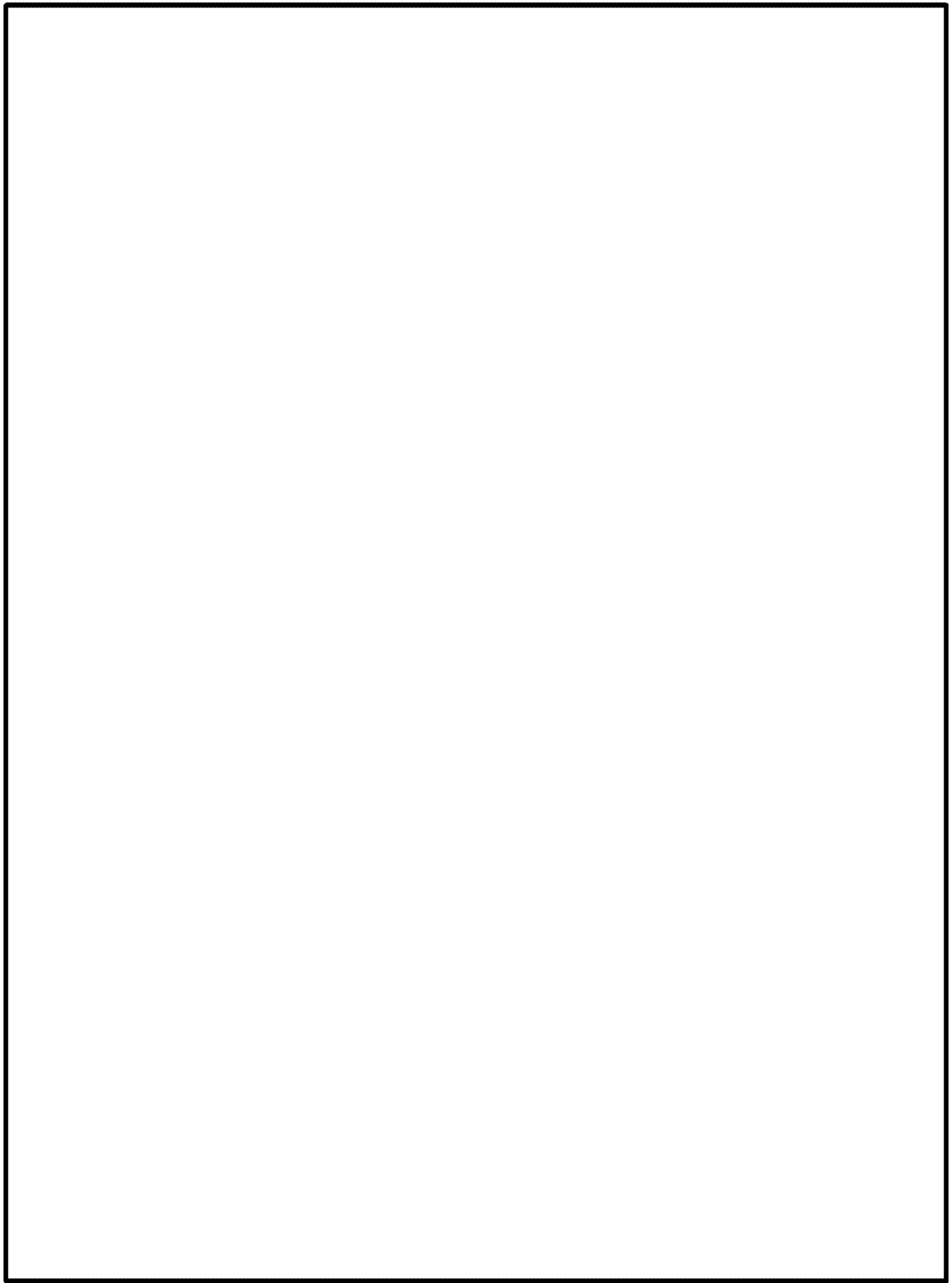
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[Signature page follows]

EXHIBIT A

MEMBER'S EQUITY PERCENTAGE

<u>Member</u>	Initial Capital Contribution	Members' Equity Percentages
The Prime Group, Inc.		

(b)(4)

IN WITNESS WHEREOF, the undersigned has executed this Operating Agreement of LaSalle Street Regional Center, LLC as of the date first above written.

MEMBER:

The Prime Group, Inc.

By: Michael W. Reschke
Name: Michael W. Reschke
Title: CEO

Address: 120 North LaSalle Street, Suite 3200
Chicago, IL 60602

An EB-5 Economic Analysis of the Luxury Lifestyle Hotel
within the Proposed
LaSalle Street Regional Center, LLC

October 28, 2014

Prepared by:
Impact DataSource
Economic Consulting, Research and Analysis
Austin, TX
1.800.813.6267
www.ImpactDataSource.com



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I. Executive Summary

Regional Center: The LaSalle Street Regional Center, LLC is a proposed regional center under the U.S. Citizenship and Immigration Services Immigrant Investor Pilot Program (the "EB-5 Program").

Project Studied In This Analysis: The EB-5 capital investment activity studied in this report consists of construction and operations of a Luxury Lifestyle Hotel in Chicago, IL (the "Project").

Geographic Impact Area: The Project is located in Chicago, IL and will impact the Chicago-Naperville-Elgin, IL-IN-WI metropolitan statistical area ("Chicago MSA" or "impact area" or "regional center area").

Targeted Employment Area: The Project location has been certified as a Targeted Employment Area ("TEA") by the Illinois Department of Employment Security on September 4, 2014. Please see the Appendix D for a copy of the TEA letter.

Furthermore, the proposed geographic footprint of the regional center contains other TEA-eligible areas for potential future projects to locate. Appendix C contains a list of TEA-eligible census tracts within the proposed regional center area.

Industries: The Project's primary activities will occur in the following industries.

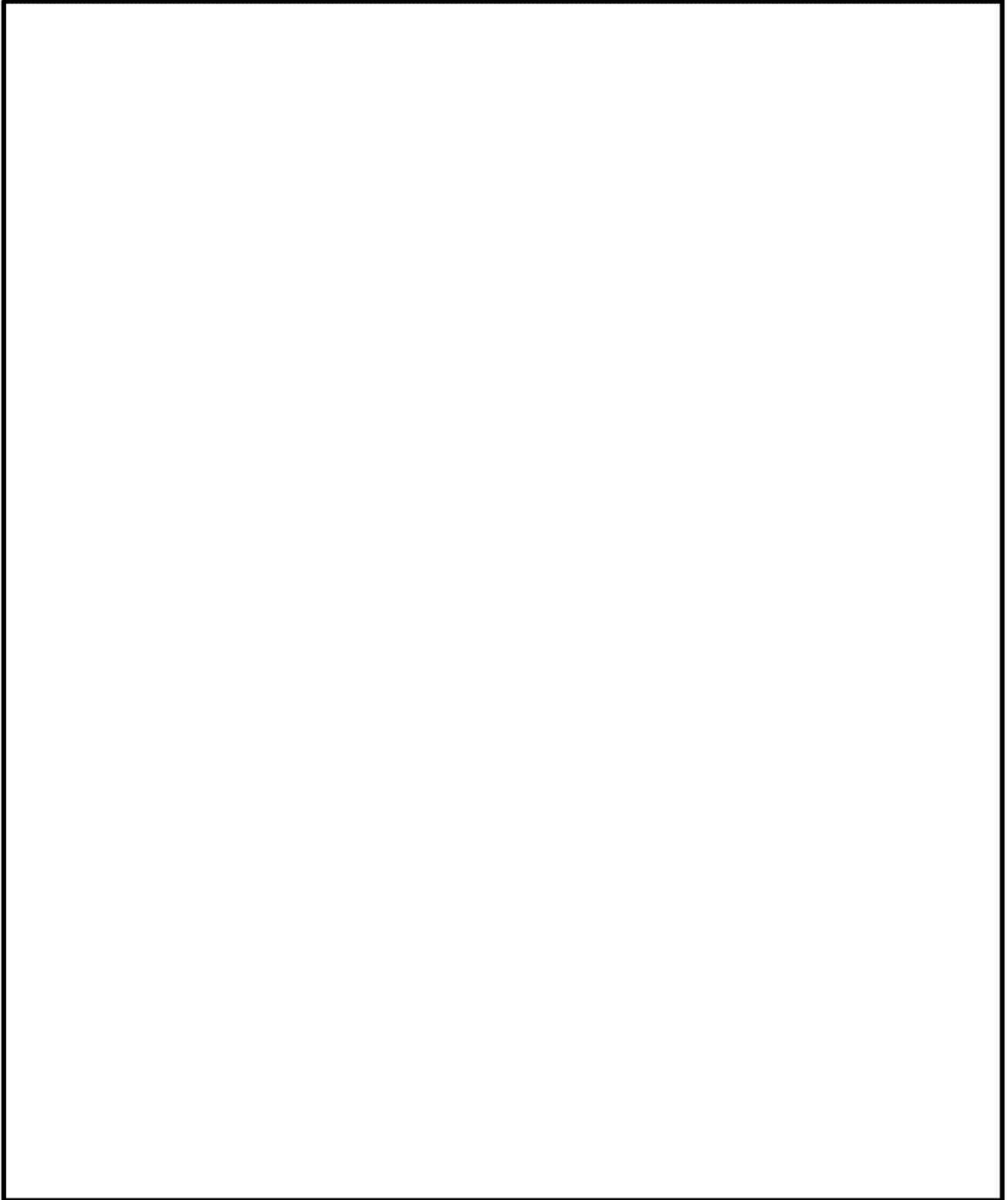
Table 1: Industries

NAICS	Industry
2362	Nonresidential Building Construction
5413	Architectural, Engineering, and Related Services
7211	Traveler Accommodation

Job Calculation Related to Construction Activities: The construction period for the Project is expected to last 14 months and therefore, consistent with USCIS guidance, this analysis only considers indirect and induced impacts resulting from construction for the Project. A discussion of the indirect and induced calculation methodology is provided in Appendix A. As discussed in the detail of this report, the job creation related to construction activity rely on hard construction expenditures and architectural and engineering expenditures only. All other project costs are excluded from the impact model.

Job Calculation Related to Operations: Total job creation from operations for the Project analyzed in this report is determined based on the projected revenues from operations and the industry-specific RIMS II Type II final-demand employment multiplier for the impact area.

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	Economic Output
Itemized Demand for Additional Services	
Utilities	
Maintenance & repair construction	
Manufacturing	
Business Services	
Total for Four Categories	

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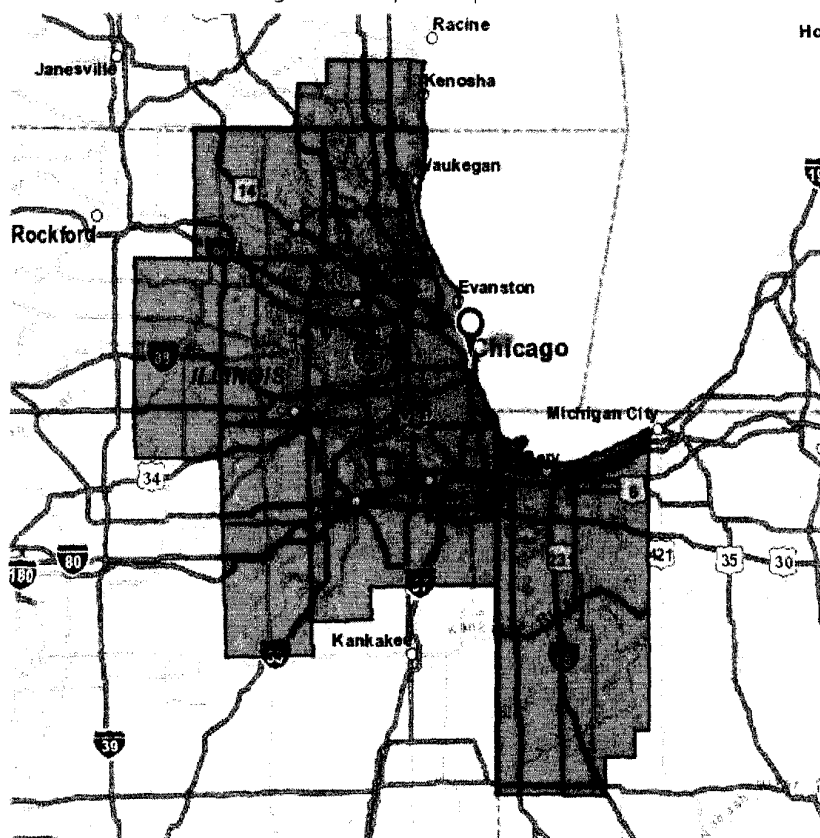
II. Geographic Area Impacted

The Project is located in Chicago, IL and will impact the following 14 counties that make up the Chicago MSA:

Cook, IL; DeKalb, IL; DuPage, IL; Grundy, IL; Kane, IL; Kendall, IL; Lake, IL; McHenry, IL; Will, IL;
Jasper, IN; Lake, IN, Newton, IN; Porter, IN; Kenosha, WI

The map below demonstrates the proposed regional center area, along with the approximate location of the Project.

Figure 1: Map of Impact Area



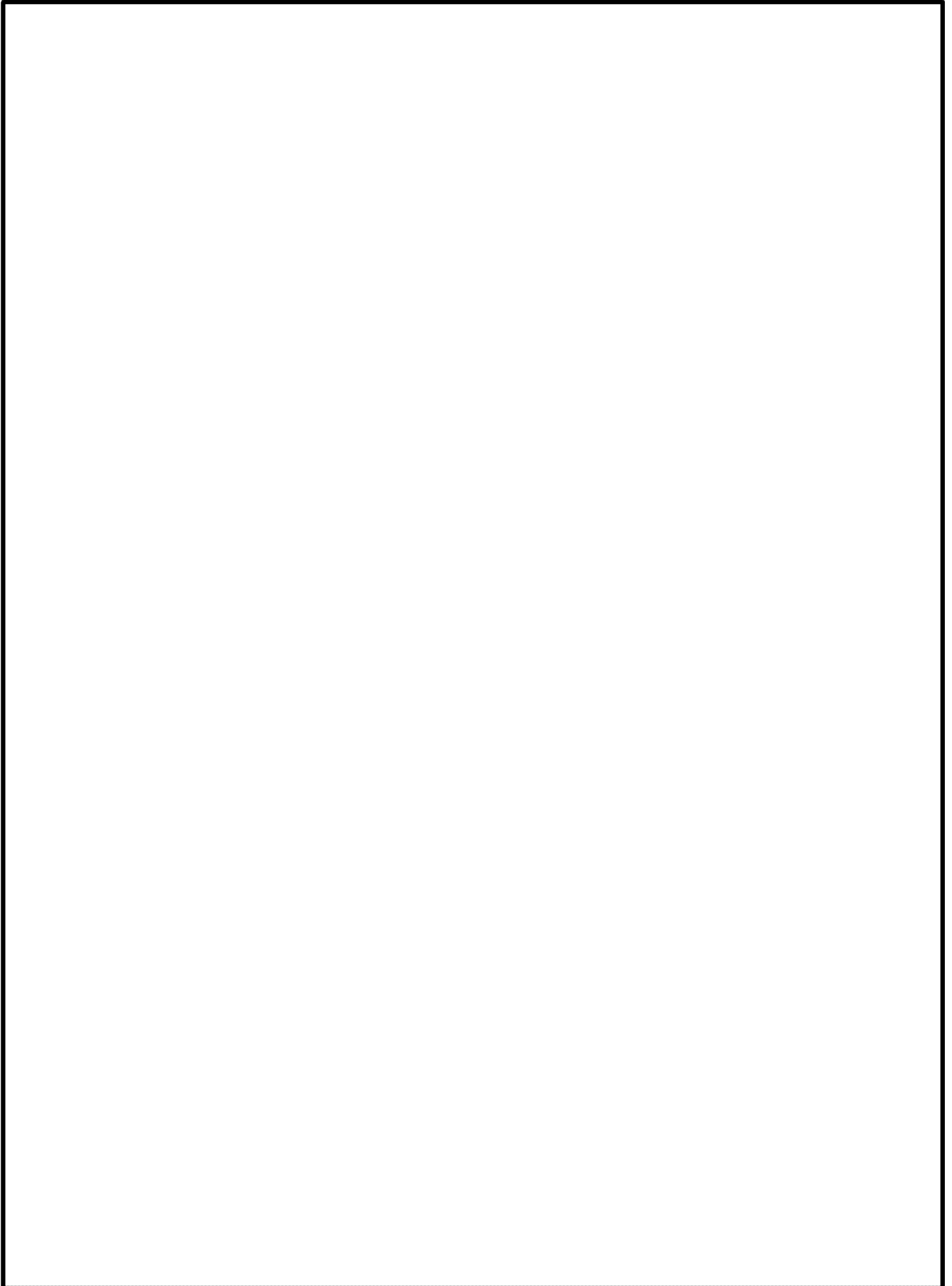
The pin on the map indicates the approximate location of the Project in Chicago.

