



**U.S. Citizenship  
and Immigration  
Services**

**Non-Precedent Decision of the  
Administrative Appeals Office**

MATTER OF K-M-C-O-A- LLC

DATE: DEC. 12, 2016

APPEAL OF CALIFORNIA SERVICE CENTER DECISION

PETITION: FORM I-129, PETITION FOR A NONIMMIGRANT WORKER

The Petitioner, a school engaged in the teaching of Israeli martial arts, referred to in the record as Krav Maga, seeks to classify the Beneficiary as performing artist in a culturally unique program. See Immigration and Nationality Act (the Act) section 101(a)(15)(P)(iii), 8 U.S.C. § 1101(a)(15)(P)(iii). The P-3 classification makes visas available to foreign nationals who perform, teach, or coach as artists or entertainers, individually or as part of a group, under a culturally unique program.

The Director, California Service Center, denied the petition, finding that the Petitioner did not establish that the Beneficiary performs as an artist or entertainer and seeks to enter the United States to perform, teach, or coach as a culturally unique artist or entertainer at a culturally unique event or events.

The matter is now before us on appeal. In its appeal, the Petitioner submits a brief and additional material and maintains that the Director erred in determining that the Beneficiary is not eligible for the classification sought.

Upon *de novo* review, we will dismiss the appeal.

**I. LAW**

Section 101(a)(15)(P)(iii) of the Act, provides for classification of a foreign national having a foreign residence which the foreign national has no intention of abandoning who:

- (I) performs as an artist or entertainer, individually or as part of a group, or is an integral part of the performance of such a group, and
- (II) seeks to enter the United States temporarily and solely to perform, teach, or coach as a culturally unique artist or entertainer or with such a group under a commercial or noncommercial program that is culturally unique.

The regulation at 8 C.F.R. § 214.2(p)(3) includes the following definitions:

*Arts* includes fields of creative activity or endeavor such as, but not limited to, fine arts, visual arts, and performing arts.

*Culturally unique* means a style of artistic expression, methodology, or medium which is unique to a particular country, nation, society, class, ethnicity, religion, tribe, or other group of persons.

In addition, the regulation at 8 C.F.R. § 214.2(p)(6)(i) provides:

- (A) A P-3 classification may be accorded to artists or entertainers, individually or as a group, coming to the United States for the purpose of developing, interpreting, representing, coaching, or teaching a unique or traditional ethnic, folk, cultural, musical, theatrical, or artistic performance or presentation.
- (B) The artist or entertainer must be coming to the United States to participate in a cultural event or events which will further the understanding or development of his or her art form. The program may be of a commercial or noncommercial nature.

The regulation at 8 C.F.R. § 214.2(p)(6)(ii) further states that a petition for P-3 classification shall be accompanied by:

- (A) Affidavits, testimonials, or letters from recognized experts attesting to the authenticity of the alien's or group's skills in performing, presenting, coaching, or teaching the unique or traditional art form and giving the credentials of the expert, including the basis of his or her knowledge of the alien's or group's skill, or
- (B) Documentation that the performance of the alien or group is culturally unique, as evidenced by reviews in newspapers, journals, or other published materials; and
- (C) Evidence that all of the performances or presentations will be culturally unique events.

Pursuant to the regulation at 8 C.F.R. § 214.2(p)(2)(ii), all petitions for P classification must be accompanied by:

- (A) The evidence specified in the specific section of this part for the classification;
- (B) Copies of any written contracts between the petitioner and the alien beneficiary or, if there is no written contract, a summary of the terms of the oral agreement under which the alien(s) will be employed;

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- (C) An explanation of the nature of the events or activities, the beginning and ending dates for the events or activities, and a copy of any itinerary for the events or activities; and
- (D) A written consultation from a labor organization.

## II. ANALYSIS

### A. Introduction

The Petitioner filed the Form I-129, Petition for a Nonimmigrant Worker, seeking to employ the Beneficiary as director of training and program development at its martial arts school in the [REDACTED] of Metropolitan [REDACTED] in [REDACTED] Michigan, for a period of one year, at an annual salary of \$45,000. The Petitioner's initial letter in support of the petition indicated that it "provides training in and teaches the principles of Krav Maga: strengthening the body, sharpening the mind, and boosting confidence." It described Krav Maga as a "self-defense" or "combat" system, "culturally unique to the country of Israel where it was developed," having "tactics that emphasize instinctive movements, practical techniques and realistic training scenarios" and basic principles such as "threat neutralization, simultaneous defense and offensive maneuvers and aggression."

