Sample Company

Mr. Peter Peterson

EB-2 NIW Business Plan

Automotive Engineer

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1 The EB2 National Interest Waiver Overview

The Employment-Based Second Preference (EB-2) immigrant classification is available to foreign nationals who are members of professions holding advanced degrees or their equivalent, as well as individuals who demonstrate exceptional ability in the sciences, arts, or business. Generally, EB-2 classification requires a permanent job offer and labor certification from the U.S. Department of Labor. However, U.S. Citizenship and Immigration Services (USCIS) may waive the job offer and labor certification requirements when doing so is deemed to be in the national interest of the United States. Under the framework established in Matter of Dhanasar, a petitioner seeking a National Interest Waiver (NIW) must demonstrate that: (1) the proposed endeavor has both substantial merit and national importance; (2) the petitioner is well positioned to advance the proposed endeavor; and (3) on balance, it would be beneficial to the United States to waive the requirements of a job offer and labor certification. [1]

The Petitioner seeks EB-2 classification as a member of the professions holding an advanced degree. Building upon this specialized education and his professional experience, the Petitioner intends to establish and develop a U.S. venture focused on the clean dismantling, technical assessment, testing, and repurposing of retired electric vehicle battery packs for secondary-life applications, including stationary energy-storage systems. The proposed endeavor therefore represents a direct application of his advanced engineering knowledge to the growing technical challenges associated with electric vehicle battery end-of-life management, resource recovery, and circular-economy solutions.

2 The Petitioner’s Profile

The Petitioner is an automotive engineer and engineering professional with approximately XX years of progressive experience in vehicle engineering, electrified powertrain systems, battery integration, product development, testing, and technical project management. His academic and professional trajectory has increasingly focused on the technical challenges created by the automotive industry's transition toward electric mobility, including battery performance, system

[1] SOURCE





reliability, lifecycle management, and the potential reuse of automotive battery systems beyond their initial application.

The Petitioner earned a Bachelor of Science in Mechanical Engineering, with a concentration in Automotive Engineering, from SAMPLE UNIVERSITY in Year XXXX. During his undergraduate studies, he completed coursework in thermodynamics, materials science, vehicle dynamics, electrical systems, manufacturing processes, engineering design, and control systems. He subsequently earned a Master of Science in Automotive Engineering from SAMPLE UNIVERSITY in Year XXXX, where his graduate studies focused on electrified powertrains, energy-storage systems, vehicle energy management, and advanced automotive technologies. His master's research examined the performance and degradation characteristics of lithium-ion battery systems under different automotive operating conditions, providing him with early specialized knowledge relevant to battery health and lifecycle assessment.

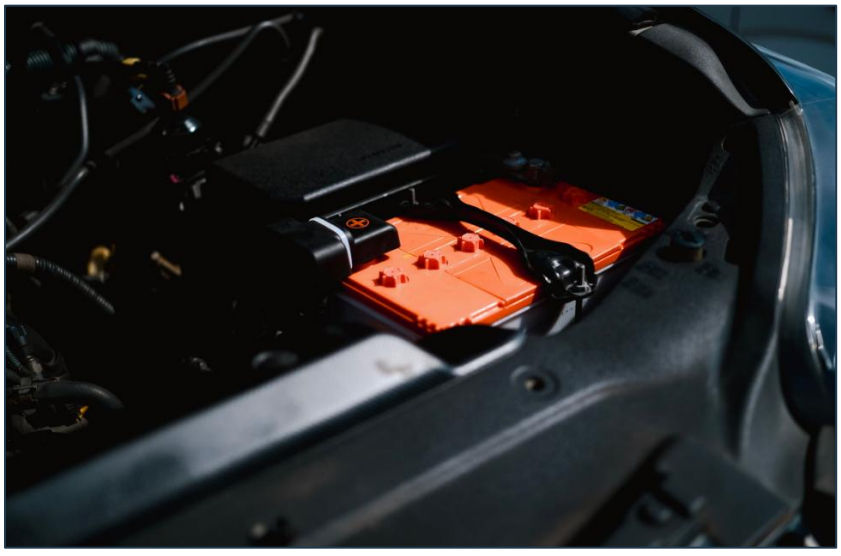
Building upon this specialization, the Petitioner earned a Ph.D. in Mechanical and Automotive Engineering from SAMPLE UNIVERSITY in Year XXXX. His doctoral research, completed through the SAMPLE PROGRAM, concentrated on battery degradation modeling and lifecycle optimization for electrified vehicles. His research examined how operating conditions, thermal behavior, charging patterns, and aging affect lithium-ion battery performance and remaining useful life. This work required the integration of mechanical engineering, automotive systems, energy-storage technology, data analysis, and experimental validation. His doctoral training is therefore directly relevant to one of the central technical questions underlying his proposed endeavor: determining when an electric vehicle battery is no longer suitable for automotive use while identifying whether it retains sufficient capacity, safety, and functional value for a secondary application.

The Petitioner's education and proposed work fall within science, technology, engineering, and mathematics (STEM) disciplines, particularly mechanical and automotive engineering and their application to electrified transportation and energy-storage technologies. His advanced STEM education is complemented by substantial industry experience. From Year XXXX to Year XXXX, he worked as an Automotive Systems Engineer at SAMPLE COMPANY, where he participated in vehicle development and validation projects involving powertrain components, thermal systems, vehicle diagnostics, and engineering testing. He subsequently served as a Senior Electrified

Powertrain Engineer at SAMPLE COMPANY from Year XXXX to Year XXXX, assuming greater responsibility for the integration and validation of hybrid and electric powertrain systems. His work included battery-system performance analysis, thermal-management considerations, diagnostic evaluation, testing protocols, failure analysis, and coordination with multidisciplinary engineering teams.

Most recently, from Year XXXX to the present, the Petitioner has served as Lead Battery Systems and Vehicle Integration Engineer at SAMPLE COMPANY, where his responsibilities have expanded beyond vehicle-level integration to include battery durability, degradation assessment, state-of-health evaluation, technical validation, and lifecycle considerations. In this capacity, he has developed practical experience evaluating how battery systems perform over time and how engineering data can be used to determine their continued suitability for demanding automotive applications.

In the United States, the Petitioner intends to apply this background through a circular-economy venture focused on retired electric vehicle battery packs. The venture will establish a structured process for the safe dismantling, testing, and evaluation of retired EV battery systems. Battery packs and modules will be assessed to determine their condition, remaining capacity, and potential for continued use. Batteries that remain technically viable will be repurposed for secondary-life applications, particularly stationary energy-storage systems. This approach will extend the useful life of suitable EV batteries before they ultimately enter material recycling. The Petitioner's qualifications are closely aligned with the technical requirements of this endeavor.



Petitioner's background	Relevance to the proposed endeavor
Automotive engineering experience	Understanding of ev battery design, integration, operation, diagnostics, and removal from vehicles.
Graduate & doctoral research	Specialized knowledge of battery degradation, state of health, and remaining useful life.
Testing & validation experience	Ability to develop reliable procedures for assessing the condition and secondary-use potential of retired batteries.
Engineering leadership	Experience coordinating multidisciplinary teams and developing standardized technical processes as operations scale.

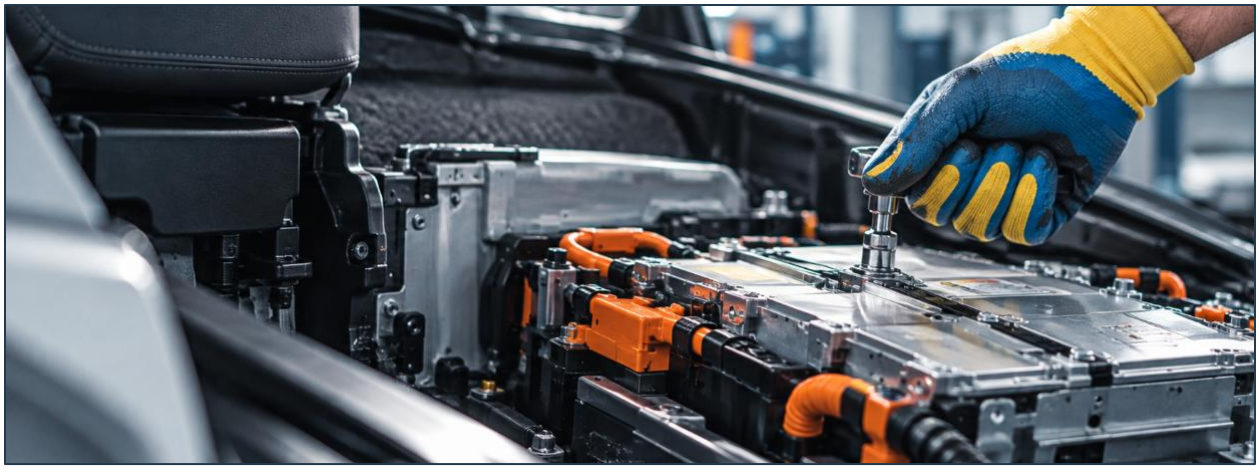
Accordingly, the proposed endeavor represents a logical progression of the Petitioner's advanced STEM education and professional career, applying his existing expertise in automotive and battery engineering to the challenge of extending the useful life of EV batteries and supporting more circular use of energy-storage resources in the United States.

