July 6, 2026

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Texas Service Center
6046 N Belt Line Rd STE 140
Irving, TX 75038-0014

BRENO DE CASTRO NOGUEIRA
c/o OTAVIO HAVERROTH SILVA
PO BOX 90487
SAN DIEGO, CA 92169

U.S. Citizenship and Immigration Services

IOE0936800902

RE: BRENO DE CASTRO NOGUEIRA
I-140, Immigrant Petition for Alien Worker

PREMIUM PROCESSING

IMPORTANT: THIS NOTICE CONTAINS YOUR UNIQUE NUMBER. THE ORIGINAL NOTICE MUST BE SUBMITTED WITH THE REQUESTED EVIDENCE.

You are receiving this notice because U.S. Citizenship and Immigration Services (USCIS) requires additional evidence to process your form. Please provide the evidence listed on the attached page(s). Include duplicate copies if you are requesting consular notification.

Your response must be received in this office by October 1, 2026.

Please note that you have been allotted the maximum period allowed for responding to an RFE. The time period for responding cannot be extended. 8 Code of Federal Regulations (8 CFR 103.2(b)(8)(iv). Because many immigration benefits are time sensitive, you are encouraged to respond to this request as early as possible, but no later than the deadline provided above. If you do not respond to this notice within the allotted time, your case may be denied. The regulations do not provide for an extension of time to submit the requested evidence.

You must submit all requested evidence at the same time. If you submit only some of the requested evidence, USCIS will consider your response a request for a decision on the record. 8 CFR 103.2(b)(11).

If you submit a document in any language other than English, the document must be accompanied by a full and **complete** English translation. The translator must certify that the translation is accurate and he or she is competent to translate from that language to English. **If you submit a foreign language translation in response to this request for evidence, you must also include a copy of the foreign language document.**

Processing of your I-140 will resume upon receipt of your response. If you have not heard from USCIS after **45 days of responding**, you may contact the Texas Service Center Premium Processing at email address tsc-premium.processing@uscis.dhs.gov.

Reference is made to this Form I-140, Immigrant Petition for Alien Worker, seeking classification as a member of the professions holding an advanced degree or an alien of exceptional ability and an exemption from the requirement of a job offer, and thus of a labor certification, in the national interest of the United States for BRENO DE CASTRO NOGUEIRA (petitioner and beneficiary), filed on his/her own behalf. The priority date for this petition is May 8, 2026.

In order to establish eligibility, the petitioner must establish that:

- The beneficiary qualifies for the requested classification; and
- An exemption from the requirement of a job offer, and thus of a labor certification, is in the national interest of the United States.

USCIS has designated *Matter of Dhanasar,* 26 I&N Dec. 884 (AAO 2016) ("*Dhanasar*") as a precedent decision. That decision rescinded the earlier precedent decision, *Matter of New York State Dep't of Transp.* ("*NYSDOT*"), 22 I&N Dec. 215 (Acting Assoc. Comm'r 1998), regarding national interest waivers under Section 203(b)(2)(B)(i) of the Immigration and Nationality Act, and introduced a new three-prong test for determining eligibility. Under *Dhanasar*, USCIS may grant a national interest waiver as a matter of discretion if the petitioner demonstrates by a preponderance of the evidence that:

- The beneficiary's proposed endeavor has both substantial merit and national importance;
- The beneficiary is well positioned to advance the proposed endeavor; and
- On balance, it would be beneficial to the United States to waive the requirements of a job offer and thus of a labor certification.

If these three elements are satisfied, USCIS may approve the national interest waiver as a matter of discretion.

The evidence does not establish that all the above-listed eligibility elements have been met. Therefore, USCIS requests additional evidence.

I. Eligibility for the Requested Classification

The first issue in this case is whether the beneficiary established eligibility for the requested classification. The beneficiary must qualify under an advanced degree or exceptional ability criteria to be eligible to waive the job offer requirements for a national interest waiver.

Advanced Degree

The petitioner must establish that the beneficiary holds an advanced degree as of the priority date to qualify as a professional with an advanced degree. The regulations at 8 CFR § 204.5(k)(2) indicate an advanced degree means a United States academic or professional degree of a foreign equivalent degree above that of baccalaureate. The beneficiary can also qualify by having a four-year bachelor's degree plus five years of full-time, progressive, post-baccalaureate experience in the specialty.

The petitioner provided evidence of the following:

- Bachelor of Information Systems from Fluminense Federal University;
- Academic transcript;
- Academic evaluation report; and
- Employment verification letters.

The evidence submitted by the petitioner demonstrates that the beneficiary qualifies as a member of the professions

lding an advanced degree. Therefore, the beneficiary meets eligibility for the requested classification.

The remaining issue is whether the beneficiary established that a waiver of the job offer requirement, and a labor certification, is in the national interest.

II. National Interest Waiver

The next issue in this case is whether the beneficiary warrants an exemption from the requirement of a job offer, and thus of a labor certification, in the national interest of the United States.

Prong I: Substantial Merit & National Importance

The first prong, substantial merit and national importance, focuses on the specific endeavor that the foreign national proposes to undertake. *Matter of Dhanasar*, 26 I&N Dec. 884, 889 (AAO 2016). The endeavor's merit may be demonstrated in a range of areas such as business, entrepreneurialism, science, technology, culture, health, or education. Id.

In support of this requirement, the petitioner provided the following:

- Business plan; and
- Articles and reports.

Based on the record, the proposed endeavor is to establish and lead a a specialized software development and digital automation firm based in Dallas, Texas, with a strategic focus on empowering small and medium-sized enterprises (SMEs), technology startups, and service-based organizations through high-quality, accessible, and scalable digital solutions. The company will focus on custom software development, digital transformation, scalable SaaS architecture, and technical leadership programs, particularly for U.S. organizations seeking to modernize legacy systems and automate complex operational workflows.

Based on the submitted evidence, the petitioner established the proposed endeavor has substantial merit.

To evaluate whether the petitioner's proposed endeavor satisfies the national importance requirement, USCIS must look to evidence documenting the "potential prospective impact" of the proposed endeavor work.

In determining national importance, the relevant question is not the importance of the field, industry, or profession in which the individual will work; instead USCIS must focus on the "the specific endeavor that the foreign national proposes to undertake." See Matter of *Dhanasar*, 26 I&N Dec. at 889. In *Dhanasar*, the AAO noted that they "look for broader implications" of the proposed endeavor and that "[a]n undertaking may have national importance for example, because it has national or even global implications within a particular field." Id. AAO also stated that "[a]n endeavor that has significant potential to employ U.S. workers or has other substantial positive economic effects, particularly in an economically depressed area, for instance, may well be understood to have national importance." Id. at 890.

The petitioner has not provided sufficient evidence to demonstrate that the prospective impact of the proposed endeavor rises to the level of national importance. The business plan for Prikster Tech includes industry and market analyses, a description of the company and its services, financial forecasts and projections, marketing strategies, and anticipated staffing levels. It reflects an intention to employ a modest number of personnel over five years, generate several million dollars in revenue, and pay taxes and payroll consistent with a small but growing technology firm. However, the staffing and revenue projections rely primarily on generalized assumptions about demand for digital transformation services and the petitioner's prior experience, without offering detailed, corroborated evidence showing the basis for these projections or explaining concretely how they will be realized. As such, the projections are of limited probative value. See *Matter of Chawathe*, 25 I&N Dec. 369, 375-76 (AAO 2010).

