

TWISTEE TREAT
America's Favorite Real Ice Cream



Invest in **Twistee Treat**
Fast Food Restaurants and
Obtain Permanent USA Residency
through the EB-5 Program



Marketed Exclusively by

INVESCOMM

THE U.S. EMBASSY IN WASHINGTON, D.C. IS THE OFFICIAL U.S. EMBASSY FOR THE EB-5 PROGRAM

Intram Investments

Twistee Treat is Intram's flagship EB-5 product ideally suited for EB-5 qualification with investments of US\$500,000.

Intram is known throughout the market for its high quality, well located development projects. Intram has acquired property for development from iconic companies such as The Walt Disney Company and Lockheed Martin, and has developed projects for:

- * Leading retailers including Wal-Mart Stores, Inc., Starbucks Corporation, and Walgreen Co.;
- * Major financial institutions such as Bank of America, SunTrust Bank and Wells Fargo Bank; and
- * National restaurant companies such as T.G.I Friday's, Burger King, Taco Bell and Pizza Hut.

Intram's success is the direct result of execution of this philosophy: Identify an investment opportunity, thoroughly research all the issues affecting, or potentially affecting the investment, control the risk associated with the investment, project an attainable financial result, bring the appropriate capital to the investment, carefully monitor the performance of the investment, and deal with issues before they become problems. With a proven history of successful projects over more than 20 years, Intram is well-suited to identify an opportunity, evaluate the merit of the opportunity, and expertly execute a project to successful completion.

**INTRAM INVESTMENTS INC.**
PARTNERS AND TENANTS











The Trademarks above are the property of their respective owners

References and Endorsements



BILL NELSON
FLORIDA

October 11, 2012

Mr. Rashid Khatib
President/CEO
Intram Investments
5555 South Kirkman Road,
Suite 201
Orlando, Florida 32819

Dear Rashid,

I understand that you are working with "Enterprise Florida" on initiatives for economic development in Central Florida, in addition to pursuing business opportunities with international partners. I congratulate you on these endeavors. Over the 10 years that I have known you, you have shared with me how Intram Investments has worked hard to produce quality development projects throughout Orlando and central Florida.

Florida is a central hub for goods passing in and out of the country. Thousands of jobs in Florida depend on maintaining vibrant commerce and economic relations with international trading partners. I commend "Enterprise Florida" for playing an important role in attracting foreign direct investment to the state and in helping our companies compete in the global market.

Keep up the great work, and I look forward to hearing about your continued success!

Sincerely,



**Senator Bill Nelson with
Mr. Rashid Khatib,
President/CEO Intram Investments**



**Mr Rashid Khatib and Mr Leo Lemos
with City of Orlando Mayor Buddy Dyer**



OFFICE OF
BUDDY DYER
MAYOR

October 15, 2012

To Whom It May Concern:

On behalf of the City of Orlando, I would like to thank you for generously receiving Mr. Rashid Khatib, President of Intram Investments during his upcoming trip to the People's Republic of China.

Mr. Khatib's company, Intram Investments is located in the City of Orlando and has gained regional prominence as a developer and operator of high-profile real estate projects. Intram Investments' growth resulted from strong relationships Mr. Khatib has formed with investors, lending institutions, buyers, sellers, tenants and real estate professionals.

In 2010, Intram Investments purchased the "Twistee Treat" restaurant brand, which serves ice cream, shakes, malts, sundaes and slushes in a family-friendly atmosphere. After purchasing the brand, Intram Investments redesigned the concept and revamped the menu and opened the first new model in the City of Orlando in October 2011. The new location in the City of Orlando represented a capital investment of more than \$500,000 and employed more than 40 residents.

To support Intram Investments' Twistee Treat endeavor, the Orlando City Council unanimously approved a Business Assistance Program Agreement to offset a portion of Twistee Treat's impact fees which are assessed to open a business in the City of Orlando.

Mr. Khatib and Intram Investments' Twistee Treat project was recently selected by the City of Orlando and Enterprise Florida, the state of Florida's economic development agency, as one of approximately 25 projects throughout the state to be presented to Chinese investors who recently visited Orlando for the US-China Investment Week Summit. Mr. Khatib and the Twistee Treat project were well received by the group of investors visiting our community.