3 Prong 1: Endeavor Has Substantial Merit and National Importance

The Petitioner proposes to establish a U.S.-based venture focused on the safe dismantling, testing, evaluation, and second-life use of retired electric vehicle (EV) batteries. The endeavor will address a growing challenge within the automotive industry: determining what should happen to EV batteries once they no longer meet the demanding performance requirements of a vehicle. Rather than automatically treating these batteries as waste, the Petitioner will apply his automotive and battery-engineering expertise to determine whether they retain sufficient capacity and technical integrity for continued use. Suitable batteries and modules will be prepared for secondary applications, particularly stationary energy-storage systems, while batteries that cannot be safely or effectively reused will be directed to qualified recycling partners.

The need for this type of solution is becoming increasingly substantial as EV adoption expands across the United States. Approximately XX million electric cars were sold in the United States in XXXX, representing more than XX% of new car sales.[2] As these vehicles age, increasing numbers of battery packs will eventually leave automotive service and require technically appropriate management. However, removal from an EV does not necessarily mean that a battery has reached the end of its useful life. The SAMPLE SOURCE[3] recognizes that used EV batteries can be evaluated for reuse or repurposed for applications such as stationary storage of electricity generated by solar systems. The same source further notes that providing batteries with a second life can extend their usefulness and reduce the resources required to manufacture new batteries.

One of the problems the endeavor will address is the premature loss of usable battery capacity. Automotive applications require batteries to meet demanding standards for driving range, power output, charging performance, and reliability. A battery that can no longer perform adequately in a vehicle may still retain meaningful storage capacity. Without proper technical assessment, this remaining value may be overlooked, and the battery may proceed directly toward recycling. The Petitioner's venture will address this gap through systematic state-of-health testing and classification, identifying batteries and modules that can safely continue operating in less demanding applications. In this way, the same battery asset can provide additional years of productive use before its materials ultimately require recovery.



[2] SOURCE
[3] SOURCE



A second challenge is the difficulty of determining the appropriate next use for retired batteries. Used EV batteries vary significantly in age, chemistry, operating history, degradation, physical condition, and remaining capacity. They therefore cannot all be treated in the same manner. The Petitioner will establish standardized procedures for safety screening, inspection, diagnostic testing, dismantling where appropriate, and evaluation of remaining capacity and electrical performance. Based on these results, batteries will be classified for secondary use, further component-level evaluation, or recycling. This will provide a more technically informed pathway between automotive retirement and final disposal.

The endeavor will also address safety and waste-management concerns associated with lithium-ion batteries. SAMPLE AGENCY[4] warns that improperly managed lithium-ion batteries can create fire hazards when damaged or crushed within conventional waste and recycling systems. Large EV battery packs require particularly careful handling because of their size, energy content, high voltage, and complex construction. Through controlled intake, storage, dismantling, testing, and classification procedures, the venture will help prevent retired batteries from being handled as ordinary waste and direct them toward an appropriate reuse or recycling pathway.

The endeavor also has substantial merit because it promotes more efficient use of valuable battery materials. EV batteries contain resources such as lithium, nickel, cobalt, manganese, graphite, copper, and aluminum. Several battery materials are considered critical minerals in the United States. Extending the life of viable batteries will preserve the value already embedded in these manufactured products, while routing batteries that are no longer usable to qualified recyclers will support eventual recovery of valuable materials. The model therefore creates a circular sequence of automotive use → technical assessment → secondary use where viable → material recycling, rather than moving directly from automotive use to disposal or recycling in every case.

At the same time, repurposing suitable batteries can provide an additional source of equipment for the growing U.S. energy-storage sector. U.S. utility-scale battery-storage capacity reached approximately XX GW at the end of 2025 and nearly XX GW by June 2026, and operators have

[4] SOURCE



reported plans for significant additional capacity[5]. Second-life EV batteries will not replace new battery systems across the market, but appropriately tested units can serve certain stationary applications where automotive-level performance is unnecessary. The endeavor can therefore turn an end-of-life challenge in one industry into a productive resource for another.

These problems are national in scope. EVs are being deployed throughout the United States, meaning that battery retirement will increasingly affect automotive manufacturers, dealerships, fleets, dismantlers, recyclers, and communities across the country. At the same time, battery safety, critical-mineral conservation, waste reduction, and energy storage are issues extending well beyond any single customer or geographic market. By developing a repeatable engineering process that determines whether retired batteries should be reused, repurposed, dismantled, or recycled, the Petitioner will provide a practical response to each of these interconnected challenges. Accordingly, the endeavor has substantial technological, environmental, safety, and economic merit and addresses an emerging issue of clear national importance to the United States.

3.1 The Petitioner's Contributions to U.S. National Interests

The Petitioner's proposed endeavor directly supports several established U.S. priorities related to battery supply-chain resilience, critical-mineral conservation, energy infrastructure, safe battery management, and advanced battery technology. By developing an engineering-based system for evaluating and extending the useful life of retired EV batteries, the Petitioner will contribute to these national interests in four principal areas.

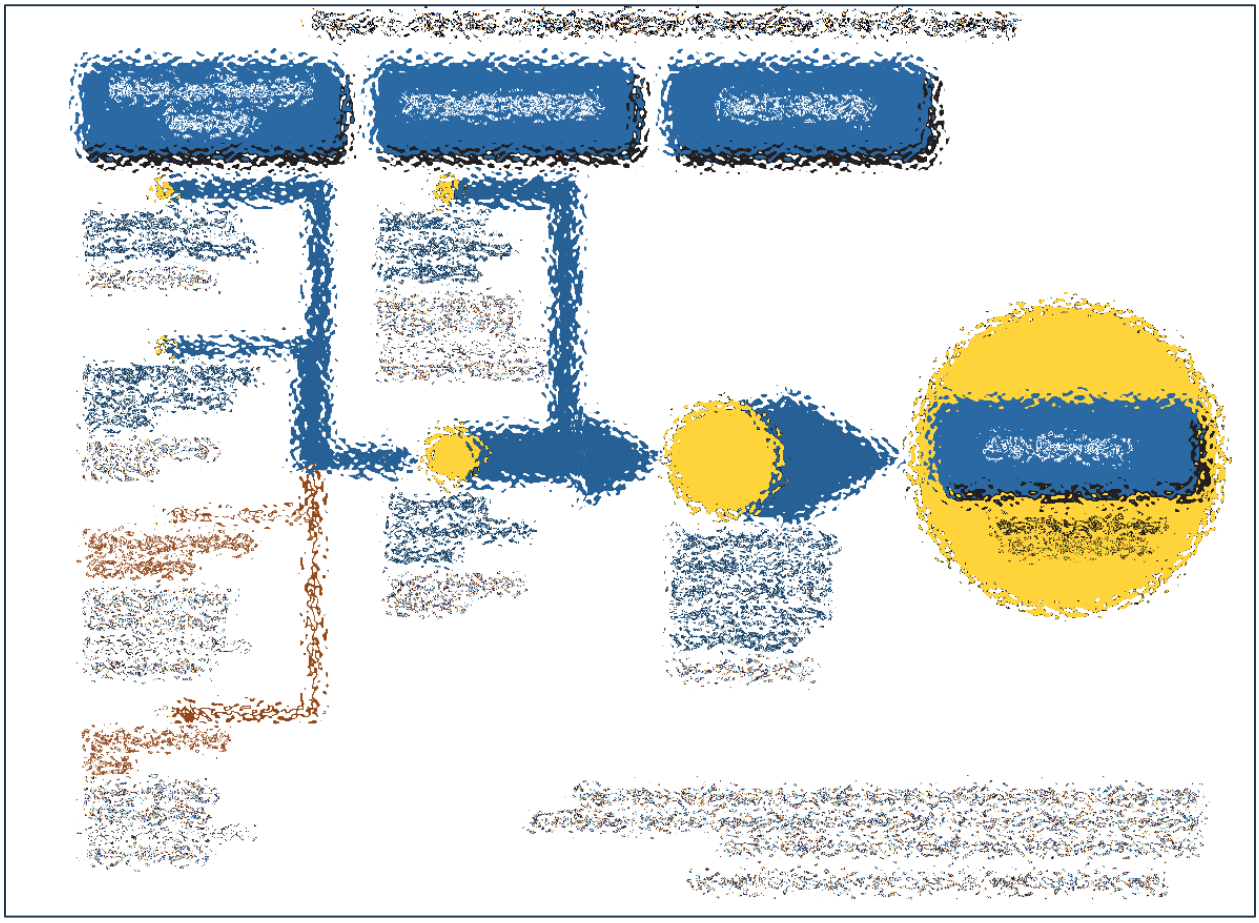
3.1.1 Strengthening the Domestic Battery Supply Chain and Conserving Critical Minerals

The United States has identified secure access to battery materials as an important national supply-chain priority. Lithium-ion batteries depend on materials such as lithium, graphite, cobalt, nickel, and manganese, several of which are designated as critical minerals. U.S. dependence on foreign sources remains significant. According to SAMPLE SOURCE[6], in XXXX the United States was 100% net import reliant for natural graphite and manganese, both important battery

[5] SOURCE
[6] SOURCE

materials. More broadly, China remained a major source for XX of the XX critical minerals for which the United States was most import dependent. Mineral-reliant U.S. industries generated approximately $XX trillion in economic value in 2025, illustrating the economic importance of secure mineral supplies.