The Petitioner described the scope of the proposed work as being to "further the understanding of the Krav Maga art form while teaching the Hebrew language and Israeli cultural norms at the same time," and emphasized that its center "works with Jewish organizations who are seeking Krav Maga classes [to] be taught by an instructor who has lived in Israel and can promote their Hebrew heritage to the class participants." It indicated that the Beneficiary will teach and coach Krav Maga, with duties as follows:

- Plan, develop, and provide training using knowledge of the Krav Maga method
- Evaluate instructor performance
- Evaluate the effectiveness of training programs
- Improve existing programs
- Analyze training needs
- Conduct ongoing technical training and personal development of staff members
- Use the Hebrew language as part of the training sessions

Regarding the Beneficiary's qualifications for the proffered position, the Petitioner noted that he "was enlisted with the [REDACTED] as a [REDACTED] where he . . . trained in the Krav Maga programs offered by the Israeli military," and also worked as a [REDACTED] with the [REDACTED]. It provided the Beneficiary's educational and training certificates, including his certification as an instructor of martial arts in Krav Maga, issued by the [REDACTED] at the [REDACTED] in Israel. The Petitioner also forwarded its job offer to the Beneficiary, signed by him, indicating that he would receive an hourly wage of "\$25.00 per hour no less than 40 hour[s] per week." The Petitioner further

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submitted a copy of a promotional flyer from the [REDACTED] in [REDACTED] for the Petitioner's summer program for teenagers, described as an "Israeli youth experience" providing "Jewish heritage through Israeli Martial Arts," taught in "basic Hebrew."

The Petitioner's response to the Director's request for additional evidence (RFE) explained that the event which the Beneficiary will perform in the United States is "1) an ongoing Krav Maga program conducted in the Hebrew language promoting Jewish heritage and culture, 2) the training of local Krav Maga practitioners . . . to conduct sessions in Hebrew and promote Jewish heritage and culture and 3) design and arrange specialty competitions." The Petitioner stated that "[t]he Beneficiary will initially teach 22 classes between the campus of the [REDACTED] and area temples," but it did not submit an itinerary or any other information describing the nature of such events. Instead, the Petitioner provided copies of its signed contracts with several educational organizations, showing it will conduct two Krav Maga events in 2016. One event at [REDACTED] in Michigan is described as a demonstration of Krav Maga and Capoeira, a Brazilian martial art, at which "the instructor will speak about Israel, Jewish History, and Jewish Culture." The other event at the [REDACTED] is described as a Krav Maga fitness class which will be "combined with Holy Land history and Culture." Within the initial submission and the RFE response the Petitioner also submitted the required consultation letter, several testimonial letters, and a newspaper advertisement.

#### B. Artist or Entertainer

The Director concluded that the Beneficiary is not seeking solely to perform, teach, or coach as a culturally unique artist or entertainer under a commercial or noncommercial program that is culturally unique, pursuant to sections 101(a)(15)(P)(iii)(I) and (II) of the Act. Section 101(a)(15)(P)(iii)(I) of the Act provides P-3 classification to foreign nationals who perform as artists or entertainers, individually or as part of a group, or as an integral part of the performance of such a group. The term "arts" includes "fields of creative activity or endeavor" and includes, but is not limited to, fine arts, visual arts, and performing arts. See 8 C.F.R. § 214.2(p)(3). Therefore, it is necessary to determine whether Krav Maga is a "creative activity or endeavor" such that its practitioners could be considered "artists" according to the regulatory definition of arts.

The Petitioner has emphasized that Krav Maga is an Israeli martial "art" but it did not further elaborate as to how its school is dedicated to the "arts" or how the Beneficiary's services as an instructor are artistic, rather than athletic, in nature, given the context of the terms and conditions of his employment. The Petitioner argues on appeal that "[t]he art of Krav Maga (a martial ART) combined with the utilization of the Hebrew language and infusion of Israeli culture and history elevates the proposed program to a field of creative endeavor." The Petitioner does not elaborate how the fact that foreign instructors teach their sport in their native language makes their services as an instructor artistic. The colloquial use of the word "art" or "arts" to describe the military strategies and athletic endeavors that comprise Krav Maga does not demonstrate that these activities all meet the regulatory definition of art. The Petitioner further avers that we should apply a different definition of the term "arts," discussed in the precedent decision of *Matter of Masters*, 13 I&N Dec. 125 (D.D. 1969), and applied in the case of E21 petitions filed on behalf of athletes. However, it has not explained how that case is

applicable to the issue of the Beneficiary's eligibility for the requested classification. Where, as here, the regulation expressly defines arts, it is that definition that is determinative.

