

IN THE FIFTEENTH JUDICIAL CIRCUIT IN
AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO.:

EB5AN, LLC, a Florida limited liability
company, and EB5AN WOHALI UTAH
FUND XV, LP, a Delaware limited
partnership,

Plaintiffs,

v.

SOUTHEAST REGIONAL CENTER, LLC,
SRC AJIN FUND VI LLC, and SRC
INVESTMENTS, LLC, all Georgia limited
liability companies,

Defendants.

_____ /

COMPLAINT FOR DEFAMATION

Plaintiffs, EB5AN, LLC and EB5AN WOHALI UTAH FUND XV, LP (“EB5AN Wohali” and collectively with EB5AN, LLC, “EB5AN”), sues Defendants, SOUTHEAST REGIONAL CENTER, LLC, SRC AJIN FUND VI LLC, and SRC INVESTMENTS, LLC (collectively, “SRC”) for defamation and tortious interference with business relationships and alleges:

Nature of Case, Jurisdiction and Venue

1. This is an action for defamation per se, defamation, and tortious interference with business relationships under Florida law.
2. The amount in controversy exceeds \$50,000, exclusive of attorneys’ fees and costs, and jurisdiction is otherwise applicable under Fla. Stat. § 26.012(2).

3. This Court has personal jurisdiction over Defendants under Fla. Stat. § 48.193(1)(a)(2) because they published defamatory statements on the Internet, accessible to residents of Florida, of, concerning, aimed to cause, and causing substantial injury to, EB5AN, a Florida resident.

4. Venue is proper in this Court because Plaintiff resides in, and the causes of action accrued, in Palm Beach County, Florida.

The EB-5 Immigrant Investor Program

5. Congress created the EB-5 Immigrant Investor Program in 1990 to stimulate the U.S. economy through job creation and capital investment by foreign investors.

6. Under the EB-5 Program, investors, including their spouses and unmarried children under 21, are eligible to apply for a lawful permanent residence in the U.S. and obtain a Green Card if they satisfy two requirements: (a) they must make the necessary investment in a commercial enterprise in the U.S.; and (b) they must plan to create or preserve a certain number of permanent full-time jobs for qualified U.S. workers.

EB5AN's Tremendous EB-5 Investment Success

7. EB5AN, LLC, together with its affiliates, is a government-authorized EB-5 regional center operator.

8. Founded in 2013, EB5AN, LLC is also a global investment fund manager with offices in the United States and abroad.¹

¹ <https://eb5visainvestments.com/overview-history/>

9. EB5AN, LLC is one of a select few in the EB-5 industry to have successfully closed and funded over 25 EB-5 transactions representing billions in project development.

10. In fact, EB5AN, LLC proudly maintains a 100% USCIS project approval rate, which means that all the adjudicated EB-5 regional center project investment funds it sponsors and for which it serves as manager have received project approval from United States Citizenship and Immigration Services.²

The Wohali Utah Project

11. One of EB5AN's investment projects is a luxury master-planned golf resort community called "Wohali," which is located in Coalville, Utah (the "Wohali Project").

12. EB5AN, LLC, through its investment fund, EB5AN Wohali, LP, was instrumental in securing from 99 foreign investors \$79.2 million in investment capital, through the EB-5 Program, to partially fund the development of the Wohali Project.

13. The capital EB5AN raised was loaned to Wohali Land Estates LLC, the owner and developer of the Wohali Project.

14. EB5AN Wohali is EB5AN's funding partner for the Project.

15. Construction started on the Wohali Project in approximately 2018.

16. The golf course was open for the entire 2025 season.

17. Wohali Land Estates, LLC, however, defaulted on its loan and subsequently declared bankruptcy.

² *Id.*

18. As the senior secured lender with a perfected first-priority lien, EB5AN, and consequently its foreign investors, are not expected to experience any loss of principal invested capital.

Defendants SRC

19. Defendants SRC compete with EB5AN for foreign investments in EB-5 projects.

20. Defendant Southeast Regional Center, LLC, located in Suwanee, Georgia, holds the EB-5 regional center license sponsoring multiple EB-5 projects, including Defendant SRC Ajin Fund VI, LLC, which is managed by Defendant SRC Investments, LLC.

21. Defendants SRC are considerably smaller than EB5AN and infinitely less experienced and less successful.

Defendants' Maliciously Defamatory Wechat Article

22. Envious of EB5AN and its tremendously successful investment projects, Defendants SRC concocted a ploy to try to “level the playing field.”