The petitioner further relies on published employment multipliers to claim indirect and induced job creation, but the

record does not reflect a sufficiently direct connection between the proposed activities and a broad impact attributable to this specific endeavor. Broader implications can reach beyond a proposed endeavor's geographical area and focus, but the relevant inquiry is whether the broader implications apply beyond narrowly conferring the proposed benefits on the business, its employees, and its clients.

While any basic economic activity and offering of goods or services has some potential to positively impact the economy, the record does not show that the claimed ripple effects will, for instance, affect U.S. GDP, tax revenues, or employment levels in a manner commensurate with national importance. In *Matter of Dhanasar*, USCIS explained that an endeavor that has significant potential to employ U.S. workers or to have other substantial positive economic effects, particularly in an economically depressed area, may be considered to have national importance. 26 I&N Dec. 884, 890 (AAO 2016).

Although the petitioner asserts that Prikster Tech will be located in an economically distressed ZIP code and will ultimately employ several dozen workers, he has not demonstrated that these employment levels, taken alone or together with projected revenues and tax payments, represent "substantial positive economic effects" to the area, region, or industry within the meaning of Dhanasar. Simply having the potential to employ U.S. workers, without more, does not satisfy the requirement that such potential be significant. Nor does the record establish that the proposed endeavor will participate in or materially advance any specific government program or initiative tied to that distressed area.

The petitioner submits publications on digital transformation market size, updated employment multipliers, and executive orders concerning government efficiency and regulatory barriers, however, these documents primarily show that the broader fields of software development and digital modernization are important to the U.S. economy and that such activities are generally consistent with federal priorities. They do not, however, identify any broader implications of this particular company's customized software and consulting services or show how its individually tailored products and services would impact the software industry or the U.S. economy more broadly at a level commensurate with national importance. As in Dhanasar, where the petitioner's teaching activities did not rise to national importance because they would not impact the education field more broadly, the record here does not sufficiently show that the proposed endeavor will extend beyond Prikster Tech and its clientele to affect the field of digital transformation or the national economy in a manner rising to the level of national importance.

Overall, the petitioner has not offered sufficient evidence to demonstrate that the petitioner's endeavor stands to impact the regional or national population at a level consistent with having national importance. The petitioner has not shown that the beneficiary particular work would have broader implications for the field. Accordingly, the petitioner has not demonstrated that the endeavor is of national importance and has not met the first prong of the *Dhanasar* framework.

Evidence to establish that the petitioner's proposed endeavor has national importance consists of, but is not limited to, the following:

- A detailed description of the proposed endeavor and why it is of national importance; and
- Documentary evidence that supports the petitioner's statements and establishes the endeavor's national importance. Such evidence must demonstrate the endeavor's potential prospective impact, and may consist of, but is not limited to, evidence showing that the proposed endeavor:
    - Has national or even global implications within a particular field;
    - Has significant potential to employ U.S. workers or has other substantial positive economic effects, particularly in an economically depressed area;
    - Will broadly enhance societal welfare or cultural or artistic enrichment; and
    - Impacts a matter that a government entity has described as having national importance or is the subject of national initiatives.

ong II: Well-Positioned to Advance the Proposed Endeavor

To evaluate whether the beneficiary is well positioned to advance the proposed endeavor USCIS will evaluate submitted evidence.

In support of this requirement, the petitioner provided evidence of the following:

- Academic credentials;
- Thesis publications;
- Specialized certifications;
- Award;
- Memberships;
- Operational steps;
- Financial evidence;
- Reference letters;
- Letter of intent to invest; and
- Other miscellaneous documentation.

The second prong shifts the focus from the proposed endeavor to the foreign national. See *Matter of Dhanasar*, 26 I&N Dec. at 880. In general, research must add information to the pool of knowledge in some way in order to be accepted for publication, presentation, funding, or academic credit; not every individual who has performed original research will be found to be well positioned to advance the proposed research. Rather, USCIS must examine the factors set forth in *Dhanasar* to determine whether, for instance, the individual's progress towards achieving the goals of the proposed research, record of success in similar efforts, or generation of interest among relevant parties supports such a finding. Id. at 890.

The *Dhanasar* decision spelled out several factors which can be considered in determining whether a petitioner or beneficiary is well-positioned to advance the proposed endeavor, including several which are pertinent to entrepreneurial endeavors. These include a record of success in similar efforts, any progress towards achieving the proposed endeavor, and the interest of potential customers, users, investors, or other relevant entities or individuals.

The evidence provided is sufficient to demonstrate that the beneficiary is well positioned to advance the specific proposed endeavor.

Therefore, USCIS can conclude that the beneficiary is well positioned to advance the specific proposed endeavor.

Prong III: On Balance, It Would Be Beneficial to the United States to Waive the Requirements of a Job Offer, and Thus of a Labor Certification

The third prong requires the petitioner to demonstrate that, on balance, it would be beneficial to the United States to waive the requirements of a job offer and thus of a labor certification.

USCIS cannot conclude that the beneficiary offers contributions of such value that, on balance, it would be beneficial to the United States to waive the requirements of a job offer and thus of a labor certification. As discussed above, the evidence establishes that the proposed endeavor has substantial merit, but the petitioner did not establish that the beneficiary's specific proposed endeavor has national importance as required by the first prong of the *Dhanasar* framework. The petitioner has only satisfied the second prong by establishing that the beneficiary is well positioned to advance the proposed endeavor.

Given the failure to establish national importance of the proposed endeavor, the record does not demonstrate that waiving the requirements of a job offer would be beneficial to the United States.

In sum, the petitioner has not established that, on balance, it would be beneficial to the United States to waive the requirements of a job offer and thus of a labor certification.

Please submit evidence to establish that, on balance, it would be beneficial to the United States to waive the requirements of a job offer and thus of a labor certification. This balance was described in *Dhanasar* as on one hand protecting the domestic labor supply through the creation of the labor certification process, while on the other hand recognizing that in certain cases the benefits inherent in the labor certification process can be outweighed by other factors that are also deemed to be in the national interest.

USCIS may evaluate factors including, but not limited to, the following:

- Whether, in light of the nature of the beneficiary's qualifications or proposed endeavor, it would be impractical either for the beneficiary to secure a job offer or for the beneficiary to obtain a labor certification;
- Whether, even assuming that other qualified U.S. workers are available, the United States would still benefit from the beneficiary's contributions;
- Whether the national interest in the beneficiary's contributions is sufficiently urgent to warrant forgoing the labor certification process;
- Whether the petitioner's endeavor may lead to potential creation of jobs; and
- Whether the beneficiary is self-employed in a manner that generally does not adversely affect U.S. workers.

PLACE THE ATTACHED COVERSHEET AND THIS ENTIRE LETTER ON TOP OF YOUR RESPONSE. SUBMISSION OF EVIDENCE WITHOUT THE COVERSHEET AND THIS LETTER WILL DELAY PROCESSING OF YOUR CASE AND MAY RESULT IN A DENIAL.

Sincerely,

Carrie M. Selby
Associate Director, Service Center Operations

Officer: XM1984

PREMIUM PROCESSING
COVERSHEET
PLEASE RETURN THE REQUESTED INFORMATION AND
ALL SUPPORTING DOCUMENTS **WITH**
THIS PAGE ON TOP TO:
USCIS/TSC
ATTN: RFE/NOID/NOIR/NOIT
6046 N BELT LINE RD STE 140
IRVING, TX 75038-0014

Please check the appropriate box regarding if there is a new Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative, additional fees, additional forms, etc. Please place the new Form G-28, additional fees, additional forms directly under this sheet.

