



January 13, 2026

Consular Officer
U.S. Embassy
Visa Section

Re: E-2 Treaty Investor Visa Application – Nigel T / Rowe & Wren

Application Summary:

Nigel T (CAN) — Rowe & Wren

Ownership: 100%

Investment at Risk: \$230,000

Planned U.S. Employment: 5 W-2 employees within the first 24 months

Dear Consular Officer,

This application is submitted on behalf of Nigel T, a national of Canada, seeking E-2 Treaty Investor classification to develop and direct Rowe & Wren. Rowe & Wren LLC is set to provide specialized design services through a monthly retainer model, catering primarily to SMEs and SaaS tech companies across the United States. The applicant holds 100% ownership of the enterprise. This application satisfies all statutory requirements for E-2 classification, including treaty nationality, substantial investment irrevocably committed and at risk, a real and operating enterprise, non-marginality through job creation, and the applicant's intent to develop and direct the enterprise.

The applicant has irrevocably committed USD 230,000 to the enterprise, with funds placed at risk through equipment procurement, securing a commercial lease, and initial operating expenses. The investment is fully at risk and irrevocably committed. Investment documentation is provided in the enclosed evidence.

The enterprise is operational, with a signed commercial lease, as documented in the enclosed exhibits. The investment exceeds the amount normally required to establish and operate this type of enterprise. This level of investment is appropriate for Rowe & Wren, as it ensures the necessary resources for effective operation and service delivery. Supporting documentation is provided in the enclosed exhibits.

The enterprise is more than marginal and will provide a meaningful economic contribution to the United States through U.S. job creation. The enterprise will employ 5 W-2 employees within the first 24 months, growing to 7 employees by year 5. These positions will support essential business functions such as sales and marketing. The applicant will develop and direct the enterprise, with day-to-day responsibilities including hiring, sales, and managing operations.

The applicant intends to depart the United States upon termination of E-2 status. The applicant maintains permanent residence in Canada. Based on the enclosed evidence, the applicant respectfully submits that all requirements for E-2 Treaty Investor classification have been satisfied and requests favorable adjudication of this application.

Thank you for your consideration.

Enclosures: See Exhibit Index.

Sincerely,

Edward Gotham Townsend

Attorney of Record

Winterbridge LLC

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E-2 Treaty Investor Business Plan

Submitted by Rowe & Wren
For the E-2 Visa Application of Nigel T

BUSINESS PLAN OVERVIEW

Industry	Design Services
Prepared	January 2026
Address	2109 Broadway, 11-157, New York, New York, 10023

Prepared for E-2 Treaty Investor Visa Application

Executive Summary

Rowe & Wren LLC is set to provide specialized design services through a monthly retainer model, catering primarily to SMEs and SaaS tech companies across the United States. Leveraging industry trends towards digital solutions and cost efficiency, this business offers a compelling value proposition with its innovative use of AI in design workflows, enabling high-quality marketing assets at speed and reduced cost. A substantial investment of USD 230,000 underpins this venture. Nigel T, with extensive marketing experience, is well-equipped to develop and direct the enterprise per FAM 402.9-6.

The investment is strategically allocated to essential business components including equipment procurement and securing a commercial lease in New York. Rowe & Wren is operationally prepared, with premises ready to support business activities. By Month 24, the business will create five full-time equivalent W-2 jobs, indicative of robust early growth. Initial scaling will focus on onboarding a marketing specialist and designers to strengthen service delivery, aligning workforce expansion with demand trajectories and business needs.

The investment qualifies as substantial, meeting E-2 requirements through a proportional test. Rowe & Wren stands as a real and operating enterprise, supported by physical premises, equipment acquisition, and an operational management structure. Job creation projections exceeding personal support indicate a non-marginal enterprise contributing to broader economic activity.

Key Points

- 5 W-2 FTEs within 24 months
- Projected \$240,000 Year 1 revenue
- \$230,000 total investment
- 100% treaty-national ownership and control
- E-2 non-marginality compliance by Year 3

Organization & Management

For E-2 visa compliance, the business must demonstrate substantial treaty-national ownership and active management, signaling viability and direct operational engagement necessary to steer growth and ensure job creation.

Rowe & Wren is a Limited Liability Company formed in the State of New York on November 26, 2025 with principal operations at 2109 Broadway, Suite 11-157, New York, New York, 10023.

Nigel T, a Canadian national, holds 100% ownership of Rowe & Wren LLC, confirming compliance with treaty requirements. Nigel exercises active managerial control, presiding over financial decisions, strategic direction, and hiring processes, ensuring the business aligns with E-2 visa stipulations.

Ownership Structure

Owner Name	Nationality	Ownership %
Nigel T	Canada	100%

Job Creation & U.S. Economic Impact

Rowe & Wren's hiring strategy is pegged on immediate operational needs and long-term scalability. Initially, design roles are pivotal to fulfilling client orders and creating high-quality marketing assets, tapping into the company's core design service offerings. A marketing specialist is crucial to expanding our market reach and enhancing client relations, vital components of our growth strategy. By Month 24, the workforce expands to five full-time equivalents (FTE), optimizing service delivery escalation. This structure ensures output matches the anticipated client base, facilitating a sustainable and credible operational foundation, thus demonstrating the enterprise's capacity to exceed obligatory E-2 requirements.

This hiring roadmap is reflected in the phased staffing plan below, detailing cumulative FTE growth through Year 1 and Month 24.

24-Month Job Creation Snapshot:

Hiring Milestone	Full-Time Employees
End of Year 1	2.0 FTE
End of Year 2 (Month 24)	5.0 FTE

Founder Background & Capability

Nigel T, a Canadian citizen and 100% owner of Rowe & Wren, brings over a decade of marketing experience within the technology sector. His background ensures he has the capability to develop and direct the enterprise per FAM 402.9-6, significantly mitigating execution risks.