The federal response reflects the scale of this concern. SAMPLE INSTITUTION[7] allocated nearly $X billion to strengthen the domestic battery supply chain, including battery-material processing and recycling. SAMPLE Program alone provides $3 billion to develop domestic battery manufacturing and recycling capacity. SAMPLE Program has already awarded $XX billion to XX projects involving lithium, graphite, other battery materials, components, and recycling technologies.[8]



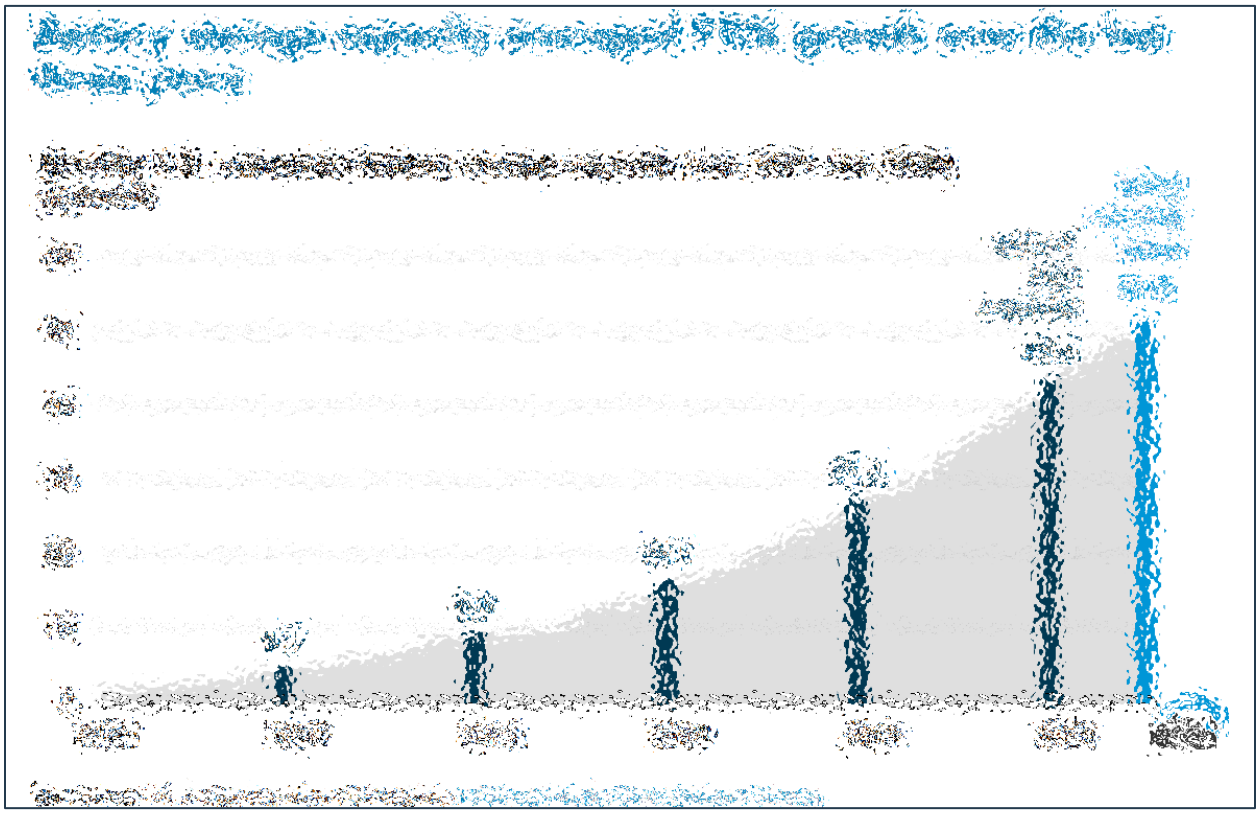
The Petitioner's endeavor will contribute to the same national objective from the battery lifecycle side. By identifying batteries that can remain in productive use, the venture will preserve the

[7] SOURCE
[8] SOURCE

value of battery systems already present in the United States. Once those batteries are no longer technically suitable for reuse, they will be directed toward recycling so that valuable materials can reenter productive supply chains. This creates a circular pathway in which existing battery resources are used longer, and their materials can ultimately be recovered, reducing unnecessary pressure on new material supplies.

3.1.2 Supporting U.S. Energy Storage and Grid Reliability

Energy storage has become an increasingly important part of U.S. electricity infrastructure. According to SAMPLE SOURCE[9], utility-scale battery-storage capacity grew at an average annual rate of XX% over the three years preceding XXXX. Operational capacity reached XX GW at the end of XXXX and nearly XX GW by XXXX, after another XX GW was added in only XX months. Operators reported plans for an additional XXX GW of battery-storage capacity over the following two and a half years.



[9] SOURCE



SAMPLE GOVERNMENT DEPARTMENT[10] recognizes energy storage as important to maintaining a reliable and balanced electric system. Storage allows electricity to be captured when supply is available and released when demand increases, helping balance supply and demand and supporting greater flexibility within the power system. The Petitioner's endeavor can contribute to this expanding infrastructure by creating an additional pathway for stationary battery applications. EV batteries that no longer satisfy automotive requirements may still retain capacity suitable for less demanding uses. Through state-of-health testing, diagnostics, and technical classification, the venture will identify which retired batteries can safely serve such applications. The endeavor will therefore connect two rapidly developing U.S. needs: responsible management of retired EV batteries and increasing demand for energy-storage resources.

This application is specifically supported by federal policy. XXXX established a $XXX million SAMPLE Program administered through XXXX. The program expressly supports research, development, and demonstration of second-life applications for batteries previously used in electric vehicles. XXX-funded projects have included the integration of end-of-life EV batteries into stationary energy-storage systems, directly corresponding with the application the Petitioner intends to advance.[11]

3.1.3 Improving the Safety and Management of End-of-Life Batteries

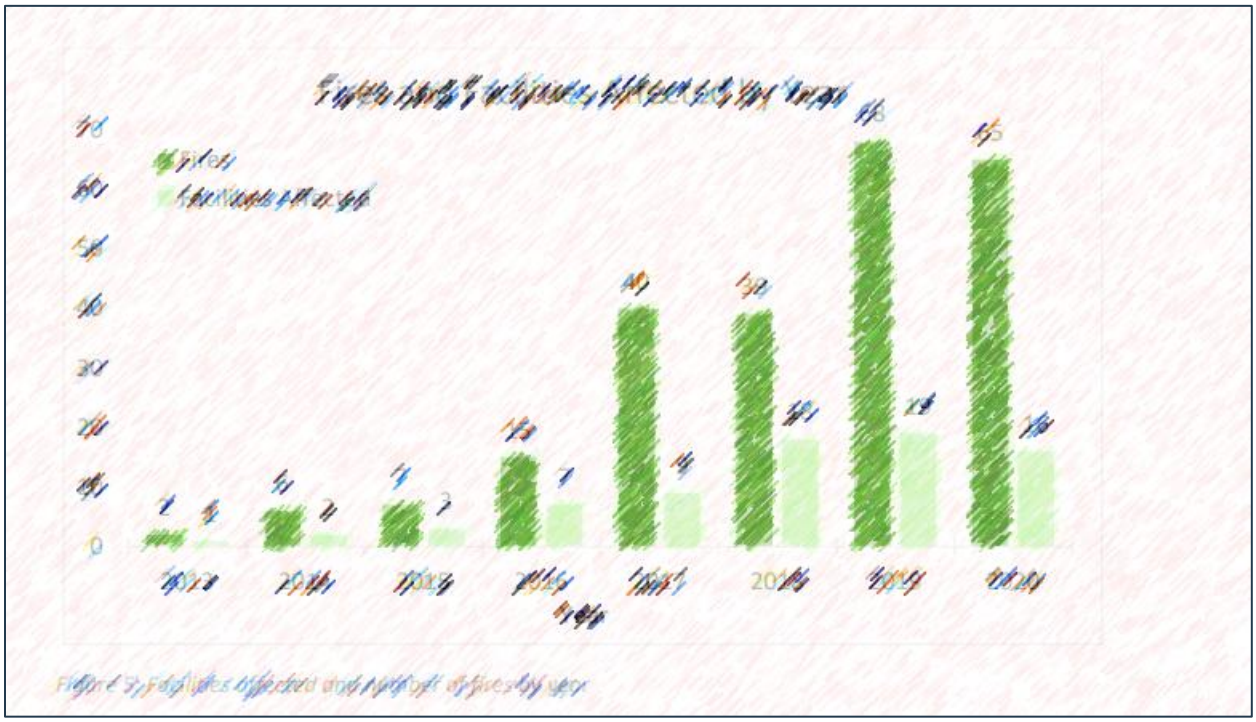
The increasing number of lithium-ion batteries in circulation also creates a growing safety and waste-management challenge. Lithium-ion batteries cannot be handled like ordinary waste. When damaged, crushed, improperly stored, or incorrectly processed, they can generate fires and create risks to workers, waste-management facilities, emergency responders, and surrounding communities.

