

Loan Administration Procedures

The Manager of the Company intends to implement a program of loan administration in order to check the interest of the Company and the investors that will include the following component:

1. Retention of Independent Counsel. Their Loan documentation that is in accordance with industry standards to the nature of the Loan being made, taking into account the fact that the EB-5 Immigration program has unique requirement issues that will need to be factored into the Loan documentation.
2. Undertaking the normal due diligence process that would normally be undertaken by a financial institution in underwriting the Loan itself, such as obtaining the following:
 - (a) Feasibility of current marketing studies and appraisers.
 - (b) Title reports and potentially obtaining a title insurance policy.
 - (c) Receipt and review of survey.
 - (d) Review of all other necessary zoning environmental issues to ensure that there are no material entitlements with respect to development of the Project as contemplated by the loan.
 - (e) A provision in the Loan agreement with respect to funding of construction of the Project providing for draw requests systems whereby the Developer/Borrower will be obligated to provide draw requests that will be reviewed by qualified personnel on behalf of the Company before loans are otherwise funded. The manager intends to hire professionals to review and/or verify the loan requests, including they're not rooted to engineers, architects, or other consultants that may otherwise be retained by the Developer to sign off on draw requests for senior lenders or otherwise rely upon the new senior lender procedures including draw requests.
 - (f) Obtaining regular financial reporting from the Developer to verify the budget for the development and whether or not the Project is on budget.
 - (g) Receipt of periodic financial statements to the extent applicable with respect to the development of the Project, and after the Project has been completed, then financials related to the operation of the Project to ensure that the Project is operating in accordance with the budgeted proforma.

- (h) Regular review and confirmation that basic protections are in place, such as, insurance on the Project, the continued maintenance of the senior loan in good standing, and the receipt of any items that need to be reported to the Company on a regular basis in accordance with the terms of the Loan agreement.
- (i) Furnishing periodic reports to investors summarizing the procedures in place and providing investors with access to all of the information otherwise received and/or paid by the manager.