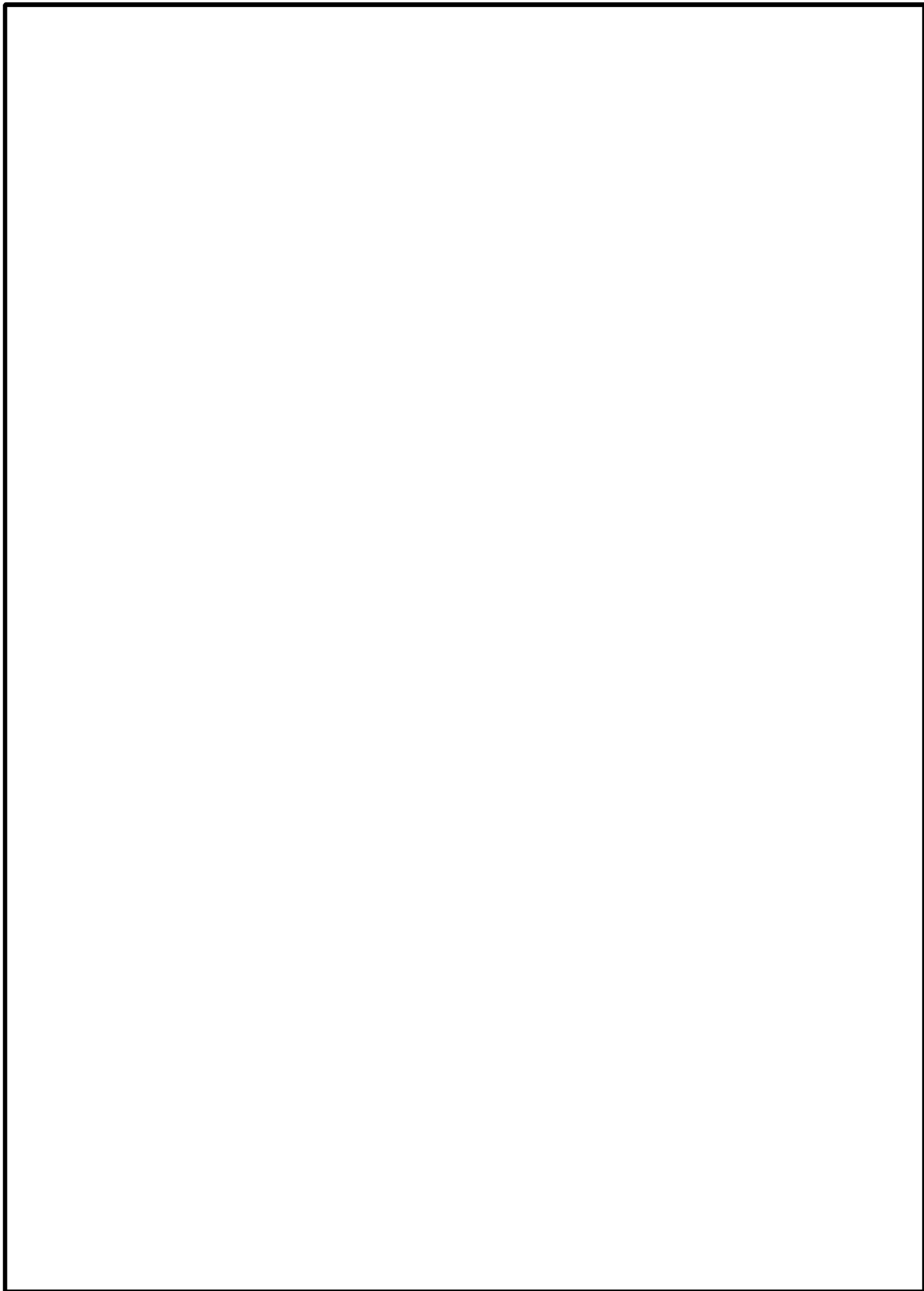
A discussion of the proposed regional center area follows.

Chicago is located roughly 60 miles from Wisconsin and 25 miles from Indiana. Several interstates connect the city to the greater Chicago area. The functional economy of the Chicago area reasonably includes 14 counties that make up the Chicago MSA, as the Chicago area businesses rely on suppliers and business in this 14-county region. The Project will likely rely on suppliers from this 14-county region.

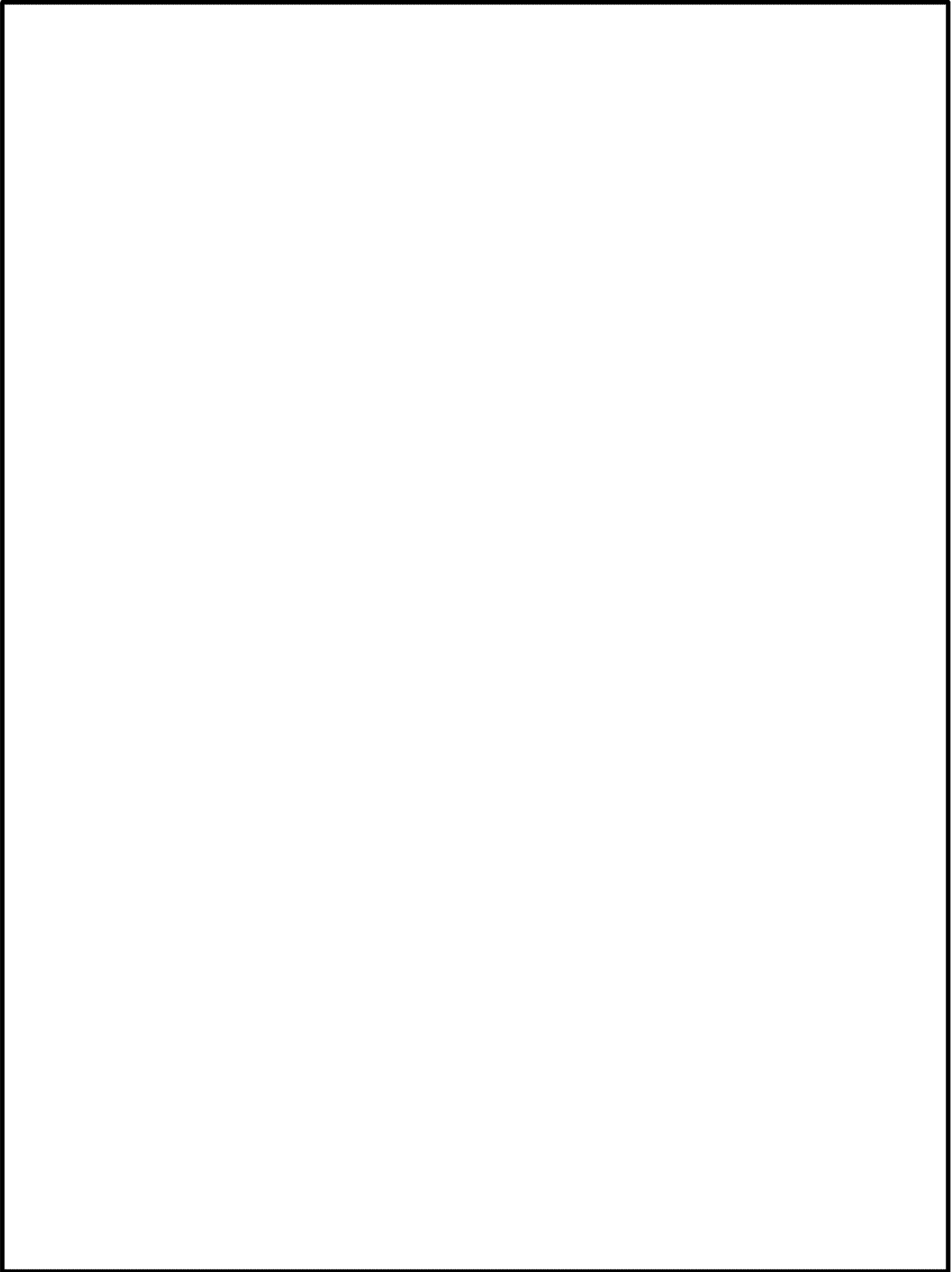
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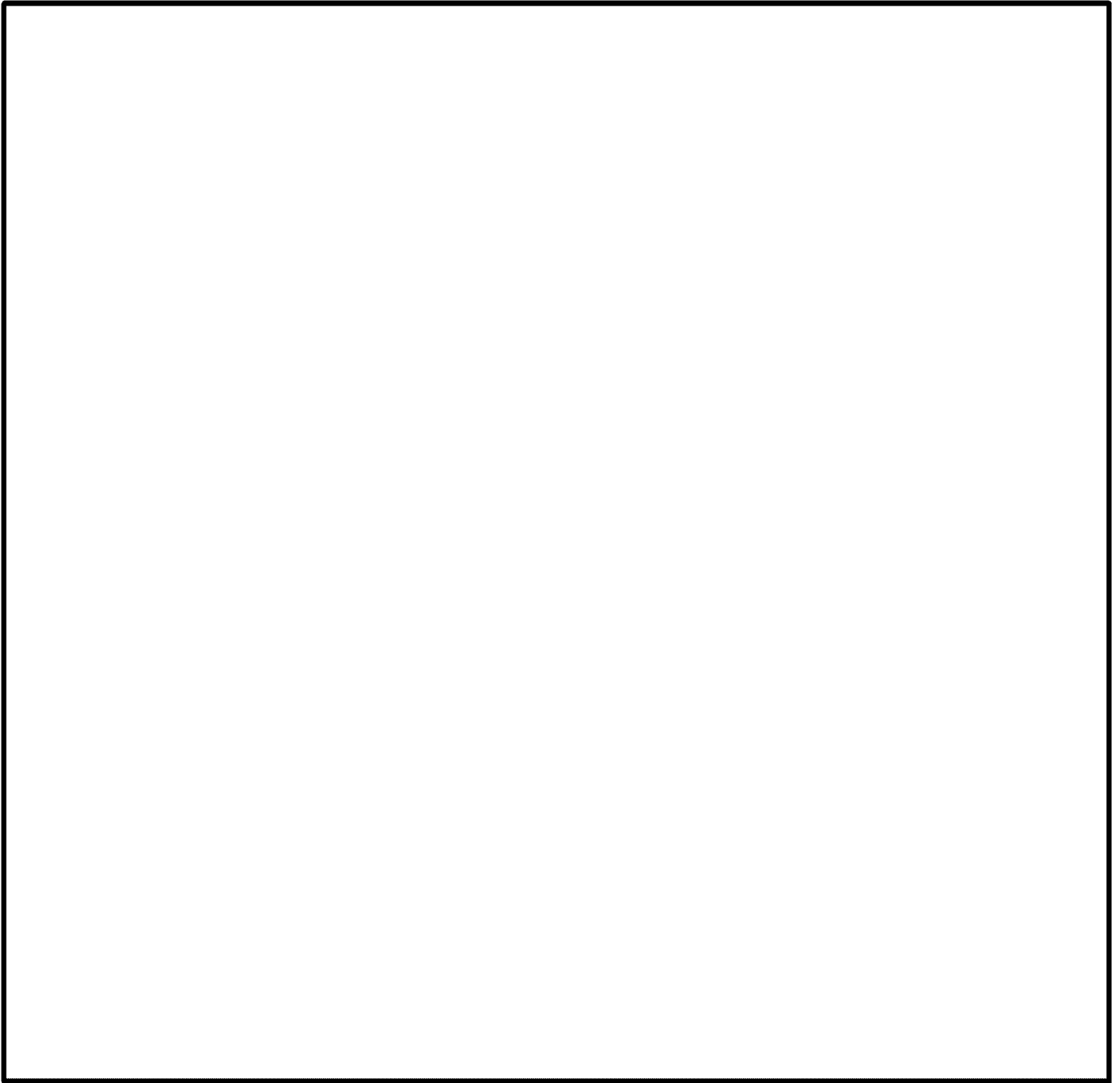


