

Ms. Jackie Jackson

RFE Response Letter

April 2026

Petitioner: Ms. Jackie Jackson

Position: Chief Operating Officer

Classification: Form I-129, Petition for Nonimmigrant Worker



Contents

1.	Request for Evidence Response Overview	2
2.	Continuous Qualifying Employment Abroad During the Statutory Period	4
2.1	The Beneficiary's Role Abroad	6
2.2	Employment Verification Letter	9
3.	Sufficient Physical premises	10
4.	Executive Position Within the U.S. Subsidiary	12
5.	Concluding Statement.....	16

1. Request for Evidence Response Overview

This submission is presented in response to the Request for Evidence ("RFE") issued by U.S. Citizenship and Immigration Services ("USCIS") regarding the Form I 129, Petition for a Nonimmigrant Worker on XXXX Year XXXX, filed on behalf of Ms. Jackie Jackson (hereafter referred to as Ms. Jackson) under the L1-A intracompany transferee classification. Through the RFE, USCIS requested additional documentation concerning several aspects of the petition. This response provides further evidence and clarification demonstrating that the petition satisfies all applicable statutory and regulatory requirements.

The petition requests the transfer of Ms. Jackson from SAMPLE PARENT COMPANY (hereafter also called the Parent Company) to its newly established U.S. subsidiary, SAMPLE USA COMPANY (hereafter also referred to as the U.S. Subsidiary or the Company), where she will assume the position of Chief Operating Officer. Her transfer is a key component of the Parent Company's international expansion strategy and is intended to provide executive leadership during the establishment and growth of the U.S. operation.

The Parent Company has established a successful presence in the SAMPLE COUNTRY real estate industry through its experience in the acquisition, development, construction, and management of multifamily residential projects. Building upon this foundation, the U.S. Subsidiary will pursue residential development, renovation, and investment opportunities throughout SAMPLE STATES, concentrating on properties located in the proximity of SAMPLE CITIES metropolitan areas. By combining strategic acquisitions with value enhancing renovations and new construction projects, the Company will address increasing demand for quality housing while leveraging the SAMPLE PARENT COMPANY's proven business model and industry experience.

Since establishing SAMPLE PARENT COMPANY, Ms. Jackson has directed its strategic growth and played the principal role in planning the Company's expansion into the United States. Her leadership has been instrumental in developing the business model, defining operational objectives, and preparing the U.S. Subsidiary for launch. With more than XX years of executive experience in real estate development, construction management, investment strategy, and

international business operations, she possesses the knowledge and leadership required to guide the Company's successful entry into the U.S. market.

As Chief Operating Officer, Ms. Jackson will oversee the Company's strategic and executive functions, including evaluating new business opportunities, directing relationships with key stakeholders, supervising senior personnel, monitoring financial and operational performance, and ensuring that the U.S. Subsidiary's activities remain aligned with the long-term objectives of SAMPLE PARENT COMPANY. Because these responsibilities require executive level judgment and continuous strategic oversight, they cannot reasonably be delegated during the Company's formative stage without creating significant operational risk.

The documentation included with this response addresses each issue identified in the Request for Evidence, as summarized below.

RFE Issue	Summary of Response
Qualifying Employment Abroad	Confirms that Ms. Jackson completed the required period of continuous full-time executive employment abroad within the statutory timeframe. Her temporary XX visits to the United States were brief, incidental to her foreign employment, and did not interrupt the qualifying period.
Executive Capacity Abroad	Demonstrates that Ms. Jackson's primary responsibilities involved executive leadership, including strategic planning, high level decision making, corporate governance, and organizational oversight rather than day-to-day operational activities.
Parent Company Organizational Structure	Establishes that managerial personnel and qualified third-party professionals performed routine operational functions, allowing Ms. Jackson to remain focused on executive level responsibilities rather than first line supervision.
Physical Premises of the U.S. Subsidiary	Provides evidence that the U.S. Subsidiary has secured suitable commercial premises that are fully available and sufficient to support its executive, managerial, and administrative operations.
Staffing Plan and Executive Role in the United States	Demonstrates that operational responsibilities will be delegated to managers, professional employees, and specialized service providers, enabling Ms. Jackson to devote her time primarily to executive leadership, organizational management, and long-term business development.

