

EXHIBIT A

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Robert Kraft, President
William P. Gresser, Vice President
Stephen Strnisha, Secretary-Treasurer
Aaron L. Grau, Executive Director



Al Rattan, Director
David Souders, Director
Abteen Vaziri, Director
Cletus M. Weber, Director

Eren Cicekdagi, Director
Rush Deacon, Director
Daniel J. Healy, Director
Patrick F. Hogan, Director
Joseph McCarthy, Director
Mariza McKee, Director

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K. David Anderson, President Emeritus
Stephen Yale-Loehr, President Emeritus
Robert C. Divine, Vice-President Emeritus
Robert G. Honts, Sec-Treasurer Emeritus
Henry Liebman, Director Emeritus
Tom Rosenfeld, Director Emeritus

VIA EMAIL – uscis.foia@uscis.dhs.gov

December 16, 2019

U.S. Citizenship and Immigration Services
National Records Center, FOIA/PA Office
P. O. Box 648010
Lee's Summit, MO 64064-8010

Attention: SENIOR FOIA OFFICER

RE: Freedom of Information Act Request

To whom it may concern:

Pursuant to the Freedom of Information Act, U.S.C., et Seq., and C.F.R. 103.8 et Seq., I, Ashley Sanislo Casey, as Director of Education and Professional Development, on behalf of the Invest In the USA ("IIUSA"), am hereby making this request for release of information.

We respectfully request that you please provide the following:

1. Copies of the most current and up-to-date USCIS EB-5 Adjudicator training materials for adjudicating EB-5-related petitions submitted before November 21, 2019, including PowerPoint or other presentations, memoranda and manuals. In her remarks at the IIUSA EB-5 Industry Forum on October 29, 2019 in Seattle, WA, Immigrant Investor Program Office Chief Ms. Sarah M. Kendall stated, "...in the last year we conducted a training update for all I-526 adjudicators and economists." IIUSA is seeking the materials created and used in this update for training of adjudicators and economists.

IIUSA has made and successfully fulfilled similar requests in the past (COW2015000709, COW2016000384, and COW2017000617).

IIUSA is a 501(c)(6) not-for-profit trade organization comprised of USCIS designated Regional Center members who manage, operate and promote employment-creating investment into specified regional areas of the United States. As such IIUSA has a vital interest in the information sought in this Freedom of Information Request.

As a trade organization we have no interest in the personal information pertaining to beneficiaries or petitioners. Rather we have a vested interest in the various issues arising in connection with Regional Center affiliated applications and petitions. The purpose of this request is to advance and maintain Regional Center industry standards and best practices.

The following supporting documents are available upon request. They have been included in over 200 previous FOIA requests, but I am happy to supply them again if need be.

1. Copy of NY Certificate of Incorporation;
2. Copy of IL Certificate to do business;
3. Copy of IL Assumed name filing;
4. Copy of Certificate of Registration to transact business in the District of Columbia; and
5. Printouts from our Association website (www.iiusa.org) including a list of the US Regional Centers Members within our organization.

We trust you will find the enclosed in order and sufficient to proceed with this request. I respectfully ask that you conduct a search and forward any and all records you have on file regarding the above referenced matters to our offices at the address noted herein.

Please feel free to contact me with any questions. Thank you for your assistance.

Available upon request:

Copy of NY certificate of incorporation
Copy of IL certificate to do business
Copy of IL assumed name filing
Copy of Certificate of Registration to transact business in the District of Columbia
Printouts from iiusa.org with list of Regional Center members

Sincerely,



Ashley Sanislo Casey
Director of Education & Professional Development