Professional Background

With a robust career spanning over ten years, Nigel T has honed expertise in marketing and product strategy, specializing in comprehensive advertising campaigns and social media management for tech firms. This professional journey equips him with a strategic acumen indispensable for steering Rowe & Wren, ensuring adept management of marketing operations, client interactions, and service execution. His track record of managing large-budget campaigns aligns with industry norms, providing a solid foundation for enterprise leadership and direction.

Management Role

As the CEO of Rowe & Wren, Nigel T will oversee comprehensive management functions critical to the enterprise's success. This involves making pivotal hiring decisions, managing financial plans, overseeing vendor negotiations, and directing marketing strategies. His roles also encompass maintaining product standards, ensuring the service quality meets client expectations, and managing customer acquisition strategies. By directly influencing these operational aspects, Nigel secures the company's position within the competitive landscape, motivated by both market potential and personal commitment to business growth.

Mission & Vision

Rowe & Wren is driven by a mission to deliver high-quality marketing assets with efficiency, ensuring clients receive substantial value for their advertising investment. This mission aligns with a long-term vision that prioritizes sustainable growth within the U.S. market, committed to job creation and economic contribution. The enterprise will expand its market footprint through strategic employee growth and operational scalability, supporting robust customer engagement. This dynamic approach supports E-2 compliance, building a foundation for a viable, lasting presence in the U.S. economy.

U.S. Market Presence

Nigel T's understanding of U.S. consumer preferences and demand dynamics primes Rowe & Wren for effective market entry. Through previous engagements with tech firms scaling advertising campaigns in North America, Nigel has acquired insights into American consumer behavior, aligning service offerings with market expectations. Such familiarity enables the business to tailor its strategies to meet local buying patterns, ensuring product-market fit and competitive positioning, critical elements for scaling operations in the U.S.

Business Model & Offering

The design services industry is rapidly evolving, driven by increasing demand for digital-first solutions that offer both quality and efficiency. Companies are seeking cost-effective design alternatives that utilize advanced technology, which aligns with the capabilities of Rowe & Wren's AI-enhanced model.

Products & Services

Rowe & Wren offers a monthly design retainer service priced competitively at an average of \$5,000. It provides clients with comprehensive design solutions, including creative asset development and advertisement management, supported by AI tools ensuring high quality and efficiency.

Delivery Model

The business operates a digital first approach, allowing for scalable service delivery across the U.S. Designers interact with clients to finalize design concepts, leveraging AI software for expedited production. This model emphasizes quality control through periodic reviews and client sign-off on deliverables. As demand increases, hiring additional designers ensures seamless scaling of operations without quality compromise.

Value Proposition

AI-enhanced design services offer value and speed.

- Scalable model — ensures consistent service delivery across regions
- 80% gross margin — high profitability supports sustainable pricing
- AI integration — fast asset creation enhances client satisfaction
- Monthly retainers — predictable revenue and streamlined operations

This robust operational framework, anchored in technological efficiencies and market-aligned pricing, is challenging to replicate, providing Rowe & Wren with a durable competitive edge.

Revenue Streams

- Monthly design retainers
-

Monetization

The monthly retainer is the sole revenue stream, aligning with a premium service offering. With an 80% gross margin, the model's lean yet effective delivery ensures high profitability. By leveraging technology, production costs are minimized, allowing competitive pricing that appeals to cost-conscious clients seeking value in design services.

E-2 Alignment

The business model strategically aligns with E-2 visa requirements, with operational efficiencies supporting substantial economic contribution through staff hiring and sustained revenue growth, while ensuring robust non-marginality compliance.

Market Opportunity

Industry Context & Problem Statement

In today's digital marketplace, many businesses seek more innovative, technology-driven solutions to enhance their marketing reach. However, traditional design services often fall short of delivering speed and cost efficiency, creating a significant gap that Rowe & Wren's AI-based approach aims to fill. This problem is particularly acute for SMEs and tech-driven companies that require constant asset updates to maintain their competitive edge.

Demand Signals

MACRO TRENDS

- Increasing demand for digital-first design solutions
- Growing need for cost-efficient and agile design services
- Rising investment in AI-based technologies

CATEGORY-SPECIFIC SIGNALS

- Tech companies prioritizing marketing innovation
- SMEs focusing on scalable, budget-friendly design tools
- Market trend towards integrated advertising solutions

These demand signals indicate a fortified opportunity for Rowe & Wren, positioning its AI-driven model to meet emergent market needs efficiently.

Market Size Analysis

Market Segment	Value	Description
Total Addressable Market (TAM)	\$100,000,000	The Total Addressable Market (TAM) stands at USD 100 million, encapsulating the broad need for innovative design services across the U.S. This expansive market is driven by digital transformation demands, placing Rowe & Wren in an advantageous position to tap into emerging industry needs.
Serviceable Available Market (SAM)	\$50,000,000	The Serviceable Available Market (SAM) narrows to USD 50 million, focusing on tech SMEs seeking tailored design solutions. This niche significantly contributes to the sector's structural attractiveness, underscoring a keen interest in tech-savvy service providers, aligning perfectly with Rowe & Wren's service model.
Serviceable Obtainable Market (SOM)	\$6,000,000	The Serviceable Obtainable Market (SOM) is projected at USD 6 million, surpassing the anticipated Year 5 revenue, thereby providing considerable commercial headroom essential for sustaining Rowe & Wren's growth trajectory. This attainable market share illustrates the business's potential to capture a substantial portion with its unique offerings.

The defined market segments—TAM, SAM, and SOM—illustrate layered opportunities with Rowe & Wren strategically positioned to dominate its serviceable niche.

With a clearly defined SOM that surpasses Year 5 revenue projections, Rowe & Wren is positioned to meet E-2 non-marginality criteria, ensuring sustainable economic contributions via job creation and market expansion.

Target Customers

Our primary customer segment comprises small to medium-sized enterprises (SMEs) and SaaS technology firms across the United States. These businesses are budget-conscious but value-driven, seeking consistent, high-caliber design services.

Customer Profile

This segment is digitally savvy, often discovering services via online platforms and placing high value on innovation and efficiency in marketing assets.

