

## Comment Submitted by Matthew Gordon

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## Comment

Part 2 - Item 6 (and generally), the question presumes that the JCE and NCE are separate entities. For non-regional center investments the JCE and NCE are always one and the same. The wording on the form should be updated to clarify (e.g. "JCE, when separate from the NCE").

Items 15-20 - The questions are over-broad. They ask for the investors total income and net worth, even though the EB-5 investment might represent only a small portion of their income and/or net worth. Some families have substantial business interests and assisting for essentially what is a full accounting of the investor's (or sources') balance sheet will have a chilling effect on investors. The logistics of documenting the source of funds for \$500,000 can cumbersome, often running hundreds of pages. For investors worth many millions (often tens and hundreds of millions), it would be extraordinarily burdensome.

There is no basis in the enabling legislation for requesting this information.