As Mayor of Orlando, I am committed to growing the relationship between the People's Republic of China and Central Florida by opening dialogue with Chinese companies interested in exploring business opportunities here and Orlando's businesses interested in investing in China. I am proud to support Mr. Khatib's desire to further this effort by traveling to China to continue the relationships established during US-China Investment Week and to pursue new relationships.

Again, thank you for graciously receiving Mr. Khatib and the Intram Investments team.

Sincerely,

Buddy Dyer
Mayor



• Economy

Florida has a vibrant economy. Its economy is the fastest growing among the top ten states in the USA!

Climate

Florida is one of the warmest places in the United States with year round sunshine.

• No State Income Tax

There is no personal income tax in Florida.

• Tourism

Orlando is the vacation capital of the world. 57 Million people visit Florida each year.

• Shopping

People come from all areas of the world to shop in Orlando!

• Sandy Beaches

Florida has 663 miles of beaches.

• Vacation Lifestyle

Living in Florida is like being on vacation all year long.

• Education

Florida has excellent schools, colleges and Universities.

• Excellent Healthcare

Florida has some of the best medical centers in the USA





Twistee Treat is a fast food company characterized by its quality ice cream, made fresh daily, and its distinctive cone shaped building. The concept originated in Florida in 1983 and enjoys a great reputation with families as the predominate customer.

The building is the key to the concept. The attractive building façade makes a lasting impression on the eyes and in the minds of the customers. A Twistee Treat operation generates substantial foot traffic which helps foster a unique community atmosphere.

Twistee Treat is managed by a qualified group with a management team that has nearly 100 years of restaurant management, real estate, financial and development experience.

Twistee Treat comfortably meets all criteria for investors to qualify for permanent residency in the USA via the EB-5 program.

Intram Investments, the parent company, is implementing a plan to expand the concept to over 1,000 units throughout the United States.

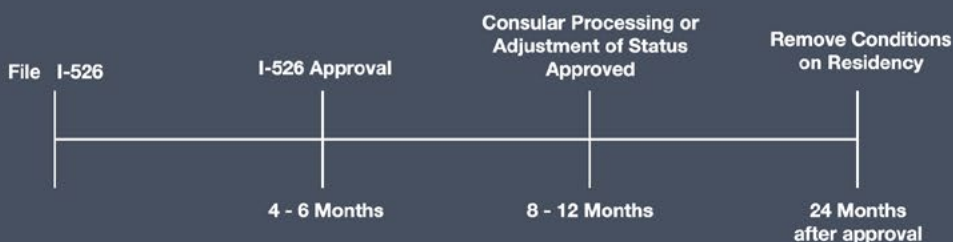
WESH Orlando



2012

BEST ICE CREAM
TWISTEE TREAT

Estimated Timeline



The Case for Twistee Treat

Proven Concept

Twistee Treat as a concept has proven successful over nearly thirty years in a wide variety of demographic profiles.

Attractive Financial Model

Twistee Treat offers a focused limited menu which is highly executable with margins creating an attractive return on investment.

'Edge' on the Competition

The unique Twistee Treat building gives it a substantial advantage over other fast food and frozen desert concepts. This, coupled with a family environment and high quality products at competitive pricing, gives it the 'edge'.

Expansion of Existing Business

Twistee Treat is a proven long standing business whose growth and development is ongoing.

Unlimited Growth Potential

The plan is to open 1000 stores across the USA.

Strong Team

Intram Investments has put together a team of seasoned professionals to lead growth of the brand.

Popularity & Demand

Twistee Treat was recently voted Central Florida's favourite Ice Cream.

Fun Product

Everybody loves Ice Cream! Twistee Treat is simply fun. The cone shaped building brings a smile to everyone's face and provides for a family outing.