SAMPLE research identified XXXX fires at XX waste-management facilities across XX states between XXXX and XXXX that were caused or likely caused by lithium metal or lithium-ion batteries. The number identified increased from only XX fires in XXXX to XX fires in XXXX. Among materials recovery facilities in EPA's dataset that experienced lithium-ion battery fires, XX%

[10] SOURCE
[11] SOURCE



required emergency responders, XX% experienced worker injuries, XX% experienced monetary impacts, and XX% temporarily or permanently suspended operations. [12]



The Petitioner's venture will address this problem before retired EV batteries enter inappropriate downstream channels. Batteries will undergo controlled intake, identification, safety screening, testing, and classification. Unsafe or excessively degraded batteries will be separated from batteries suitable for continued use and routed toward qualified recycling partners. This technical triage is important because batteries differ substantially in chemistry, condition, degradation, damage, and remaining capacity. A standardized engineering assessment can determine the appropriate pathway for each battery rather than allowing fundamentally different battery conditions to be treated in the same manner.

Federal investment again confirms the national significance of this challenge. In XXXX, XXXX selected XX projects for $XXX million specifically to improve the economics of EV battery recycling, including reducing the costs and improving the safety of transporting, dismantling, and preprocessing end-of-life EV batteries. This was the second phase of the federal government's broader $XXX million SAMPLE Program[13]. The Petitioner's focus on safe dismantling, assessment,

[12] SOURCE
[13] SOURCE



and classification therefore addresses precisely the type of battery-management challenge that has attracted dedicated federal investment.

3.1.4 Advancing U.S. Battery Circularity and Technical Capacity

The Petitioner's endeavor will also contribute to a broader national transition from a linear battery lifecycle toward a circular one. Under a linear model, materials are extracted, processed into batteries, used, and ultimately discarded or recycled. A more efficient system introduces additional stages: batteries are first evaluated for continued use, viable systems are repurposed, and material recycling occurs when their remaining functional value has been exhausted.

Federal programs demonstrate strong interest in building this capacity domestically. SAMPLE INSTITUTION[14] states that its battery-recycling programs are intended to establish a secure, resilient, and circular domestic supply chain for critical materials. Federal objectives have included achieving XX% recycling of consumer battery content by XXXX, while dedicated EV programs have funded both second-life applications and technologies for reclaiming critical materials into the battery supply chain. Same source has further stated that demand from EVs and stationary storage could increase the lithium-battery market by five- to ten-fold by the end of the decade, increasing the importance of scalable recycling and reuse infrastructure.

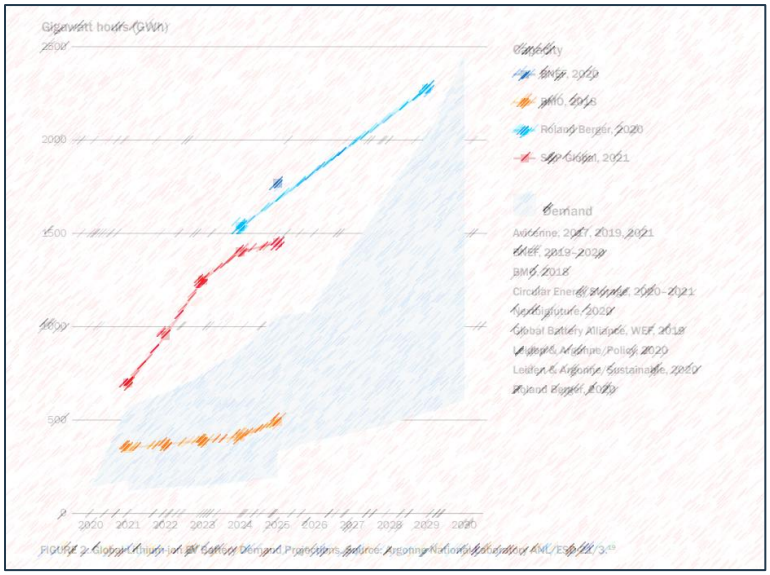
The Petitioner's contribution will be particularly relevant at the point where a battery leaves automotive service but its ultimate value has not yet been determined. His venture will introduce technical assessment between automotive retirement and final recycling, allowing remaining functional value to be identified rather than automatically lost. Standardized testing, state-of-health assessment, controlled dismantling, module-level evaluation, and documented classification will help determine whether a battery should enter a second-life application or proceed to material recovery.

This capability can generate benefits beyond the individual batteries processed by the company. As operations expand, the Petitioner intends to develop repeatable technical procedures for evaluating retired EV batteries and matching their condition with appropriate downstream uses. The result will support a more mature U.S. battery ecosystem in which automotive companies,

[14] SOURCE



fleet operators, dismantlers, energy-storage providers, and recyclers are connected through clearer technical pathways. The Petitioner's endeavor will therefore contribute not only to recycling more batteries, but to building the engineering and operational infrastructure necessary to use U.S. battery resources more efficiently throughout their complete lifecycle.



3.1.5 Economic Impact

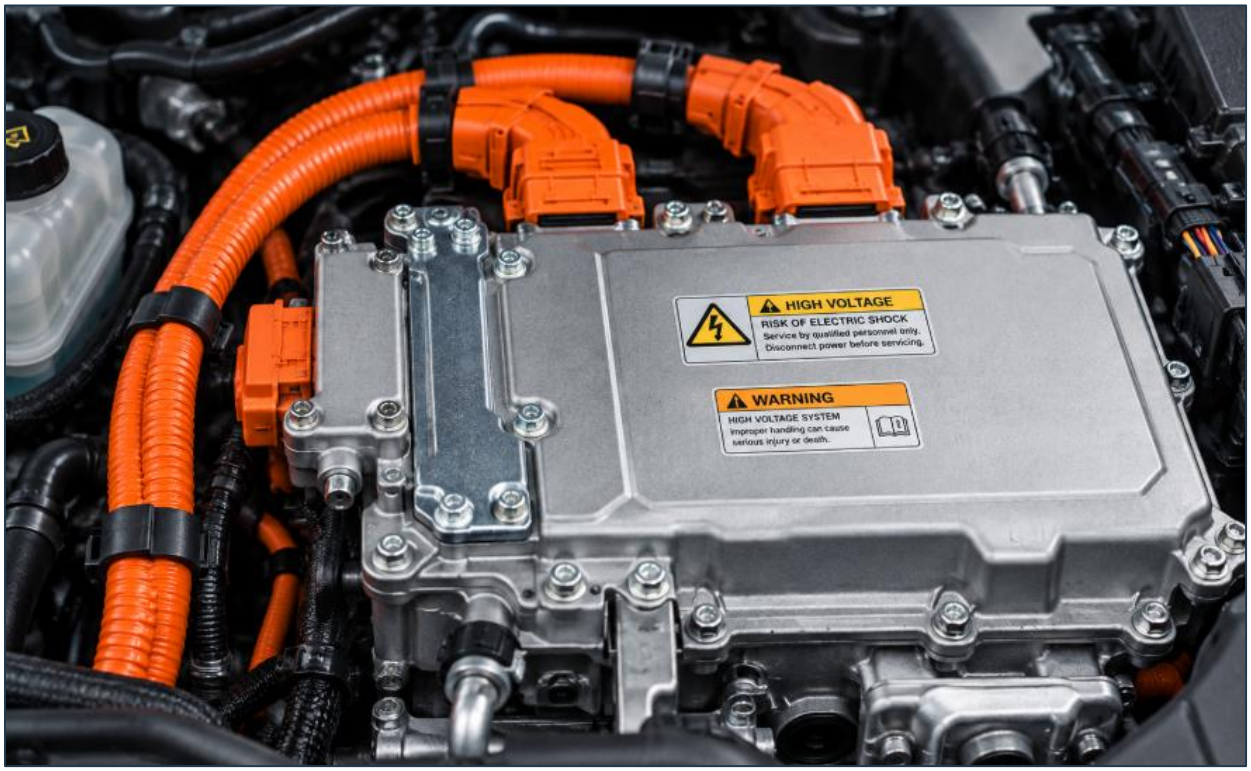
The Petitioner's endeavor will contribute to the U.S. economy through direct job creation and demand for services across related industries. As operations expand, the company will require engineers, battery technicians, testing and dismantling personnel, logistics support, and administrative staff. Its activities will also generate business for equipment suppliers, transportation providers, recyclers, energy-storage companies, and other technical service providers.



The economic importance of these linkages is demonstrated by XXX from the XXX. XXX's estimates measure not only direct employment, but also supplier jobs and employment supported by the additional spending generated by an industry's activity.