Yes, there is:

☐ **A New G-28** ☐ **Additional Fees**
☐ **Additional Forms** ☐ **Other:**

If you have moved, write your current address in the blank area below. Please be sure to write clearly.

(Select appropriate check box)

☐ **Applicant/Beneficiary** ☐ **Petitioner**

New Address:

As required by Section § 265.1 Reporting change of address. "Except for those exempted by section 263(b) of the Act, all aliens in the United States required to register under section 262 of the Act must report each change of address and new address within 10 days of such change in accordance with instructions provided by USCIS."

REQUEST FOR EVIDENCE

I-140 Immigrant Petition for Alien Worker

IOE0936800902

DE CASTRO NOGUEIRA, BRENO
DE CASTRO NOGUEIRA, BRENO

YOUSA LAW FIRM

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Petitioner: **NOGUEIRA, Breno de Castro**
Type of Petition: **I-140, EB-2 National Interest Waiver - Response to Request for Evidence**
Classification Sought: **Immigration and Nationality Act 203(b)(2)(B)**
Case No.: **IOE0936800902**

Forms	Copy of the Request for Evidence (issued July 6, 2026)
Cover Letter	RFE Response Cover Letter and Legal Argument Summary Cover Letter Exhibit List
Enclosure **ELIGIBILITY CRITERIA**	First Prong - National Importance (Legal Argument) Third Prong - Benefit of Waiving the Job Offer and Labor Certification (Legal Argument) Business Plan Supplement (Prikster Tech), including Appendices A - B
Exhibit A **NATIONAL INTEREST WAIVER**	**C.I - First Prong - National Importance: Documented Demand from Prospective Clients:** Letter of Interest, Paisano Fab & Control, LLC (Mr. Randy Croft, Founder and CEO), dated August 13, 2026
Exhibit B	Letter of Interest, Moseley Construction (Mr. John Moseley, owner), dated August 3, 2026
Exhibit C	Letter of Interest, Proteligence Inc. (Mr. Tae Ho, President), dated August 17, 2026
Exhibit D	**C.II - First Prong - National Importance: Government Programs Tied to the Distressed Area:** Correspondence with the Texas Workforce Commission, Skills for Small Business program (July 29 to August 10, 2026), including the response of Ms. Leigh Heath dated August 5, 2026, copying Mr. Seth Green, regional business liaison for the Dallas area
Exhibit E	Texas Workforce Commission Skills for Small Business program page, Frequently Asked Questions, and register of training providers
Exhibit F	Correspondence with Workforce Solutions Greater Dallas (July 29 to August 17, 2026), including the response of Mr. Jose J. Vega dated August 5, 2026, naming Ms. Gina Hodge as the company's direct point of contact
Exhibit G	Correspondence with the City of Dallas Office of Economic Development (July 29 to August 10, 2026), including the response of Mr. Nicholas G. Becerra dated August 5, 2026
Exhibit H	City of Dallas, South Dallas / Fair Park Opportunity Fund Program Statement and program flyer

Exhibit I	**C.III - The Proposed Endeavor:** Prikster Tech company overview

+1 510 714 0100

+1 415 425 2508

PO BOX 90487/
ZIP CODE 92169

September 24, 2026.

VIA USPS

USCIS/TSC (Texas Service Center)

ATTN: RFE/NOID/NOIR/NOIT

6046 N Belt Line Rd, STE 140 Irving, TX 75038-0014

RE: RFE issued on I-140 Immigrant Visa Self-Petition of Mr. Breno de Castro Nogueira

Case # IOE0936800902
Priority Date: May 8, 2026

PREMIUM PROCESSING

Dear Immigration Officer,

We write on behalf of Mr. **Breno de Castro Nogueira** (hereinafter "Mr. Nogueira"), who is represented by our office, in response to the Request for Evidence ("RFE") that U.S. Citizenship and Immigration Services ("USCIS") issued on July 6, 2026. The RFE concerns his Form I-140, Immigrant Petition for Alien Worker, filed under the Employment-Based Second Preference (EB-2) classification as a professional holding an advanced degree, together with a request for a National Interest Waiver ("NIW").

This response is submitted within the period prescribed by USCIS. It includes additional documentary evidence and legal argument addressing each issue that the Service raised.

Mr. Nogueira is an accomplished software engineer with seven years of experience working at platform scale on the scheduling, quoting, invoicing, subscription, and payment systems that United States service businesses rely upon every day. Through his proposed endeavor, he intends to establish and lead Prikster Tech, a software consulting company based in Dallas, Texas.

That company will design, build, and integrate custom software for small and medium-sized service businesses, and it will also deliver workflow automation, systems integration, application security assessment, and technical leadership. As it does so, it will extract and redeploy generalized software components, so that capability once affordable only on a platform scale becomes available to businesses that were never priced to receive it. As shown throughout this response, Mr. Nogueira satisfies the remaining requirements under *Matter of Dhanasar* and therefore qualifies for a National Interest Waiver.

We are grateful for the Service's careful review of the record. We submit this response together with the existing record and substantial additional evidence developed or obtained since the petition was filed, including, among other things, a comprehensive Business Plan Supplement, written responses

from three public bodies, and three independent letters of interest from prospective clients. The response also incorporates and further documents the evidence previously submitted in support of the petition. As discussed below, the complete record, considered as supplemented, speaks directly to the concerns identified in the RFE. It further demonstrates that the proposed endeavor is of national importance and that, on balance, waiving the job offer and labor certification requirements would benefit the United States.

RFE OVERVIEW

The Request for Evidence ("RFE") does not dispute that Mr. Breno de Castro Nogueira qualifies as a member of the professions holding an advanced degree under the EB-2 classification. The Service also acknowledges that the proposed endeavor possesses substantial merit. In addition, the Service has determined that Mr. Nogueira is well positioned to advance the proposed endeavor, thereby satisfying the second prong of *Matter of Dhanasar*. Accordingly, this response does not revisit those issues except where the additional evidence of implementation also bears on whether waiving the job-offer and labor-certification requirements would benefit the United States under the third prong.

Instead, the RFE focuses primarily on whether the proposed endeavor satisfies the national-importance requirement under the first prong of *Matter of Dhanasar*. The Service's concerns also inform its conclusion that the record does not establish that, on balance, waiving the job-offer and labor-certification requirements would benefit the United States under the third prong.

The RFE discusses the following deficiencies, which this response addresses in the same order in which they appear in the RFE:

> (a) that "the staffing and revenue projections rely primarily on generalized assumptions about demand for digital transformation services and the petitioner's prior experience, without offering detailed, corroborated evidence showing the basis for these projections or explaining concretely how they will be realized";
>
> (b) that "the record does not reflect a sufficiently direct connection between the proposed activities and a broad impact attributable to this specific endeavor";
>
> (c) that "the record does not show that the claimed ripple effects will, for instance, affect U.S. GDP, tax revenues, or employment levels in a manner commensurate with national importance";
>
> (d) that "simply having the potential to employ U.S. workers, without more, does not satisfy the requirement that such potential be significant";
>
> (e) that the record does not "establish that the proposed endeavor will participate in or materially advance any specific government program or initiative tied to that distressed area"; and
>
> (f) that "the record here does not sufficiently show that the proposed endeavor will extend beyond Prikster Tech and its clientele to affect the field of digital transformation or the national economy in a manner rising to the level of national importance."