Regional Center

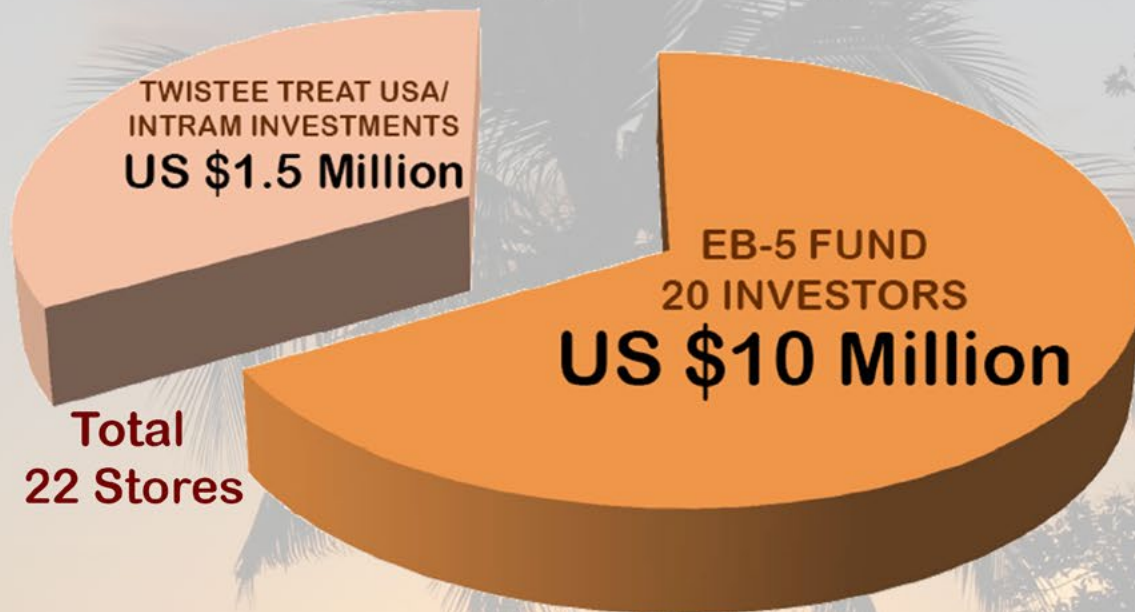
Twistee Treat is an affiliate of Florida EB5 Investments LLC which is a USCIS approved Regional Center authorized for the entire state of Florida. Twistee Treat is also in the process of forming Regional Centers in both Florida and Texas.



Fund Structure

Twistee Treat is a financially viable Investment

A series of US\$10 Million/5 Year Funds will be created.
Each Fund will be supported by US\$1.5 Million equity from the parent company creating an asset base of US\$11.5 Million



Security

Each Investor is secured by all 22 stores in the Fund, not by any single store, thus spreading the risk across the entire \$11.5 Million asset base.

Exit Strategy

Each Fund will loan \$10 Million to a wholly owned affiliate of Twistee Treat USA. The loan will mature in 5 years.

Repayment of the investment will be funded from:

- The \$1.5M equity;
- Profits from the business;
- Refinancing; or
- Sale of the running business

Equity & Collateral

The parent company will provide equity of \$1.5 Million (15% of the fund) for added security of the investors.

The collateral of the Fund is a lien on the assets of each unit constructed with Fund proceeds. This asset base totals US\$11.5 Million.