2. Continuous Qualifying Employment Abroad During the Statutory Period

One of the issues identified in the Request for Evidence concerns whether Ms. Jackie Jackson satisfies the statutory requirement of completing at least one continuous year of qualifying employment abroad during the three-year period preceding the filing of the L1-A petition. USCIS also requests clarification regarding several temporary entries into the United States under XX status and asks whether those trips affected the continuity of her foreign employment. The evidence number XX submitted with this response confirms that Ms. Jackson remained continuously employed by SAMPLE PARENT COMPANY throughout the relevant period and that her travel to the United States neither interrupted nor altered her qualifying employment abroad.

Throughout the entire qualifying period, Ms. Jackson remained employed exclusively by SAMPLE PARENT COMPANY, continued receiving direction through the Parent Company's executive structure, and retained the same executive authority before, during, and after each temporary visit. This is explained in detail in the Employment Letter number XX submitted. Her travel was temporary in nature and did not involve a transfer of employment, relocation of her principal workplace, or assumption of duties for the U.S. Subsidiary. At all relevant times, her employment relationship remained centered in SAMPLE COUNTRY.

To further clarify these facts, SAMPLE PARENT COMPANY prepared an Executive Capacity Attestation dated XXXXXX. Executed by the Company's founders and executive partners, the attestation confirms that Ms. Jackson has served continuously as XXXX and XXXX since XXX XXXX without any interruption in her employment. The document verifies her executive title, confirms her full-time engagement with the Parent Company, provides %s of time allocated to each task, and explains that she remained responsible for directing the organization throughout the statutory period.

Unlike employees whose responsibilities depend on continuous physical presence at a specific worksite, Ms. Jackson's role consists of executive leadership and organizational oversight. Her primary responsibilities include establishing strategic priorities, approving major business initiatives, allocating corporate resources, evaluating organizational performance, and making high level business decisions. These functions continued without interruption regardless of occasional international travel because executive authority is exercised through leadership, governance, and decision making rather than continuous physical presence in one location.

The Company's organizational structure further supports the continuity of Ms. Jackson's qualifying employment. Operational execution is entrusted to experienced department managers and specialized external professionals who administer routine business activities within their respective areas of responsibility. This management framework enables executive leadership to remain focused on corporate direction while allowing daily operations to continue efficiently during short business travel. Consequently, Ms. Jackson maintained continuous executive oversight while routine operational matters remained under the supervision of qualified personnel.



The Request for Evidence also references documentation reflecting Ms. Jackson's review of invoices, financial information, and other business records. These materials are entirely consistent with an executive position. Reviewing significant expenditures, authorizing exceptions,

and evaluating financial performance are examples of executive oversight within the Company's established governance procedures. They do not indicate participation in routine operational work, nor do they suggest any interruption in her qualifying employment during periods of travel.

The documentary record extends well beyond the Executive Capacity Attestation. Governance documentation audited financial records, Integrated Management System materials, and executive meeting records consistently identify Ms. Jackson as the individual responsible for strategic oversight, policy approval, and executive decision making. Collectively, these records demonstrate an uninterrupted pattern of executive leadership throughout the qualifying period. (See Evidence Number XX)