These figures demonstrate that the economic value of the Petitioner's endeavor can extend beyond its direct workforce. Battery assessment, repurposing, and recycling depend on a network of technical services, equipment, transportation, processing, and downstream energy-storage activities. The venture will participate in this broader ecosystem while creating specialized employment in an industry that the federal government is actively supporting through major domestic investment.

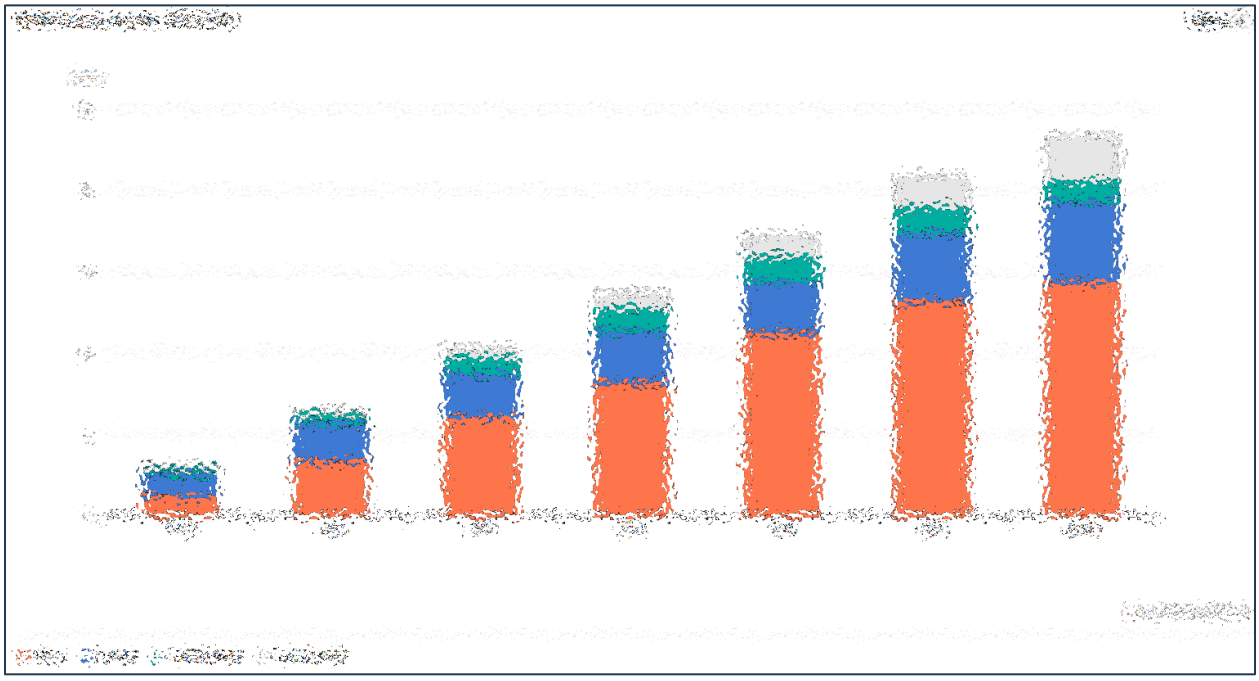
Accordingly, the Petitioner's contribution will not be limited to the commercial performance of a single enterprise. As the venture scales, its direct employment, supplier expenditures, technical partnerships, and participation in the domestic battery value chain can generate broader economic activity while strengthening U.S. capacity in automotive engineering, battery technology, energy storage, and circular-economy operations.



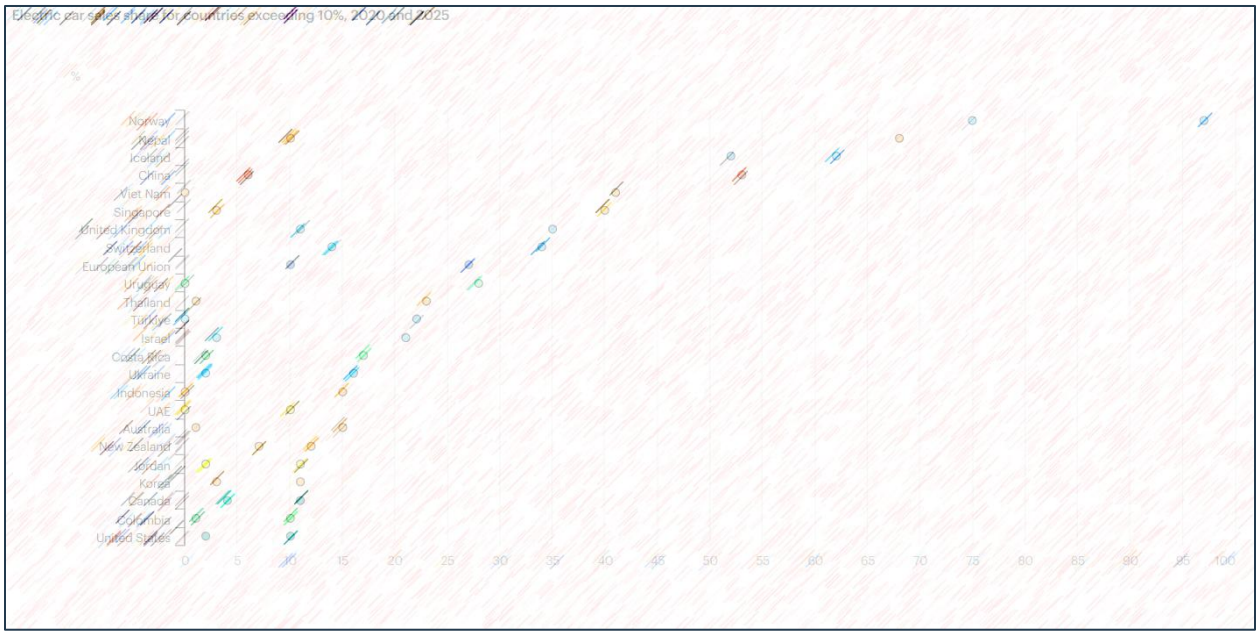
4 National Demand for the Petitioner's Services and Solutions

4.1 Growing U.S. EV Fleet Is Creating Long-Term Demand for Battery Lifecycle Services

The national demand for the Petitioner's services begins with the continued presence and expansion of electric vehicles in the United States. Approximately XX electric cars were sold in the United States in XXXX, representing more than XX% of new car sales. In XXXX, despite changes in federal incentives and a weaker fourth quarter, approximately XX million electric cars were still sold nationwide. Electric vehicles also represented approximately X% of all registered U.S. light-duty vehicles in XXXX, demonstrating that millions of EVs are already operating on American roads.[15]



[15] SOURCE



This installed vehicle base creates a long-term need for battery inspection, diagnostics, dismantling, state-of-health assessment, repurposing, and recycling. Battery demand is also substantial. U.S. EV battery demand increased by approximately XX% in XXXX alone.[16] Every battery entering automotive service will eventually require a decision about repair, continued use, repurposing, or recycling.

The Petitioner's services address this transition directly. As the cumulative population of EV batteries grows, demand for qualified companies capable of determining their appropriate next use will grow with it.

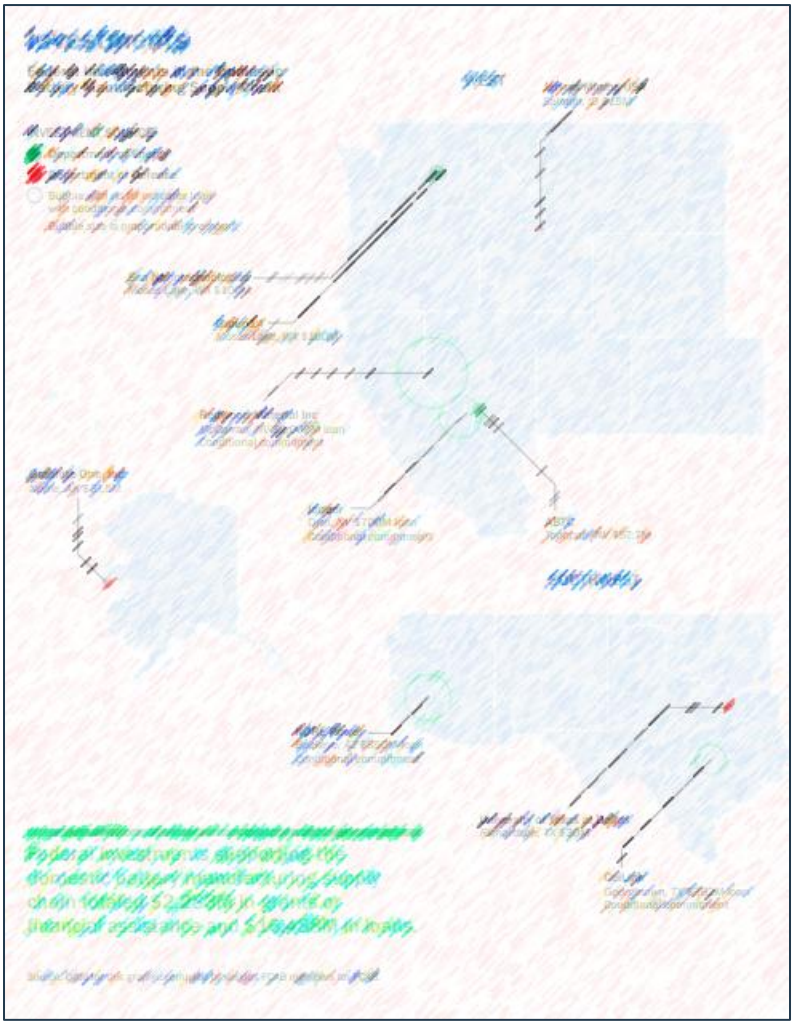
4.2 Increasing Need for End-of-Life Battery Assessment and Processing

Retired EV batteries cannot simply be treated as a uniform waste stream. Batteries leave automotive service in different conditions and with different levels of remaining capacity. Some may be suitable for reuse, some may contain modules capable of further use, and others require recycling. The technical challenge is determining which pathway is appropriate.