This response addresses each concern in the order the Service presented it. It also incorporates substantial new evidence generated after the original petition was filed. That evidence consists of a

comprehensive Business Plan Supplement, written correspondence from the Texas Workforce Commission, Workforce Solutions Greater Dallas, and the City of Dallas Office of Economic Development, and three independent letters of interest from prospective clients located in different states and operating in different industries. Considered together, these materials confirm that Mr. Nogueira is eligible for a National Interest Waiver under the framework established in *Matter of Dhanasar*.

I. NATIONAL INTEREST WAIVER, FIRST PRONG (NATIONAL IMPORTANCE)

As noted above, the RFE does not dispute that the proposed endeavor possesses substantial merit, and the Service has already found that Mr. Nogueira is well positioned to advance it. The Service does, however, question whether the endeavor satisfies the national importance requirement under *Matter of Dhanasar*. With respect, the additional evidence submitted with this response answers each of the specific concerns raised, and we take them one by one below.

At the outset, it is worth recalling what national importance under *Dhanasar* does and does not require. The Administrative Appeals Office was explicit that the focus of this prong is on the potential prospective impact of the endeavor, and that an undertaking may have national importance even where it is geographically local in its immediate operation. See 26 I&N Dec. 884, 889 (AAO 2016). The AAO cautioned that an endeavor's importance is not measured by the size of the petitioner's business, the number of its immediate clients, or the geographic breadth of its customers, but by whether the work has broader implications for a field, an industry, or the national economy. Id. By contrast, the AAO made clear that an endeavor whose benefits stay confined to a single employer and its own customers, with no ripple beyond that relationship, will ordinarily fall short. The controlling question, then, is not whether Prikster Tech is large, but whether the effects it sets in motion extend beyond the firm and the clients that pay it.

Framed that way, the record here answers the Service's concern directly. The endeavor's national importance rests not on generalized claims about digital transformation, but on three concrete and independently documented dimensions of prospective impact. First, there is a quantified economic footprint of wages, purchasing, taxes, and indirect and induced employment, traced line by line to the filed financial model and to published federal multipliers. Second, there is a workforce-development and job-creation effect concentrated in a federally and locally designated distressed community, delivered through named, standing government programs whose administering officials have responded in writing. Third, there is a diffusion effect, in which capability developed at platform scale is generalized into reusable components and delivered to a class of small and medium-sized United States service businesses that the incumbent platforms were never priced to serve. Each of these dimensions reaches parties who are not, and never become, the company's clients, which is precisely the broader implications that Dhanasar contemplates. With respect, the additional evidence submitted with this response answers each of the specific concerns raised, and we take them one by one below.

(a) Whether the projections rest on corroborated evidence rather than generalized assumptions.

The RFE concludes that the staffing and revenue projections rely mainly on generalized assumptions, without corroborated evidence showing their basis or explaining concretely how they will be realized.

This is the concern the Service frames under *Matter of Chawathe*, and the Supplement meets it on both the demand side and the delivery side.

On the demand side, interest is now documented rather than assumed, as shown in Section 4.1 of the Supplement. Three prospective clients, in different states and different industries, have written on their own initiative. The first is Paisano Fab & Control, LLC, of Denton, Texas, inside the Dallas-Fort Worth metropolitan area where the company will operate. Its founder and chief executive, Mr. Randy Croft, who has thirty years of experience in electrical control panel fabrication, writes that he has reviewed the company's materials, expects to evaluate specialized solutions to improve the efficiency and coordination of his production-related workflows, and, subject to mutually agreeable terms, intends to engage the company once it is operational (Exhibit A).

The second is Moseley Construction, of Crestline, California, whose owner Mr. John Moseley, a licensed contractor since 1984, describes the operational need behind his interest: as his business has grown into apartment remodeling and maintenance, it requires technology-driven support for project coordination, client communication, and operational efficiency (Exhibit B). The third is Proteligence Inc., a specialized software company of Elgin, South Carolina that has operated for over twenty years, whose President, Mr. Tae Ho, intends to engage Prikster Tech for process automation, internal systems integration, and workflow optimization so that his own engineering team can stay focused on its proprietary product (Exhibit C). This last letter is particularly probative, because it comes from an established enterprise in a different state and market segment that was never the founder's client. It bears emphasis that no revenue in the Year One forecast is attributed to any of these three letters.

The significance of these approaches lies in what they describe. A panel fabricator coordinating production runs, a construction firm scheduling crews across multiple properties, and a software company seeking to offload its internal process work are different trades running the same administrative spine: work that must be tracked to completion, communicated to a customer, and invoiced once done. That spine is exactly what the six service lines address, and it is what the founder spent seven years working on a platform scale. Their geographic spread, across Texas, California, and South Carolina, matches the plan's own market definition, which describes small and medium-sized businesses across industries and regions rather than a single trade in a single city.

On methodology, Section 4.2 of the Supplement quantifies where the work must come from, so that the volume is stated rather than asserted. The forecast rests on sixty-six projects across the first year, which is five to six closings a month at an average value of $8,917. The plan assumes one closed project for every four qualified conversations, which requires an average of twenty-two qualified conversations a month across all channels. Because the forecast is deliberately backloaded, that requirement is roughly thirteen conversations a month at the start of the year and about thirty-one by its end, which is the workload of the one full-time sales representative the plan carries from month one, supported by a founder who also sells. The assumption is conservative rather than fragile: even at one closed project in eight, the requirement is forty-four conversations a month, or about two per working day. Critically, the plan does not depend on paid acquisition to generate this volume, budgeting only $6,000 of marketing in Year One; it relies instead on the founder's referral network built over seven years in the service software category, on the dedicated sales representative, and on inbound channels.

On the delivery side, the forecast is expressed as work, hours, and the team that performs it, as set out in Sections 5.0 to 5.2 and Appendices A and B. The Year One revenue of $588,500 is built from sixty-

six pieces of work at prices already stated in the filed sales forecast, requiring 3,185 hours of effort against a billable capacity of 3,328 hours, performed by a team whose composition and hiring dates, from the founder in month one to a senior software engineer in month three, a software developer in month eight, and a project manager in month eleven, are fixed month by month in the plan. The effort figures are deliberately modest, reflecting scoped assignments rather than full enterprise systems, and dividing revenue by hours yields a blended rate of roughly $185 an hour, which independent references bear out: published rate guides place United States providers between $95 and $220 an hour, and senior engineers at established United States agencies between $130 and $190. Assessed month by month, the workload runs ahead of the employed team in only five months, by a total of 183 hours, and each of those hours is expressly accounted for in Appendix B. Four of those months are funded from the direct cost of sales line already budgeted, at a cost that absorbs only 17 percent of that line across the year, and the fifth is month twelve, whose bookings are delivered across the year boundary in the ordinary way, without adding permanent headcount. The projections therefore rest on operational drivers rather than on generalized assumption, which satisfies the standard of proof articulated in *Matter of Chawathe*.

It is worth pausing on why this level of detail answers the specific concern the Service raised. The RFE's objection was not that the numbers were wrong, but that they appeared to float free of any concrete basis, resting on generalized assumptions about demand rather than on evidence. The Supplement responds to that objection on its own terms. Every figure in the forecast now traces back to one of three things the Service can independently check: a documented expression of interest from a named prospective client, a conversion and pipeline assumption stated as a monthly workload that a named salesperson is hired to carry, or a staffing and hours calculation tied to specific hires on specific dates at rates confirmed by published market data. A projection built this way is not a hopeful narrative about a growing market. It is an operating plan whose inputs are visible, and whose reasonableness the Service can test line by line.