23. Specifically, on or about December 1, 2025, Defendants created, authored, promoted, and published to Wechat, a Chinese multi-purpose messaging and social media “super app,” a highly inflammatory and blatantly defamatory article about the Wohali Project (the “Maliciously Defamatory Article”) for the direct purpose of inflicting maximum damage on EB5AN, the Project’s senior secured lender.

24. Published in Chinese and directed to Chinese investors and agents, “Part 02” of the Maliciously Defamatory Article, a copy of which is attached in both English and Chinese as the **Exhibit**, asserts numerous false statements about the Wohali Project, and,

by direct intended implication, EB5AN (collectively, the “Maliciously False Statements”), including:

- a. Wohali is an “abandoned project” that “collapsed;”
- b. the number of jobs [to sustain the Wohali Project] cannot be met;
- c. foreign investor applicants [in EB5AN Wohali] cannot obtain a green card;
- d. foreign investor applicants [in EB5AN Wohali] cannot get back their investment principal; and
- e. most of the employees of the Wohali Project have been dismissed.

25. Defendants’ Maliciously False Statements are completely and utterly baseless and false.

26. Among other facts proving the baseless falsity of Defendants’ statements are the following:

- a. the Wohali Project golf course, its hallmark feature, was open for the entire 2025 season and only closed, temporarily, for the winter season;
- b. all the EB-5 jobs required for all 99 Wohali EB-5 investors to obtain U.S. permanent residency status under the EB-5 visa program have been successfully created;
- c. approximately 80 of the 99 EB5AN Wohali EB-5 investors have already received Form I-526E petition approval from USCIS, the first step in the permanent green card process, and many investors have already received physical temporary green cards;
- d. no EB-5 investors in EB5AN Wohali have realized or are expected to face a loss of investment principal.
- e. the Wohali Project, at the direction of the bankruptcy court appointed trustee, continues to employ team members to maintain the golf course and operate the Project; and
- f. the Wohali Project has never been abandoned and has not collapsed.

27. Defendants published the Maliciously Defamatory Article to Wechat and through a prominent and influential EB-5 user account, EB5Sir (account holder Connor Chen), which has 79,747 followers, including EB-5 investors, foreign investment agents and brokers, and other industry professionals.

28. Over 1,500 EB-5-related articles have been posted to EB5Sir's Wechat account, many of which are republished to various Wechat groups such as, for example, Yitoulou (managed by EB5Sir).

29. In fact, EB5AN's most valuable Chinese partners and regional center staff members are followers of the EB5Sir and Yitoulou Wechat accounts.

30. Defendants published the Maliciously Defamatory Article on EB5Sir for the direct purpose of maximizing its spread of misinformation about the Wohali Project and, by direct implication, EB5AN, to as many foreign agents, brokers, and investors as possible.

31. Defendants fully intended, by their deceptive and unlawful conduct, to damage EB5AN's reputation with a goal of causing foreign agents and brokers to stop promoting EB5AN's open investment projects to potential Chinese EB-5 investors.

32. Defendants also fully intended to cause EB-5 investors who have already invested in EB5AN Wohali LP to panic and question the correct information about the status of their investment in EB5AN Wohali and the Wohali project itself, as well as try to pull out or cancel their investments made years ago.

33. All of this was done with the intentional and spiteful purpose of perpetrating maximum damage on EB5AN.

34. Defendants are commonly owned and/or controlled and act in concert and participation with each other and they all participated and/or benefited from the unlawful activities described herein.

35. EB5AN files this action for damages arising from Defendants' defamation, defamation per se, and tortious interference with EB5AN's business relationships, and has fulfilled all conditions precedent, if any, to asserting these claims.

COUNT I
DEFAMATION PER SE

36. EB5AN realleges paragraphs 1-35 as though set forth in full herein.

37. This is an action for defamation per se against all Defendants.

38. With malice and a deliberate intention to harm, Defendants made the Maliciously Defamatory Statements about the Wohali Project and, by direct and intentional implication, EB5AN.

39. The Maliciously Defamatory Statements were widely published to foreign investment agents and brokers, foreign investors, and other EB-5 industry professionals.

40. The Maliciously Defamatory Statements: (a) tend to subject EB5AN to distrust, ridicule, contempt, or disgrace; (b) tend to injure EB5AN in its trade or profession; and (c) attribute to EB5AN conduct, characteristics, or conditions incompatible with the proper exercise of a lawful business, trade, or profession.