SAMPLE REPORT[17] specifically recognizes that a battery that no longer meets the needs of an EV may still provide useful energy storage in another application. Same report identifies reuse and

[16] SOURCE
[17] SOURCE

repurposing as alternatives that can extend battery life before recycling. This creates demand for precisely the intermediate services proposed by the Petitioner - inspection, safe dismantling, testing, state-of-health evaluation, classification, and preparation for appropriate downstream use.



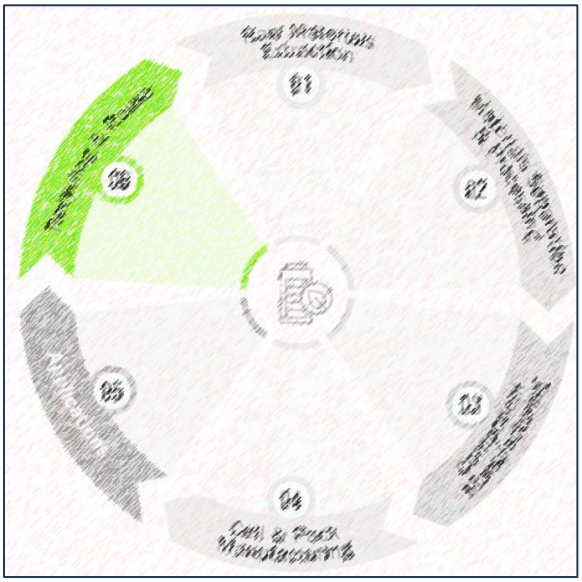
The scale of the developing recycling system further demonstrates this demand. In XXXX, U.S. facilities had capacity to reclaim approximately X tons of battery materials, while planned facilities were expected to add another X tons of capacity. Intermediate processing facilities handled nearly X tons of material in XXXX, with plans for capacity to process nearly XXXXX additional tons in subsequent years. These figures show that a substantial domestic battery recovery industry is being built. The Petitioner's venture will operate upstream of and alongside this infrastructure by determining which batteries should enter recycling and which can first retain value through secondary use.

4.3 Expanding Market for Second-Life Battery Applications

National demand also exists on the other side of the battery lifecycle. Batteries removed from vehicles may retain meaningful storage capacity even when their performance is no longer sufficient for automotive use. This creates an opportunity to connect retired EV batteries with applications that have less demanding performance requirements.

Stationary energy storage represents an important potential destination. Sample Report[18] specifically supports projects that integrate end-of-life EV batteries into stationary energy-storage systems. Ten projects selected under an earlier federal funding round were designed to advance battery recycling and second-use scale-up demonstrations, including stationary storage applications. Combined with recipient cost sharing, these projects represented more than $XX million in investment.

Demand for EVs and stationary storage is expected to substantially increase the scale of the battery economy. XX states that these two markets could increase the size of the lithium battery market by XX to XX times by the end of the decade. The Petitioner's venture will respond to this demand by identifying batteries with sufficient remaining technical value and preparing them for appropriate secondary applications. This creates a commercial link between organizations seeking solutions for retired EV batteries and industries requiring energy-storage resources.



[18] SOURCE



4.4 Demand for Specialized Domestic Battery Recycling and Circular-Economy Capacity

The expansion of the U.S. battery industry is creating demand not only for recycling capacity, but also for specialized services throughout the battery lifecycle. Transportation, dismantling, preprocessing, testing, classification, reuse, and material recovery all require technical infrastructure and expertise.

Sample Program[19] provides $XXX million for research, development, and demonstration related specifically to EV battery recycling and second-life applications. In a subsequent funding round, XX selected eight projects for $XXX million to improve the economics of EV battery recycling. The funded activities include reducing costs associated with transportation, dismantling, and preprocessing of end-of-life EV batteries.

More broadly, the SAMPLE PROGRAM[20] allocated nearly $X billion to strengthen the U.S. battery supply chain, including critical-mineral production and recycling. XXX explicitly identifies sustainable battery recycling as necessary to support a secure, resilient, and circular domestic supply chain.

The Petitioner's services fall directly within this developing domestic ecosystem. The venture will provide a technical bridge between EV retirement, second-life use, and eventual recycling. As more EV batteries enter and eventually leave service, automotive companies, fleets, dismantlers, energy-storage businesses, and recyclers will require reliable methods for determining battery condition and directing each asset toward the correct next stage.

[19] SOURCE
[20] SOURCE





5 Prong 2: The Petitioner is well positioned to advance the Proposed Endeavor

The Petitioner is well positioned to advance the proposed endeavor based on his advanced technical education, approximately xx years of automotive engineering experience, specialized battery expertise, and concrete progress toward establishing the business in the United States.

He holds a B.S. in Mechanical Engineering with a concentration in Automotive Engineering, an M.S. in Automotive Engineering, and a Ph.D. in Mechanical and Automotive Engineering from SAMPLE UNIVERSITY, SAMPLE STATE. His graduate and doctoral work focused on electrified powertrains, energy-storage systems, battery degradation, thermal behavior, lifecycle optimization, and remaining useful life. This STEM background is directly relevant to evaluating the condition, safety, and secondary-use potential of retired EV batteries.

His professional experience further supports the endeavor. The Petitioner progressed from Automotive Systems Engineer to Senior Electrified Powertrain Engineer and currently serves as Lead Battery Systems and Vehicle Integration Engineer at SAMPLE COMPANY, SAMPLE STATE. His work has included EV integration, battery performance, diagnostics, thermal management, durability, state-of-health evaluation, failure analysis, and system validation. He has also led multidisciplinary engineering activities and contributed to standardized testing procedures. This combination of technical and leadership experience provides a strong foundation for operating an engineering-led battery assessment and repurposing business.

The Petitioner will pursue the endeavor through SAMPLE LLC, registered in SAMPLE STATE on SAMPLE DATE, Year XXXX. The business will be developed in phases. Initial operations will focus on establishing the facility, acquiring testing and handling equipment, implementing safety protocols, and standardizing assessment procedures. The Company will build relationships with EV dealerships, service centers, fleets, and dismantlers as sources of retired batteries, while developing partnerships with energy-storage companies, renewable-energy businesses, and recyclers. Capacity and staffing will expand as battery volumes increase.

Implementation has already begun. The company has secured a SAMPLE-square-foot facility in SAMPLE CITY, SAMPLE STATE, and the Petitioner has invested approximately $XXX,XXX in





equipment, facility preparation, safety systems, insurance, and startup expenses. The Company has hired X employees and established initial technical and operating procedures.

Commercial progress provides additional evidence of feasibility. The company has initiated discussions with SAMPLE NUMBER dealerships and service centers, SAMPLE NUMBER fleet operators, and SAMPLE NUMBER dismantling or recycling businesses. It has also received SAMPLE NUMBER letters of interest, letters of intent, or preliminary service requests from prospective customers and industry partners. As of SAMPLE DATE, the company has processed approximately XXX battery packs or modules and generated approximately $XXX,XXX in sales.

The Petitioner therefore brings more than a proposed business concept. He has directly relevant STEM education and industry experience, a defined operating model, an established U.S. company, committed capital, initial infrastructure, and demonstrated market interest. These factors provide a credible and practical foundation for successfully advancing the proposed endeavor in the United States.

6 Leadership, Expertise, and Team Structure

The Petitioner is an automotive and battery systems engineer with approximately 15 years of experience in vehicle engineering, electrified powertrains, lithium-ion battery systems, testing, and lifecycle assessment. His academic and professional career has increasingly focused on electric vehicle technology and battery performance, providing a direct foundation for his proposed work in EV battery assessment, repurposing, and circular-economy applications.

6.1 Educational Background

The Petitioner earned a Bachelor of Science in Mechanical Engineering, with a concentration in Automotive Engineering, from SAMPLE UNIVERSITY in Year XXXX. His undergraduate studies included vehicle systems, thermodynamics, materials science, electrical systems, manufacturing, control systems, and engineering design.