The conservatism built into the model reinforces the point. The plan carries a full-time sales representative from month one even though the early-year conversation requirement is modest, budgets only $6,000 for marketing rather than leaning on expensive paid acquisition, and backloads its revenue so that the heaviest delivery falls in the second half of the year when the team is largest. Where the workload briefly runs ahead of the employed team, the plan does not paper over the gap; it identifies the exact five months in which it occurs, quantifies it at 183 hours in total, and funds it from a cost line already in the budget. A forecast that discloses its own pressure points and shows how each is absorbed is the antithesis of the generalized, uncorroborated projection the RFE described.

(b) Whether there is a direct connection between the proposed activities and a broad impact.

The RFE concludes that the record does not reflect a sufficiently direct connection between the proposed activities and a broad impact attributable to this specific endeavor. In our submission, Sections 6.1 to 6.3 of the Supplement trace that connection line by line from the filed financial model, so that the link is documentary rather than inferential.

The company's own non-payroll purchasing is itemized at $1,489,300 over five years, taken directly from the filed Pro Forma Profit and Loss. That figure is not a lump sum but a set of identified lines: $993,673 in contracted technical specialists and vendors engaged on client projects, $201,040 in equipment, hardware, and technical tooling, $160,739 in the Dallas office lease, $44,650 in marketing

and website services, $42,944 in employee education, $17,860 in commercial insurance, $15,000 in accounting and bookkeeping, and $13,394 in utilities and communications.

Every one of those lines is payment to another firm, and the office lease and its utilities are spent in Dallas by definition. Alongside that purchasing, the company pays $8,608,449 in wages over five years to employees hired and working in the United States, at rates benchmarked against published Dallas metropolitan wage data. Purchasing and wages are precisely the two flows that the published employment multiplier measures, the purchasing being the indirect component and the wages, larger by a factor of roughly six, being the induced component. Because each flow is traced to the specific line in the filed model that produces it, the direct connection the Service found lacking is established on the face of the record.

(c) Whether the ripple effects reach GDP, tax revenues, or employment.

The RFE concludes that the record does not show that the claimed ripple effects will affect U.S. GDP, tax revenues, or employment levels in a manner commensurate with national importance. Each effect is now stated as a five-year total traced to the model, as shown in Sections 6.1 to 6.4 and Section 7.0, so that none of them rests on generalized characterization.

On employment, applying the Economic Policy Institute's published multiplier for the computer systems design and related services industry, under which 100 direct jobs support a further 283.4 indirect and induced positions, the company's 28 direct positions support approximately 79 additional positions, roughly 107 in total. On tax revenue, the company is projected to contribute approximately $1.25 million in federal, state, and payroll taxes over five years, rising from $58,101 in Year One to $444,386 in Year Five; these are payments to the United States Treasury and to the State of Texas that would not otherwise be made. On economic activity, the wage and purchasing flows quantified under item (b) above, $8,608,449 and $1,489,300 respectively, are the concrete transactions behind these figures. Beyond the dollar flows, the workforce-development mechanisms described in Section 7.0, which include internal training, billed engineering-mentorship engagements delivered to client organizations at a price small business can afford, and the state-funded Skills for Small Business program, extend the effect into transferable technical skill held by United States workers. Each of the ripple effects the Service asks about is therefore quantified and sourced rather than merely claimed.

The multiplier applied here is neither self-generated nor generic. It is the employment multiplier published by the Economic Policy Institute for NAICS 5415, Computer Systems Design and Related Services, which is the industry classification into which Prikster Tech's activity falls, and under which every 100 direct jobs in the sector support an additional 283.4 indirect and induced positions. Applying a sector-specific, published, federal-data-derived multiplier to a headcount that is itself built up position by position and month by month in the filed staffing plan is the opposite of a generalized assumption. It is a quantified projection, grounded in the company's own model and in an external, verifiable source, exactly as Matter of Chawathe requires. The same discipline governs the tax projection, which is not a round-number estimate but a year-by-year build rising from $58,101 in Year One to $444,386 in Year Five, and it governs the wage and purchasing totals, which are sums of identified line items rather than aggregate characterizations.

(d) Whether the potential to employ U.S. workers is significant.

The RFE observes that simply having the potential to employ U.S. workers, without more, does not satisfy the requirement that such potential be significant. Sections 6.1, 6.4, and 7.0 of the Supplement supply the "more" the Service requires, in four concrete respects.

First, the positions are quantified: headcount grows from 5 employees in Year One to 28 in Year Five, and every one is a full-time W-2 technology or technology-adjacent role, spanning senior software engineers, software developers, project managers, DevOps engineers, user experience designers, digital transformation consultants, and training and development specialists, together with the supporting functions. Second, the recruitment channel into the area is identified: the Dallas County workforce board described in Section 3.2, whose statutory function is to place county residents into work, and which has already named a direct contact for the company. Third, the training mechanism is a named, funded state program: the Skills for Small Business grant, delivered through the county's public college system, which the company will use to fund continuing technical education for the 23 workers it hires after Year One and for those already in place. Fourth, the conditions of the receiving area are stated with the figures that describe them: the company will locate in the South Dallas and Fair Park area within ZIP code 75215, which the Economic Innovation Group's Distressed Communities Index places in the most distressed band in Texas, with a distress score of 92.2 out of 100, where 28.5 percent of residents live in poverty, 27.5 percent of adults are not working, and median income is 41.7 percent of the national figure.

The positions, moreover, are skilled and paid against Dallas metropolitan wage benchmarks rather than against local medians. Taken together, quantified skilled positions, an identified recruitment channel into a designated distressed community, and a named funded training mechanism establish that the employment potential here is significant rather than merely theoretical.

It is important to see why these four features, taken together, supply the more that the Service found missing. The RFE's concern was that a bare potential to employ workers, standing alone, proves little, because almost any business could make the same generic claim. What distinguishes this record is that the employment is not described in the abstract but pinned to specifics at every step. The jobs are counted and named by role. The channel through which local residents will reach those jobs is a named public workforce board that has already assigned the company a point of contact. The means of building those workers' skills is a named, funded state grant with stated per-employee amounts. And the place where this hiring will occur is identified by ZIP code and characterized by the specific distress figures that describe it. Each element is independently verifiable, and each converts a general aspiration to hire into a concrete, documented mechanism for putting people to work.

The location of that employment gives it particular weight. Jobs created in a community that the Economic Innovation Group ranks in the most distressed band in Texas, where more than a quarter of residents live in poverty and more than a quarter of working-age adults are not employed, do more work per position than the same jobs created in a prosperous area. They reach a population that the labor market has largely bypassed, and they do so at Dallas metropolitan wage levels rather than at the depressed local median. Skilled, well-paid, W-2 positions channeled into a designated distressed community through a public recruitment pipeline and sustained by public training funds are significant in exactly the sense Dhanasar contemplates, because their benefit extends past the company to the workers, households, and neighborhood that receive them.

(e) Whether the endeavor participates in a specific government program tied to the distressed

area.

The RFE concludes that the record does not establish that the endeavor will participate in or materially advance any specific government program or initiative tied to the distressed area where the company will operate. Since the RFE was issued, the founder has approached the three public bodies whose programs govern workforce and economic development in that area, and all three have responded in writing, as documented in Section 3.0 of the Business Plan Supplement and in Exhibits A through E.