2.1 The Beneficiary's Role Abroad

Throughout the qualifying period, Ms. Jackie Jackson served as the Chief Strategy Officer of SAMPLE PARENT COMPANY, where she was responsible for establishing the Company's strategic direction and ensuring that all major business functions operated in alignment with its corporate objectives. As one of the Company's senior executives, her responsibilities extended across multiple departments and business units, requiring continuous oversight of organizational performance, expansion initiatives, financial planning, and executive decision making. Rather than participating in the execution of daily operational activities, the Beneficiary directed the Company's overall strategy, evaluated significant business opportunities, approved major investments and corporate initiatives, monitored organizational results, and guided the Company's domestic and international growth, including the planning and establishment of SAMPLE USA COMPANY. Her role required substantial discretionary authority and independent judgment over matters affecting the enterprise, while departmental managers remained responsible for implementing operational objectives within their respective areas. This organizational framework enabled Ms. Jackson to concentrate on executive leadership, ensuring that the Company's resources, priorities, and business strategy remained coordinated across every functional division.

Executive Responsibilities as Chief Strategy Officer

Executive Responsibility	Approximate Time Allocation
Developing corporate strategy, establishing long-term business objectives, and evaluating expansion opportunities	30%
Leading market expansion initiatives, approving major investments, and directing strategic business development	20%
Reviewing organizational performance, financial reports, and executive level metrics to guide business decisions	15%
Approving corporate budgets, governance policies, and significant operational initiatives requiring executive authorization	15%
Directing senior management meetings, coordinating cross functional leadership, and monitoring implementation of strategic priorities	10%
Representing the Company in negotiations with investors, financial institutions, business partners, and other high-level stakeholders	10%

The importance of the Chief Strategy Officer position has grown significantly as organizations expand across multiple markets and increasingly rely on centralized executive leadership to coordinate complex operations. According to SAMPLE Survey¹, XX% of chief executives identify strategic planning as essential to sustaining business growth and organizational resilience. Likewise, the same report indicated that companies with dedicated executives responsible for enterprise strategy achieve stronger organizational alignment, more effective execution of transformation initiatives, and greater consistency in long term decision making. These findings reflect the evolving role of the Chief Strategy Officer as an executive responsible for translating

¹ Source

corporate vision into measurable business results while ensuring coordination across multiple departments and leadership teams.

Consistent with these executive responsibilities, Ms. Jackson directly supervised five senior managers, each entrusted with independent authority over a critical functional area and supported by their own teams of professional and administrative personnel. This management structure enabled routine operational matters to remain within each department while executive oversight, corporate governance, and strategic direction remained under Ms. Jackson's authority.

Direct Report	Position
XXXXXX XXXXXX (<i>Master of Science in Civil Engineering, Annual Salary: \$XX,XXX</i>)	Director of Construction and Development
XXXXXX XXXXXX (<i>Master of Business Administration, Annual Salary: \$XX,XXX</i>)	Director of Finance and Treasury
XXXXXX XXXXXX (<i>Bachelor of Science in Business Administration, Annual Salary: \$XX,XXX</i>)	Director of Business Development and Investments
XXXXXX XXXXXX (<i>Bachelor of Science in Information Systems, Annual Salary: \$XX,XXX</i>)	Director of Technology and Digital Solutions
XXXXXX XXXXXX (<i>Bachelor of Science in Human Resource Management, Annual Salary: \$XX,XXX</i>)	Director of Human Resources and Corporate Administration

Each of these executives exercised independent managerial authority within their respective departments, supervising their own teams and overseeing the daily execution of departmental objectives. This layered organizational structure ensured that operational activities, employee supervision, project implementation, financial administration, technology management, and human resources functions were carried out by qualified managers rather than by Ms. Jackson herself.

By directing five senior managers, each responsible for a separate organizational function and their own subordinate staff, Ms. Jackson exercised executive authority across a vertically integrated management structure rather than serving as a first line supervisor. Her responsibilities required coordinating diverse business functions, aligning departmental objectives with the Company's strategic vision, allocating resources among multiple divisions, and making high-level decisions. This breadth of executive oversight demonstrates her ability to successfully lead a complex organization through successive layers of management and reflects the versatility, leadership experience, and organizational expertise required to establish and direct the operations of SAMPLE USA COMPANY in the United States.