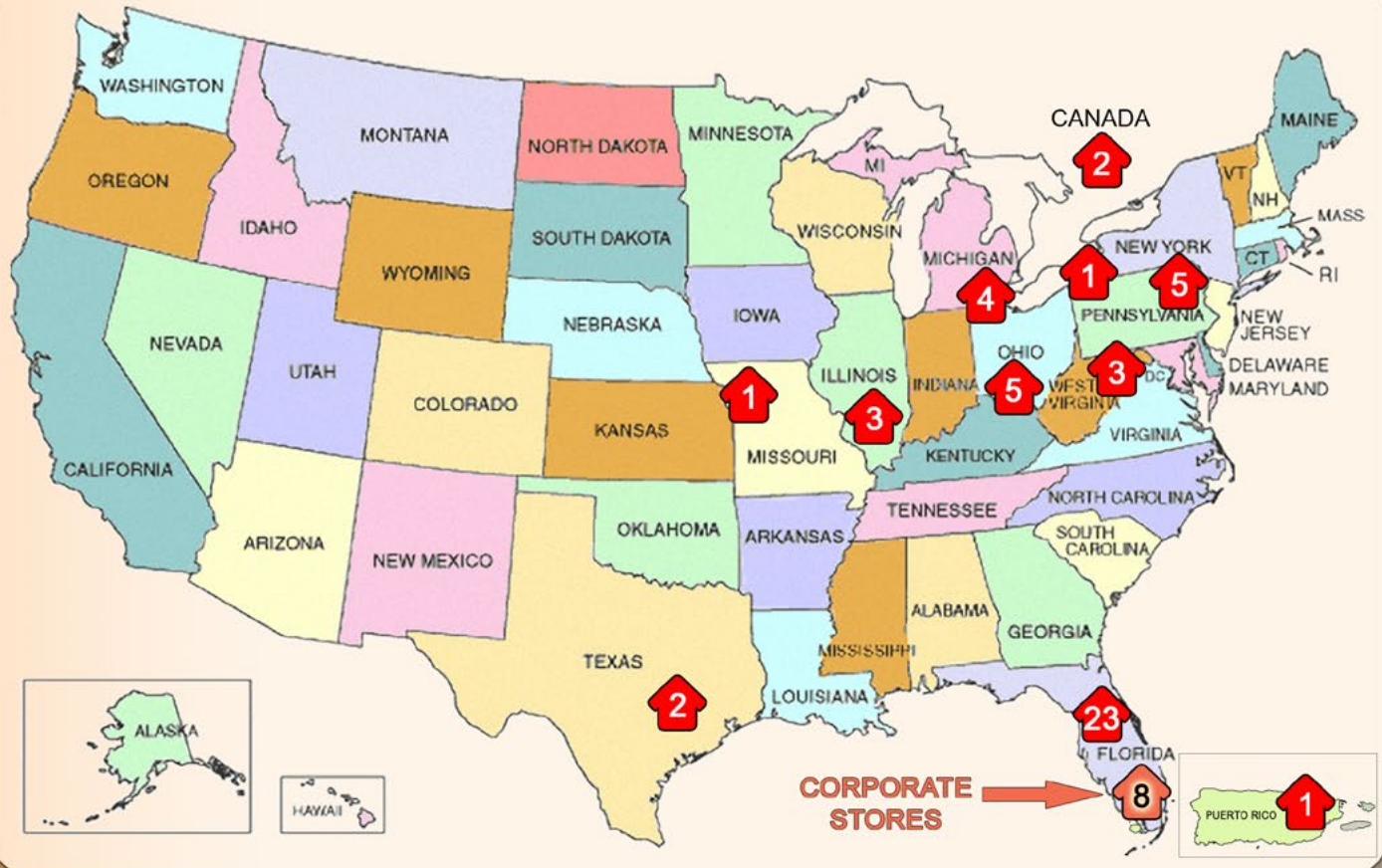
Job Creation

Each store creates *at least* 16 jobs
For 20 stores = 320 jobs
EB-5 Requirement = 200 jobs

FUND CREATES AT LEAST 120 JOBS MORE THAN THE MINIMUM REQUIREMENT AS CONFIRMED IN THE ECONOMIC REPORT

Current Twistee Treat Stores

As of January 2014



Regional Center

Twistee Treat is an affiliate of the statewide Florida EB-5 Investments Regional Center.

U.S. Department of Homeland Security
21009 Avila Road, 2nd Floor
Laguna Niguel, CA 92677

U.S. Citizenship and Immigration Services

July 15, 2010

Walter Cummins, Jr.
Florida EB-5 Investments, LLC
125 Spring Lake Hills Drive
Altamonte Springs, FL 32714

Application: Request for Designation as a Regional Center
Applicant(s): Walter Cummins, Jr.