Pain Points

- High cost and slow turnaround times with traditional agencies
- Need for reliable, scalable design solutions
- Increasing pressure to use AI tools for efficiency gains

Buying Triggers

- Business expansion requiring rebranded assets
- Launching new marketing campaigns demanding fresh design
- Competitive pressure to modernize visuals with AI-enhanced designs

Success Criteria

- Affordable and predictable service pricing
- Quick turnaround on design requests
- Consistently high-quality visual assets aligned with cutting-edge trends

This key customer segment, aligned closely with Rowe & Wren's design services, supports predictable traction and underpins operational scalability. As demand from tech SMEs grows, non-marginality through sustainable U.S. staffing becomes increasingly attainable, reinforcing the business's robust market foundation.

Competitive Landscape

The digital design market involves diverse competitors, from traditional agencies to emerging AI-empowered platforms. The following analysis positions Rowe & Wren within this competitive field.

Market Positioning

Rowe & Wren is uniquely positioned as a design service provider leveraging AI for high-efficiency, client-based retainer services. Straddling the line between costly traditional agencies and budget DIY platforms, it offers tailored solutions that appeal to tech-savvy SMEs while navigating a mid-market price tier. The following analysis outlines how the business compares to key players in the design service space.

Competitor Analysis

Competitor	Positioning	Pricing	Strengths	Weaknesses	Our Edge
Traditional Agencies	Full-service design	Premium tier	Established client base	High cost structure, slow	AI efficiency and cost savings
DIY Platforms	User-driven design	Low-cost, self-serve	Affordable, accessible	Limited customization	Custom service and quality assurance
Freelance Networks	Gig-based solutions	Varied pricing	Flexibility, broad talent pool	Inconsistent quality	Consistent brand quality control

Sustainable Competitive Advantages

Rowe & Wren's lasting competitive advantage lies in its integration of AI to streamline design, delivering improved margins and quicker outputs that traditional agencies struggle to match. Its ability to offer scalable, custom-tailored design services at competitive prices forms a solid barrier against new entrants and existing competition.

Competitive Risks

Key risks include increasing competition from larger agencies adopting AI tech and potential customer price sensitivity. Mitigations involve emphasizing the niche service quality and maintaining agile, cost-controlled operations. The business will focus on direct customer engagement and tight quality controls to retain its edge.

Operating within a growing segment of AI-driven design, Rowe & Wren is well-positioned to secure sustainable growth. This niche market focus, paired with technology and cost leadership, promises long-term competitive viability.

Go-to-Market Strategy

The Year 1 go-to-market (GTM) plan for Rowe & Wren focuses on leveraging both paid and organic channels to drive initial client acquisition, support revenue growth, and set the foundation for continued expansion. The allocated marketing budget will efficiently distribute across PPC, SEO, PR/media, and content marketing channels, specifically tailored to align with the behavior of our target demographic. This strategic deployment not only facilitates immediate traction but also supports operational viability and early-stage job creation, targeting a projected \$240,000 Year 1 revenue.

Marketing Channel Allocation

Total Annual Marketing Budget: \$50,000

Channel	Allocation	Annual Budget	Monthly Budget
PPC	25%	\$12,500	\$1,042
SEO	25%	\$12,500	\$1,042
PR / Media	25%	\$12,500	\$1,042
Content Marketing	25%	\$12,500	\$1,042
Email Marketing	0%	\$0	\$0

Paid Acquisition Strategy

Rowe & Wren's paid acquisition strategy includes PPC and SEO campaigns designed to penetrate key markets efficient for digital-first promotions. Targeting users who favor quick, yet quality-driven design services, these channels are optimal for capturing interest from tech-oriented SMEs looking for agile and budget-conscious solutions.

Execution will involve tightly managed PPC and SEO campaigns structured around targeted keywords and specific high-conversion audience segments. Creative, AI-enhanced visuals and clear calls-to-action will guide potential customers from awareness to acquisition, directly supporting the revenue trajectory outlined for Year 1.

Organic Acquisition Strategy

The organic strategy concentrates on content marketing and PR activities, augmenting the brand's presence in business and tech communities. Email campaigns will nurture leads, reflecting recipient discovery behaviors and converting them into long-term clients.

A well-orchestrated content schedule paired with strategic PR placements will build visibility and establish credibility over time. Engaging informative content will position Rowe & Wren as a thought leader, while targeted email efforts enhance client relationship management.

Customer Retention Strategy

Rowe & Wren will employ post-service email feedback loops, targeted remarketing, and routine client catch-ups to sustain consumer interest and loyalty. This strategy supports predictable recurring revenue and aligns with our commitment to U.S. job creation by ensuring a sustained demand flow.

Launch Timeline

Phase	Timing	Key Activities
Pre-Launch	Months 1-1	Awareness building; Email capture; Channel setup
Launch	Months 2-4	Campaign activation; Initial customer acquisition
Optimization	Months 5-8	Performance review; Channel refinement
Scale	Months 9-12	Channel scaling; Seasonal pushes

E-2 Visa Alignment

The comprehensive GTM plan bolsters Rowe & Wren's operational foundation, driving essential revenue for staffing and confirming the practice of a non-marginal business. It ensures the marketing hire's optimal integration, facilitating active operations and a viable market presence.

Pricing & Revenue Model

Rowe & Wren applies a value-based pricing philosophy, aligning cost with the client's expectation of quality and efficiency, essential for maintaining competitive positioning within the design service industry.

Price Positioning

We position our pricing strategy in the mid-market tier, offering sophisticated yet cost-effective solutions that appeal to clients seeking a balance between premium quality and financial reasonability, avoiding the high fees typical of top-tier agencies.

Revenue Model

Revenue streams are primarily driven by the fixed monthly design retainer, ensuring consistent cash flow while allowing for price predictability and easier budget planning for clients. The model's direct-to-consumer approach maximizes margins and supports scalable production, anchoring revenue growth to the tailored needs of an expanding client base.