2.2 Employment Verification Letter

To further verify the Beneficiary's qualifying employment abroad, SAMPLE PARENT COMPANY has provided an Employment Verification Letter, date XX XXXX, confirming that Ms. Jackie Jackson has been continuously employed on a full-time basis as Chief Strategy Officer since XXXXXX. The letter specifies her employment dates, executive title, reporting relationship, and confirms that she remained continuously employed in an executive capacity throughout the statutory qualifying period.

The Employment Verification Letter also describes Ms. Jackson's active participation in the Parent Company's executive leadership meetings, where she regularly collaborated with other senior executives to evaluate business performance, review investment opportunities, approve annual strategic priorities, and determine the Company's long-term growth initiatives. In these meetings, Ms. Jackson presented market analyses, assessed expansion opportunities, reviewed financial and operational performance, and provided strategic recommendations that supported executive decision making.

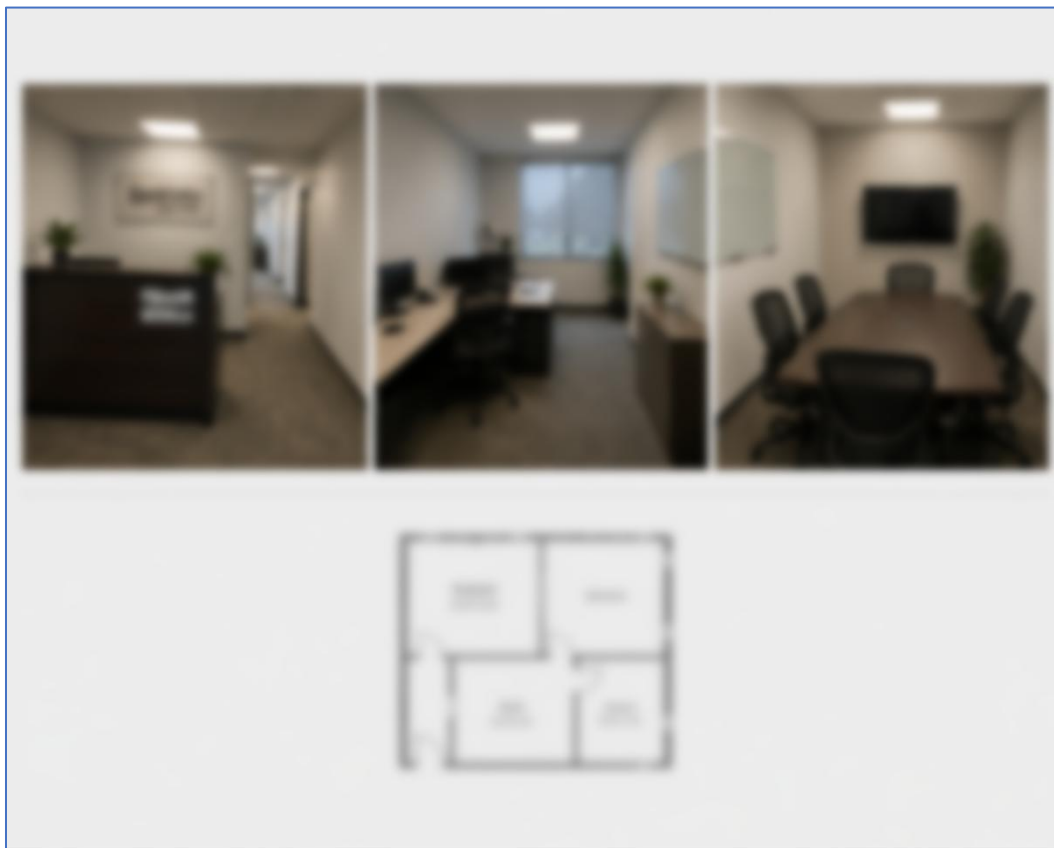
In particular, the letter highlights Ms. Jackson's leading role in discussions concerning the establishment of SAMPLE USA COMPANY, including evaluating the commercial viability of the U.S. expansion, identifying target markets, developing the implementation strategy, allocating financial resources, and defining the organizational structure of the future U.S. Subsidiary. Her

recommendations were presented directly to the executive leadership team and served as a key basis for the Company's decision to proceed with its international expansion.