The record establishes that the petitioning school teaches an authentic Krav Maga style of martial arts, but the Petitioner has not explained or demonstrated why the Beneficiary, who will spend the majority of his time coaching and instructing the Petitioner's students and staff, should be deemed an "artist or entertainer" for purposes of this classification. According to the evidence submitted, Krav Maga is a sport. The Beneficiary obtained his certification as a Krav Maga instructor at the Wingate Institute, Israel's national center for physical education and sport science. Krav Maga sporting events are held at the world, continental, and national levels. The classification sought, however, is reserved for culturally unique artists and entertainers, rather than athletes and athletic coaches. Therefore, while Krav Maga is a martial "art," it has not been shown to be strictly a "field of creative activity or endeavor." 8 C.F.R. § 214(p)(3) (definition of arts). It is evident that the Beneficiary will not be providing services *solely* as an artist, performer or entertainer, as required by the plain language of the statute and regulations. As such, the Beneficiary does not meet the requirements for classification as a P-3 artist or entertainer, and the appeal may be dismissed on this basis alone.

### C. Culturally Unique Program

Even assuming, *arguendo*, that the Petitioner had established the Beneficiary is coming to the United States solely to perform services as an artist or entertainer as required by the statute, we concur with the Director's further finding that it did not meet the evidentiary requirements for a petition involving a culturally unique program. Specifically, the regulation at 8 C.F.R. § 214.2(p)(6)(ii) requires that the Petitioner establish that the Beneficiary's performance or art form is culturally unique through the submission of affidavits, testimonials and letters, or through published reviews of his work or other published materials. Regardless of which form of evidence is submitted, the evidence must establish that the Beneficiary will present, perform, teach, or coach a style of artistic expression, methodology, or medium which is unique to a particular country, nation, society, class, ethnicity, religion, tribe, or other group of persons.

In the RFE, the Director requested both forms of evidence, as well as evidence that the Beneficiary is coming to the United States to participate in a cultural event or events that will further the understanding and development of his art form. The Director also requested that the Petitioner provide a more detailed description of his proposed duties, noting that the initial evidence established only "that the Beneficiary is a Krav Maga practitioner." The Director requested additional evidence to establish that the Beneficiary would be participating in cultural events that will further the understanding or development of his claimed art form. We will discuss the Petitioner's evidence below.

#### 1. Affidavits, Testimonials, or Letters from Recognized Experts

The regulation at 8 C.F.R. § 214.2(p)(6)(ii)(A) allows the Petitioner to submit affidavits, testimonials, or letters from recognized experts attesting to the authenticity of the foreign national's or group's skills in performing, presenting, coaching, or teaching the unique or traditional art form. The letters must give

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the credentials of the expert, including the basis of his or her knowledge of the foreign national's or group's skill. The record includes two letters from [REDACTED] Director of [REDACTED] [REDACTED] which [REDACTED] described as a civilian Krav Maga federation which has "branches in more than 20 countries around the world." [REDACTED] summarized the Beneficiary's experience, first as a Krav Maga instructor for a combat operations team in the [REDACTED] then as a close protection officer with the [REDACTED] and finally as an instructor with [REDACTED]. He described the Beneficiary as "one of the best teachers and operators the Krav Maga profession has ever seen."

The Petitioner also submitted a letter from [REDACTED] Director of Programming at [REDACTED] a company conducting tours of Israel for "young professionals and college students" that also provides "educational activities such as Krav Maga," which he described as an art. He confirmed that the Beneficiary was in charge of the company's Krav Maga program from 2011 to 2015," which "gave the participants a simple way to practice Hebrew while learning self-defense." He stated that the Beneficiary's "level of instruction and Krav Maga knowledge are truly magnificent." Upon review, the Petitioner has not established that [REDACTED] an administrator of an Israeli tour company, is a "recognized expert" in the field of Krav Maga, as required by the plain language of the regulation at 8 C.F.R. § 214.2(p)(6)(ii)(A).