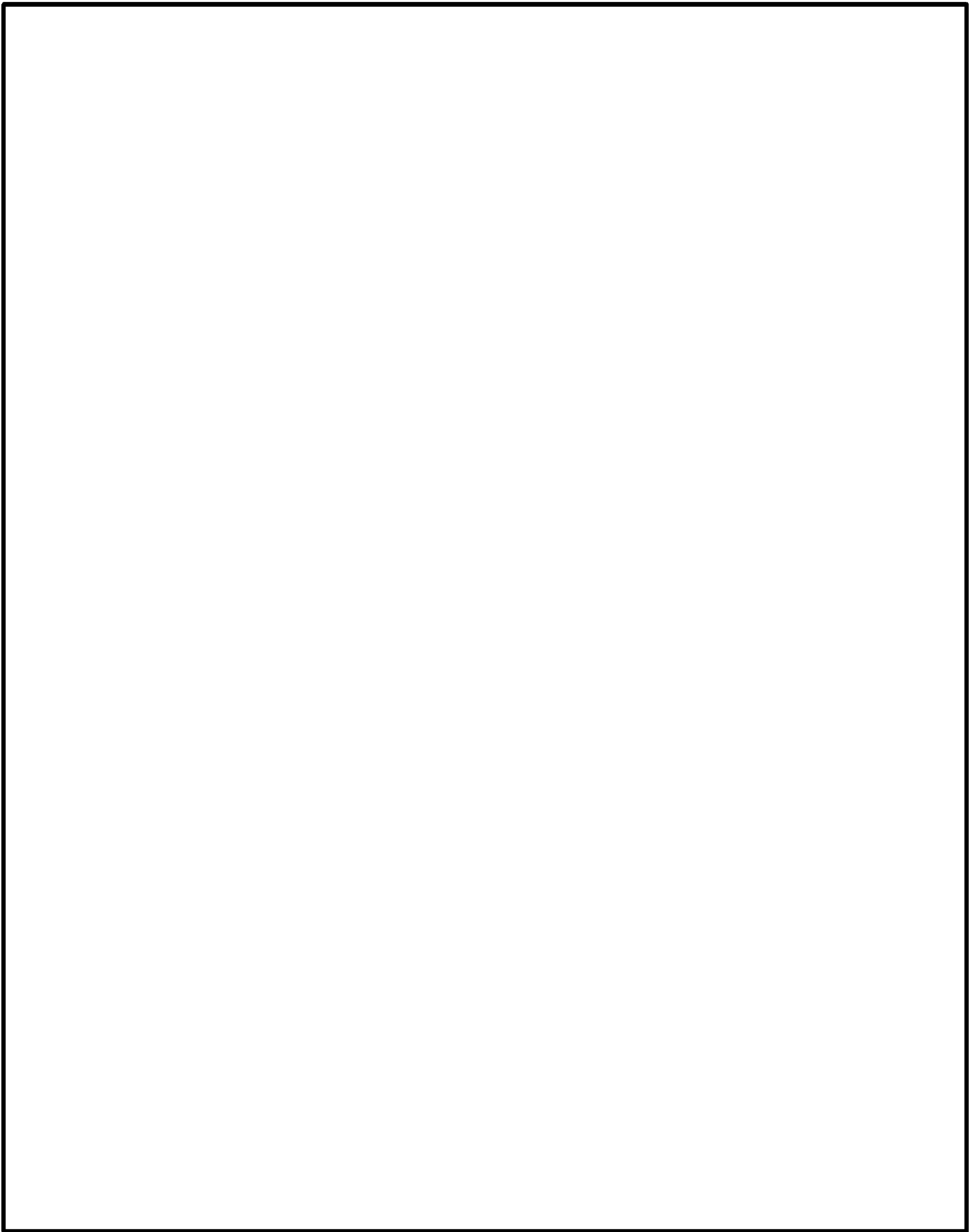


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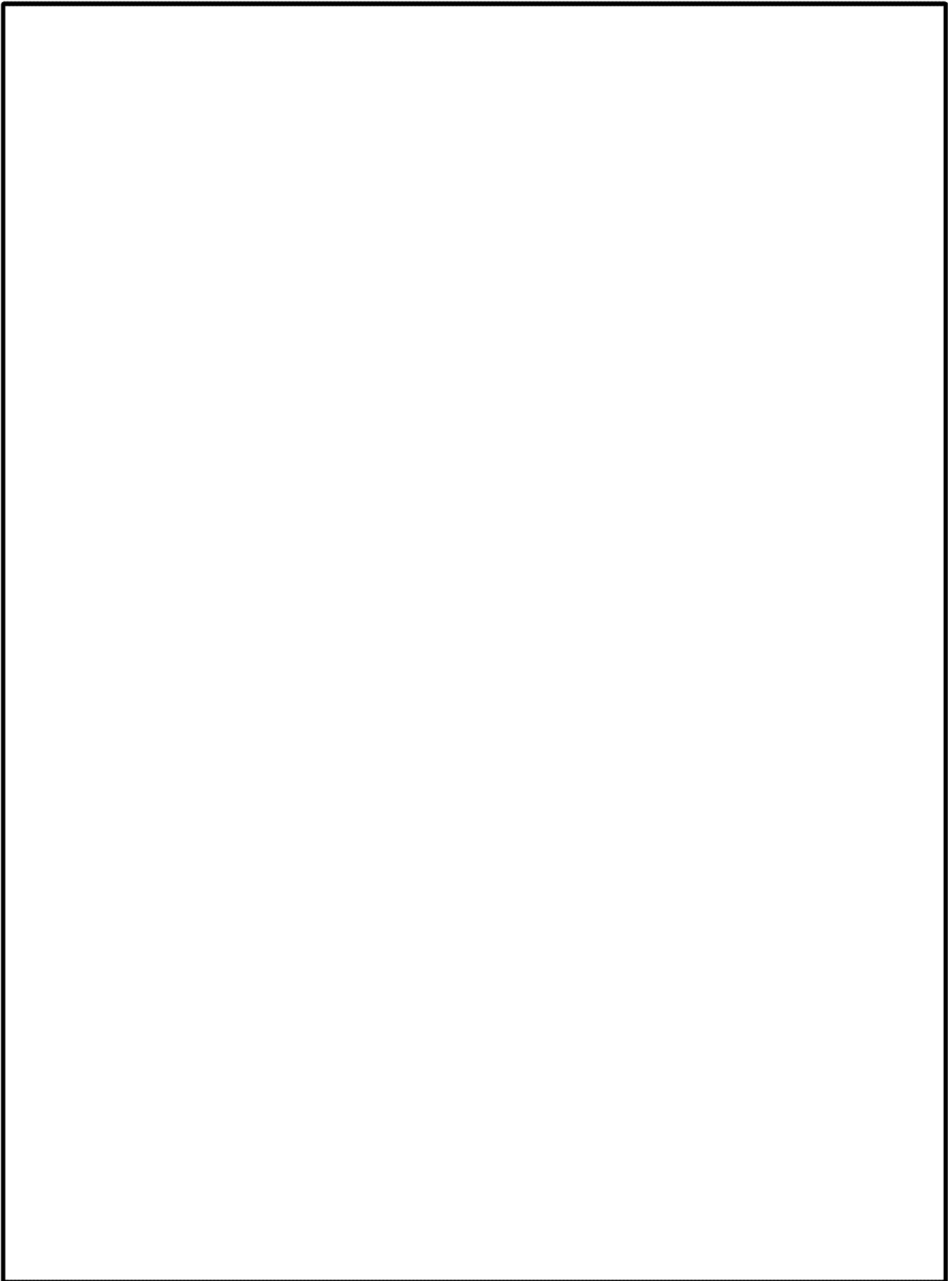


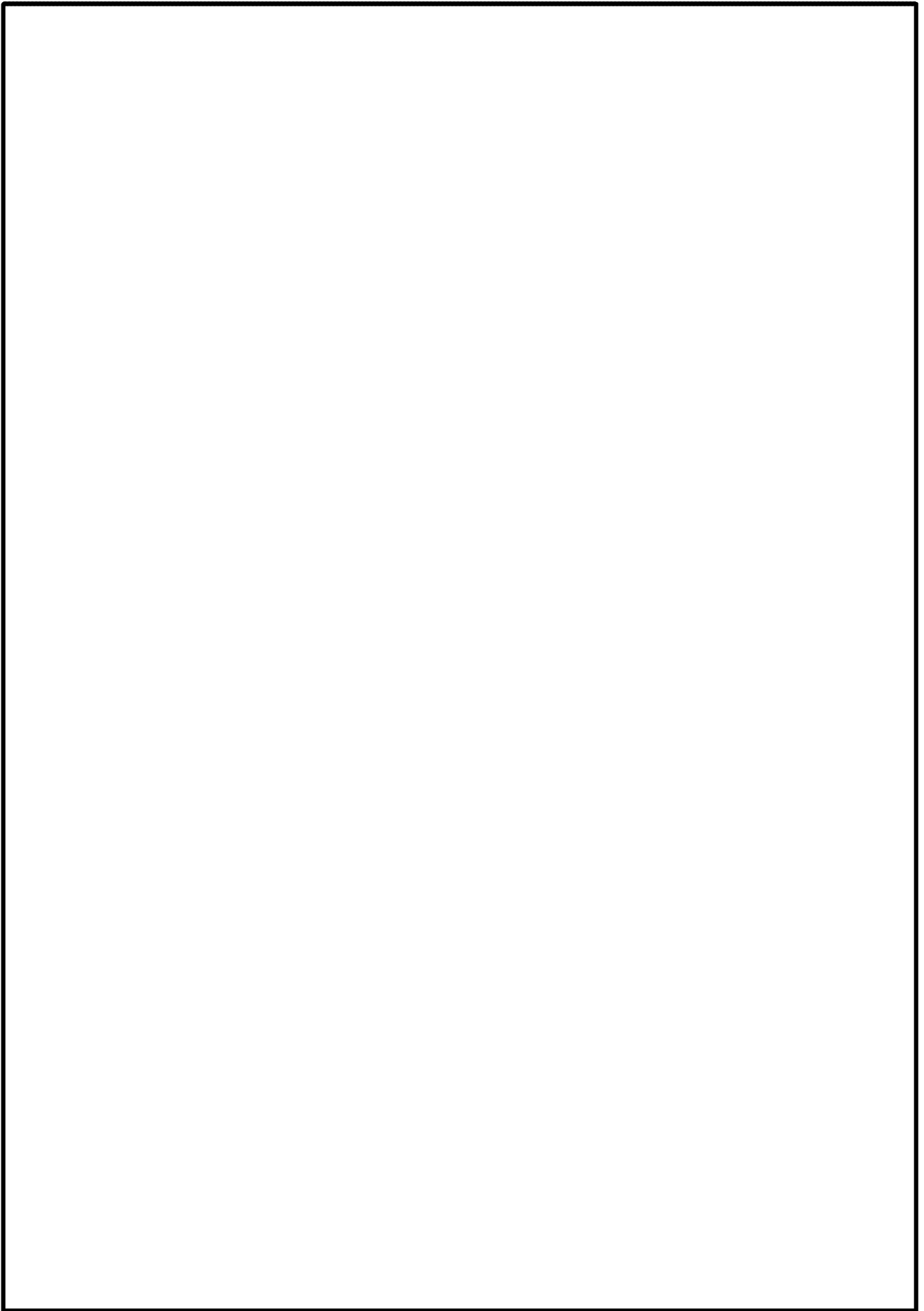
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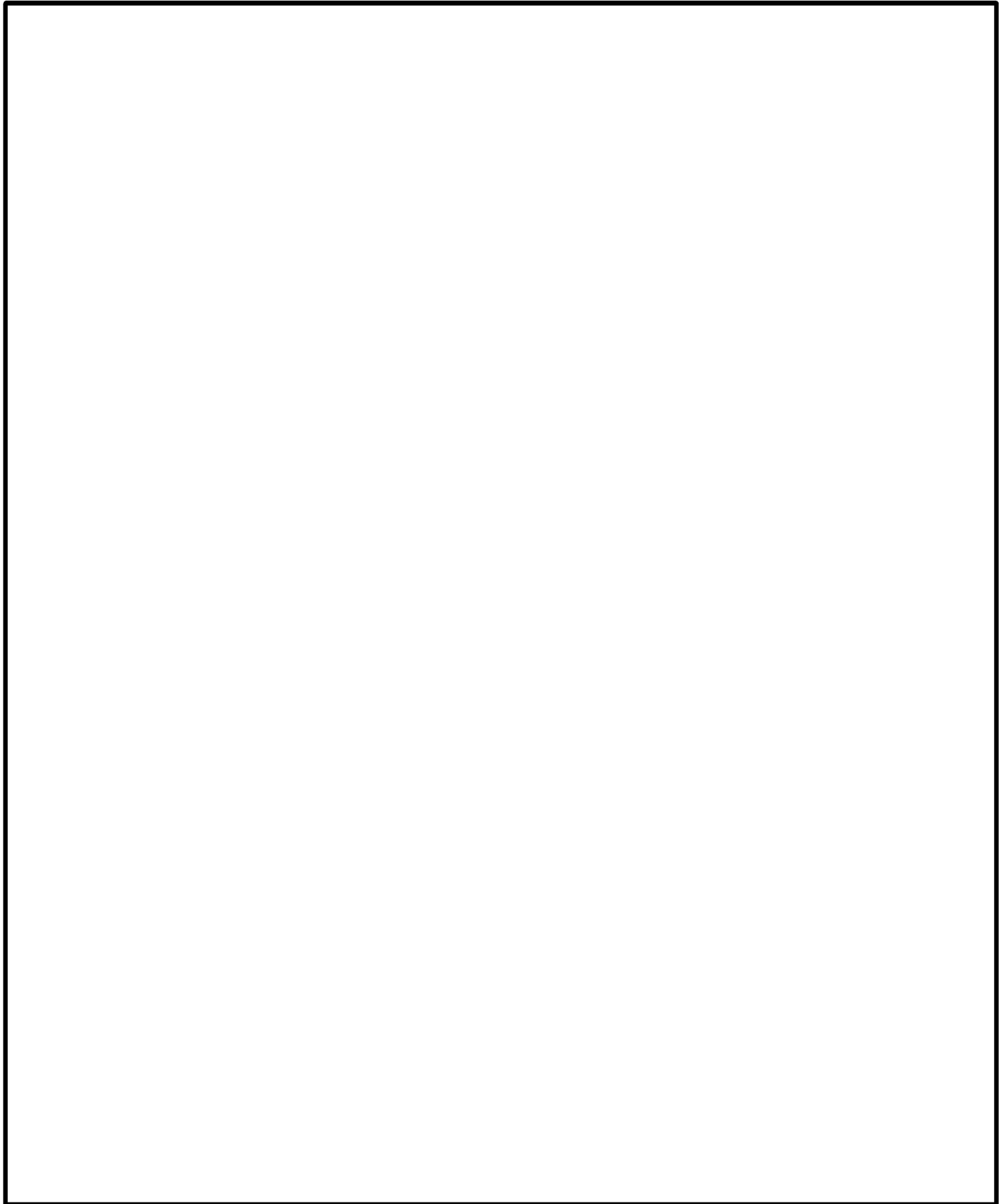




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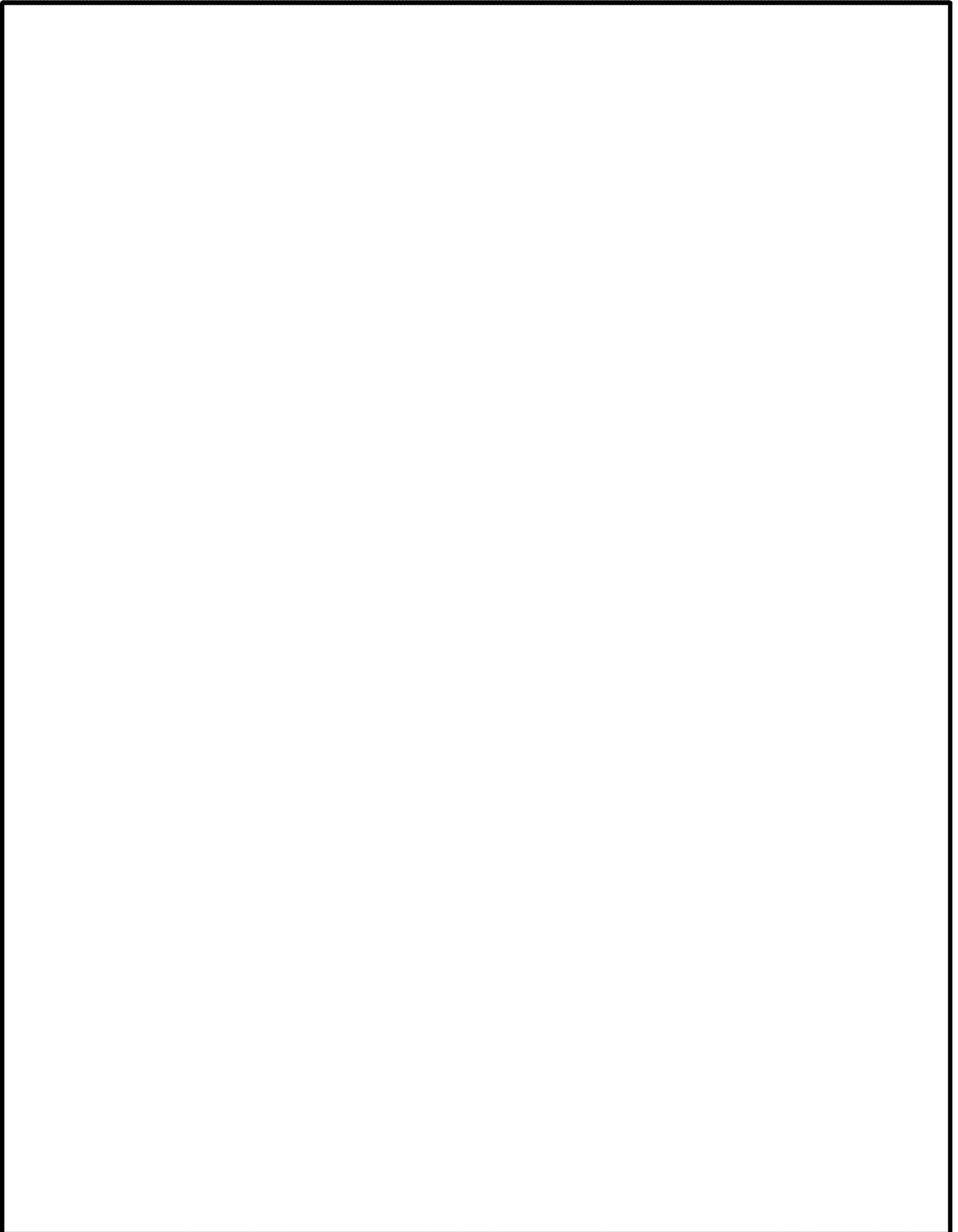