The Employment Verification Letter therefore confirms not only the continuity of Ms. Jackson's qualifying employment, but also that her responsibilities consistently involved executive level planning, strategic decision making, and participation in high level corporate governance rather than routine operational activities.

3. Sufficient Physical premises

A fully executed lease agreement has been signed confirming the Company's right to occupy dedicated office space located at SAMPLE ADDRESS. The lease commenced on XXXXXX and remains in effect through XXXXXX, providing the Company with approximately XXXX square feet of commercial office space. The Landlord is XXXXX, at XXXXXX, phone number XXXXXXXX.



The leased premises include private offices, open workstations, a conference room suitable for client and investor meetings, reception and waiting areas, kitchen facilities, restrooms, high speed internet infrastructure, utilities, and designated parking. Securing these facilities before commencing operations demonstrates that the U.S. Subsidiary has established an appropriate business environment capable of supporting its executive, managerial, and administrative activities from the outset.

During its first year, SAMPLE USA COMPANY anticipates employing 11 individuals. However, not every employee will require a permanent workstation within the office. Several positions, including field-based personnel, business development professionals, and employees whose responsibilities primarily involve visiting construction sites, meeting clients, or working remotely, will perform a significant portion of their duties outside the office. As a result, only six employees, including Ms. Jackson, are expected to occupy the office on a full-time basis.

According to workplace planning guidance published by the SAMPLE INSTITUTE REPORT², modern office environments typically allocate between XXX and XXX square feet per employee, depending on the nature of the work performed. Likewise, Sample Workplace Survey³ reports that hybrid work arrangements have substantially reduced the amount of dedicated office space required for many organizations, with companies increasingly designing offices around employees whose responsibilities require regular on-site collaboration rather than maintaining permanent workstations for every member of the workforce.

Based on these industry standards, office space accommodating six full-time employees generally requires between XXX and XXXX square feet. The leased premises comfortably satisfy this benchmark while also providing meeting areas and shared spaces necessary for management, client consultations, and administrative functions. The remaining employees will primarily perform their responsibilities remotely or at project locations, making permanent office accommodation unnecessary for their positions.