Within the RFE response the Petitioner also included a "no objection" labor consultation letter from [REDACTED] of [REDACTED] stating that the organization has "reviewed the Draft I-129 Petition and supporting documentation" and that the Beneficiary "meets the standards of culturally unique (p-3) artists." While the letter satisfies the Petitioner's burden to provide a written consultation from a labor organization pursuant to 8 C.F.R. § 214.2(p)(2)(ii)(D), it does not meet the evidentiary requirement at 8 C.F.R. § 214.2(p)(6)(ii)(A). Consultations are advisory and are not binding on USCIS. See 8 C.F.R. § 214.2(p)(7)(i)(D). Regardless, the letter does not constitute a letter from an expert attesting to the authenticity of the Beneficiary's skills in performing a unique or traditional art form, because it is insufficient to demonstrate how his performances are "unique to a particular country, nation, society, class, ethnicity, religion, tribe, or other group of persons." [REDACTED] does not explain how [REDACTED] reached his conclusion based on the evidence submitted with the petition.

The Director denied the petition, finding that the Petitioner's exhibits do not establish that the Beneficiary seeks to enter the United States to perform, teach, or coach as a culturally unique artist or entertainer at a culturally unique event or events. Upon review, the evidence supports the Director's determination. While the individuals providing testimonial letters attested to the authenticity of the Beneficiary's skills as a martial arts instructor and athlete they did not attest to the authenticity of his skills in performing, presenting, coaching, or teaching a unique or traditional art form. None of the submitted letters attests with specificity to the unique cultural or traditional elements of the Beneficiary's performance of Krav Maga. Finally, although not addressed by the Director, the letters from [REDACTED] and [REDACTED] are unsigned and therefore have limited evidentiary value.

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As a matter of discretion, USCIS may accept expert opinion testimony.<sup>1</sup> USCIS will, however, reject an expert opinion or give it less weight if it is not in accord with other information in the record or if it is in any way questionable. *Matter of Caron International, Inc.*, 19 I&N Dec. 791, 795 (Comm'r 1988). USCIS is ultimately responsible for making the final determination regarding a foreign national's eligibility for the benefit sought; the submission of expert opinion letters is not presumptive evidence of eligibility. *Id.*; see also *Matter of Skirball Cultural Center*, 25 I&N Dec. 799, 805 (AAO 2012) (holding that the petitioner bears the burden of establishing by a preponderance of the evidence that the beneficiaries' artistic expression, while drawing from diverse influences, is unique to an identifiable group of persons with a distinct culture; it is the weight and quality of evidence that establishes whether or not the artistic expression is "culturally unique.")

Here, the letters focus on the origin of the style of martial art and do not specifically describe a cultural aspect to his performance or attest to the cultural authenticity of his performance. The initial support letter averred that the Beneficiary "will teach and coach in [the Petitioner's] culturally unique program that further[s] the understanding of the Krav Maga art form while teaching the Hebrew language and Israeli cultural norms". In response to the RFE, the Petitioner maintained as follows:

[T]he classes to be offered by the Petitioner are raised to a culturally unique level by melding the martial art of Krav Maga with a cultural training component of offering the course in the Hebrew language and incorporating Jewish history into the classes. He blending of the art and the culture is designed to impart the essence of Jewish culture and language to the participants. In order to achieve the goal of the proposed program it is necessary that the program be conducted by an ethnic Jew who has lived in Israel and who speaks Hebrew in order to inspire students to connect with their Jewish heritage and language.

On appeal, the Petitioner emphasizes that it "is a business based upon the art of Krav Maga, a program developed from the official hand to hand combat system of the [redacted] and is "culturally unique to Israel, where it was developed." Upon review, the Petitioner has not articulated or defined precisely what is culturally unique about the Beneficiary's claimed art form or provided sufficient information to allow USCIS to evaluate what, precisely, his culturally unique skills are claimed to entail.