Re: Florida EB-5 Investments, LLC
File no. W09000940

Pursuant to Section 610 of the Appropriations Act of 1993, on September 8, 2009, Walter Cummins, Jr. submitted a proposal seeking approval and designation by U.S. Citizenship and Immigration Services (USCIS) of the Florida EB-5 Investments, LLC.

Based on its review and analysis of your proposal, and of your responses to the USCIS Request for Evidence, USCIS hereby designates Florida EB-5 Investments, LLC as a Regional Center within the Immigrant Investor Pilot Program and approves the request as described below:

GEOGRAPHIC AREA:

The Florida EB-5 Investments, LLC shall have a geographic scope which includes the entire State of Florida.

FOCUS OF INVESTMENT ACTIVITY:

As depicted in the economic model, the general proposal and the economic analysis, the Regional Center will engage in the following economic activities: Real Estate construction, renovation and management, retail sales, administrative and support, manufacture, maintenance and repair, hotel and hospitality, food services, performing arts and media and information technology. The Regional Center for EB-5 Immigrant purposes shall focus investments into new commercial enterprises in the following target industry economic clusters:

1. NAICS 721 Traveler accommodation.
2. NAICS 722 Food services and drinking places.
3. NAICS 44-45 Retail trade.
4. NAICS 531 Real estate.
5. NAICS 31-33 Manufacturing.
6. NAICS 7111 Performing arts companies.

www.uscis.gov

Florida EB5 Investments LLC
A US Citizenship & Immigration Services
Designated EB5 Visa Pilot Program Regional Center
125 Spring Lake Hills Dr. Altamonte Springs, Florida 32714
www.FloridaEB5Investments.com
FloridaEB5Investments@yahoo.com (407) 497-3653

August 9, 2012

To Whom It May Concern:

We are pleased and proud to welcome Twistee Treat USA as a Business Affiliate in our US Citizenship & Immigration Services designated State-wide Florida EB5 Regional Center. Our Regional Center has at least a dozen business affiliates who are either in the process of submitting I-526s, have submitted I-526s or had them approved (all of our I-526s have been approved; there have been no denials).

Three of our business affiliates have had their business plans approved including business models that are typically much harder to get approved than the business model presented by Twistee Treat.

The Twistee Treat business model is one of the best EB5 Visa business models I have seen, because:

1. It is a "real business", operated by experienced business owners,
2. It is scalable; you can do 1 unit, 100 units or more, and
3. It has operating units in existence today.

Consequently, the Twistee Treat businesses create far more jobs per \$500,000 investor than are required.

The Economic Analysis provided by Michael Evans concludes that by not even counting construction job impact, the 20 units of Twistee Treat create at least 270 jobs, while only 16 \$500,000 investors are needed to raise the money for the EB5 portion of the budgets. Therefore, only 160 jobs are required. So, 110 EXTRA JOBS ARE CREATED.

I suspect that USCIS has been anxiously awaiting a business model that creates more than enough jobs, rather than just squeaking by with the minimum required.

The attached letter from the State of Florida indicates all 20 of the proposed Twistee Treat locations are in Targeted Employment Areas, which qualify for the \$500,000 minimum investment per investor.

Based on the Twistee Treat business model, the business plans for 20 units and the economic report, this is one of the strongest EB5 projects I have seen, and, in my opinion, based on my experience with USCIS and the EB5 Program, a qualified immigrant investor's I-526 submitted with the Twistee Treat business model should be approved.

Feel free to contact me, if you need additional information.

Sincerely,


Walter M. (Marty) Cummins Jr., President
wmc28ashundt@gmail.com

Targeted Employment Areas


Targeted Employment Areas, also known as a TEA designation allow a US\$500,000 investment in an approved Regional Center program. This designation must be determined by a licensed economist and verified, and approved, by the U.S. Government. Twistee Treat has numerous designated TEA sites as shown in the sample confirmations below:




Rashid Khatib, Intram CEO with Charlie Crist, Ex-Governor of Florida



Rick Scott
GOVERNOR



FLORIDA DEPARTMENT of ECONOMIC OPPORTUNITY



Hunting F. Deutsch
EXECUTIVE DIRECTOR

September 17, 2012

Mr. Walter M. Cummins, Jr.
President
Florida EB-5 Investments LLC
125 Spring Lake Hills Drive
Altamonte Springs, Florida 32714