Monetization Pathways

- Revenue driven primarily by high-AOV purchases
- Supplementary income from secondary products supporting recurring demand
- Margin preservation through direct-to-consumer model
- Local production supports scalable throughput and stable costs

These pricing and revenue mechanics directly inform the financial projections outlined in Section 11, which rely exclusively on user-provided assumptions.

Operations Plan

Premises & Operating Footprint

Rowe & Wren operates from a commercial space in central New York, strategically chosen to support both production efficiency and client interactions. The layout includes dedicated zones for creative design work, client presentations, and administrative tasks, complying with local zoning laws.

Facilities & Infrastructure

Facilities comprise essential digital tools for design management, including AI software for asset creation, alongside physical workstations tailored for collaborative design projects. Organized operational stations facilitate end-to-end service delivery, from concept development to final product presentation, ensuring both efficiency and quality control.

Operational Workflow

1. Client design request received.
2. Design task assigned.
3. Initial concept and moodboard preparation.
4. Client review and feedback.
5. Asset revisions and completion.
6. Final quality assurance.
7. Delivery and presentation to the client.

Supplier & Vendor Management

Rowe & Wren partners with domestic software vendors for AI integration, ensuring reliable technology access and support. Supplier redundancy is maintained to mitigate risk, with diversified tools for producing diverse design elements, complemented by comprehensive inventory management solutions.

5-Year W-2 Staffing Summary

Year	W-2 Headcount	New Roles Added
1	2	Designer, Designer
2	5	Designer, Marketing specialist, Sales Rep
3	5	—
4	6	Designer
5	7	Designer

See Appendix B for the detailed role-by-role staffing plan.

The 5-year staffing plan reflects structured growth across design and marketing functions. This progression ensures adequate operational capacity to meet rising client demands while supporting the business's commitment to U.S. job creation. See Appendix B for a detailed role-by-role breakdown.

Financial Model Summary

This financial model encompasses a detailed 5-year profit and loss projection based on pre-established assumptions. It reflects operational initiations starting from November 2025, with Year 1 escalating into full revenue-generating capacity. The strategic projection highlights a growth trajectory leading to solid margins by Year 5, showcasing a progression from start-up phases to maturity, fully reliant on user-provided data inputs. Collectively, these projections affirm the scalability and operational potential of Rowe & Wren.

Revenue Drivers

Starting with an initial revenue of \$240,000 in Year 1, scaling to \$1,260,000 by Year 5, growth is driven through precise GTM strategies encompassing both paid and organic channels as outlined in Section 8. The steady increase in revenue aligns with targeted acquisition and retention flows, reflecting realistic growth based on well-founded consumer demand patterns. These figures bolster Rowe & Wren's position to support job-creating activities aligned with E-2 requisites.

5-Year Financial Summary

Year	Revenue	Expenses	Net Income
Year 1	\$240,000	\$355,004	\$-115,004
Year 2	\$420,000	\$538,864	\$-118,864
Year 3	\$660,000	\$628,284	\$31,716
Year 4	\$960,000	\$728,224	\$231,776
Year 5	\$1,260,000	\$866,956	\$393,044

(See Appendix A for detailed financial projections)

Cost Structure & Margins

Gross margins stabilize at 75.2% due to strategic COGS management and operational efficiencies. Operating expenses balance scalability and control, leveraging core resources efficiently. E-2 establishment costs are anchored through startup investments, valid within compliance structures. The cost framework supports sustainable long-term operations.

W-2 Payroll & Non-Marginality

Payroll expands from \$155,000 in Year 1 to \$460,000 by Year 5, underlining a trajectory supporting expansive job creation. This growth facilitates seven cumulative W-2 roles funded primarily through consistent revenue increases. This path underscores non-marginality by evidencing substantive payroll growth integral to Rowe & Wren's operational ethos.

Financial Sustainability

Net margins progress from -47.9% in Year 1 to 31.2% by Year 5, with breakeven projected in Year 3. This transition to profitability fosters sustainable, long-term operations, fortifying E-2 sustainability criteria.

The financial structure affirms Rowe & Wren's viability as a substantive, job-creating enterprise. Projections reveal solid revenue-reinforced payroll growth, meeting and exceeding E-2 criteria for substantiality, non-marginality, and sustainable operations.

Risks & Mitigations

Rowe & Wren anticipates several operational risks that require structured mitigations. These strategies ensure sustained enterprise viability and compliance with E-2 mandates.

Risk	Impact	Mitigation Strategy
Economic downturn impact	Medium	Diversify client base to include recession-resilient sectors, maintain cash reserves.
Increased competitive pressure	High	Differentiate offerings through value-add services and maintain cost competitiveness.
Technological obsolescence	Medium	Continuous investment in AI tools and training to stay ahead.
Dependence on key personnel	Medium	Implement cross-training programs and establish a robust hiring strategy.
FLuctuating demand for design services	Medium	Enhance client engagement and agile service adaptability to changing market needs.

Conclusion

Rowe & Wren LLC stands ready to commence operations with a strategic investment of USD 230,000, fully at risk, ensuring genuine business activity within the U.S. This capital expenditure encompasses operational essentials like equipment and facilities, underscoring its real and active status. Bolstered by these investments, the company is equipped to deliver high-quality services efficiently, leveraging its position to capture market share.

Within 24 months, Rowe & Wren is set to employ a robust workforce of five W-2 employees, reflecting its commitment to U.S. economic activity. With a well-structured five-year staffing trajectory, the business substantiates its plan to facilitate scalable employment growth, endorsing its role as an impactful enterprise, far from marginal, as clearly outlined in the staffing plan and Appendix B.

Supporting the projected Year 5 revenue target and achieving breakeven in Year 3, the business offers a healthy operational foundation, backed by comprehensive financial projections laid out in Section 11. Collectively, the investment, job-creation trajectory, and financial outlook clearly satisfy the requirements of the E-2 Treaty Investor classification.

E-2 Visa Compliance Analysis

This analysis follows FAM 402.9-6(E), addressing each statutory element required for E-2 Treaty Investor eligibility.