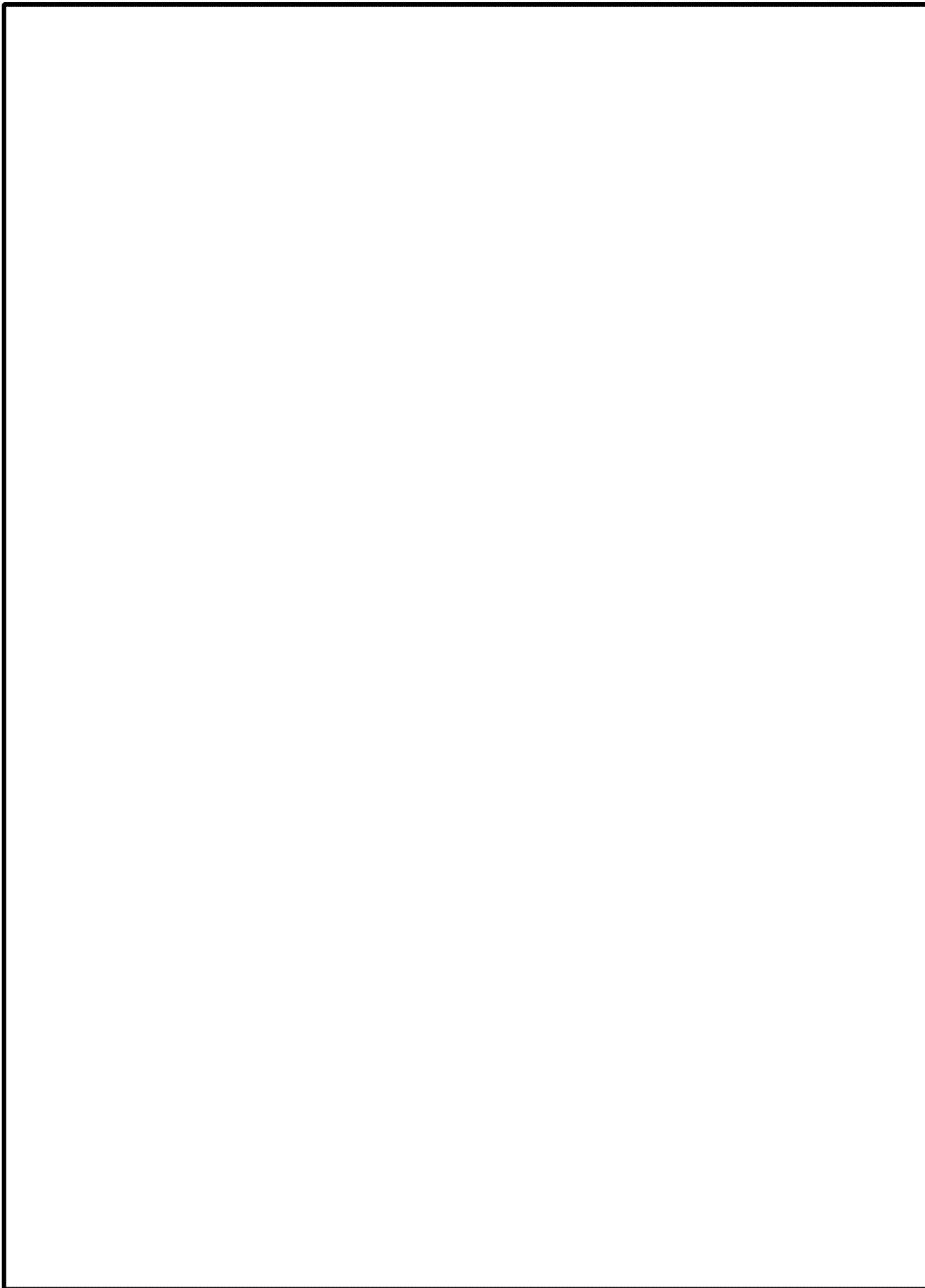


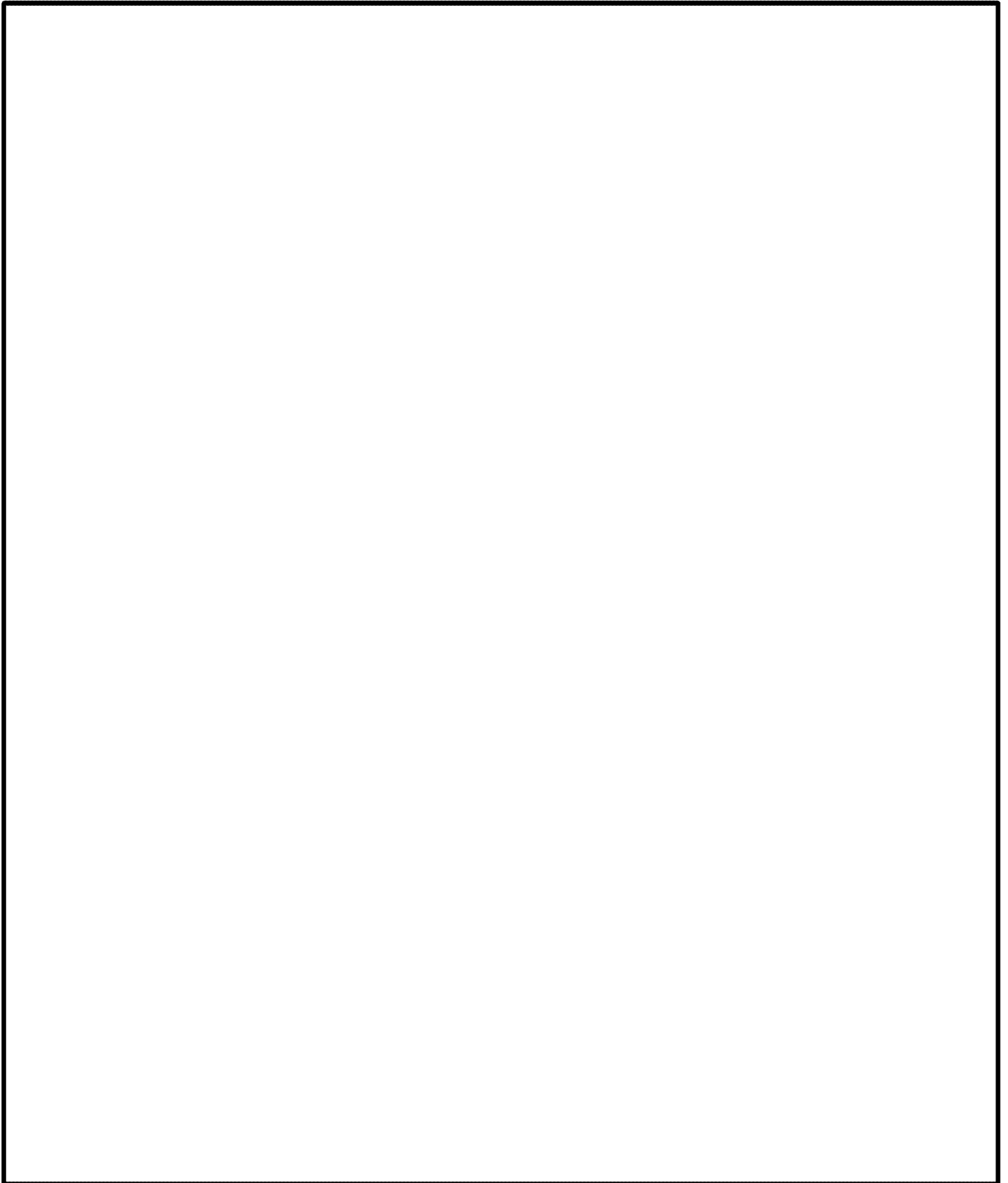


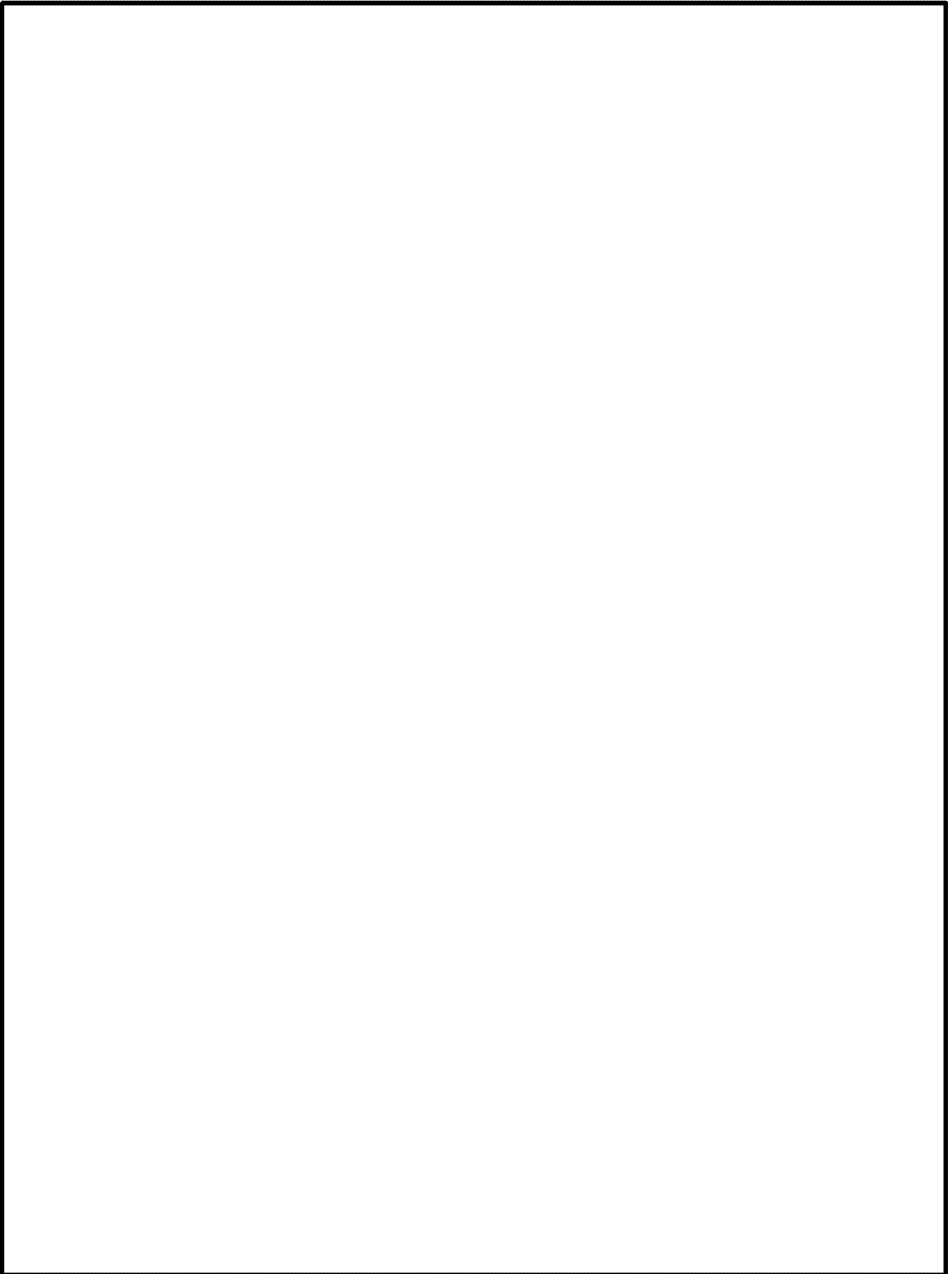
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IV. Discussion of RIMS II Methodology & Multipliers