He subsequently earned a Master of Science in Automotive Engineering from SAMPLE UNIVERSITY in Year XXXX. His graduate studies focused on electrified powertrains, energy-storage systems, vehicle energy management, and advanced automotive technologies. His



master's research examined lithium-ion battery performance and degradation under different automotive operating conditions.

In Year XXXX, he completed a Ph.D. in Mechanical and Automotive Engineering at SAMPLE UNIVERSITY. His doctoral research focused on battery degradation modeling and lifecycle optimization for electrified vehicles, including battery aging, thermal behavior, charging patterns, state-of-health assessment, and remaining useful life. His education falls within STEM disciplines and is directly related to the technical basis of the proposed endeavor.

6.2 Awards and Publications

The Petitioner's technical work has resulted in several professional and academic recognitions. He received the **SAMPLE UNIVERSITY Graduate Research Excellence Award** in Year XXXX for his research involving lithium-ion battery degradation and lifecycle modeling. In Year XXXX, he received the **SAMPLE COMPANY Engineering Excellence Award** for his contribution to improving battery-system validation procedures for an electric vehicle platform.

He has authored and co-authored technical publications related to electric vehicle batteries and energy-storage systems, including:

- *State-of-Health Assessment of Lithium-Ion Batteries Under Automotive Operating Conditions*, SAMPLE JOURNAL, Year XXXX.
- *Effects of Thermal Conditions on Lithium-Ion Battery Degradation in Electric Vehicles*, SAMPLE JOURNAL, Year XXXX.
- *Lifecycle Assessment and Remaining Useful Life Estimation for Automotive Battery Systems*, SAMPLE CONFERENCE, Year XXXX.
- *Technical Considerations for the Secondary Use of Retired Electric Vehicle Batteries*, SAMPLE JOURNAL, Year XXXX.

His publications demonstrate a sustained technical interest in battery performance, degradation, lifecycle management, and secondary use, which are central to the proposed endeavor.

6.3 Certificates

The Petitioner has continued to develop specialized knowledge through professional training and certifications relevant to electric vehicles, battery systems, and technical safety. His credentials include:

Certification / training	Issuing organization	Year
Electric vehicle high-voltage safety certification	Sample certification body	Xxxx
Lithium-ion battery safety and handling	Sample technical institute	Xxxx
Battery management systems and diagnostics	Sample engineering institute	Xxxx
Functional safety for automotive systems - iso 26262	Sample certification body	Xxxx
Project management professional training	Sample institute	Xxxx

6.4 Letters of Recommendation

The Petitioner's qualifications and proposed endeavor are supported by letters from professionals familiar with his technical work and the battery industry. These include SAMPLE PROFESSOR, Professor of Mechanical Engineering at SAMPLE UNIVERSITY, who supervised or reviewed his research involving battery degradation and lifecycle assessment, and SAMPLE EXECUTIVE, Director of Electrified Powertrain Engineering at SAMPLE COMPANY, who has direct knowledge of his work on EV battery testing, validation, and system integration.

Additional support has been provided by SAMPLE BATTERY INDUSTRY EXPERT, a senior professional in battery recycling and energy storage, who explains the technical importance of reliably assessing batteries before determining whether they should be reused, repurposed, or recycled. A letter from SAMPLE ENERGY STORAGE EXECUTIVE, representing a U.S. energy-storage company, further addresses the commercial value of technically evaluated second-life batteries for appropriate stationary applications.

Together, these letters confirm both the Petitioner's technical capabilities and the practical relevance of the expertise he intends to apply in the United States.

6.5 Technical Expertise

The Petitioner's expertise covers the principal technical areas required to implement the proposed endeavor. He has extensive experience with lithium-ion battery systems, battery diagnostics, state-of-health assessment, degradation analysis, thermal management, high-voltage vehicle systems, battery management systems, failure analysis, testing, and validation.

He is experienced in interpreting battery performance data and identifying changes in capacity, resistance, temperature behavior, and overall system performance. His work has also involved developing testing procedures, analyzing technical failures, evaluating engineering risks, and coordinating multidisciplinary teams responsible for vehicle and battery-system validation.

This expertise is directly transferable to retired EV battery assessment. It enables the Petitioner to develop procedures for determining whether batteries and modules remain technically suitable for secondary use, require further evaluation, or should proceed to recycling.

6.6 Important Projects

Throughout his career, the Petitioner has participated in several projects closely related to the proposed endeavor.

- In Year XXXX, he served as Lead Battery Validation Engineer for SAMPLE COMPANY's development of the SAMPLE EV PLATFORM, where he coordinated battery durability and performance testing under different temperature, charging, and driving conditions. The project involved the evaluation of more than XXX battery packs and contributed to improvements in testing protocols used before vehicle production.
- He later led the SAMPLE Battery Degradation Analysis Project, which analyzed field and laboratory data from approximately XXX electric vehicles to identify patterns in capacity loss and battery aging. The project developed a standardized methodology for assessing battery state of health and estimating remaining useful life. The resulting methodology improved the company's ability to identify abnormal degradation and evaluate long-term battery performance.
- In Year XXXX, the Petitioner participated in the SAMPLE Second-Life Battery Feasibility Project, which examined whether retired automotive battery modules could be



technically suitable for stationary energy-storage applications. His responsibilities included battery condition assessment, capacity testing, safety evaluation, module classification, and analysis of remaining useful life. The project demonstrated that selected modules that no longer met automotive performance requirements could retain value in less demanding applications.

- Most recently, he led the SAMPLE Battery Lifecycle Optimization Initiative, a multidisciplinary project focused on improving the management of batteries from vehicle operation through retirement. The initiative examined battery diagnostics, removal criteria, technical assessment, potential secondary use, and eventual recycling. This work provided the Petitioner with practical experience addressing many of the same technical decisions that will form the core of his proposed U.S. venture.

6.7 Duties at the U.S. Company

As Founder and Chief Technical Officer of SAMPLE COMPANY, the Petitioner will be responsible for the technical development and implementation of the Company's EV battery assessment and repurpose operations. He will oversee the safe intake, dismantling, testing, and classification of retired EV battery packs and develop standardized procedures for evaluating battery condition, state of health, remaining capacity, degradation, and safety. Based on these assessments, he will determine whether batteries and modules are suitable for secondary use, require further processing, or should be directed to qualified recycling partners.

The Petitioner will also lead the technical development of second-life battery applications, particularly stationary energy-storage solutions, and oversee the selection of diagnostic, testing, high-voltage handling, and safety equipment. He will establish quality-control, documentation, traceability, and operational safety standards and ensure that technical procedures are consistently applied as the company expands.

In addition, he will develop relationships with EV dealerships, service centers, fleets, dismantlers, recyclers, and energy-storage companies to establish reliable battery supply and downstream partnerships. He will recruit and supervise engineers and battery technicians, oversee technical projects and processing-capacity expansion, and monitor developments in battery technology,



diagnostics, recycling, and second-life applications to continuously improve the Company's operations.