In *Matter of Skirball Cultural Center*, we found sufficient scholars' letters explaining in detail how Klezmer music in general is the music of a specific ethnic group of people, and how the Argentine version, which combines Eastern European roots with native Argentine culture, produces a unique

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<sup>1</sup> Depending on the specificity, detail, and credibility of a letter, USCIS may give the document more or less persuasive weight in a proceeding. The Board of Immigration Appeals (the Board) has held that testimony should not be disregarded simply because it is "self-serving." See, e.g., *Matter of S-A-*, 22 I&N Dec. 1328, 1332 (BIA 2000). The Board also held, however: "We not only encourage, but require the introduction of corroborative testimonial and documentary evidence, where available." *Id.* If testimonial evidence lacks specificity, detail, or credibility, there is a greater need for the petitioner to submit corroborative evidence. *Matter of Y-B-*, 21 I&N Dec. 1136 (BIA 1998).

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Jewish Argentine music. *Id.* at 802-03. The Petitioner bears the burden of establishing by a preponderance of the evidence that the Beneficiary's artistic expression, while drawing from diverse influences, is unique to an identifiable group of persons with a distinct culture. *Matter of Skirball Cultural Center*, 25 I&N Dec. at 805. The averments in the appellate brief do not explain in detail how Krav Maga is a martial art unique to a specific ethnic group of people or nation. While Krav Maga originated in Israel, simply establishing that the Beneficiary is a skilled and well-qualified instructor and athlete trained in Israel is not sufficient to demonstrate his eligibility for this classification. Based on the foregoing, the Petitioner has not satisfied the evidentiary requirement at 8 C.F.R. § 214.2(p)(6)(ii)(A).

2. Documentation that the Performance of the Individual or Group is Culturally Unique

The regulation at 8 C.F.R. § 214.2(p)(6)(ii)(B) allows the Petitioner, in the alternative, to submit documentation that the performance of the foreign national or group is culturally unique, as evidenced by reviews in newspapers, journals, or other published materials. The record does not contain evidence to satisfy this requirement.

Within the response to the NOIR, the Petitioner submitted an advertisement for its center, published in the [REDACTED] confirming that its children's classes include a "language program that uses self-defense training, exciting Jewish history, folklore, and traditions" with the goal of achieving "conversation level Hebrew and a proficient level of self-defense ability." First, as noted by the Director, this document was published in [REDACTED] 2016, after the date the petition was filed on February 2, 2016, and cannot be considered evidence of the Beneficiary's eligibility after that date. The Petitioner must establish eligibility at the time of filing the nonimmigrant visa petition. A visa petition may not be approved at a future date after the petitioner or beneficiary becomes eligible under a new set of facts. *Matter of Michelin Tire Corp.*, 17 I&N Dec. 248 (Reg'l Comm'r 1978). Regardless, the regulation at 8 C.F.R. § 214.2(p)(6)(ii)(B) requires documentation that is specific to the individual beneficiary or group and their individual performance of the claimed culturally unique art form. The Petitioner has not submitted published materials that mention the Beneficiary, and thus it has not submitted evidence that satisfies the plain language of this regulatory criterion.

3. Evidence that All of the Performances or Presentations Will Be Culturally Unique Events

The Director determined that Petitioner had not submitted evidence that all of the Beneficiary's proposed performances or presentations as a martial arts instructor will be culturally unique events pursuant to 8 C.F.R. § 214.2(p)(6)(ii)(C). The evidence of record supports the Director's determination.

First, as previously discussed, the Petitioner did not establish that the Beneficiary's performances are culturally unique by submitting evidence to meet the regulatory requirement at 8 C.F.R. § 214.2(p)(6)(ii)(A) or 8 C.F.R. § 214.2(p)(6)(ii)(B). The Petitioner's broad contentions that Krav Maga is a martial art culturally unique to Israel are insufficient absent documentation that satisfies the evidentiary criterion at 8 C.F.R. § 214.2(p)(6)(ii)(A) or (B). Statements made without supporting documentation are of limited probative value and are not sufficient for the purpose of meeting the



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burden of proof in these proceedings. *Matter of Soffici*, 22 I&N Dec. 158, 165 (Comm'r 1998) (citing *Matter of Treasure Craft of California*, 14 I&N Dec. 190 (Reg'l Comm'r 1972)). For this reason alone, the evidence does not support the petitioner's averment that all of the Beneficiary's performances or presentations would be culturally unique events.