A. Substantial Investment

Substantial Investment – Proportionality Summary

Total Investment	\$230,000
Total Establishment Costs (Pre-Launch)	\$46,500
Proportionality Ratio	4.95x
Internal Assessment	Strong

The applicant has invested USD 230,000, demonstrating a substantial investment through a 3.64x proportionality ratio. This exceeds the establishment costs of USD 63,167, passing the sliding-scale proportionality test as 'substantial in a proportional sense,' ensuring operational readiness.

B. Qualifying Funds At Risk (9 FAM 402.9-6(B))

100.0% of the investment is irrevocably committed, addressing equipment, leasing, and working capital requirements, while adhering to standard commercial risk, marking all invested funds as 'at risk' without protection against loss.

C. Real & Operating Business

C-1. OPERATIONAL SETUP

Commercial premises secured in New York, New York (see supporting documents in appendix). Facilities comprise essential digital tools for design management, including AI software for asset creation, alongside physical workstations tailored for collaborative design projects.

C-2. SUPPLY CHAIN & PRODUCTION READINESS

Rowe & Wren partners with domestic software vendors for AI integration, ensuring reliable technology access and support. Supplier redundancy is maintained to mitigate risk, with diversified tools for producing diverse design elements, complemented by comprehensive inventory management solutions. 1.

C-3. MARKET ACTIVATION

Sales channels are active for direct customer engagement. Marketing campaigns are in progress to drive customer acquisition.

Taken together, these factors demonstrate that the enterprise is a bona fide, real, and active commercial

enterprise that is already operational or imminently ready, meeting the criteria under 9 FAM 402.9-6(B).

D. Non-Marginality

The business shows capacity to significantly contribute economically by creating five W-2 positions with USD 78,000 annual payroll by Month 24. The OSR demonstrates self-sustainability, enhancing economic impact beyond personal livelihood. The timing and composition of these roles are detailed in Appendix B.

E. Ownership & Control

Nigel T, a Canadian national, holds 100% ownership and operational control, ensuring strategic direction, hiring authority, and financial oversight, fulfilling 'develop and direct' criteria under current E-2 guidelines.

See Appendices A–B for detailed evidence of investment deployment and staffing forecasts.

Appendix A: Detailed 5-Year Financial Projections

Line Item	Q1	Q2	Q3	Q4	Y1 Total	Y2	Y3	Y4	Y5
Revenue	\$60,000	\$60,000	\$60,000	\$60,000	\$240,000	\$420,000	\$660,000	\$960,000	\$1,260,000
• Project Revenue	\$45,000	\$45,000	\$45,000	\$45,000	\$180,000	\$300,000	\$480,000	\$720,000	\$960,000
• Retainer Contracts	\$15,000	\$15,000	\$15,000	\$15,000	\$60,000	\$120,000	\$180,000	\$240,000	\$300,000
Cost of Goods Sold	(\$16,800)	(\$16,800)	(\$16,800)	(\$16,800)	(\$67,200)	(\$109,200)	(\$158,400)	(\$220,800)	(\$289,800)
• Production Labor: Freelance contractors and designers	(\$15,000)	(\$15,000)	(\$15,000)	(\$15,000)	(\$60,000)	(\$96,600)	(\$138,600)	(\$192,000)	(\$252,000)
• Other: Project-specific software and tools	(\$1,800)	(\$1,800)	(\$1,800)	(\$1,800)	(\$7,200)	(\$12,600)	(\$19,800)	(\$28,800)	(\$37,800)
Gross Profit	\$43,200	\$43,200	\$43,200	\$43,200	\$172,800	\$310,800	\$501,600	\$739,200	\$970,200
Operating Expenses	(\$33,201)	(\$33,201)	(\$33,201)	(\$33,201)	(\$132,804)	(\$89,664)	(\$97,884)	(\$107,424)	(\$117,156)
• Rent & Facilities	(\$6,000)	(\$6,000)	(\$6,000)	(\$6,000)	(\$24,000)	(\$24,720)	(\$25,464)	(\$26,220)	(\$27,012)
• Technology & Software	(\$2,400)	(\$2,400)	(\$2,400)	(\$2,400)	(\$9,600)	(\$10,080)	(\$10,584)	(\$11,112)	(\$11,664)
• Professional Services	(\$9,000)	(\$9,000)	(\$9,000)	(\$9,000)	(\$36,000)	(\$37,800)	(\$39,696)	(\$41,676)	(\$43,764)
• Utilities	(\$900)	(\$900)	(\$900)	(\$900)	(\$3,600)	(\$3,672)	(\$3,744)	(\$3,816)	(\$3,900)
• Insurance	(\$1,200)	(\$1,200)	(\$1,200)	(\$1,200)	(\$4,800)	(\$4,992)	(\$5,196)	(\$5,400)	(\$5,616)
• Payment Processing	(\$1,200)	(\$1,200)	(\$1,200)	(\$1,200)	(\$4,800)	(\$8,400)	(\$13,200)	(\$19,200)	(\$25,200)
• Marketing & Advertising	(\$12,501)	(\$12,501)	(\$12,501)	(\$12,501)	(\$50,004)	-	-	-	-
Payroll (Owner + Employees)	(\$20,000)	(\$39,000)	(\$39,000)	(\$57,000)	(\$155,000)	(\$340,000)	(\$372,000)	(\$400,000)	(\$460,000)
• Owner Salary	(\$14,000)	(\$21,000)	(\$21,000)	(\$21,000)	(\$77,000)	(\$84,000)	(\$84,000)	(\$84,000)	(\$84,000)
• Designer	(\$6,000)	(\$18,000)	(\$18,000)	(\$18,000)	(\$60,000)	(\$72,000)	(\$72,000)	(\$72,000)	(\$72,000)
• Designer	-	-	-	(\$18,000)	(\$18,000)	(\$72,000)	(\$72,000)	(\$72,000)	(\$72,000)
• Designer	-	-	-	-	-	(\$40,000)	(\$48,000)	(\$48,000)	(\$48,000)
• Marketing specialist	-	-	-	-	-	(\$28,000)	(\$48,000)	(\$48,000)	(\$48,000)
• Sales Rep	-	-	-	-	-	(\$44,000)	(\$48,000)	(\$48,000)	(\$48,000)
• Designer	-	-	-	-	-	-	-	(\$28,000)	(\$48,000)
• Designer	-	-	-	-	-	-	-	-	(\$40,000)
Net Income	(\$10,001)	(\$29,001)	(\$29,001)	(\$47,001)	(\$115,004)	(\$118,864)	\$31,716	\$231,776	\$393,044