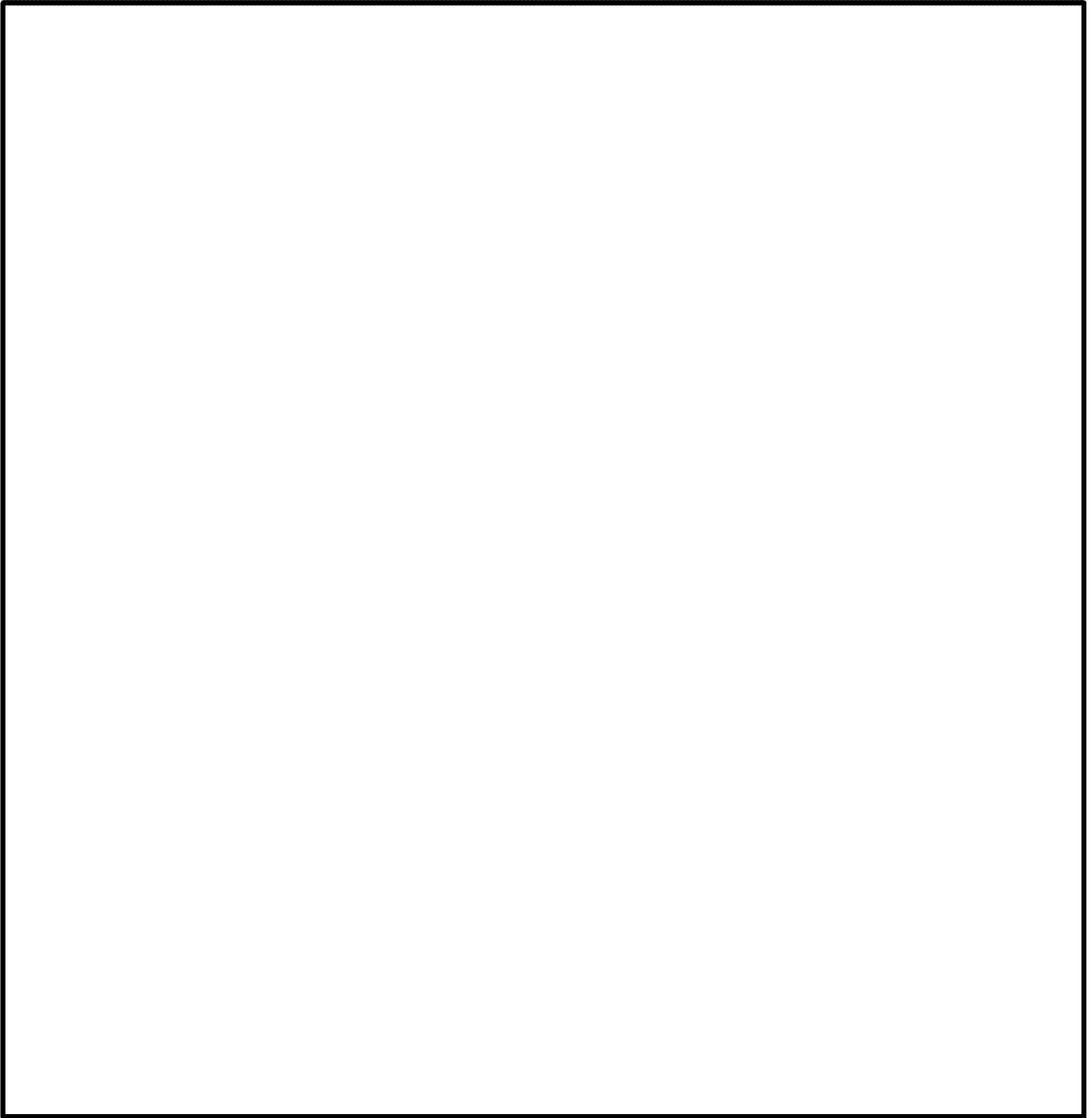


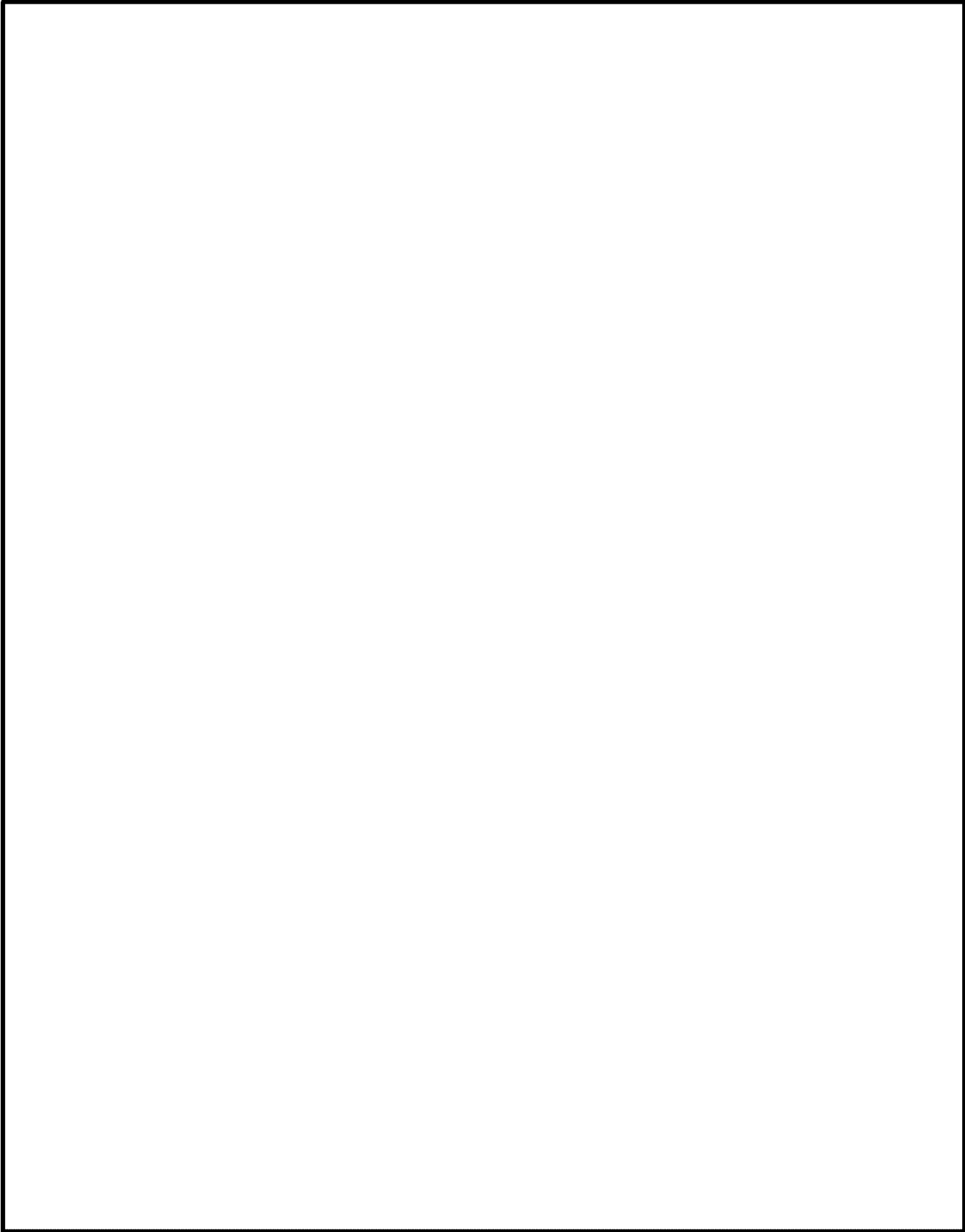






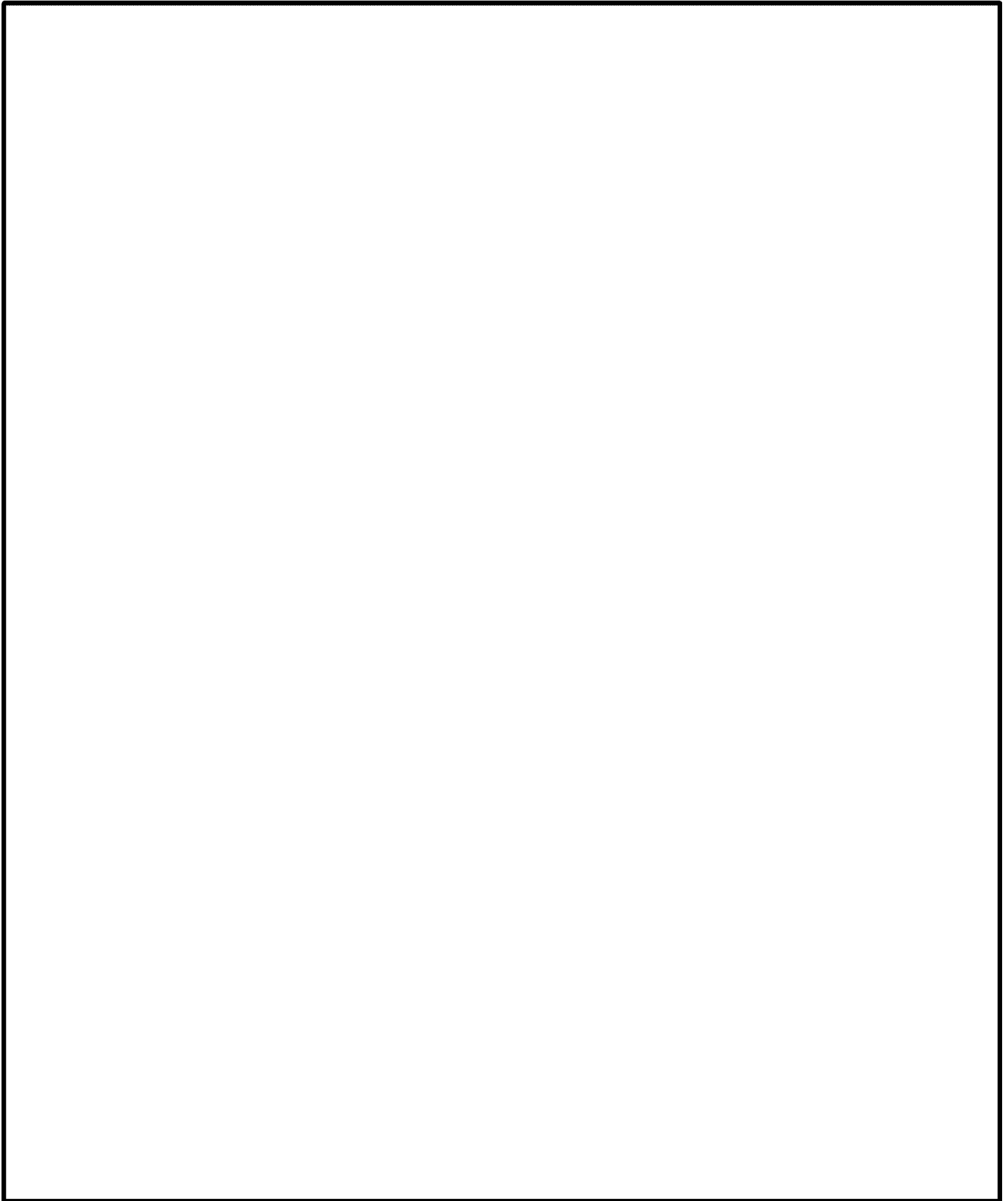
(b)(4) V. Impacts from Hard Construction Expenditures

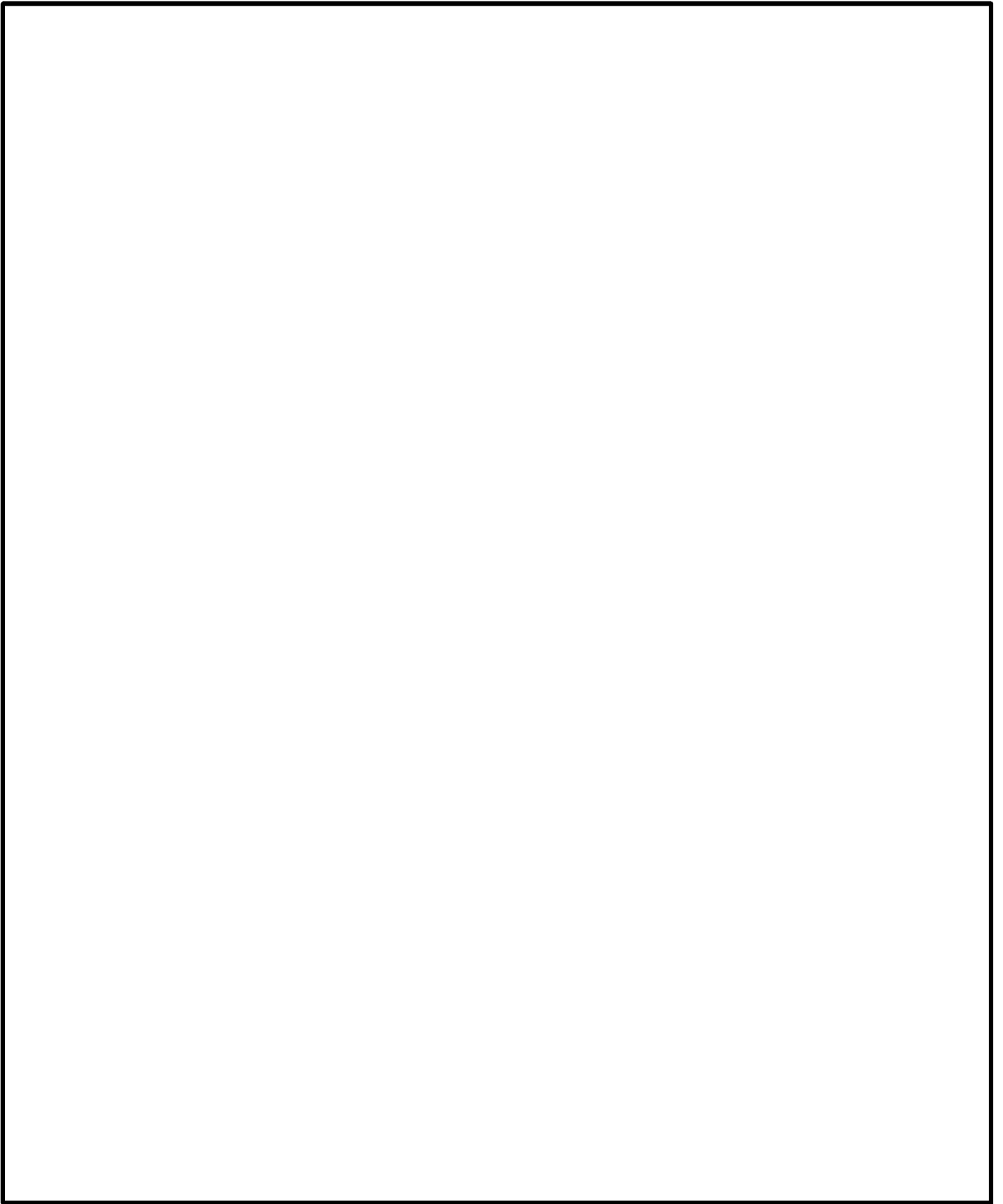




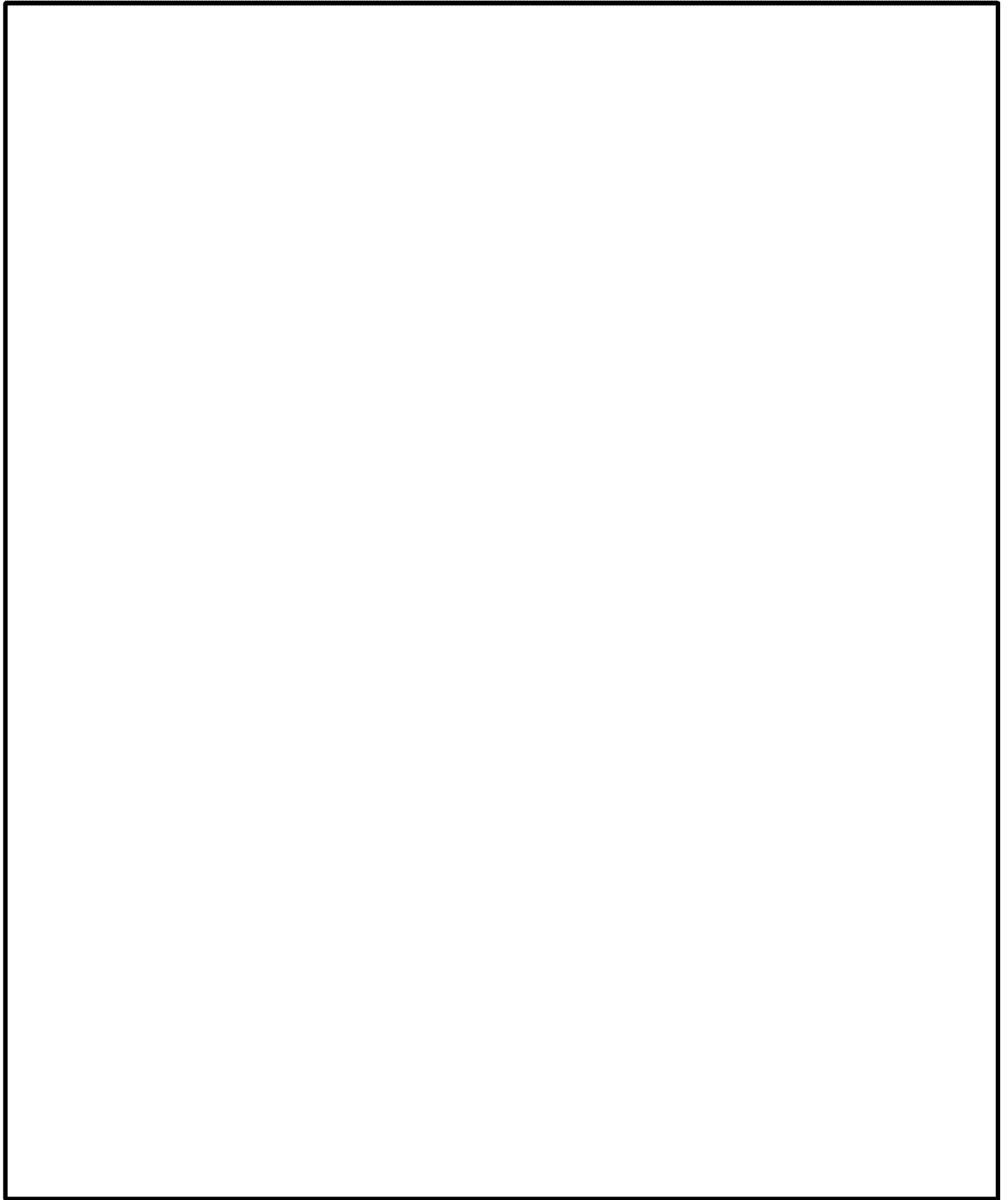
VI. Impacts from Architectural and Engineering Expenditures

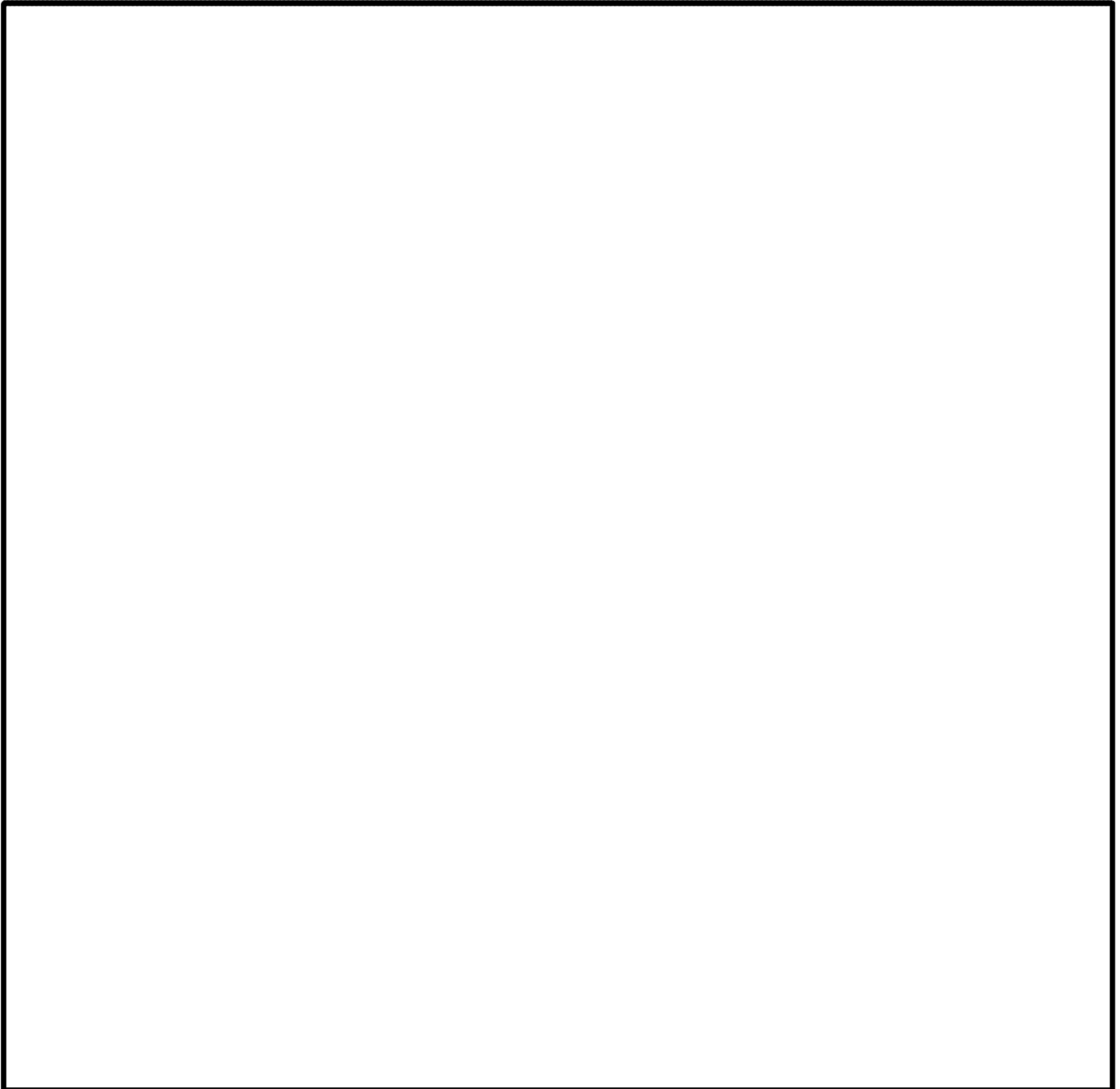
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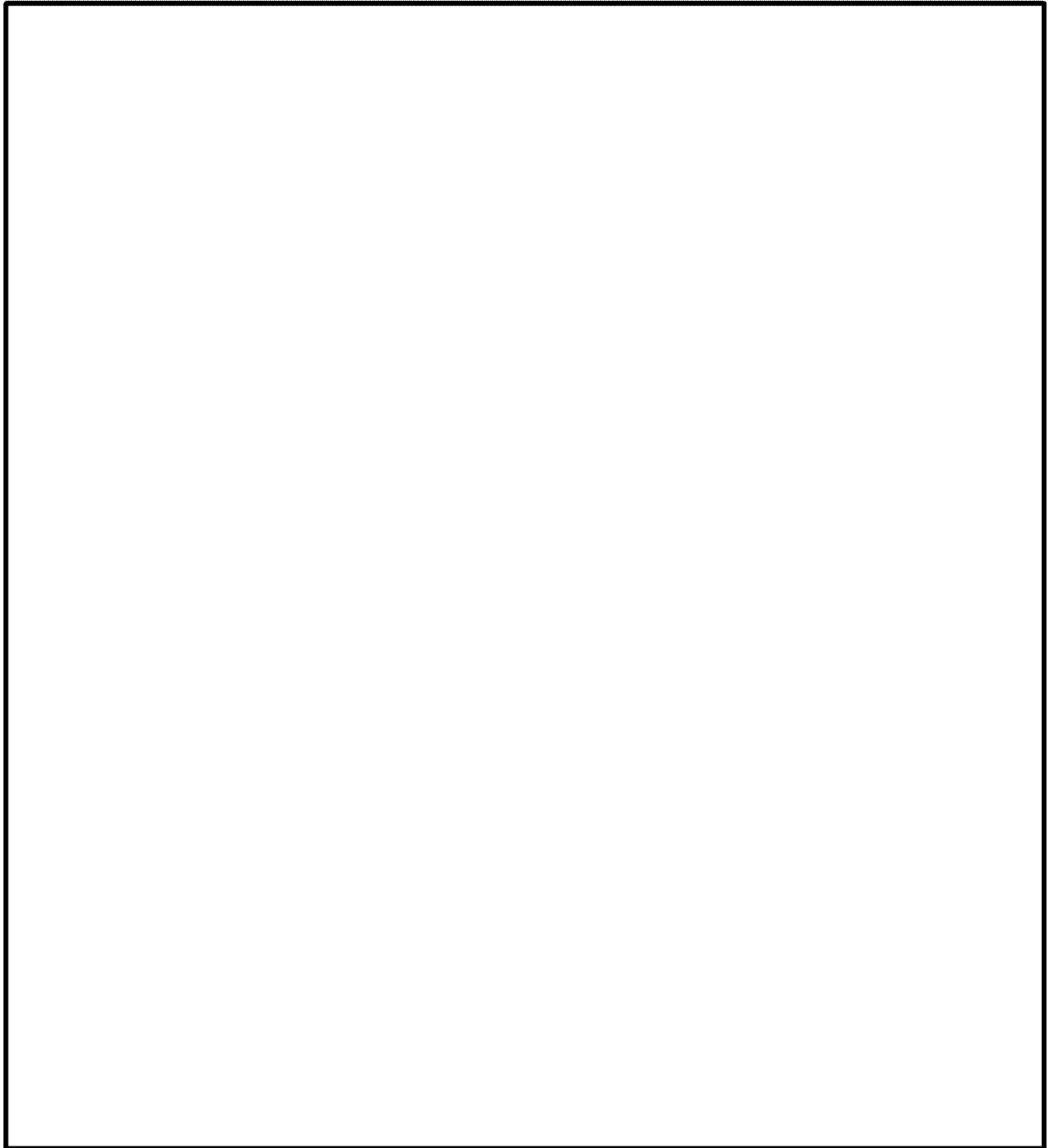
(b)(4) VII. Impacts from Operations