41. The Maliciously Defamatory Statements are therefore defamatory per se.

42. None of the Maliciously Defamatory Statements published about EB5AN are protected or privileged.

43. EB5AN has suffered damages as a result of Defendants' misconduct.

44. Upon proffer or other evidentiary showing, EB5AN will seek, in addition to compensatory damages, to plead punitive damages against Defendants.

COUNT II
DEFAMATION

45. EB5AN realleges paragraphs 1-35 as though set forth in full herein.

46. This is an action for defamation against all Defendants.

47. Defendants published the Maliciously Defamatory Statements, which were utterly false, with knowledge, reckless disregard, and/or negligence as to their falsity.

48. The Maliciously Defamatory Statements were widely published to foreign investment agents and brokers, foreign investors, and other EB-5 industry professionals.

49. None of the Maliciously Defamatory Statements published about EB5AN are protected or privileged.

50. EB5AN has suffered significant financial damages as a result of Defendants' misconduct.

51. Upon proffer or other evidentiary showing, EB5AN will seek, in addition to compensatory damages, to plead punitive damages against Defendants.

COUNT III
TORTIOUS INTERFERENCE WITH BUSINESS RELATIONSHIPS

52. EB5AN realleges paragraphs 1-35 as though set forth in full herein.

53. This is an action for tortious interference with business relationships.

54. EB5AN has had business relationships with foreign investment brokers, agents, and investors.

55. Defendants have knowledge of these relationships.

56. By and through the publication of their Maliciously Defamatory Article, Defendants intentionally and unjustifiably interfered with these relationships.

57. As a result, EB5AN has been damaged.

Prayer for Relief

WHEREFORE, as to all causes of action, EB5AN demands:

- a) A Final Judgment finding that Defendants have engaged in defamation per se, defamation, and tortious interference with business relationships;
- b) A permanent injunction prohibiting and restraining Defendants, their agents, servants, employees, attorneys, related companies, and all those persons in active concert or participation with them, from creating, authoring, publishing, promoting, and/or distributing false statements about EB5AN and/or its projects, including the Wohali Project;
- c) An Order requiring Defendants to retract the Maliciously Defamatory Article and Statements and issue an apology, through the same channels, to EB5AN for their wrongful actions;
- d) An award of compensatory, special, and punitive damages against Defendants; and
- e) such other and further relief as this Court deems just and proper.

Jury Demand

EB5AN demands a trial by jury on all issues triable of right on its Complaint.

JOHNSON & MARTIN, P.A.

/s/ Matthew S. Nelles

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Attorneys for EB5AN Plaintiffs

Exhibit

EB5 这样做，钱卡两失

Do EB-5 This Way, and You Lose Both Money and Green Card

对于 EB-5 投资人而言，项目的成功与否与能否顺利拿到绿卡及拿回本金息息相关。

For EB-5 investors, the success of the project is closely tied to whether they can successfully obtain the green card and recover their invested principal.

然后，一个项目从启动到最终满足 I-829 审核条件，几年甚至十几年的时间里，充满着各种不确定。即使最终 I-829 审批通过，顺利拿到的永久绿卡，80W 美金也可能血本无归.....

Then, from the time a project is launched to the time it finally meets the I-829 review requirements, the period of several years—or even more than ten years—is filled with various uncertainties. Even if the I-829 is ultimately approved and the permanent green card is obtained smoothly, the US\$800,000 may still end up being completely lost...

今天，给大家系统性地梳理一下 EB-5 项目中几种常见的爆雷情况。因为新政下申请量过大，很多朋友担心各环节等待流程出现变化，为此团队特意整理了这份《[EB5 递交获批全流程细节（最新版本 2.0）](#)》！如果你需要这份资料，下方[点个关注](#)，【SRC 美投智库】后台发送关键词【[流程](#)】，直接分享给你！

Today, we will systematically sort out several common types of “blow-up” situations in EB-5 projects. Because the number of applications has greatly increased under the RIA, many people are worried that the waiting processes at various stages may change. For this reason, the team has specially prepared this “[EB-5 Filing-to-Approval Full Process Details \(Latest Version 2.0\)](#)”! If you need this material, **follow the account** below and send the keyword **【Process】** to the backend of SRC Investment Think Tank, and it will be shared with you directly!