At the state level, the Texas Workforce Commission administers the Skills for Small Business program under Texas Labor Code Chapter 303 and Title 40, Part 20, Chapter 803 of the Texas Administrative Code. The program funds up to $2,000 of college-delivered training for each new employee and $1,000 for each incumbent employee in a twelve-month period, it has no expiration date, and applications are accepted at any time. On August 5, 2026, Ms. Leigh Heath of the Commission replied to the founder's inquiry, opening with the statement that the program "would be an excellent fit for what you are looking for." She then set out the conditions of participation in detail, including that participating businesses employ fewer than ninety-nine people, that training be for full-time W-2 employees, that all training be delivered by a public community or technical college, that employers pay prevailing wages for the trainees funded, and that the employer hold a Commission tax account. She identified and copied the agency's regional business liaison for the Dallas area, Mr. Seth Green, and offered his assistance with the application. Notably, the company is positioned to satisfy those conditions: its headcount peaks at 28, well below the ninety-nine-employee ceiling; every position is a full-time W-2 role; it carries a dedicated training function and budgets $42,944 of employee education spending from Year Two onward; and its salaries are benchmarked against published Dallas-Fort Worth-Arlington wage data (Exhibit D, with program materials at Exhibit E).

Within the federally authorized workforce system, Workforce Solutions Greater Dallas, the local workforce board established for Dallas County under the Workforce Innovation and Opportunity Act, responded on August 5, 2026, through Mr. Jose J. Vega, Business Solutions Supervisor. He named a direct point of contact for the company, Ms. Gina Hodge, Business Solution Liaison, and provided her office and mobile numbers and email address; on August 10, 2026, the founder confirmed that Ms. Hodge had already reached out. This board operates nine centers across Dallas County and receives federal funding under the Act, and its statutory function is to place county residents into work, which is the mechanism through which the 23 positions the company adds after its first year become positions available to the people who live in the area (Exhibit F).

At the municipal level, the City of Dallas Office of Economic Development responded on August 5, 2026, through Mr. Nicholas G. Becerra, Coordinator. He set out the terms of the South Dallas/Fair Park Opportunity Fund, the standing, capitalized program through which the City pursues job creation and tax base expansion in this specific service area, explaining that the program supports projects which expand the area's tax base or create or retain jobs in the community. As the Supplement is careful to note, the company cites this fund not as a source of its own financing, since it is capitalized by the founder's committed $50,000, but as documentary evidence of what the City of Dallas has formally identified as the economic development priority for the area in which the company will operate, confirmed in writing by the office that administers it (Exhibits G and H).

As Section 3.4 of the Supplement explains, none of these responses is a general statement about the importance of software. Each is a named program, a named official, a written response, and a defined

set of conditions, and together they connect the company to public programs at three levels of government. The company does not present them as eligibility determinations, since eligibility is established at application, once the company is registered and operational. What they establish is that the very objectives the proposed endeavor advances, namely workforce development and job creation in a designated distressed area, are objectives that state, federal, and municipal authorities maintain standing programs to pursue.

More importantly, the connection is operational rather than merely thematic. Prikster intends to use the TWC program to fund qualifying employee training and Workforce Solutions Greater Dallas to assist in recruiting for the 23 positions projected after Year One. Thus, the governmental programs are tied to specific activities contemplated by the endeavor, training and recruitment, rather than cited merely as evidence that governmental authorities consider workforce development important.

This operational tie is what separates the present record from the situation the RFE described. The Service's concern was that a petitioner might invoke government interest in workforce development as a generic theme, without showing that its own endeavor actually plugs into any specific program. Here the endeavor does plug in, and the connection runs in both directions. The company brings something each program is designed to receive: full-time W-2 hiring below the ninety-nine-employee ceiling for the Texas Workforce Commission grant, positions to be filled by county residents for Workforce Solutions Greater Dallas, and job creation and tax-base expansion in the exact service area targeted by the City of Dallas Opportunity Fund. In return, each program supplies something the endeavor will actually use, whether training funds, recruitment assistance, or confirmation of a municipal economic-development priority. The fit is not rhetorical; it is a matching of the company's concrete activities to the stated purposes of standing public programs.

That three levels of government, state, federal, and municipal, each responded in writing through a named official within the same short window underscores that these are live programs actively engaging with the company, not statutory references pulled from a website. A regional business liaison was identified and copied at the state level, a dedicated business-solutions contact reached out at the local workforce level, and a coordinator set out the terms of the municipal fund at the city level. Correspondence of this kind, naming officials, describing conditions, and offering assistance with applications, is precisely the sort of specific, verifiable evidence the Service asked for when it questioned whether the endeavor would participate in or materially advance any specific government program tied to the distressed area.

(f) Whether the endeavor extends beyond Prikster Tech and its clientele.

The RFE concludes that the record does not sufficiently show that the endeavor will reach beyond Prikster Tech and its own clientele to affect the field or the national economy at a level rising to national importance. The record answers this concern in two connected ways: first, through the operating model set out in Section 2.0 of the Business Plan Supplement, which carries each engagement's output past the client that commissioned it; and second, and more decisively, through the chain of economic effects documented in Sections 6.0 and 7.0 of the Supplement, which fall on parties who are not, and never become, the company's clients.

Under that operating model, delivery and reuse feed one another. The company designs, builds, and integrates software for a named client under a defined scope, and each assignment yields generalized components, including subscription and billing logic, scheduling and dispatch modules, invoicing and payment flows, accounting connectors, and integration adapters. As Section 2.1 explains, the client's agreements assign the client ownership of its own configuration, data, and business logic, while Prikster Tech retains the generalized components and the right to redeploy them for other clients, so that a module built once is offered to the next client at a materially lower build cost. Drawn from workflows the founder spent seven years developing at platform scale, these components let the company bring to small and medium-sized service businesses capability that the very platforms he helped build were never priced to serve.

Standing alone, that reuse would still operate largely within the company's own clientele. What carries the endeavor decisively beyond that clientele is the broader set of economic effects addressed under items (b) and (c) above and documented in Sections 6.0 and 7.0 of the Supplement, effects that fall on third parties rather than on the businesses Prikster Tech serves. These include job creation, payroll spending, procurement from outside suppliers, vendors, and subcontracted specialists, workforce training, and the indirect and induced economic activity that follows. Concretely, the model commits $1,489,300 in five-year purchasing to contracted specialists, equipment vendors, a Dallas landlord, insurers, and other outside firms; $8,608,449 in wages to United States workers and the households whose spending sustains roughly 79 indirect and induced positions beyond the company's own 28; and skilled employment recruited through the Dallas County workforce board and trained through the state-funded Skills for Small Business program, for residents of the distressed South Dallas and Fair Park community.

The distinction the Service drew, between an endeavor that benefits only Prikster Tech and its clientele and one that rises to national importance, is therefore the very distinction the record is built to satisfy. The reuse model carries each engagement's output past the client that commissioned it, extending to a class of underserved businesses capability formerly available only at platform scale. But even setting that diffusion effect aside, the endeavor's economic and workforce effects fall decisively outside the client relationship: on independent suppliers and subcontractors, on United States workers and the households their wages sustain, on the public treasuries that receive its taxes, and on the residents of a designated distressed community recruited and trained through standing government programs. None of those beneficiaries is a client of Prikster Tech. That external reach, quantified, sourced, and traced to the filed model, is what elevates the endeavor from a locally operating consultancy to an undertaking of national importance within the meaning of Matter of Dhanasar.