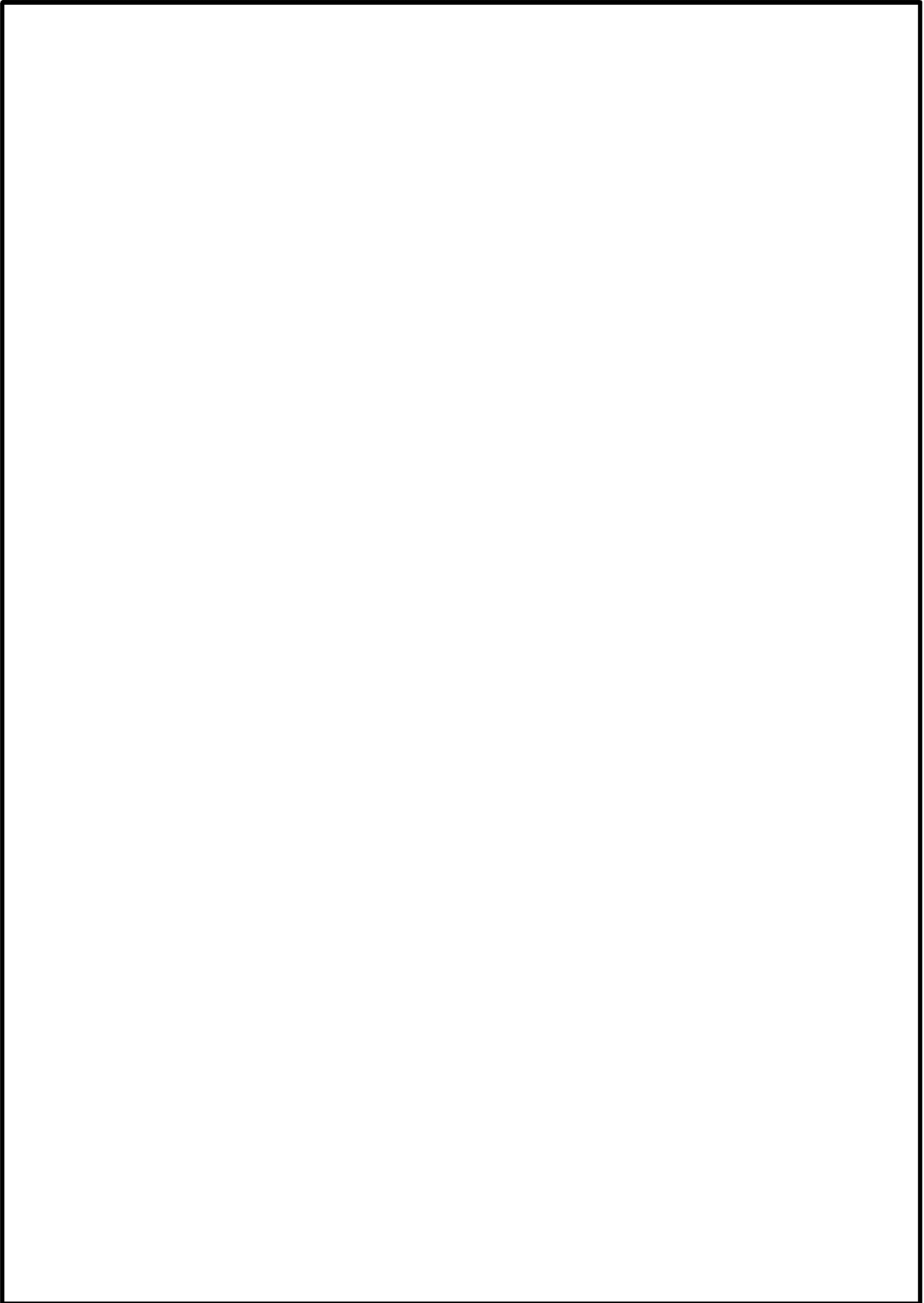


VIII. Combined Impact from Construction and Operations

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(b)(4) IX. Conduct of the Analysis



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APPENDIX A

Indirect and Induced Impact Calculations

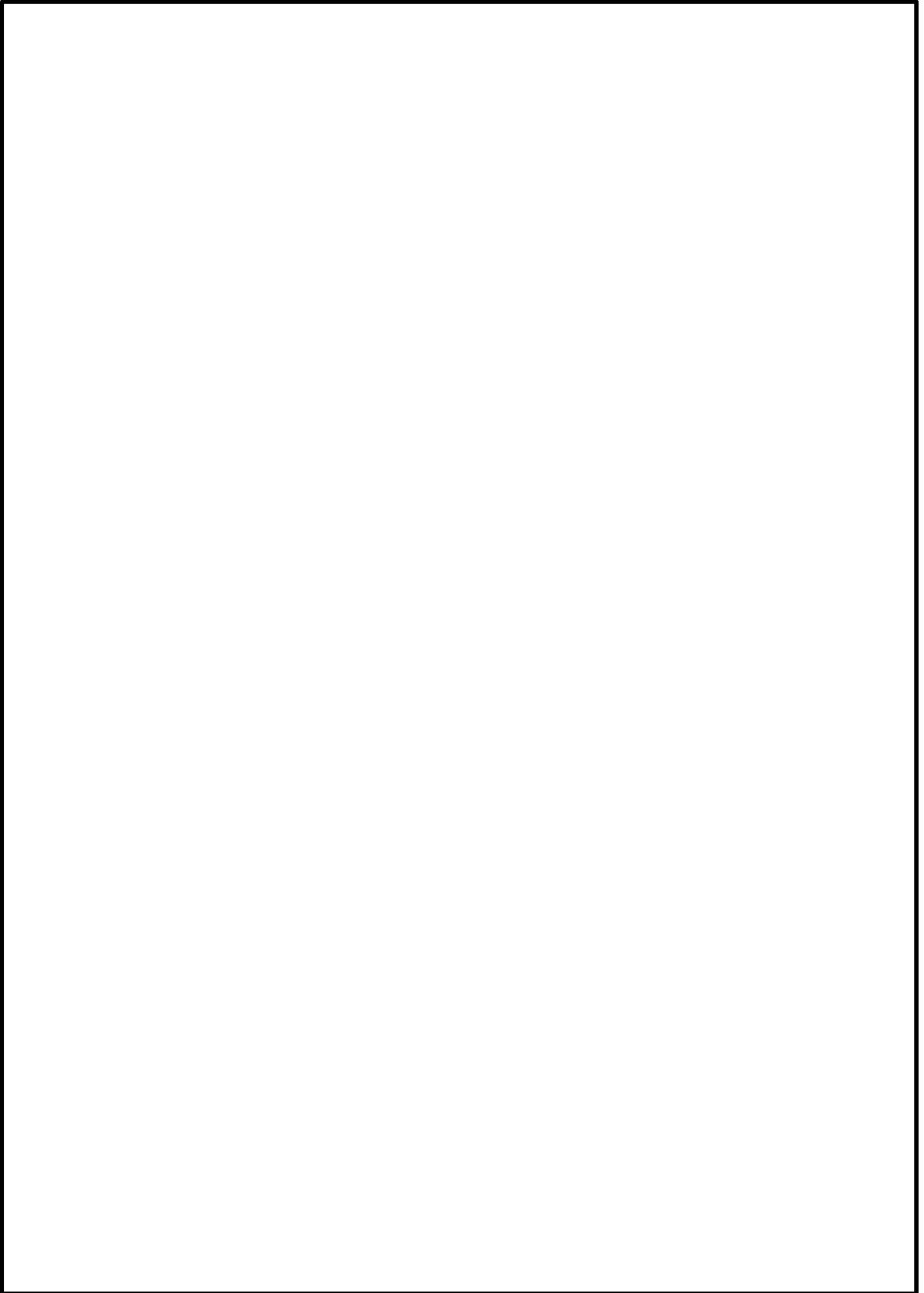
Disaggregation of Direct, Indirect, and Induced Effects from the Total Impact Using RIMS II

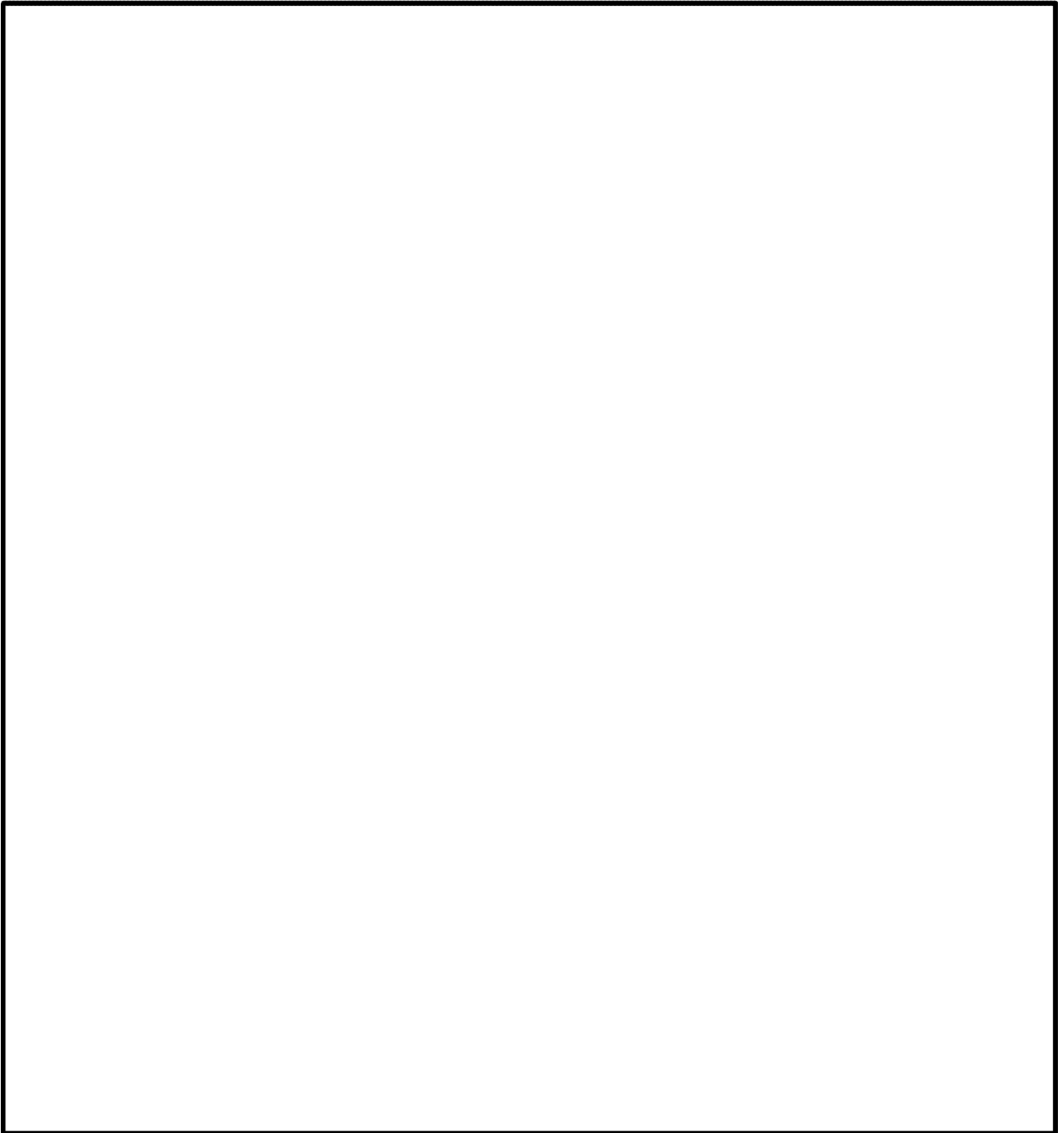
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Impact DataSource | 35

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(b)(4) Indirect & Induced Economic Output

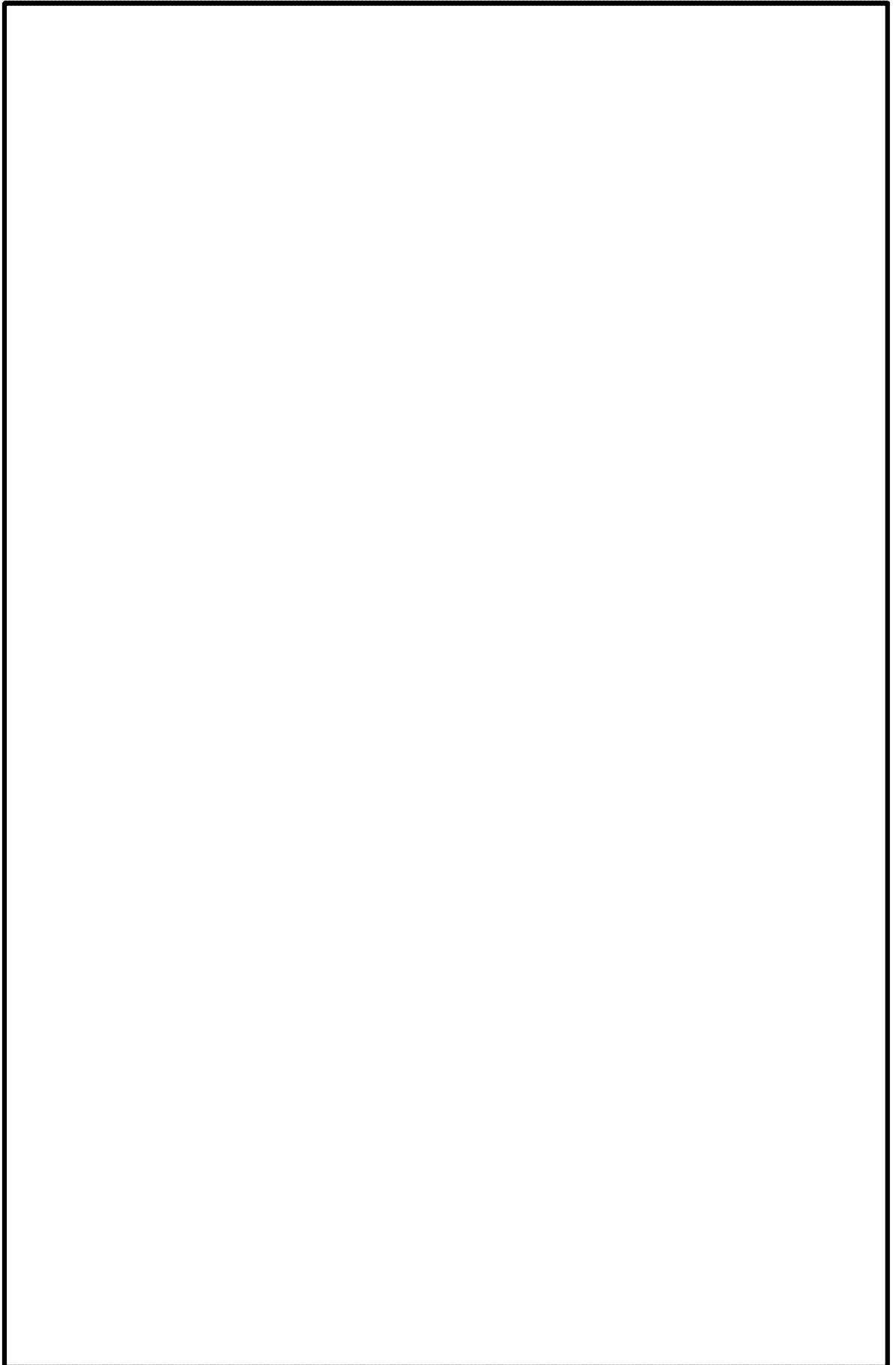
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¹⁰ Each final-demand output entry represents the total dollar change in output that occurs in all industries for each additional dollar of output delivered to final demand by the industry corresponding to the entry.