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Coalville luxury golf community saddled with debt and layoffs, lawsuits say

KPCW | By Connor Thomas
Published July 25, 2025 at 3:10 PM MDT



▶ LISTEN • 2:35



Wohali 就是因为资金出现状况，造成项目停工、解雇大部分员工，项目烂尾爆雷。

Wohali faced financial problems that caused construction to halt and led to the dismissal of most of its employees, ultimately resulting in the project being abandoned and collapsing.

项目烂尾的情况是大家很难预料到的，但是在选择项目初期可以尽力规避：

It is difficult for anyone to predict whether a project will end up unfinished and abandoned, but there are several ways to minimize this risk during the project-selection stage:

·选择 EB-5 资金占比较少、规模适中的项目。规模过大 EB-5 的融资周期和完成度无法确定，项目的烂尾风险就会随之增加；·选择项目已经动工或即将完工的项目，警惕还处在 PPT、地基坑阶段的项目；·了解项目的其他资金到位情况，如果其他资金均已到位，可以保证项目的工程进度，烂尾风险相对较小。

· Choose projects where EB-5 capital represents a smaller share and the overall scale is reasonable. When a project is too large, the EB-5 fundraising timeline and completion certainty become unpredictable, which significantly increases the risk of the project being left unfinished.· Choose projects that have already begun construction or are

close to completion. Be cautious of projects that are still only at the presentation stage or remain in the excavation/foundation phase. Review the status of the project's other funding sources. If other capital has already been secured, the project is more likely to maintain steady construction progress, and the risk of abandonment is comparatively lower.

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诚邀诸位代理洽谈合作

共享项目红利，共赢市场未来



公众号 | SRC美投智库

视频号 | SRC聊美国移民

SRC 亚进六期项目



SRC AJIN FUND VI, LLC

SRC亚进基金六期

亚进汽车部件制造项目

EB-5美国投资移民 / 乡村地区TEA

项目位置	美国佐治亚州Bulloch县 Bruce Yawn Commerce Park商业园 (乡村地区)
EB-5资金	7920万美元 (23%)
总投资	3.12亿美元
投资名额	99
就业创造	2172
投资金额/人	80万美元
投资期限	5+1 年



Southeast Regional Center
东南区域中心

»»»»» 专注乡村地区制造业项目 «««««





AJIN USA美国亚进

现代/起亚汽车

特定车身部件唯一供应商

专注乡村15年 | 新能源汽车制造

与现代/起亚汽车的长期稳定的合作关系

美国亚进是现代/起亚汽车 (世界上最大汽车品牌之一, 全球销量NO.3) 的主要的关键部件独家供应商。

优秀的历史业绩

SRC东南区域中心拥有良好的历史业绩, 保持着100%的I-526和I-829获批率, 并成功归还投资款。

就业已完成

工厂完工已投产, 已创造足够的就业名额, 现在进场每个投资人能分配20个就业名额, 就业盈余达50% (EB-5项目要求每位投资人至少10个就业)。

真抵押担保 (提供UCC备案)

三重担保第一顺位——抵押物和担保函, 均有UCC和法院的备案, 一旦触发, 执行无障碍, 不需要经过法律诉讼。

I-956F已获批

I-956F已获批, 项目已通过移民局初步审核, 投资人进场即可开始审理I-526E申请。

银行已放款

银行资金到位凭证已到位。

Southeast Regional Center, LLC / 东南区域中心

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SRC 东南区域中心

SRC Southeast Regional Center

关注账号，即可收获：EB5 市场最新动态||EB5 暴雷项目拆解||EB5 移民干货||新移民生活||藤校升学规划||签证科普||楼股汇债||实景直播||组团考察||调研白皮书

Southeast Regional Center 成立于 2010 年，总部位于美国亚特兰大市，是 EB5 移民投资者计划下经 USCIS 批准的区域中心。15 年专注美国投资移民，专注乡村，专注制造业，EB5 乡村项目鼻祖。时刻奔走在考察最前沿，为你筛选真正靠谱的润美之路，定期分享 **美国新移民生活约访与各项政策动向的捕捉**，只为让家庭选择更及时，更安心！没有捷径，踏实走好脚下的路，专注坚持，坚持专注，就是我们的信念和行动准则。拒绝完美宣传和自我神化，只是扎根美国本土，有专业的金融和律师团队做支撑，能为大家提供更真实的美国面貌和关键数据！