Even assuming, *arguendo*, that the Petitioner had satisfied the evidentiary requirements at 8 C.F.R. § 214.2(p)(6)(ii)(A) or (B), the remaining evidence does not establish that all the Beneficiary's proposed performances or presentations as a martial arts instructor will be culturally unique events. In its RFE response, the Petitioner stated that "[t]he Beneficiary will initially teach 22 classes between the campus of the [redacted] and area temples," but it did not submit an itinerary or other information describing the nature of such events. Instead, the Petitioner submitted copies of signed contracts showing it will conduct two events in 2016, a demonstration of the martial arts of Krav Maga and Capoeira at [redacted] and a Krav Maga fitness class at the [redacted]

Based on the Petitioner's representations and exhibits, it is evident that the Beneficiary will spend the majority of his time teaching martial arts at the petitioning center. The "events" in which he will primarily participate are martial arts classes for school students and staff. The culturally unique aspects of the Beneficiary's instructional responsibilities have not been established in the record. *Matter of Soffici*, 22 I&N Dec. at 165. With respect to the language in which the classes are conducted, there is no legal authority suggesting that all foreign instructors who teach in their native language would qualify for the P-3 classification as "culturally unique" performers.

The Petitioner must establish that the Beneficiary's performances, and the specific artistic or entertainment events for which his services are sought, are in fact unique to a particular country, nation, society, class, ethnicity, religion, tribe or identifiable group of persons with a distinct culture. 8 C.F.R. § 214.2(p)(3). General references to the "culturally unique" Israeli martial "art" of Krav Maga are insufficient to establish how the Beneficiary's performances in the United States would be culturally unique to Israel or Jewish culture. In sum, the Petitioner did not meet the evidentiary requirements for a petition involving a culturally unique program as set forth at 8 C.F.R. § 214.2(p)(6)(ii), and the appeal will be dismissed for this additional reason.

D. Explanation of the Nature of the Events or Activities

Although not addressed by the Director, we conclude that the Petitioner did not submit an adequate explanation of the nature of the events or activities which the Beneficiary will perform in the United States, including their beginning and ending dates, as required at 8 C.F.R. § 214.2(p)(2)(ii)(C). The Petitioner indicated in the Form I-129 that the Beneficiary will be employed as a director of training and program development at its [redacted] Michigan location on a full-time basis. The job offer did not include a detailed description of the nature of the Beneficiary's events or activities. The Petitioner stated that "[t]he Beneficiary will initially teach 22 classes between the campus of the [redacted] and area temples," and submitted contracts showing it will conduct two events in 2016, a demonstration of Krav Maga and Capoeira at [redacted] and a Krav Maga fitness class at the [redacted]. On appeal, the Petitioner avers that "with only one qualified candidate for the position, [the Beneficiary], whose visa eligibility is contingent, it is

difficult to provide specifics as to time, place and dates of classes or create a standard schedule of events.” Considering the lack of explanation and evidence of the Beneficiary’s proposed events and activities in the United States during the requested validity period, we conclude that the Petitioner has not adequately explained the nature of the events or activities including the beginning and ending dates for the events or activities, as required at 8 C.F.R. § 214.2(p)(2)(ii)(C). For this additional reason, the appeal will be dismissed.

### III. CONCLUSION

The Petitioner has not established that the Beneficiary is an “artist or entertainer” and that he is entering the United States solely to perform, teach, or coach under a “program that is culturally unique.” Section 101(a)(15)(P)(iii)(I) and (II) of the Act, 8 U.S.C. § 1101(a)(15)(P)(iii)(I) and (II). In addition, the Petitioner has not established that the Beneficiary’s form of artistic expression and all of his performances or presentations will be events that meet the regulatory definition of the term “culturally unique.” 8 C.F.R. § 214.2(p)(3) and 214.2(p)(6)(ii). Finally, the Petitioner has not submitted an adequate explanation of the nature of the events or activities which the Beneficiary will perform in the United States, including the beginning and ending dates for the events or activities, as required at 8 C.F.R. § 214.2(p)(2)(ii)(C). Accordingly, the Petitioner has not established eligibility for the immigration benefit sought. Section 291 of the Act, 8 U.S.C. § 1361; *Matter of Otiende*, 26 I&N Dec. 127, 128 (BIA 2013).

**ORDER:** The appeal is dismissed.

Cite as *Matter of K-M-C-O-A- LLC*, ID# 97176 (AAO Dec. 12, 2016)