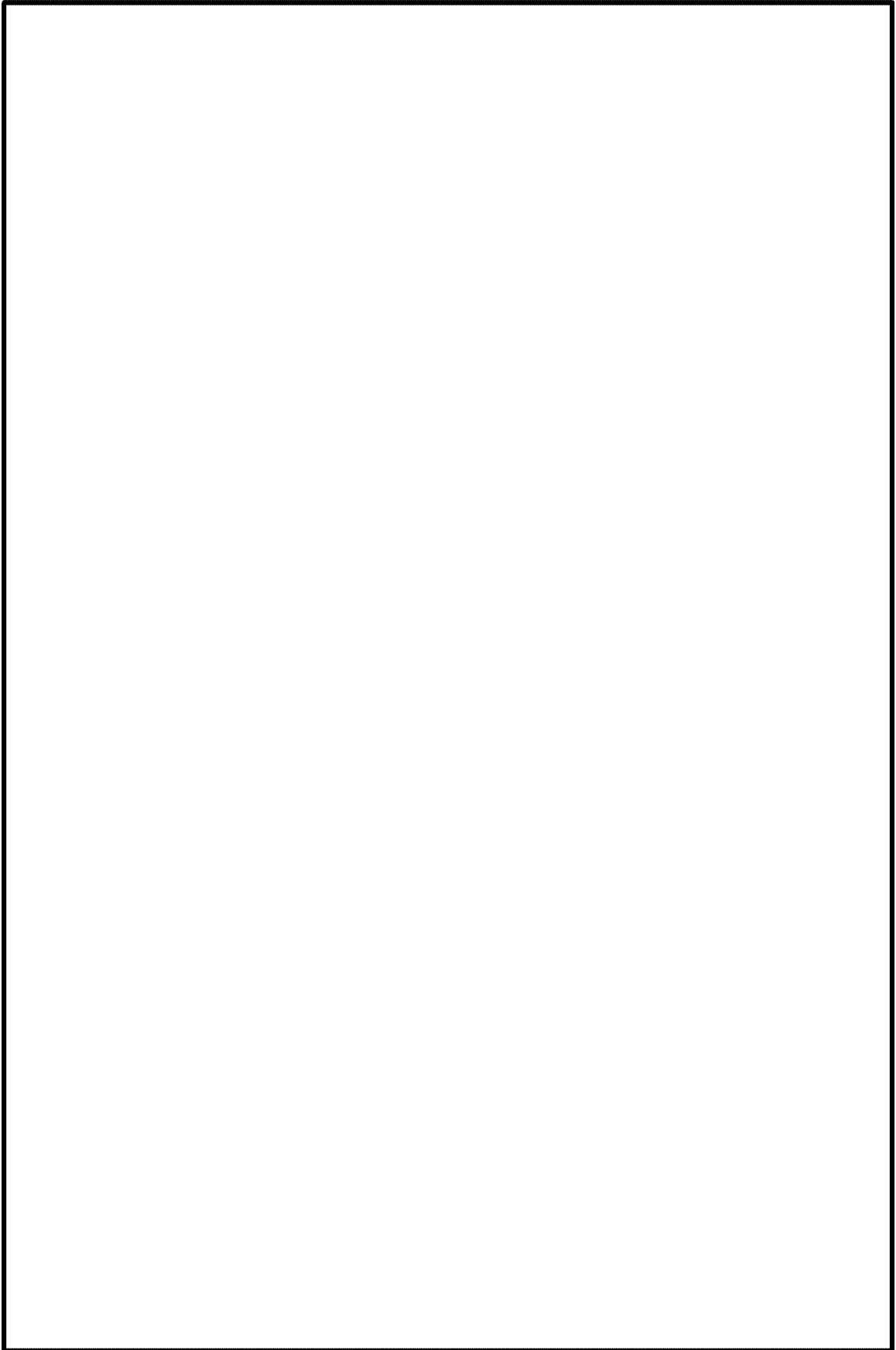
APPENDIX B

RIMS II Multipliers (Type II)

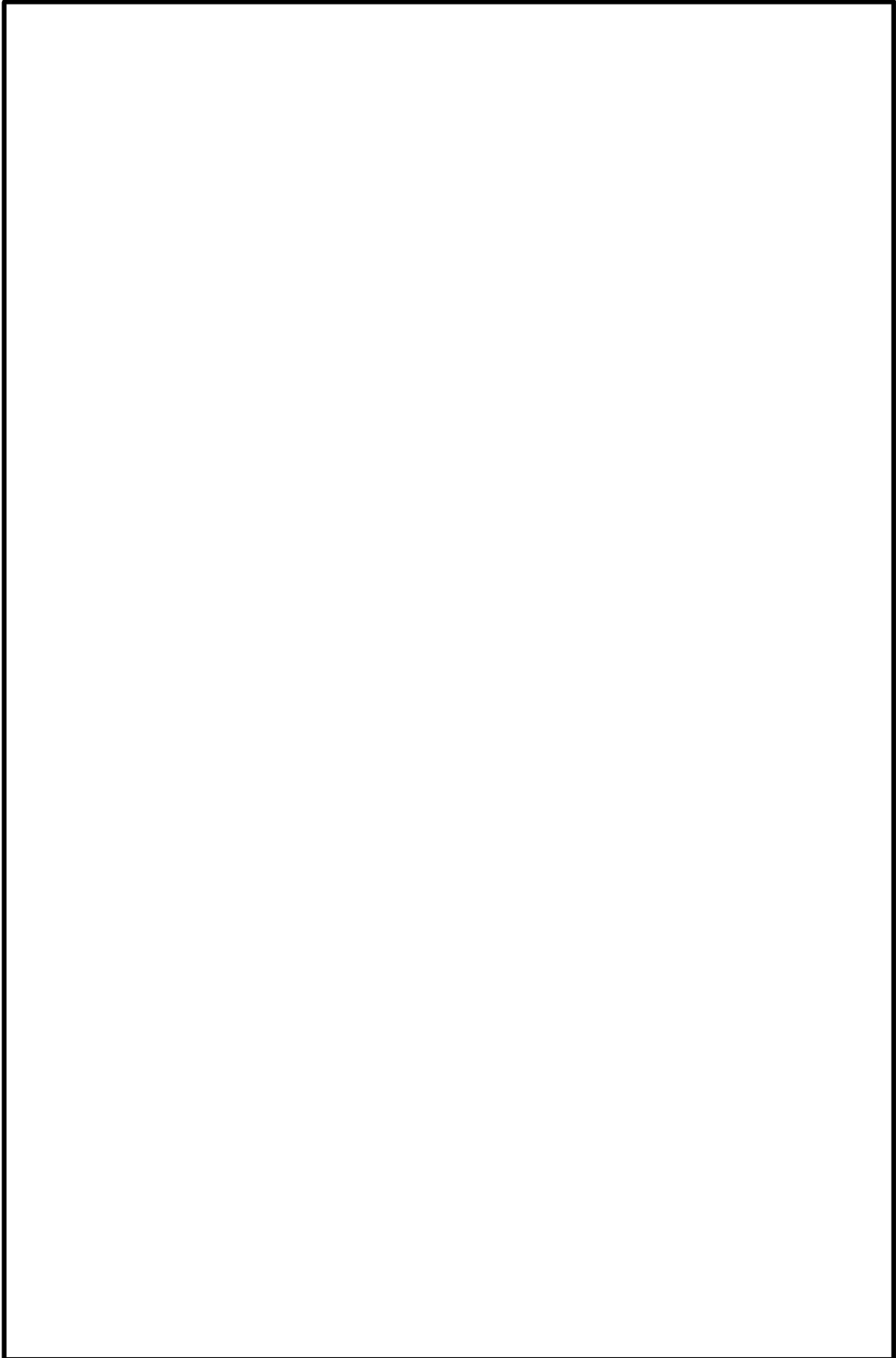
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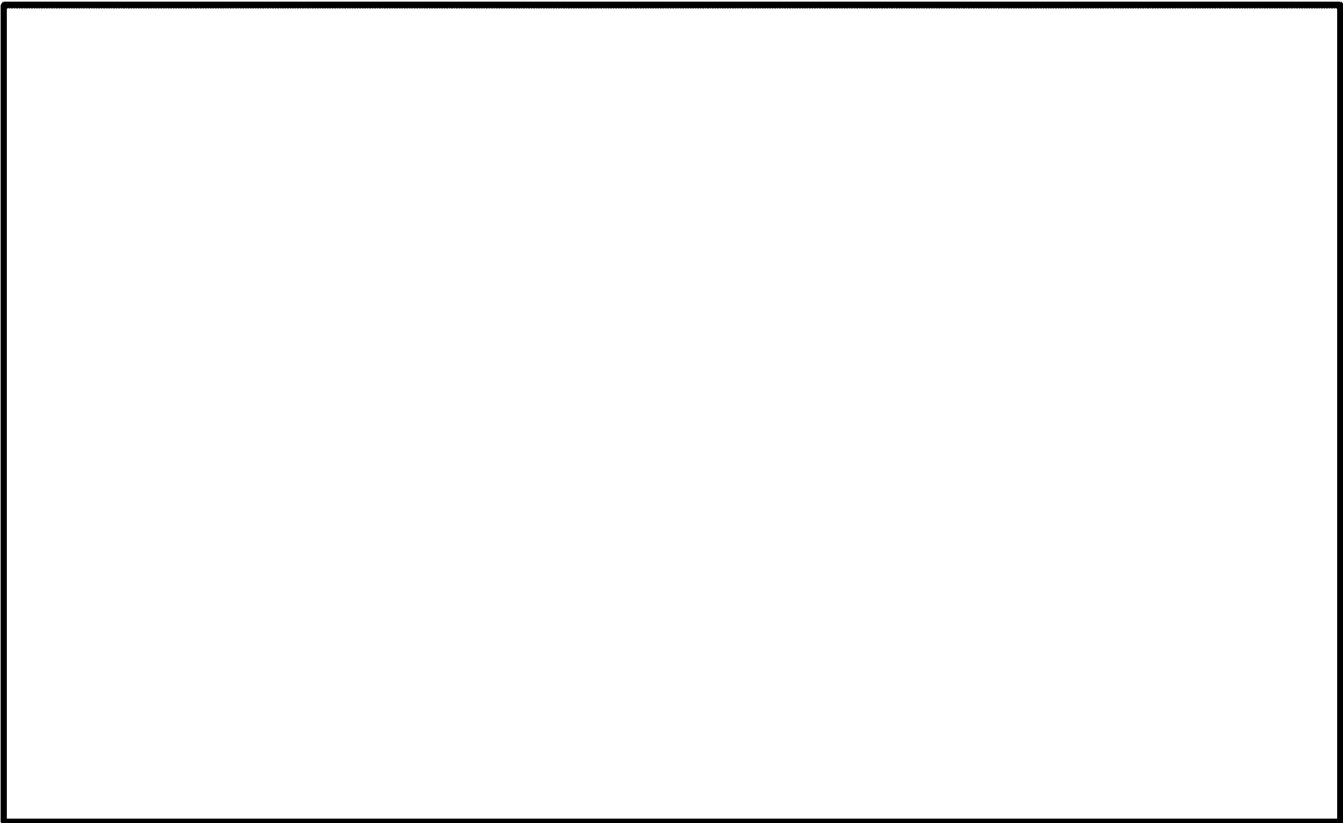


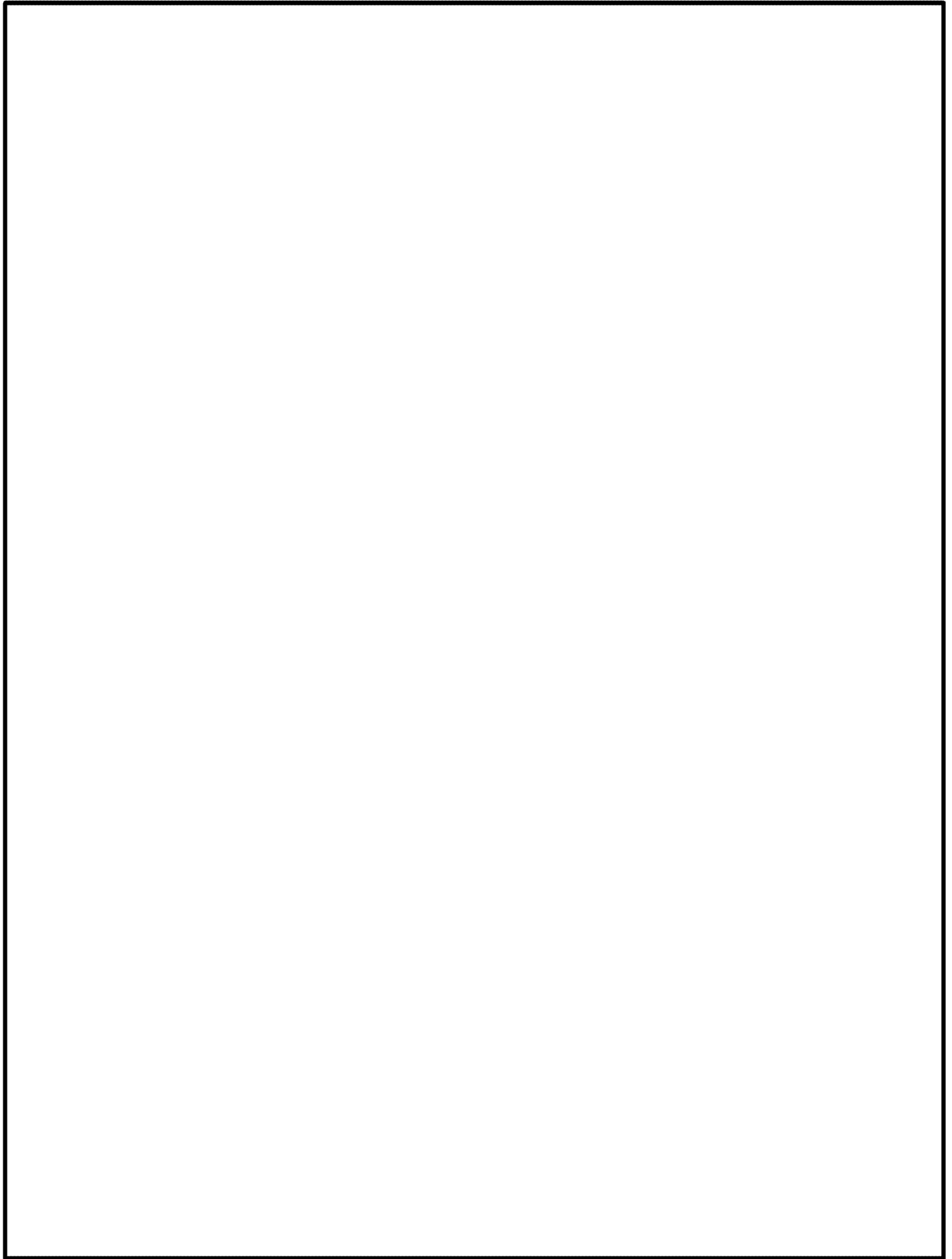
(b)(4)