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Southeast Regional Center Founded in 2010 and headquartered in Atlanta, the Southeast Regional Center is a USCIS-designated regional center under the EB-5 Immigrant Investor Program. For 15 years, we have focused exclusively on U.S. investment immigration—specializing in rural projects, specializing in manufacturing, and widely recognized as an early pioneer of rural EB-5. We are constantly on the ground conducting project due diligence, helping you identify truly reliable paths to immigrate to the United States. We regularly share **firsthand interviews with new immigrants and updates on the latest policy developments**—so that families can make timely and confident decisions! There are no shortcuts in EB-5. Walking steadily, staying focused, is our belief and guiding principle. We avoid exaggerated marketing and self-glorification; instead, we remain deeply rooted in the U.S., supported by professional financial and legal teams, committed to providing you with a realistic view of America and the key data that truly matter!



SRC军规

Southeast Regional Center
项目选筹军规

专注乡村制造业项目的开发

✓ (15年始终如一)

坚持区域中心的独立性

✓ (与客户利益共生)

保证每个项目老板深度参与亲自把关

✓ (20年JP摩根执业)

秉持高度的透明度和真诚

✓ (敢于披露老板住址)

放弃项目的短期高收益

✓ (只看项目的稳定安全性)



行业警醒



你看的是高收益，别人盯得是你的本金

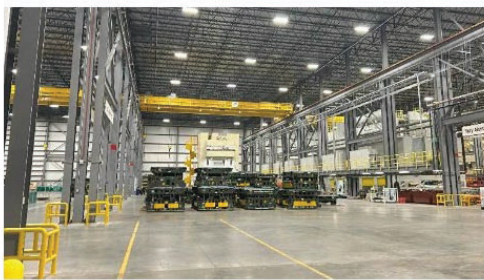
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获批喜报

新政下亚进六期获批恭喜 🎉
最快仅用4个月获批

工厂实拍图



SRC 媒体报道



“随着全球汽车制造业从内燃机发动机（ICE）转向电动汽车（EV）美国电动汽车市场预计将迅速增长东南区域中心（SRC）正在发起倡议，以解决问题为导向，振兴美国制造业SRC的战略着眼于通过吸引外国投资者的资金来支持电动汽车制造厂，为乡村地区的工厂建设和运营创造就业机会，振兴当地经济。”

《今日美国》

公众号 2024年1月31日 SRC美投智库

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行性研究和其他文件等可能会在没有通知的情况下发生变化。以电子形式，比如 PPT、网站、博客、微信或其他媒介传播的信息通常经过删减和归纳以提高可读性；任何财务、税务或法律方面的详细信息需要咨询有资质的专业人士。

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ENGLISH TRANSLATION ONLY

Do EB-5 This Way, and You Lose Both Money and Green Card

For EB-5 investors, the success of the project is closely tied to whether they can successfully obtain the green card and recover their invested principal.

Then, from the time a project is launched to the time it finally meets the I-829 review requirements, the period of several years—or even more than ten years—is filled with various uncertainties. Even if the I-829 is ultimately approved and the permanent green card is obtained smoothly, the US\$800,000 may still end up being completely lost...

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PART.02 Abandoned Projects

These types of projects may perform well in the early stages, but later on they may be unable to continue due to issues such as a broken funding chain, poor management, or construction-permit problems. As a result, they ultimately end up abandoned—and are unable to generate sufficient job creation as required...

In the end, because the project is left abandoned and the number of jobs cannot be met, most applicants cannot obtain the green card, and cannot get back their principal — losing both money and green card.

the first EB-5 project collapse under the RIA — **The Wohali high-end golf resort project in Utah**—was caused for exactly this reason.

Wohali faced financial problems that caused construction to halt and led to the dismissal of most of its employees, ultimately resulting in the project being abandoned and collapsing.

It is difficult for anyone to predict whether a project will end up abandoned, but there are several ways to minimize this risk during the project-selection stage:

· Choose projects where EB-5 capital represents a smaller share and the overall scale is reasonable. When a project is too large, the EB-5 fundraising timeline and completion certainty become unpredictable, which significantly increases the risk of the project being left unfinished.
· Choose projects that have already begun construction or are close to completion. Be cautious of projects that are still only at the presentation stage or remain in the excavation/foundation phase.
· Review the status of the project's other funding sources. If other capital has already been secured, the project is more likely to maintain steady construction progress, and the risk of abandonment is comparatively lower.

◆ Follow the official SRC WeChat account ◆

SRC Southeast Regional Center

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