Dear Mr. Cummings:

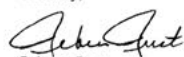
In response to your request, the Labor Market Statistics Center has verified that 8810 New Tampa Boulevard in Hillsborough County, Florida is located in Census tract 110.09. The area consisting of contiguous Census tracts 108.07, 110.03, 110.08, 110.09, and 110.10 qualifies as a high unemployment area under the provisions of the EB-5 Investor Visa Program. The 2011 annual average unemployment rate for the combined area was 14.9 percent, above the qualifying rate of 13.4 for that time period (see enclosed table).

The method used to estimate the unemployment rate in this area is called Census-share disaggregation, a standard U.S. Department of Labor, Bureau of Labor Statistics procedure used to calculate rates for small subcounty areas.

Since this area is located in Tampa-St. Petersburg-Clearwater Metropolitan Statistical Area, it is not considered a rural area. The area does qualify as a Targeted Employment Area however, due to its high unemployment rate.

Please call Susanna Patterson at 850-245-7268, if you have any questions.

Sincerely,


Rebecca Rust
 Director
 Labor Market Statistics Center

RR/to

Enclosure

Florida Department of Economic Opportunity | The Caldwell Building | 107 E. Madison Street | Tallahassee, FL | 32399-4120
 866.FLA.2345 | 850.245.7105 | 850.921.3223 Fax | www.FloridaJobs.org | www.FLDOE.org | www.facebook.com/FLDOE
 An equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers on this document may be reached by persons using TTY/TDD equipment via the Florida Relay Service at 711.

Twistee Treat USA, LLC

5555 S. Kirkman Road, Ste. 201
Orlando, Florida 32819

September 17, 2012

Re: Targeted Economic Area Designations for Pending Sites

To Whom It May Concern:

Twistee Treat USA, LLC has identified fourteen sites within the State of Florida for development of new Twistee Treat units and is in various stages of the process of developing those sites ranging from lease negotiation to construction permitting. While we understand that a Targeted Economic Area ("TEA") Designation Letter is typically provided for the Project at the outset, in circumstances where there are multiple sites instead of one site with multiple investors, the process is inherently more complicated. Moreover, the Florida Labor Market Statistics Center representative in charge of this process has advised us that "requests for TEA designation letters should be one of the last steps in the EB-5 application process to insure that the latest available annual unemployment estimates are used". Consequently, to avoid the possibility that changed information would result in the denial of an investor's I-526 petition, we have elected to wait as long as possible to obtain the final TEA designation letter for each site.

We have obtained confirmation from the State of Florida that each of the following sites is within a TEA and will request formal Designation Letters from the office responsible for providing the same as each site has executed subscription documents.

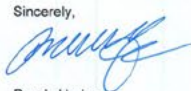
	Address	TEA?	Basis for approval:
1	8810 New Tampa Blvd., Hillsborough County	Yes	Combination of census tracts equaling 14.9% rate
2	905 E Tarpon Ave., Pinellas County	Yes	In census tract with 16.9% rate
3	11933 E Colonial Dr., Orange County	Yes	Combination of census tracts equaling 16.2% rate
4	8890 W Irla Bronson Memorial Hwy., Osceola County	Yes	Combination of census tracts equaling 13.6% rate
5	2703 W Vine St., Osceola County	Yes	In census tract with 15.0% rate
6	4500 Pleasant Hill Rd., Osceola County	Yes	Either same combination as 4 or combination of census tracts equaling 13.4% rate
7	8160 W Irla Bronson Memorial Hwy., Osceola County	Yes	Same as 6
8	2901 Parkway Blvd., Osceola County	Yes	Same as 6 and 7
9	1004 Buenaventura Blvd., Osceola County	Yes	Combination of census tracts equaling 16.5% rate
10	13330 Cortez Blvd., Hernando County	Yes	Entire county qualifies
11	1217 S Missouri Ave., Pinellas County	Yes	Combination of census tracts equaling 13.5% rate
12	12901 N Dale Mabry Hwy., Hillsborough County	Yes	Combination of census tracts equaling 15.0% rate
13	3670 N Atlantic Ave., Brevard County	Yes	In census tract with 13.5% rate
14	3475 Wedgewood Lane, Sumter County	Yes	Rural area

We are happy to provide the backup calculations performed by the State of Florida to show that those site qualified by combinations of census tracts are based on contiguous census tracts if you wish to have this detailed information.