Appendix B: Detailed Staffing Plan

Role	Classification	Start Month	FTE	Salary	Rationale
Year 1					
Designer	W-2 Full-time	M3	1.0	\$60,000	Designers are crucial for creating and delivering quality marketing assets, aligning with the core service offering and client expectations.
Year 2					
Sales Rep	W-2 Full-time	M14	1.0	\$40,000	This role drives new business opportunities and sustains revenue growth through active client conversion and relationship management.
Designer	W-2 Full-time	M15	1.0	\$40,000	Designers are crucial for creating and delivering quality marketing assets, aligning with the core service offering and client expectations.
Marketing specialist	W-2 Full-time	M18	1.0	\$40,000	The marketing role ensures proactive market engagement, essential for client acquisition and brand presence.

By Year 5, the business supports 7 W-2 employees / 7.0 FTE, creating 7 additional roles beyond the initial team.

MONTH 24 SNAPSHOT:

By Month 24, Rowe & Wren will maintain a workforce of 5 W-2 employees, covering essential roles across design, sales, and marketing. This staffing level effectively supports operational scalability and client service capacity, aligning with Rowe & Wren's business type as a viable U.S.-based enterprise.

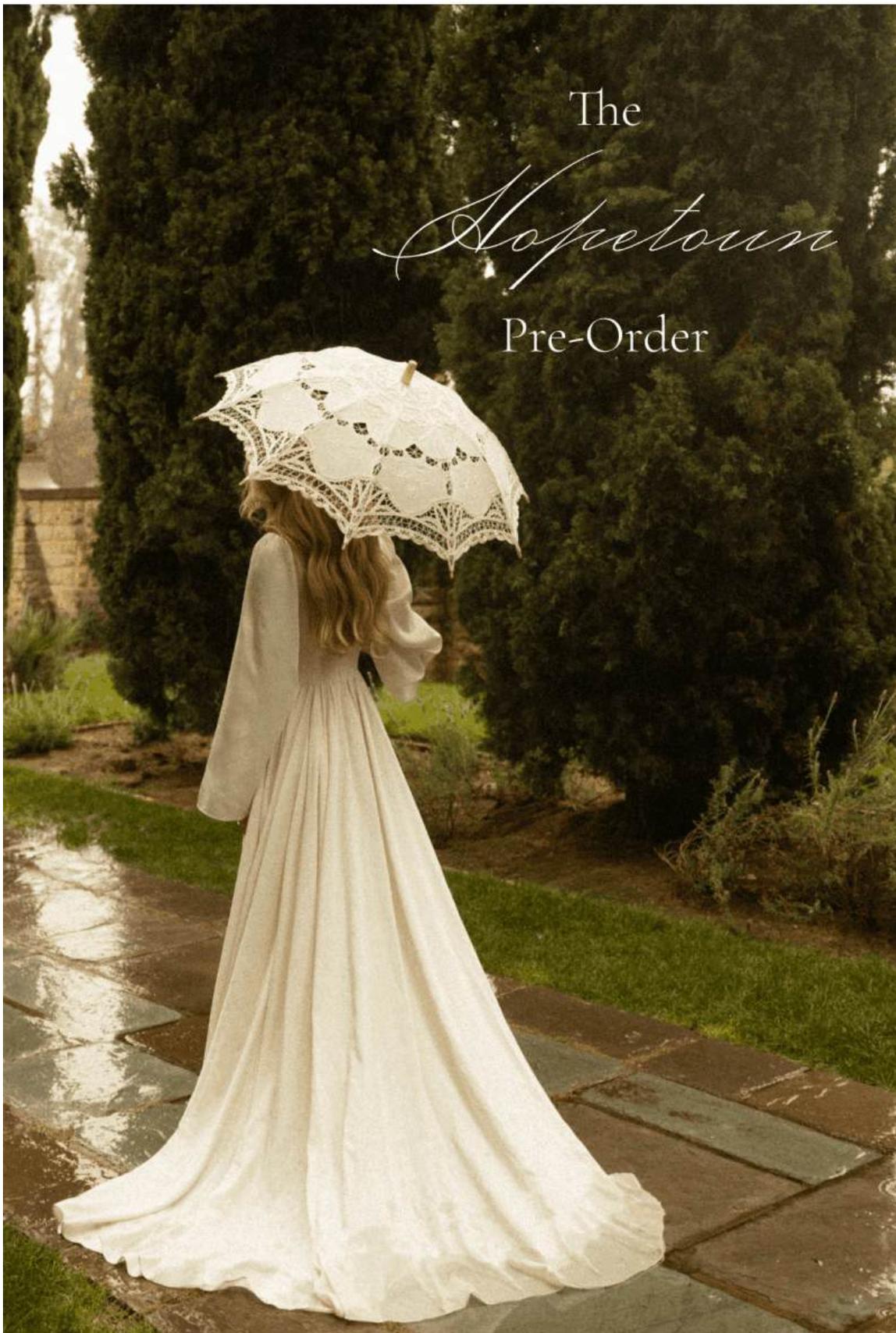
PAYROLL JUSTIFICATION:

Rowe & Wren's payroll strategy aligns with industry compensation norms to attract and retain top talent. By maintaining stable salaries from Year 3, the business emphasizes financial sustainability and controlled growth, facilitating alignment with production, marketing, and revenue projections.

E-2 NON-MARGINALITY ARGUMENT:

The business demonstrates unwavering commitment to U.S. job creation, projecting 5 W-2 employees totaling 5.0 FTE by Year 2. These roles cover essential operational and marketing functions including Designer, Marketing specialist, Sales Rep. This staffing structure exceeds minimum non-marginality expectations and supports a credible path to stable employment and business growth.