² Source

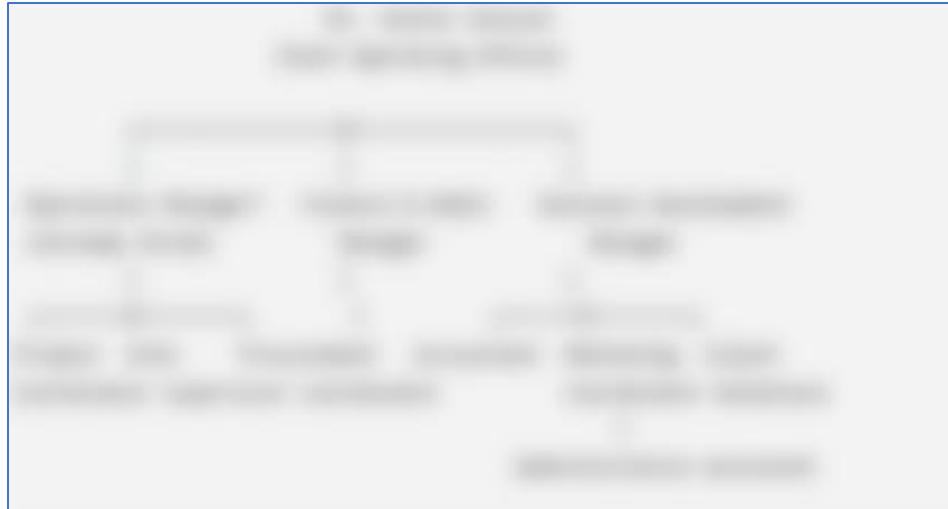
³ Source

The Company's physical premises have therefore been selected based on its anticipated operational needs rather than total headcount alone. The office provides sufficient capacity for executive leadership, administrative coordination, client meetings, financial management, and collaborative planning while supporting a workforce that combines office-based personnel with employees whose duties are performed remotely or in the field. Accordingly, the leased premises are fully consistent with the Company's projected operations during its first year and demonstrate that SAMPLE USA COMPANY is adequately prepared to commence business activities immediately upon approval of the petition.

4. Executive Position Within the U.S. Subsidiary

Upon approval of the petition, Ms. Jackie Jackson will assume the position of Chief Operating Officer of SAMPLE USA COMPANY, where she will be responsible for directing the Company's overall operations during its first year of business. Her role has been structured at the executive level, focusing on organizational leadership, operational oversight, resource allocation, and implementation of the Company's business strategy rather than the execution of day-to-day operational activities. As illustrated in the organizational chart below, Ms. Jackson will initially supervise three department managers, one of whom has already been hired prior to the commencement of operations. These managers will oversee their respective departments and supervise the remaining employees, creating a layered management structure consisting of 11 employees during the first year.

This organizational design allows operational responsibilities to be delegated to qualified managers and professional personnel while Ms. Jackson concentrates on matters affecting the Company as a whole. Rather than directing individual contributors, she will oversee department heads, evaluate organizational performance, establish operating priorities, approve significant expenditures, and coordinate the execution of the Company's expansion plan across all business functions.



The proposed reporting structure reflects well established management practices recognized as essential for organizational effectiveness. According to SAMPLE SOURCE⁴, executives who effectively delegate authority enable their organizations to achieve up to XX percent higher revenue growth than organizations where senior leaders remain directly involved in routine execution. Similarly, research published by SAMPLE SOURCE⁵ emphasizes that clearly defined management layers improve accountability, accelerate decision making, and allow executives to focus on initiatives that create enterprise-wide value rather than departmental administration. The staffing model adopted by SAMPLE USA COMPANY follows these principles by assigning responsibility for daily operations to experienced managers while reserving executive oversight for the Chief Operating Officer.

Direct Reports

During the Company's first year, Ms. Jackson will directly supervise the following management personnel:

Position	Status	Primary Responsibility
Operations Manager (Already Hired)	Active	Oversee construction activities, project scheduling, procurement, vendor coordination, and field personnel.

⁴ Source

⁵ Source

Position	Status	Primary Responsibility
Finance and Administration Manager	To Be Hired	Supervise accounting, budgeting, payroll coordination, compliance, administrative operations, and financial reporting.
Business Development Manager	To Be Hired	Leads market research, investor communications, client acquisition, strategic partnerships, and marketing initiatives.

Together, these managers will supervise the remaining professional and administrative personnel, resulting in an organizational structure of 11 employees during Year 1. This management hierarchy enables operational decisions to be made at the departmental level while significant business matters are elevated to Ms. Jackson for executive review and approval.

