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ATLANTIC AMERICAN OPPORTUNITIES FUND I, LP

[SAMPLE]

I-526 PETITION

COMPREHENSIVE BUSINESS PLAN

APRIL 2009

(Excerpts)

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Executive Summary

Atlantic American Opportunities Fund, LP, a Delaware Limited Partnership (the "Fund"), seeks to raise $50 to $100 million in equity capital from foreign EB-5 Immigrant Investors through the sale of Limited Partner Interests to invest in job creating commercial enterprises within the state of Florida. The funds will be invested in portfolio companies in which investments generally have also been made by experienced business operators, real estate developers, asset managers and/or equity and debt providers to minimize risk to the investors and to create as many jobs as possible. The Fund will build a diversified portfolio of investments in businesses operating in various industries, including manufacturing, distribution, healthcare, commercial & industrial real estate (hotel/hospitality, retail, industrial, offices, hospitals, senior care facilities, civic buildings, educational facilities, theaters, stadiums, manufacturing facilities); or mixed use projects containing more than one of the above property types. Other commercial enterprises in industries such as alternative energy, forestry and agriculture may also be considered. Fund investments may be made in the form of equity, senior secured loans, mezzanine (subordinated) loans, or in combinations thereof.

A newly formed Regional Center encompassing the state of Florida called Florida Overseas Investment Center ("FOIC" or the "Regional Center") will introduce the Fund to qualified foreign investors who wish to obtain United States permanent residency status through the EB-5 Immigrant Investor Visa Program administered by the United States Citizenship and Immigration Service (USCIS).

Mutual Fund Approach

The Fund works exactly as a mutual fund in that investors will purchase Limited Partnership Interests in the Fund just as one would purchase shares in a mutual fund. The Fund will make non-guaranteed loans and or own a non-guaranteed equity participation in each portfolio company. Investors, both foreign and domestic, will pool their investments and invest in a bundle of diversified job creating enterprises. This mutual fund is the new commercial enterprise created to comply with the EB-5 Visa regulations. Therefore the Fund is the EB-5 qualified project.

Jobs Bank

The Fund has identified and is now evaluating approximately $53 million of investment opportunities located in Targeted Employment Areas ("TEAs"). Based on the sample econometric report prepared by Evans, Carroll & Associates on investments in these industries using both the total dollars invested approach and the direct jobs approach, these investments will result in approximately 3,075 jobs, enough to support nearly $150 million of EB-5 investment (at the $500,000 level).

The Fund intends to build a diversified portfolio of qualified investments to ensure ultimate preservation of EB-5 investor capital as well as creating an abundance of direct and indirect jobs per EB-5 investor by establishing a "Jobs Bank". The Regional Center and the Fund will manage the Jobs Bank to ensure that the job creation requirements and timing for each EB-5 investor are met. Allocation of new direct and indirect jobs in the Job Bank created by each Investor will be maintained through a proprietary software tracking procedure administered by the Regional Center. Job's will be allocated to individual EB-5 investors on a first in first out basis, based on the date an investor's I-526 is approved by the USCIS.

Portfolio Companies

Although the Fund has identified and is evaluating a number of different investment opportunities, any final investment decisions will be made by the Fund's Investment Committee. The final investment portfolio of the Fund will likely contain many of the opportunities shown in this business plan. However, the Investment Manager anticipates receiving numerous new opportunities once the Fund has closed on EB-5 subscriptions, and may substitute existing investment options for better opportunities with respect to ensuring job creation and preservation of investor capital. The Regional Center will have complete specific job creation statistics for each EB-5 investor at the eventual I 829 petition stage.

Immediate Deployment

Funds received from EB-5 investor escrow accounts will be released to the Fund when the investor's I-526 petition is approved. These EB-5 proceeds will be immediately invested into pre-qualified portfolio companies upon receipt by the Fund.

5-year Minimum Investments

The Fund will invest in transactions that its Investment Manager expects can be profitably liquidated, sold or refinanced no sooner than five years after investment. The exit strategy for each portfolio investment will vary. It is anticipated, however, that most investments will take the form of 5-year senior or subordinated (mezzanine) loans and the principal will be repaid to the Fund at maturity of the loan. In the unlikely event that the Fund receives any prepayments from any loans, or an early realization of equity from a sale of one of the underlying portfolio companies, the Fund will immediately (in any event no later than 6 months) reinvest the prepayments into another qualifying investment, thereby creating additional jobs and keeping the investors' money at risk.