The endeavor therefore does not end at the company's client list. Its effects reach a class of underserved United States businesses, the outside firms and workers who supply and staff the company, and a designated distressed community, which are precisely the broader impacts contemplated under Matter of Dhanasar.

When the updated Business Plan Supplement is considered together with the correspondence from three levels of government, the three independent letters of interest, and the operational and financial evidence traced line by line from the filed model, the record establishes that the proposed endeavor has prospective implications reaching well beyond the business, its employees, and its immediate clients. Its anticipated effects on a class of underserved United States businesses, on workforce development in

a designated distressed area, and on employment, purchasing, and tax contributions are precisely the type of broader impacts contemplated under *Matter of Dhanasar*. The endeavor therefore satisfies the national importance requirement, and it does so by a preponderance of the evidence as required under *Matter of Chawathe*.

II. THIRD PRONG, ON BALANCE, IT WOULD BE BENEFICIAL TO THE UNITED STATES TO WAIVE THE JOB OFFER AND LABOR CERTIFICATION REQUIREMENTS

The RFE's conclusion on the third prong followed from its concern about national importance. Because the updated record establishes the national importance of the proposed endeavor under the first prong, and because the Service has already found that Mr. Nogueira is well positioned to advance it under the second prong, the balancing analysis under *Matter of Dhanasar* now resolves in his favor. We address each factor in turn.

Before turning to the individual factors, it is worth noting how the balancing test operates once the first two prongs are met. Matter of Dhanasar frames the third prong as a weighing exercise: the adjudicator asks whether, given the national importance of the endeavor and the beneficiary's ability to advance it, it would on balance benefit the United States to dispense with the job offer and labor certification that the statute would otherwise require. The inquiry is comparative. On one side sit the benefits the country stands to gain from allowing the endeavor to proceed unencumbered; on the other sit whatever protective purposes the labor certification requirement would still serve in the particular case. Here, as the factors below show, the benefits are concrete and time-sensitive while the protective purpose is essentially absent, and the balance therefore tips decisively in Mr. Nogueira's favor.

a. Whether it would be impractical for the foreign national to obtain a traditional job offer, or for an employer to pursue labor certification, given the nature of the proposed endeavor.

The proposed endeavor is fundamentally entrepreneurial. Mr. Nogueira is not seeking authorization to fill an existing position with a U.S. employer. He proposes to found, own, and manage Prikster Tech, a company that will itself employ software engineers and supporting staff, establish operational systems, and develop and redeploy reusable software components. Section 5.3 of the Business Plan Supplement confirms that he will be the founder and owner-manager of the company, and self-employed in that capacity.

The labor certification process is designed to test the availability of qualified U.S. workers for an existing position offered by an employer. It is ill-suited to a venture that does not occupy an existing position but instead creates new ones, growing from 5 employees to 28 over the forecast period. There is, quite simply, no employer to sponsor the beneficiary and no established position against which the domestic labor market could be tested, because the beneficiary is the person who will create the positions. Requiring labor certification in these circumstances would therefore be impractical given the entrepreneurial nature of the endeavor.

The mismatch is structural rather than incidental. Labor certification presupposes a triangle: an employer with an open position, a beneficiary who would fill it, and a domestic labor market that can be tested to see whether a qualified U.S. worker is available for that same position. In this endeavor two of the three corners do not exist. There is no separate employer, because Mr. Nogueira is the founder

and owner-manager who will create the company. And there is no fixed position to test, because the endeavor's entire purpose is to bring new positions into being, growing the workforce from five to twenty-eight over the forecast period. Asking whether a U.S. worker is available to fill the founder's role would be asking the wrong question, since the value here lies not in occupying a slot but in creating the enterprise that generates the slots in the first place.

b. Whether the United States would continue to benefit from the foreign national's contributions even if other qualified workers are theoretically available.

Even assuming that other qualified software engineers are available within the United States, the benefits expected from this endeavor do not arise from generic software work that any competent practitioner could perform. They arise from Mr. Nogueira's specific combination of qualifications. He spent seven years working at platform scale on the precise scheduling, quoting, invoicing, subscription, and payment workflows that the company's six service lines address, and from that experience comes his ability to take patterns already proven at platform scale and reimplement them, through a retained and reusable component library, for the small and medium-sized businesses that are too small to buy or build them.

The proposed endeavor has been designed around this experience rather than existing independently of it. Its distinctive benefit, extending capability to a class of underserved businesses and consolidating it into a redeployable platform, is not interchangeable with the routine output of another practitioner filling a traditional position. It is the founder's particular history with these workflows, at scale, that makes the reusable-component model credible in the first place. The United States would therefore continue to benefit specifically from Mr. Nogueira's contributions, and that benefit would not be replicated simply by the availability of other engineers in the labor market.

c. Whether the national interest in the foreign national's contributions is sufficiently urgent or substantial to justify waiving the labor certification requirement.

Two features of the record make the national interest here both substantial and time sensitive.

First, the endeavor is no longer conceptual, as Section 5.3 of the Business Plan Supplement makes clear; it is actively being assembled. The company's brand, domain, corporate email, and company overview materials are already in place, and they were used in the correspondence with the three public bodies. The founder has obtained three written expressions of interest from prospective clients. He has received written responses from all three public agencies whose programs the company expects to qualify for, has been given a direct point of contact by one and the named regional liaison for the Dallas area by another, and the $50,000 required to open, consisting of $18,000 in startup expenses and $32,000 in working capital, is committed by the founder and evidenced in the financial documentation already on file.

Second, the specific benefit the endeavor delivers, new employment created by a newly formed firm, is precisely the category of economic activity that carries outsized weight in the national interest. The point is not merely that job creation is desirable in the abstract. Recent federal data confirm that new and young firms are the disproportionate source of net job creation in the United States. Analyzing the U.S. Bureau of Labor Statistics Business Employment Dynamics program, the Bureau reported that in 2019 there were more than 420,000 startup firms responsible for almost 1.7 million job gains, and it

found that startups drove the great majority of the year's employment growth while the oldest firms shed jobs. As the Bureau put it:

> "The startup firms of less than 1 year old had 1 percent of total employment but contributed 90 percent of the employment growth. Firms in business 10 years or more lost jobs in 2019."1

That pattern has continued in the most recent reporting. In the fourth quarter of 2025, opening establishments alone added 1.6 million jobs, and the Bureau recorded 338,000 establishment births accounting for roughly 1 million jobs in that quarter.2 A newly formed, job-creating firm such as Prikster Tech therefore sits squarely within the class of businesses that federal data identify as the engine of American employment growth, rather than within the mature-firm category where net job creation is flat or negative.

Against that interest, the equities favoring the labor certification requirement are absent. The requirement exists to protect the domestic workforce by testing whether a U.S. worker would be displaced by an offered position. Here there is no incumbent position and no worker to displace, because the beneficiary is the person who will create the positions. Requiring certification in this setting would not advance its protective purpose. It would only delay an initiative already moving toward implementation, one designed to create skilled W-2 employment, to fund workforce training through a named state program, and to generate economic activity in a designated distressed community where 28.5 percent of residents live in poverty. Deferring that hiring, training, and capital deployment to run a process that does not fit the endeavor's structure would impose real cost with no offsetting protection to U.S. workers. Under the balancing framework of Matter of Dhanasar, the evidence establishes by a preponderance of the evidence, the standard confirmed in Matter of Chawathe, that on balance it would benefit the United States to waive the job offer and labor certification requirements. The third prong is therefore satisfied.

