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Department of Homeland Security  
U.S. Citizenship and Immigration Services (USCIS)  
California Service Center  
24000 Avila Rd, 2<sup>nd</sup> Floor  
Laguna Niguel, CA 92677

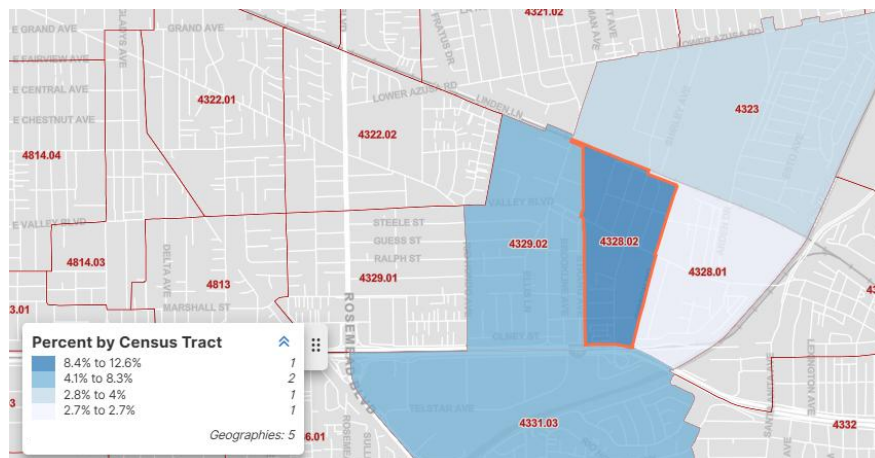
Subject: High Unemployment Area Designation for LA Valley Garden Plaza LP.

To Whom It May Concern:

As per the EB-5 Reform and Integrity Act of 2022 ("RIA") signed into law on March 2022, the Department of Homeland Security ("DHS") through the United States Citizenship and Immigration Services ("USCIS") retains the sole authority to grant targeted employment area ("TEA") designations.

The method to assign TEA designations in urban areas allows for the consideration of economic data of census tracts in which the Job Creating Entity ("JCE") is located, along with any directly adjacent census tracts. Such census tracts can be aggregated to obtain a weighted average unemployment rate of more than 150% of the national average using the same data set. The source for this data can be from the American Community Surver ("ACS") provided by the U.S. Census at the tract level, or at the tract level, or by using the census-share methodology using by using the census-share methodology, which combines the Local Area Unemployment Statistics ("LAUS") at the county level provided by the Bureau of Labor Statistics ("BLS") with the latest ACS data at the tract level.

This letter provides USCIS with the necessary evidence to grant TEA status based on high unemployment to LA Valley Garden Plaza LP, a JCE located 9933 Valley Blvd, El Monte, CA 91731, and within the boundaries of Census Tract 4328.02 as depicted in the map below.



The analysis is based on the census-share method using the latest data available from the BLS at the county level, the LAUS 1-Year Estimate of 2024, released in April of 2025 and the latest ACS data. The analysis is based on the census-share method using the latest data available from the BLS at the county level, the LAUS 1-Year Estimate of 2024, released in April of 2025 and the latest ACS data. This data is valid for TEA designation purposes until April of 2026, at which point, a new dataset will be released.

Since BLS' estimate of the national unemployment level is at 4%, the minimum unemployment level required to designate the location as TEA is set at 6% until the next release on April of 2026. The unemployment level of the JCE's census tract was found to be at **10.6%, and as a consequence, such location qualifies as an urban TEA on its own**, and without the need to aggregate data from adjacent tracts. The table below depicts the data from LAUS and using the census-share method to estimate the tract level statistics:

Tract	Labor Force	Employed	Unemployed	Unemployment Rate (%)	TEA Qualified
4328.02	2,607	2,330	276	10.6%	Yes

Therefore, in accordance with 8 CFR 204.6(i) and the RIA, we request USICS to designate the aforementioned JCE as a high unemployment area for EB-5 purposes.

**It is important to highlight that this evidence is only valid until the next LAUS data release of April 2026, and there is no guarantee that the subject census tract will continue to qualify as a TEA beyond such time.**

For any questions or additional information, please contact Dr. Fernandez at 404-602-0334 or via e-mail at [Ismael.fernandez@greengateplans.com](mailto:Ismael.fernandez@greengateplans.com).

Sincerely,



Ismael Fernandez, PhD  
President  
Greengate Consulting, LLC