Limited Partnership Rights

The Limited Partnership Interests purchased by EB-5 investors will have the same rights and duties as all other Limited Partners as allowed by the Uniform Limited Partnership Act.

Professional Management

The Fund will be managed by Atlantic American Advisors, LLC (the "Investment Manager"), an experienced professional asset management company whose principals have an extensive network of relationships in the State of Florida. With approximately 90 years of combined experience, the principals have strong financial backgrounds, and complementary experience in fund management, private investing, investment banking, commercial and merchant banking, and hands-on business management, as well as turnaround experience. In addition, Atlantic American Corporate Group ("AACG"), an affiliate of the Investment Manager and a FINRA broker dealer founded by the principals, has provided a consistent source of highly attractive investments for other debt lenders and investment groups, executing approximately $1 billion in transactions since 2000.

J. Patrick "Rick" Michaels, Jr. – Founder and Chief Executive Officer of Communications Equity Associates ("CEA") and Founder and Chairman of Atlantic American Corporate Group. Through CEA, Mr. Michaels has completed over 900 transactions in 60 countries, totaling over $45 billion. Mr. Michaels has invested (either directly or through CEA) almost $38 million in 64 transactions over the past 30 years that have yielded proceeds in excess of $131 million, resulting in a 90% annualized IRR.

O. Garwood "Gar" Lippincott – Working for Metropolitan Life's Capital Markets Group, Mr. Lippincott led over $2 billion in financings, had oversight responsibility for half of Met Life's investment portfolio in the Southeast U.S., and oversaw Met Life's LBO partnership with First Boston. In addition, Mr. Lippincott served as Vice President of Structured Finance for Banque Paribas and President of Central Electric Company, where he grew revenue of $15 million and EBITDA of $350,000 to sales of $50 million and EBITDA of $6 million over a seven-year period.

Robert Moreyra – Mr. Moreyra is a founding partner of Atlantic American Corporate Group, where he has been directly involved in a $253 million acquisition, a $215 million debt refinancing, an IPO, corporate divestitures and numerous private placements and debt financings. Mr. Moreyra has held senior investment banking positions at William R. Hough & Co. (since acquired by Dain Rauscher), one of the largest regional investment banks operating in the Southeast, and H.C. Wainwright & Co. In addition, Mr. Moreyra was Chief Executive Officer and part owner of Pardue, Heid, Church, Smith & Waller, an Orlando-based real estate appraisal and consulting firm. As CEO Mr. Moreyra grew the firm from under 20 employees to over 200 employees, with nine offices throughout the Southeast U.S.

Business Mission & Objective

The Fund has five guiding investment principals as its mission:

- Certainty for the investor in required jobs creation;
- Compliance with the EB-5 visa program requirements;
- Safety of principal;
- Market returns; and
- Exit strategies will be structured into the loan/investment.

The Fund intends to make investments in portfolio companies that create jobs in Targeted Employment Areas in the state of Florida. The Investment Manager will vet these projects for suitability for investment by the Fund in compliance with the Regional Center's objectives. These investments will be made across a number of different industries, thereby reducing the risk of being entirely exposed to one industry, location or project. In addition, the investments will be diversified in terms of risk by being composed of senior debt, subordinated debt, and equity. Using a mutual fund approach to the EB-5 Program will reduce the risks associated with more concentrated single-asset projects. The Fund will also co-invest with experienced developers, asset managers and business operators, enabling investments in larger projects. This strategy will produce a greater number of jobs, thus substantially reducing the EB-5 job creation compliance risk.

Investment Focus

The Fund's investment focus will be on companies or projects with the following characteristics:

Strong Management Teams

The Sponsors of the Fund firmly believe that the most important element of any small business is the quality of its management. As such, the Fund will focus on investing in companies with strong management teams. The Investment Managers have 90 years of combined investing experience, including sitting on numerous corporate boards, and all three principals have had experience operating businesses in a variety of industries. This experience in direct operations and board participation will provide understanding in evaluating the strength of the management teams of its prospective investments.