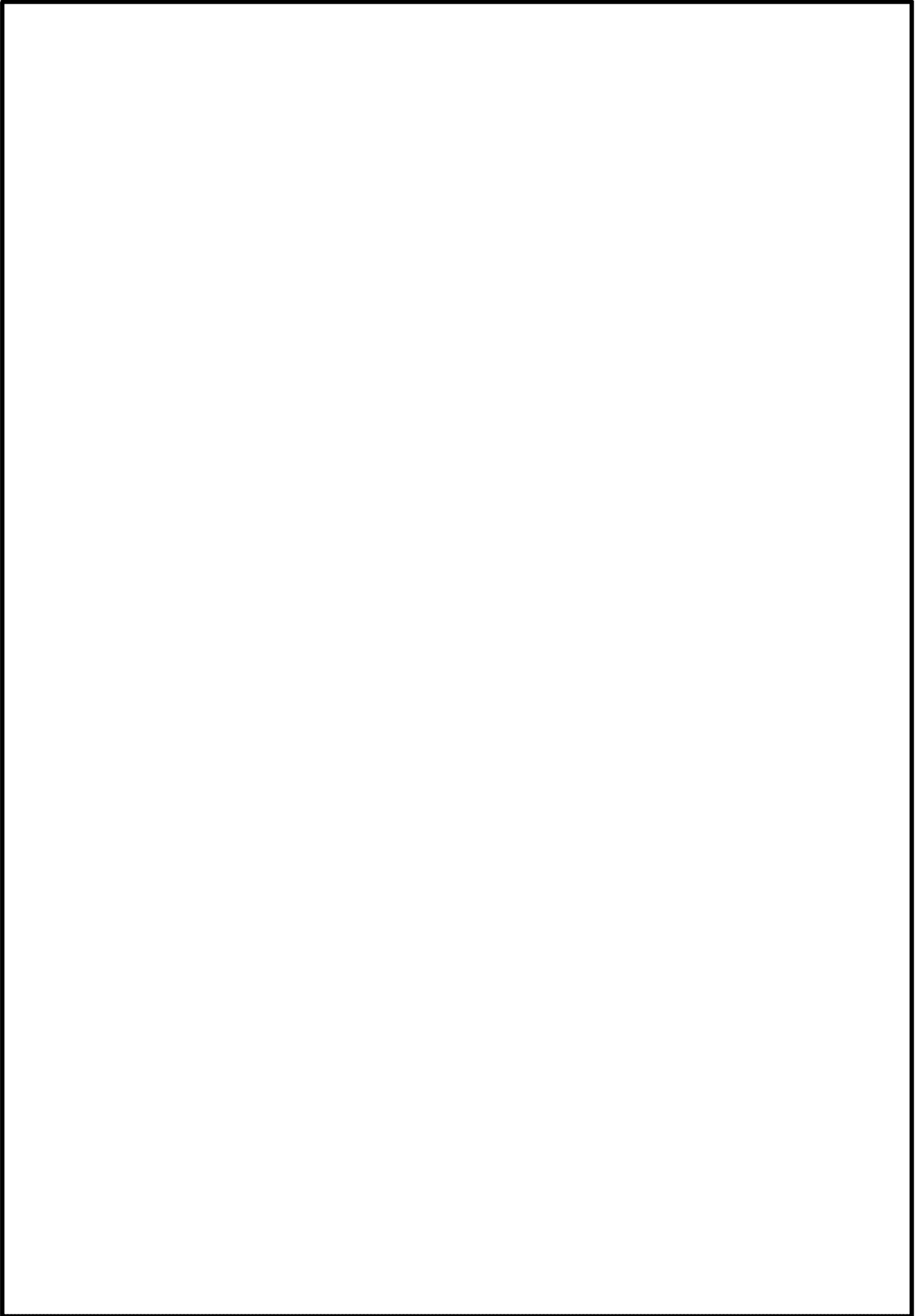
APPENDIX C

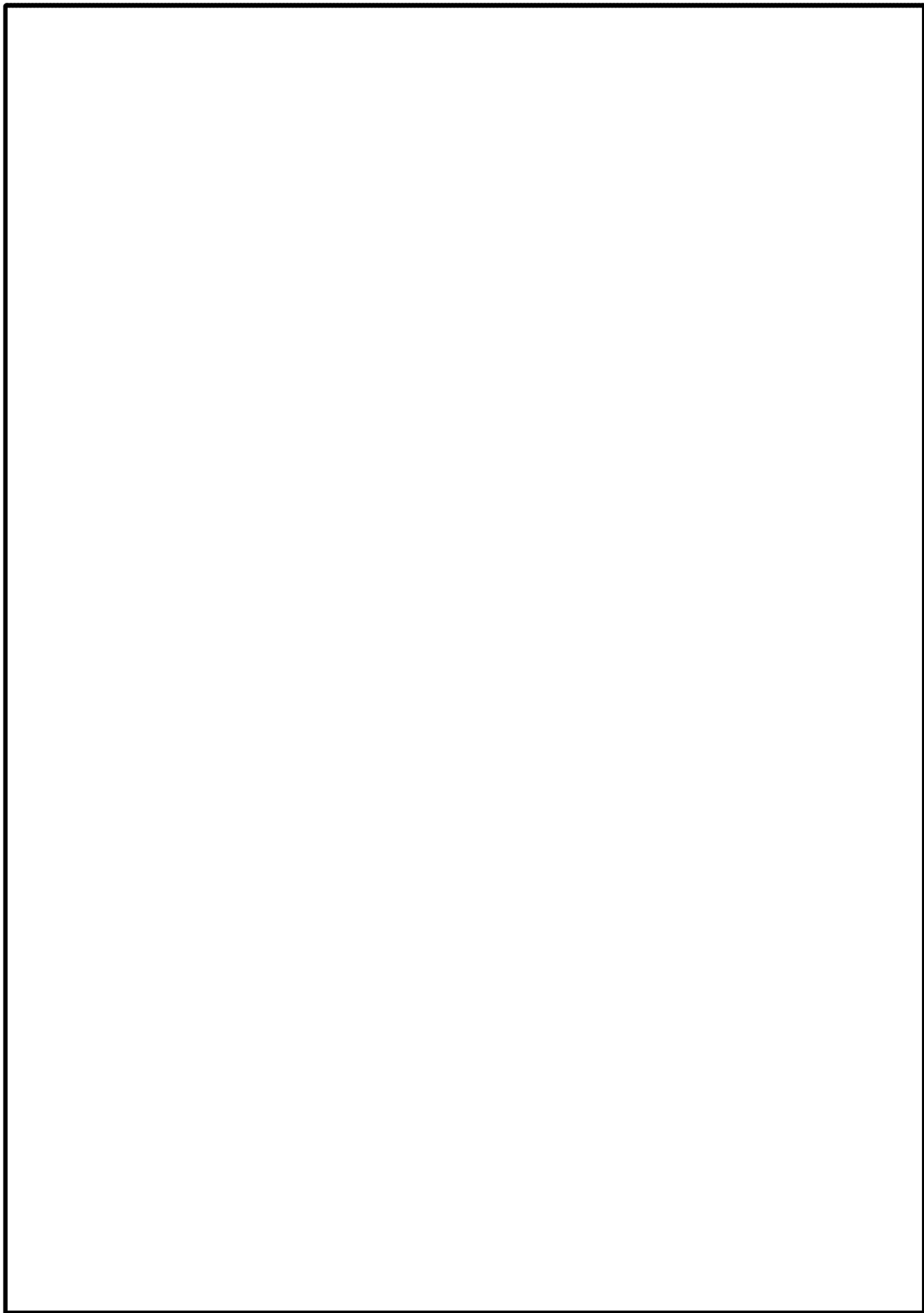
TEA-Eligible Census Tracts within Proposed Regional Center Area

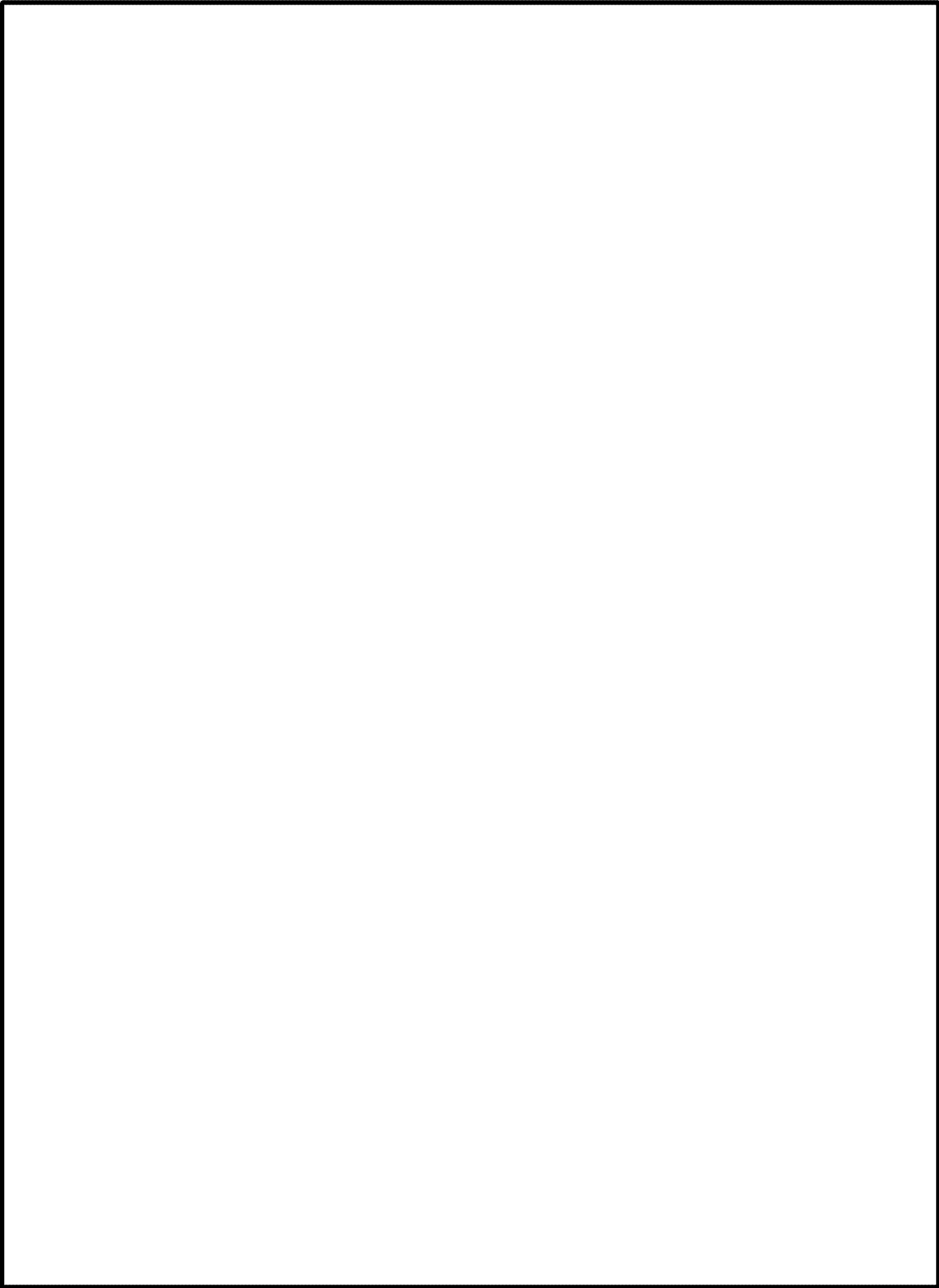


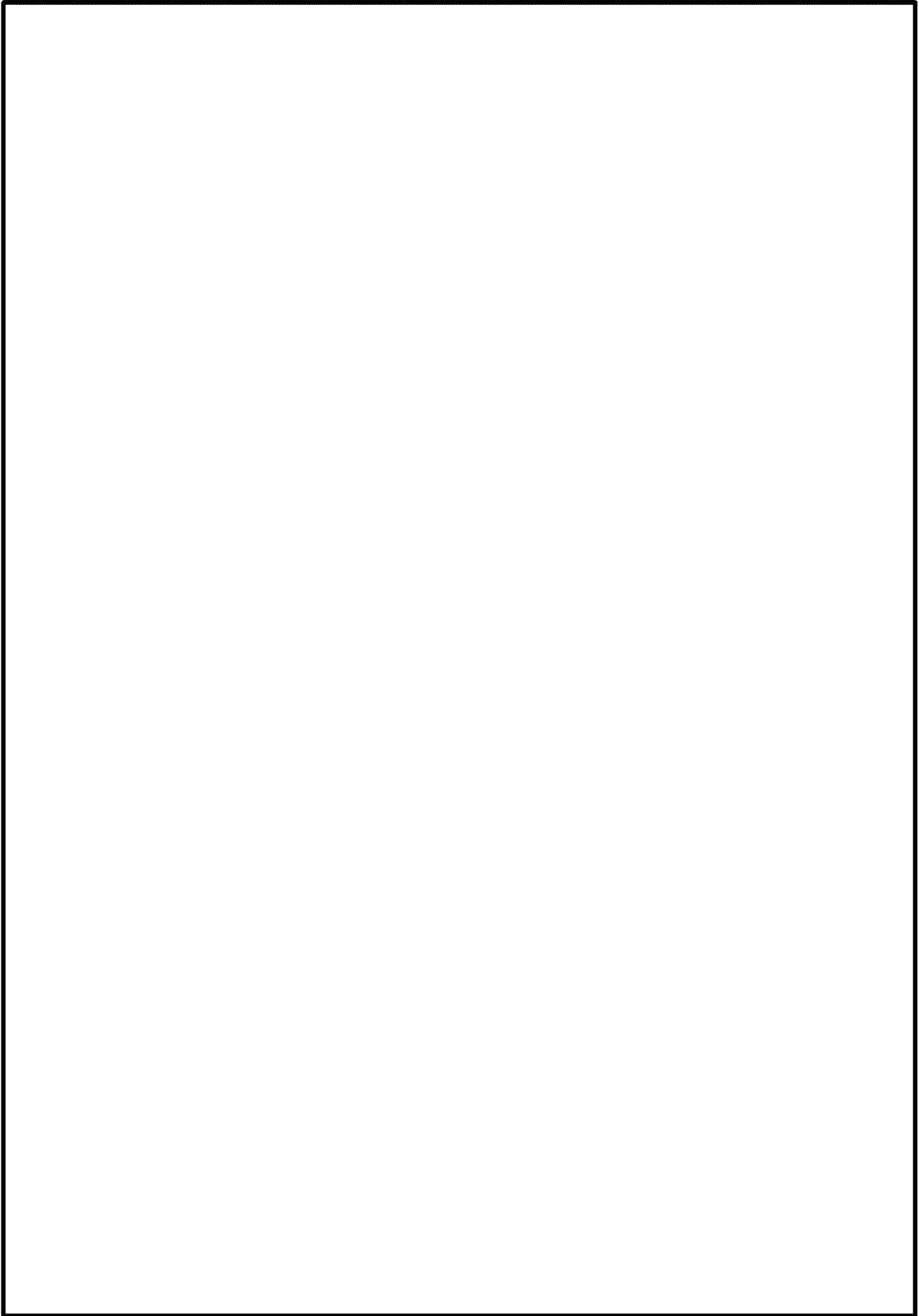


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(b)(4)



APPENDIX D

TEA Certification Letter by the Illinois Department of Employment Security



Pat Quinn
Governor

Jay Rowell
Director

September 4, 2014

Thomas Rosenberg
RKJ Legal
20 North Clark Street
Suite 3600
Chicago, Illinois 60601

Dear Mr. Rosenberg:

Please be advised that the Illinois Department of Employment Security (IDES) is the designated state agency with the authority to certify that geographic areas within the State of Illinois qualify as areas of high unemployment under the Alien Entrepreneur Visa Program.

This is to confirm that the proposed project to be located at 208 South LaSalle Street, Chicago, IL 60604 is in an area of high unemployment as defined in Section 8 CFR 204.6(i) of the Code of Federal Regulations. The proposed project encompasses the Census Tracts shown in the attached table and map, all of which are in Chicago. Federal regulations do not provide guidelines on how physical boundaries are to be evaluated, so IDES has made no judgment based on the physical boundaries of the area. IDES solely evaluates whether the geographic area meets the standards for a high unemployment area. Further, an area's final designation as a Targeted Employment Area will be made by U.S. Citizenship and Immigration Services.

The determination of eligibility is based on an analysis of the labor force data for the 12-month period ending December 2013 for the above mentioned Census Tracts and the U.S. as a whole. The Census Tract data were developed by the Economic Information and Analysis Division of IDES using the census-share method, as described in the U.S. Bureau of Labor Statistics Local Area Unemployment Statistics Program Manual. The average national unemployment rate for the year 2013 was 7.4 percent. We have determined that the 2013 unemployment rate for the Census Tracts that comprise the high unemployment area was 12.0 percent or 162 percent of the 2013 national unemployment rate.

The State of Illinois has not investigated the proposed project, nor has it made an assessment about the quality of the project, or the potential for earnings of the project at the above address. The State of Illinois verifies that the area designated is an area of high unemployment and is contiguous but does not evaluate the geographic boundaries. Projects in a TEA are not affiliated with, or sponsored by, the State of Illinois or the Illinois Department of Employment Security.

Sincerely,

Richard Reinhold
Manager, Local Area Unemployment Statistics
Economic Information and Analysis Division