Anyone with questions regarding any of this information should feel free to confirm the same with Susanna Patterson (susanna.patterson@deo.myflorida.com) the State of Florida Labor Market Statistics Center employee who provided the information to us. I have also attached a general memorandum from her explaining the process in the State of Florida for general information.

Thank you for your consideration. If you have any questions, please feel free to contact me.

Sincerely,


Randy Hodge
 Executive Vice President and COO

rhodge@intram.com
 Office: 407-354-2200 ext. 211
 Cell: 407-701-9605



Rashid Khatib, and Leo Lemos with Alan Grayson, Member US House of Representatives

Executive Profiles



Rashid Khatib
President
Intram Investments, Inc.

As the President of Intram Investments, Inc., **Mr. Rashid Khatib** has directed the activities of Intram and its predecessor since 1985. Under his guidance, Intram has grown to be a leading real estate development company in Central Florida. Intram's growth resulted from the strong relationships formed with investors, lending institutions, buyers, sellers, tenants, and real estate professionals.

Mr. Khatib received a Master in Business Administration, with a concentration in Finance, and a Bachelor of Science in Management from the University of Baltimore. In addition, Mr. Khatib has a bachelor degree in Philosophy from the Lebanese University in Beirut.



Zahi Khouri
Chairman
Intram Investments, Inc.

With various investments in the Middle East, **Mr. Khouri** is Chairman of The Coca-Cola Bottling Company and Board Member of the largest investment holding company, Palestine Development & Investment Co. (PADICO).

Prior to Intram, Mr. Khouri was a global activities director and board member of The Olayan Group.

Mr. Khouri received a Master of Science in Engineering from the Stuttgart Institute of Technology in Stuttgart, Germany and a Master of Business Administration from the European Institute of Business Administration (INSEAD) in Fontainebleau, France.



Leo Lemos
President
Invescomm

Mr. Lemos is the President of Invescomm and has expertly operated and controlled Invescomm and its predecessors since the early 1980's. After working on Wall Street for several years, Leo established the business in Florida providing services in Mortgages and Finance, Real Estate, Management, Hospitality and Investment. As a partner of Intram and Twistee Treat, Leo's focus remains on growth as the marketing interface between clients and investors worldwide and the opportunities available in the USA.

Leo is a graduate in Finance from NYU. He is a licenced Real Estate Broker in the State of Florida and a qualified Mortgage Advisor.

KEY PERSONNEL



- **Mr. Randall Hodge**
Executive Vice President & COO
Intram Investments



- **Mr. Corey Balzer**
President
Twistee Treat USA



- **Mr. Daj Mangat**
Vice President
Invescomm



- **Mr. Julián F. Montero**
Attorney at Law
Arnstein & Lehr LLP

- **Mr. Walter Cummins Jr.**
President
Florida EB-5 Investments
Regional Center



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Contact Us

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Orlando, Florida 32819

Tel: +1 (407) 574 2213

Email: info@invescomm.net

This Summary is not a prospectus and shall not constitute an offer to sell, or an invitation to subscribe for, or the solicitation of an offer to buy or subscribe for securities of any company. The Summary is intended to present general information to gauge the interest in certain individuals in participating in a business relationship as described in the Summary. An offer to sell, an invitation to subscribe for, or the solicitation of an offer to buy or subscribe for any security will only be made in formal documents yet to be prepared. The foregoing information is not intended as immigration, investment, legal or tax advice. Prospective investors are urged to consult with their own immigration, investment, legal and tax advisors prior to making any investment.