Cash-Flow-Oriented Businesses

The Fund's Investment Managers believe that many traditional commercial lenders currently have a reduced interest in cash flow lending. As a result, many small businesses are having difficulty raising debt (even if they have adequate cash flow to support debt service) unless they have eligible assets to leverage. Although it will seek collateral protection, strong emphasis on cash flow will be instrumental in supporting the Fund's interest and principal repayment.

Well-Positioned Companies

The Fund intends to invest in companies that are leaders in their respective industries. While each may not hold the lion's share of the market, prospective companies should be well positioned with respect to product/service differentiation, pricing, profit margins, and business strategy. In addition, prospective companies should maintain a strong financial position, including a reasonably conservative balance sheet that can support the company through any economic downturn.

Executable Business Plans

The Fund will seek to invest in companies that have carefully planned and executable business plans, based on sound business fundamentals and achievable goals. Financial projections must be based on realistic assumptions and incorporate actual and anticipated revenue prospects and expenses. There should also be an obvious link between the use of proceeds and execution of the company's business plan.

Opportunities for Sustainable Growth

In support of an executable business plan, the Fund's prospective borrowers typically should have a strong indication of opportunities for sustainable growth. Market fundamentals typically should exist that indicate a demand for the company's products or services. Pricing and product/service quality typically should also be positioned to drive revenue growth. Ideal candidates should maintain adequate work backlogs that support the projected short-term level of sales.

Strong Competitive Advantages

The Fund's investment focus also places a very strong emphasis on competitive advantages. Prospective borrowers must possess aspects that differentiate them from their competition. In this respect, companies should have superior product/service offerings, pricing strategies, and profit margins. Companies should have unique business models, or strategies that mitigate risks inherent in their respective industries. Strategic relationships, joint ventures, and recurring revenue streams are also sought-after aspects. In addition, significant barriers to market entry should exist that fend off potential new competition.

Collateral Value

The Fund intends to maximize its security in all financings. In the case of a senior secured transaction, which would usually take the form of equipment financing, the Fund will encumber the specific equipment being financed, as well as have a blanket or springing lien to inventory and receivables. The Fund may also take first trust or subordinated mortgage liens when appropriate.

In situations where there is another lender, or in cases where the Fund invests as a traditional mezzanine lender, it will still look for any assets available to pledge. In addition, the Principals will analyze the collateral position of the senior lender and insist on a second position where sufficient collateral coverage (beyond the senior debt) exists.

Use of U.S. Government Programs

Suncoast Community Partners, LLC (the owner of FOIC) is a Certified Development Entity registered with the U.S. Treasury. This designation allows the Regional Center and the Fund to take advantage of other specialized U.S. Government sponsored financing programs such as the New Markets Tax Credit ("NMTC") program designed to provide funding through U.S. federal tax credits for qualified projects. These tax credits are attractive investment vehicles, particularly to large corporations like Exxon and Chevron, and banks such as Bank of America and Northern Trust Company.

The Principals involved in the Regional Center have in-depth knowledge of how these federal tax credits are structured, as well as existing relationships with tax credit providers. These financing programs may provide additional equity to qualified projects, thereby decreasing risk for the EB-5 investor and increasing value and rates of return to the projects.

The Regional Center is partnering with Enterprise Florida (the state's economic development agency) on the state's New Market Tax Credits (NMTC) application. The state intends to use these tax credits in Targeted Employment Areas in conjunction with investments made by the Fund. This additional economic support from the state to the Fund's investments will further the mutual job creation goals.

Investment Process

The Investment Managers anticipate the Fund will raise between $50 and $100 million in EB-5 investor money. The Fund will invest in Targeted Employment Areas. T Therefore each investor will fund USD $500,000 to an escrow account before the submission of their I-526.

Following the approval of the I-526 petition and release of the funds from escrow, the monies will be received by the Fund, and immediately invested into Portfolio Companies. The Fund has a large pipeline of investments in various stages of evaluation. Given the current credit crisis that has created a shortage of capital to small businesses and real estate projects, the Fund has numerous opportunities to invest in TEAs around the state of Florida.

(This pre-approved business plan in its entirety will be filed with the I-526 Petition and will have attached to it several Portfolio Companies summary business plans that the fund has committed to invest in and to which the EB-5 investment dollars can be traced).