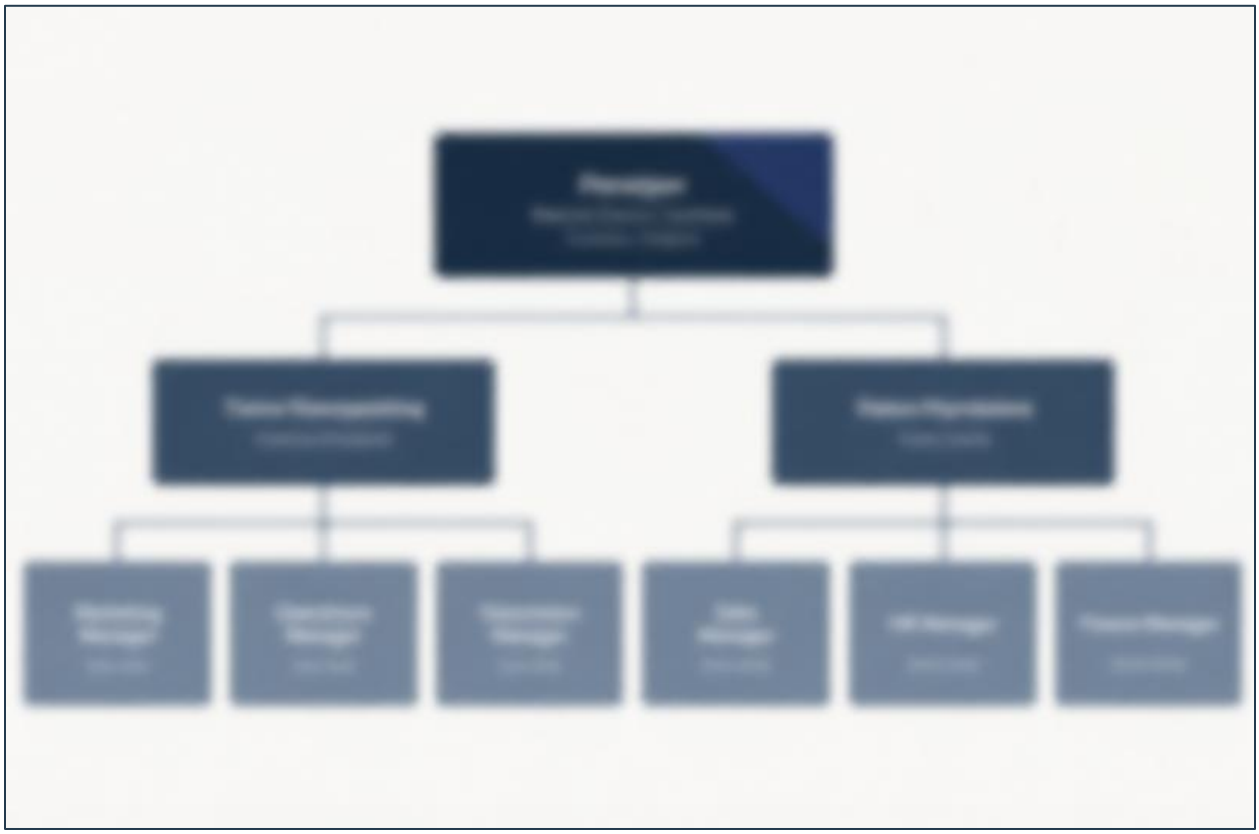
6.8 Personnel Plan

Number of Employees per Position	Year 1	Year 2	Year 3	Year 4	Year 5
Detailer and Laundry Attendant					
Front Desk Operators					
Housekeeping Assistants					
Maintenance Assistant					
Front Desk Manager					
Head Housekeeper					
Breakfast Attendant					
Sales and Guest Relations Coordinators					
Total Employees	10	10	10	10	10

Personnel Plan	Year 1	Year 2	Year 3	Year 4	Year 5
Detailer and Laundry Attendant					
Front Desk Operators					
Housekeeping Assistants					
Maintenance Assistant					
Front Desk Manager					
Head Housekeeper					
Breakfast Attendant					
Sales and Guest Relations Coordinators					
Total Employees	10	10	10	10	10
Total Payroll Expenses					



6.9 The Company's Internal Organizational Chart – Year 5



7 Financial Forecasts

7.1 Funds Available

Mr. Peter Peterson will personally invest a total of $XXX into the Company, demonstrating his financial commitment to the venture and providing the initial capital necessary to support its establishment and early-stage operations. The investment will be used to fund key startup and operating expenses, providing the Company with the financial resources required to execute its business strategy and support its planned growth.

7.2 Sales Forecast

7.2.1 Sales Assumptions

Assumption	Description	Value / Range	Timeframe	Impact on Forecast
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

7.2.2 Sales Forecast Table

[illegible]	Year 1	Year 2	Year 3	Year 4	Year 5
[illegible]					
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 5**
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]					
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 5**
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]					
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

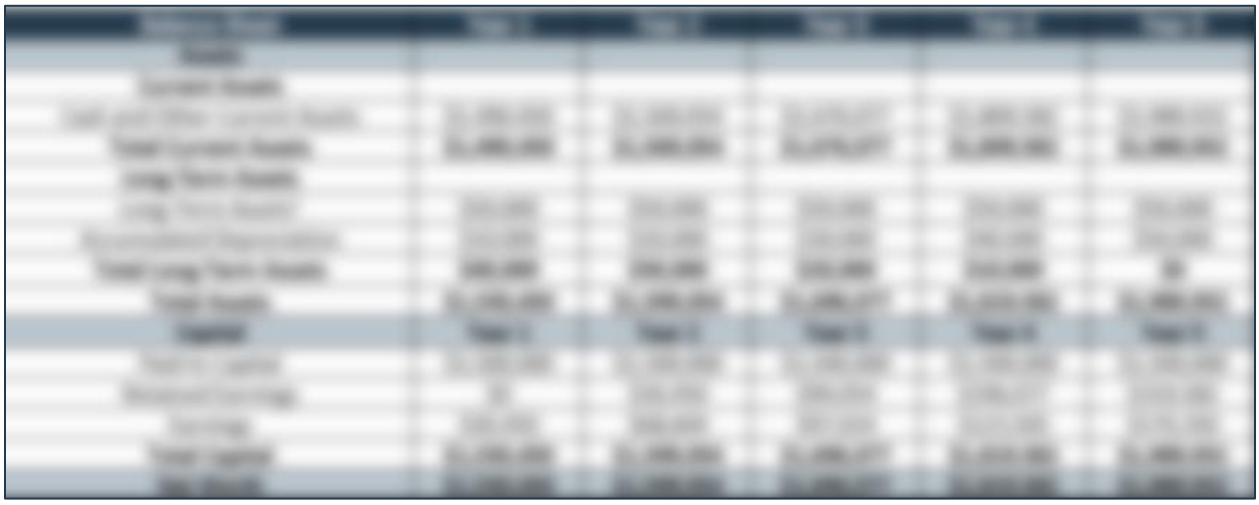
7.3 Profit and Loss

7.3.1 Operational Expenses Assumptions

[illegible]	Key Activities / Description	Timing	Expected Outcome	Status
Product Development	[illegible]	Q1 – Q2	[illegible]	In Progress
Manufacturing Setup	[illegible]	Q2 – Q3	[illegible]	Planned
Market Launch	[illegible]	Q3 – Q4	[illegible]	Planned
R&D and Next-Gen	[illegible]	Year 2+	[illegible]	Ongoing
Operational Expansion	[illegible]	Year 2/4	[illegible]	Planned

7.3.2 Profit and Loss Statement

7.4 Balance Sheet



8 Prong 3: On Balance, It Would Be Beneficial to the United States to Waive the Job Offer and Thus the Permanent Labor Certification Requirements

Requiring the Petitioner to obtain a permanent job offer and labor certification would not fit the way he intends to advance his work in the United States. The labor certification process is generally structured around a U.S. employer offering a specific permanent position and demonstrating that qualified U.S. workers are not available for that position. The Petitioner's endeavor is fundamentally different. He does not intend to enter the United States simply to fill an engineering vacancy. He intends to establish and lead SAMPLE COMPANY and build a specialized operation for evaluating what happens to EV batteries after they leave automotive service.

This distinction is important. The Petitioner's proposed contribution depends on his ability to combine several areas of his background within one venture. Through the proposed company, he will apply this knowledge to determine whether retired batteries can safely remain in productive use, whether they can be repurposed for stationary energy storage, or whether they should proceed to recycle. A conventional engineering position with an existing employer would not necessarily allow him to develop and control this complete battery lifecycle model.



The endeavor is also entrepreneurial by design. The Petitioner will establish technical procedures, acquire specialized equipment, develop relationships with dealerships and fleets, work with dismantlers and recyclers, and build connections with energy-storage companies that can use technically suitable second-life batteries. He will also recruit and train technical personnel as operations expand. The labor certification process is poorly suited to this model because there is no independent U.S. employer offering the Petitioner a predefined position. The Petitioner himself is creating the operation through which the proposed national benefits will be delivered.

The benefit to the United States does not depend on proving that American automotive or battery engineers are unavailable. Even if other qualified workers exist, they will not eliminate the value created by an additional U.S. company capable of processing retired EV batteries and employing those workers. The venture is expected to create positions for battery technicians, engineers, operations personnel, and other employees. It will also purchase equipment and professional services and generate business for transportation providers, recycling companies, and other participants in the domestic battery industry.

More importantly, the company addresses a growing technical gap between the automotive use and final recycling of EV batteries. Batteries removed from vehicles do not all reach end of life in the same condition. Some retain meaningful capacity and can potentially serve another purpose, while others require recycling. Determining the correct pathway requires testing, diagnostics, safety screening, and engineering judgment. The Petitioner's venture is designed specifically around this decision point. By identifying batteries that can remain productive before recycling, the company can preserve their remaining economic value while directing unsuitable batteries toward responsible material recovery.

The timing of this endeavor further supports the waiver. The United States is currently making substantial investments in domestic battery manufacturing, recycling, and second-life applications. SAMPLE DEPARTMENT has allocated nearly $X billion toward strengthening the U.S. battery supply chain, including recycling and material recovery. XXXXX has also established a $200 million Electric Drive Vehicle Battery Recycling and Second-Life Applications Program,



directly supporting the development of technologies and processes for batteries leaving automotive service.[21]

At the same time, the volume of batteries requiring these services will continue to increase as the U.S. EV fleet matures. This creates a present opportunity to establish the testing procedures, technical infrastructure, supply relationships, and downstream partnerships needed before significantly larger volumes of retired batteries emerge. The Petitioner's endeavor is therefore timely. Its value lies not only in processing batteries today, but in building domestic capability for a battery stream that is expected to expand substantially.

Requiring the Petitioner to abandon or delay this business model to pursue a conventional employer-sponsored engineering position would work against the manner in which he is best positioned to contribute. His prospective value to the United States comes from applying his specialized battery expertise to build an operation, create technical capacity, employ U.S. workers, extend the useful life of viable EV batteries, and support domestic recycling when further use is no longer appropriate. These benefits exist independently of whether other U.S. workers are available. On balance, allowing the Petitioner to advance this endeavor through his own company provides greater prospective benefit to the United States than requiring a permanent job offer and labor certification.



[21] SOURCE