Executive Responsibilities as Chief Operating Officer

Executive Responsibility	Examples of Executive Activities	Approximate Time Allocation
Directing operational implementation across all departments	Review weekly progress reports submitted by department managers, evaluate construction milestones, approve project schedules, resolve interdepartmental issues, and ensure that each business unit is meeting established operational objectives.	25%
Approving real estate acquisitions and development projects	Review financial feasibility studies, authorize offers on prospective properties, evaluate renovation budgets, determine project priorities, and approve construction timelines before implementation begins.	20%

Executive Responsibility	Examples of Executive Activities	Approximate Time Allocation
Financial oversight and resource allocation	Review monthly financial statements, analyze project profitability, approve expenditures exceeding management authority, evaluate cash flow projections, and authorize capital allocation for active developments.	15%
Vendor, contractor, and strategic partner oversight	Select general contractors, negotiate agreements with architects, engineers, legal counsel, lenders, and key suppliers, while approving contracts essential to the Company's operations.	15%
Leadership of senior management	Conduct executive meetings with department managers, evaluate departmental performance, establish quarterly objectives, approve staffing requests, and resolve matters requiring executive judgment.	10%
Business expansion and investment strategy	Identify additional acquisition opportunities, evaluate new geographic markets, meet with investors and financing institutions, and determine priorities for future development projects.	10%
Reporting to the Parent Company	Present operational updates, financial performance, staffing progress, project status, and major business developments to the executive leadership of SAMPLE PARENT COMPANY while coordinating activities between both entities.	5%

The duties assigned to Ms. Jackson clearly reflect an executive role. Her time will be devoted to directing managers, approving significant business initiatives, allocating resources, evaluating organizational performance, and making decisions affecting the Company. Routine responsibilities, including accounting functions, project coordination, vendor administration, marketing activities, procurement, and administrative support, will be performed by subordinate managers and their respective teams.

5. Concluding Statement

This Response to the Request for Evidence provides substantial documentary evidence addressing each issue identified by USCIS and confirms that the petition satisfies the statutory and regulatory requirements for L1-A intracompany transferee classification. The record establishes that Ms. Jackie Jackson completed more than one continuous year of qualifying full-time employment abroad with SAMPLE PARENT COMPANY during the statutory period preceding the filing of the petition. The submitted Employment Verification Letter, Executive Capacity Attestation, payroll documentation, governance records, management meeting minutes, and supporting corporate documents consistently demonstrate that her employment remained uninterrupted despite several temporary visits to the United States under XX status. Those visits were brief, incidental to her executive responsibilities, and did not constitute a transfer of employment or interrupt the continuity of her qualifying foreign service.

The evidence further confirms that Ms. Jackson has continuously served in an executive capacity, both abroad and in the proposed U.S. position. As Chief Strategy Officer of SAMPLE PARENT COMPANY, she directed corporate planning, evaluated investment opportunities, participated in executive committee meetings, approved major business initiatives, and exercised broad discretionary authority over matters affecting the organization while relying on senior managers and qualified professionals to administer daily operations. Likewise, the proposed position of Chief Operating Officer of SAMPLE USA COMPANY has been structured to ensure that Ms. Jackson remains focused on executive leadership rather than operational execution. The Year 1 organizational hierarchy establishes multiple layers of management, including three direct

managerial reports, one of whom has already been hired, and a total workforce of eleven employees. This structure delegates routine operational responsibilities to department managers and professional staff, allowing Ms. Jackson to concentrate on directing the Company's activities, allocating resources, approving significant expenditures, evaluating organizational performance, overseeing real estate investment decisions, and coordinating the implementation of the Parent Company's U.S. expansion.

Finally, the response demonstrates that SAMPLE USA COMPANY is fully prepared to commence business operations upon approval of the petition. The Company has secured dedicated commercial premises through an executed lease agreement that adequately supports its projected staffing needs and provides the infrastructure necessary for executive, managerial, and administrative functions. The submitted business documentation, staffing plan, organizational chart, financial projections, and supporting evidence collectively demonstrate that the U.S. Subsidiary possesses the physical resources, personnel, and management framework necessary to operate as a viable enterprise from its inception. When considered in its entirety, the evidence confirms that Ms. Jackson satisfies the foreign employment requirement, has been employed in a qualifying executive capacity abroad, will continue to serve in a qualifying executive capacity in the United States, and will direct a properly staffed organization capable of carrying out its business objectives.