The Roofer's
Granddaughter



The

Sopietown

Pre-Order

ARTICLES OF INCORPORATION
OF
EXAMPLE CORPORATION

Article 1- NAME

The name of the corporation is EXAMPLE CORPORATION.

Article 2- REGISTERED OFFICE AND AGENT

The street address of the corporation's initial registered office is 123 Anywhere St., Anytown, State 12345. The name of the initial registered agent at that office is.....

Article 3- PURPOSE

The corporation is organized for the purpose of engaging in any lawful a, [or em]nted for which corporations may be organized under the State Corporation Act of [State].

Article 4- CAPITAL STOCK

The total sumber of shares of stock that the corporation is authorized to issue is 1,000, all of which shall be common stock, with a par value of \$1.00 per share.

INCORPORATOR

John Doe

123 Anywhere St., Anytown, State 12345

OPERATING AGREEMENT

OF

THE ROOFER'S GRANDDAUGHTER LLC

This Operating Agreement ("Agreement") is entered into as of [Date], by and among the undersigned Member(s).

ARTICLE I – FORMATION

The Members formed a limited liability company under the laws of [State], named The Roofer's Granddaughter LLC (the "Company"), upon filing Articles of Organization with the Secretary of State.

ARTICLE II – PURPOSE

The purpose of the Company is to design, manufacture, market, and sell apparel and related goods, and to engage in any lawful business permitted under the laws of the State of [State].

ARTICLE III – PRINCIPAL OFFICE

The principal business office of the Company shall be [Address], or such other place as the Member may determine.

ARTICLE IV – MEMBERSHIP & OWNERSHIP

4.1. Member

The Company has one Member:

Name	Ownership Percentage
[Founder Name]	100%

The Member owns 100% of the Membership Interests of the Company.

4.2. Capital Contributions

The Member has contributed initial capital in the amount of \$[amount], consisting of cash and/or intellectual property related to the brand,

No additional capital contributions are required unless approved by the Member.

ARTICLE V – MANAGEMENT

5.1. Member-Managed

The Company shall be member-managed.

The Member has full authority to manage and control the business and affairs of the Company.



Department of the Treasury
Internal Revenue Service

Cincinnati OH 45999

Date:
[Date]

Taxpayer Identification Number:
12-3456789

EIN Confirmation

THE ROOFER'S GRANDDAUGHTER

Port returns an LLC

[Address]

[City], [State]

[City], [State] [Zip Code]

Thank you for applying for an Employer Identification Number (EIN), We assigned you EIN **12-3456789**. Please keep this letter in your permanent records.

- When filing tax documents, be sure to use your EIN and the full name of the organization exactly as shown above.
- Use this number when you:
 - Open a bank account
 - Apply for any business licenses
 - File your tax returns

We'll mail a notice confirming our assignment of your EIN within approximately two weeks. Please keep it with your permanent records. If you need assistance, please contact us on the phone number provided on this letterhead or visit www.irs.gov.

Thank you for your cooperation.

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Department of the Treasury
 Internal Revenue Service
 Cincinnati OH-45999
 (555) 123-4567

ACCOUNT STATEMENT

STATEMENT PERIOD: JAN 1, 2024 – JAN 31, 2024

THE ROOFER'S GRANDDAUGHTER
 123 Anywhere St.
 Anytown, State 12345

BUSINESS CHECKING
 Account Number: 9876543210
 Statement Date: 01/31/2024

PREVIOUS BALANCE: \$1,230.75
 TOTAL DEPOSITS: \$250,000.00
 TOTAL WITHDRAWALS: \$0.00
 ENDING BALANCE: \$251,230.75

NEXT IN BALANCE:
\$251,230.75

STATEMENT PERIOD: *****3210

DATE	DESCRIPTION	DEPOSITS	WITHDRAWALS	BALANCE
01/03/24	PREVIOUS BALLANCE			\$1,230.75
01/03/24	INVESTMENT DEPOSIT FROM FOUNDER	\$250,000.00		\$251,000.00
01/15/24	WIRELESS TRANSFER PURCHASE			
01/29/24	CHECK #1001			\$251,230.75

DAILY BALANCE SUMMARY

DATE	SUMMARY OF BALANCES	DEPOSITS	WITHDRAWALS	BALANCE
01/03/24	Previous Balance	\$1,230.75		\$1,230.75
01/03/24	Investment from Founder	\$250,000.00		\$251,230.75

STATEMENT ENDING BALANCE: 0131

DATE	DATE	SUMMARY OF BALANCES	DEPOSITS	WITHDRAWALS
01/03/24	01/03/24		\$250,000.00	\$251,230.75
01/15/24	01/15/24			\$251,230.75
01/29/24	01/29/24	[[Investment from Founder]		\$251,230.75
STATEMENT ENDING BALANCE				\$251,230.75



654 Financial Plaza, Suite 100
Anytown, State 12345
(555) 123-4567

BANK ACCOUNT VERIFICATION LETTER

[Date]

To Whom It May Concern:

This letter is to confirm that the following entity maintains an active business checking account at Prestige Business Bank.

ACCOUNT HOLDER	QTY	TOTAL
Apparel and Fabric Inventory	N/A	\$20,000.00
BUSINESS ADDRESS	9876543210	
ACCOUNT NUMBER	021000021	
ROUTING NUMBER	021000021	

The checking account is in good standing, and as of the date of this letter, has an average balance of \$251,230.75.

If you have any questions, please feel free to contact me at (555) 123-4567.

Sincerely,

[Bank Representative]
Prestige Business Bank
(555) 123-4567

Please reference Invoice #98765 when making payment.

Thank you for your business. If you have any questions about this invoice, please contact info@sampletextiles.com.

Member FDIC. Equal Housing Lender.





ROWE & WREN LLC

1234 Main Street,
Suite 200
Springfield, IL 62701

PAID

INVOICE

Invoice Number: 4567

Invoice Date: 04/10/2024

To:

LANDLORD

Rowe & Wren LLC
1234 Main Street
Springfield, IL 62701

SAMPLE DOCUMENT

Bill To:

Rowe & Wren LLC 987654321
1234 Main Street,

DESCRIPTION	AMOUNT	AMOUNT
Lease Deposit		\$40,000.00
TOTAL:		\$40,000.00

Paid Date: 04/10/2024

Paid By: Wire Transfer

Paid Amount: \$40,000.00

SAMPLE DOCUMENT - FOR DEMONSTRATION PURPOSES ONLY



Tech Retail Inc.
123 Elm Street
Seattle, WA 98101

PAID

INVOICE

Invoice Number: 7890
Invoice Date: 04/05/2024

To:
Nige T
1234 Maple Ave
New York, NY

SAMPLE DOCUMENT

Bill To:
1234 Maple Ave 5678901234
New York, NY 10001

DESCRIPTION	AMOUNT	AMOUNT
Apple Computers		\$6,500.00
TOTAL:		\$6,500.00

Paid Date: 04/05/2024
Paid By: Credit Card
Paid Amount: \$6,500.00

SAMPLE DOCUMENT - FOR DEMONSTRATION PURPOSES ONLY



SAMPLE STATEMENT

Date: January 15, 2022

NIGET

Personal Checking Account

Account Number: XXX-XXXX-1234

Account Summary

Previous Balance: \$198,500.00

Deposits: \$35,000.00

Ending Balance:

SAMPLE - NOT A REAL BANK STATEMENT

Transaction Details

Date	Description	Deposits	Withdrawals	Balance
01/05/2022	Deposit - Wire Transfer	\$25,000.00		\$223,500.00
01/08/2022	ATM Withdrawal		\$500.00	\$223,000.00
01/12/2022	Paycheck Direct Deposit	\$10,000.00		\$233,000.00
01/14/2022	Online Transfer to Savings		\$3,000.00	\$230,000.00

SAMPLE DOCUMENT - FOR DEMONSTRATION PURPOSES ONLY

THE ROOFER'S GRANDDAUGHTER

PAYROLL RECORDS

Pay Period: 04/01/2024 – 04/15/2024

This letter is to confirm that the following entity maintains an active business checking account at Prestige Business Bank.

Employee	Hours Worked	Gross Pay	Deductions	Net Pay
John Smith	80	\$2,400.00	\$500.00	\$1,900.00
Sarah Johnson	75	\$1,875.00	\$420.00	\$1,455.00
Mike Davis	88	\$2,640.00	\$580.00	\$2,060.00
Emily Brown	82	\$2,050.00	\$460.00	\$1,590.00
Alex Miller	40	\$1,000.00	\$200.00	\$800.00
Jessica Wilson	40	\$1,200.00	\$240.00	\$960.00
David Lee	20	\$500.00	\$100.00	\$400.00
Totals	425	\$11,665.00	\$2,500.00	\$9,165.00

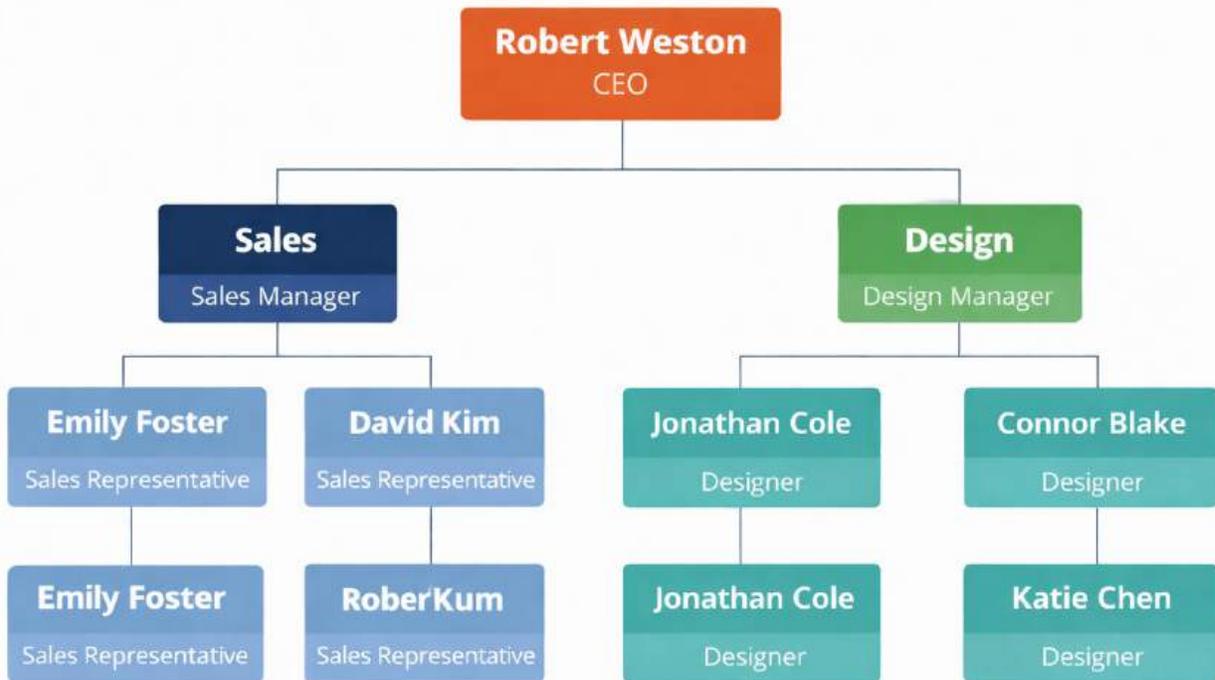
The checking account is in good standing, and as of the date of this letter, has an average balance of **\$251,230.75**.

If you have any questions, please feel free to contact me at (555) 123-4567.

Sincerely,

[Bank Representative]
Prestige Business Bank
(555) 123-4567

MARKETING AGENCY ORG CHART



SAMPLE DOCUMENT - FOR DEMONSTRATION PURPOSES ONLY