Viewed as a whole, then, the third-prong balance is not a close call. On one side of the scale is an endeavor already in motion, backed by committed capital, documented client interest, and written engagement from three levels of government, that will create skilled W-2 employment, fund workforce training through a named state program, and direct economic activity into a designated distressed community, all within the category of new-firm job creation that federal data identify as the primary engine of U.S. employment growth. On the other side is a certification requirement that, in this setting, would protect no identifiable worker and serve no purpose the statute intended, while imposing months of delay on precisely the activity the national interest favors. When the benefits are this concrete and the countervailing interest this thin, the balance can only come out one way.

III. FINAL CONSIDERATIONS

For the reasons set out above, we request that USCIS grant a favorable adjudication of Mr. Breno de Castro Nogueira's Form I-140 petition under the EB-2 Advanced Degree classification with a National Interest Waiver.

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1 Akbar Sadeghi, Business Employment Dynamics by Age and Size of Firms, Spotlight on Statistics (U.S. Bureau of Labor Statistics, Jan. 2022).

2 U.S. Bureau of Labor Statistics, Business Employment Dynamics Summary, Fourth Quarter 2025 (rel. July 29, 2026).

The Service has already determined that Mr. Nogueira qualifies for classification as a member of the professions holding an advanced degree, that his proposed endeavor possesses substantial merit, and, under the second prong of *Matter of Dhanasar*, that he is well positioned to advance it. That second-prong determination is not in dispute and remains fully satisfied. This response therefore addresses the remaining concerns identified in the RFE by providing extensive additional evidence. That evidence demonstrates the national importance of the proposed endeavor, and it shows that, on balance, waiving the requirements of a job offer and labor certification would benefit the United States.

In summary:

> **Prong One (National Importance):** The updated record establishes, through the Business Plan Supplement and its supporting exhibits, that the endeavor generates effects that transcend Prikster Tech and its clientele, including job creation, payroll expenditures, purchases from suppliers and outsourced service providers, workforce training, and associated indirect and induced economic activity. It connects to specific government programs at the state, federal, and municipal levels, each confirmed in writing by a named official. It rests on projections tied to documented demand and to work, hours, and staffing traced month by month. And it generates measurable economic effects, including 28 direct and approximately 79 indirect and induced positions, $8,608,449 in wages and $1,489,300 in purchasing over five years, and approximately $1.25 million in taxes, located in a designated distressed community and recruited and trained through named public programs. These effects satisfy the national importance requirement under *Matter of Dhanasar*.
>
> **Prong Three (Benefit of Waiving the Labor Certification Requirement):** The updated evidence establishes that the endeavor is fundamentally entrepreneurial and falls outside the traditional employment model that labor certification contemplates. It shows that the United States will continue to benefit from Mr. Nogueira's distinctive combination of platform-scale experience and reusable-component methodology, even if other qualified workers are theoretically available. And it shows that requiring labor certification would only delay an initiative already progressing toward implementation and serving a designated distressed area. On balance, waiving the requirements benefits the United States.

The evidence now before the Service presents a substantially expanded and strengthened record that addresses every concern identified in the RFE. Considered as a whole, the record establishes by a preponderance of the evidence that Mr. Nogueira fully satisfies each of the remaining requirements under *Matter of Dhanasar* and therefore qualifies for a National Interest Waiver.

Should the Service require any additional information or documentation, we remain available to provide promptly whatever may assist in the adjudication of this petition.

Respectfully submitted,



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Exhibit list

Exhibits:	Pages:
Enclosure - Business Plan Supplement (Prikster Tech), including Appendices A - B	
Business Plan Supplement	1-24
Exhibit A - C.I - First Prong - National Importance: Documented Demand from Prospective Clients: Letter of Interest, Paisano Fab & Control, LLC (Mr. Randy Croft, Founder and CEO), dated August 13, 2026	
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Exhibit B - Letter of Interest, Moseley Construction (Mr. John Moseley, owner), dated August 3, 2026	
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Exhibit C - Letter of Interest, Proteligence Inc. (Mr. Tae Ho, President), dated August 17, 2026	
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Exhibit D - C.II - First Prong - National Importance: Government Programs Tied to the Distressed Area:	
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Exhibit E - Texas Workforce Commission Skills for Small Business program page, Frequently Asked Questions, and register of training providers	
TWS Program page and FAQ	32-47
Exhibit F - Correspondence with the Texas Workforce Commission, Skills for Small Business program (July 29 to August 10, 2026), including the response of Ms. Leigh Heath dated August 5, 2026, copying Mr. Seth Green, regional business liaison for the Dallas area	

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Exhibit G - Correspondence with the City of Dallas Office of Economic Development (July 29 to August 10, 2026), including the response of Mr. Nicholas G. Becerra dated August 5, 2026

City of Dallas Office of Economic Development Correspondence 56-57

Exhibit H - City of Dallas, South Dallas / Fair Park Opportunity Fund Program Statement and program flyer

South Dallas Fair Park Opportunity Program Flyer and Statement 58-64

Exhibit I - C.III - The Proposed Endeavor:

Prikster Tech Overview 65

Enclosure - Business Plan Supplement (Prikster Tech), including Appendices A - B

Prikster Tech
RFE Business Plan Supplement

Petitioner / Beneficiary: Breno de Castro Nogueira
Petition: Form I-140, Immigrant Petition for Alien Worker
Classification: EB-2, National Interest Waiver

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1.0 Purpose of this document

This document accompanies and clarifies the business plan previously submitted for Prikster Tech. Its purpose is to answer the question raised in the Request for Evidence dated July 6, 2026, and to place on the record the documentary evidence gathered since it was issued.

The table below summarizes each concern identified in the Request for Evidence, the specific response provided by this supplement, and the corresponding sections and exhibits where the supporting evidence can be found.

Concern raised in the Request for Evidence, in the officer's words	How this supplement responds	Where it is addressed
"the record here does not sufficiently show that the proposed endeavor will extend beyond Prikster Tech and its clientele to affect the field of digital transformation or the national economy in a manner rising to the level of national importance."	The operating model is set out in two parts: work delivered for named clients, and the generalized components extracted from that work, which the company retains and redeploys, so that what is built once is built for many businesses that never contracted for it	Section 2.0
"Nor does the record establish that the proposed endeavor will participate in or materially advance any specific government program or initiative tied to that distressed area."	Three public bodies have responded in writing. The Texas Workforce Commission set out the conditions of participation in its Skills for Small Business program and identified its regional business liaison for the Dallas area. Workforce Solutions Greater Dallas named a direct point of contact for the company, who has made contact. The City of Dallas Office of Economic Development set out the terms on which its program supports job creation in the service area	Section 3.0; Exhibits A to E
"the staffing and revenue projections rely primarily on generalized assumptions about demand for digital transformation services and the petitioner's prior experience, without offering detailed, corroborated evidence showing the basis for these projections or explaining concretely how they will be realized."	Demand is evidenced by written approaches from three prospective clients, one of them inside the Dallas-Fort Worth metropolitan area, and by the channels and volumes the plan actually depends on. Delivery is set out as work, hours, and the team that performs it, month by month, against the hiring dates fixed in the filed plan	Sections 4.0 and 5.0; Appendices A and B
"the record does not reflect a sufficiently direct connection between the proposed activities and a broad impact attributable to this specific endeavor."	The company's own purchasing is itemized at $1,489,300 over five years, line by line from the filed financial model, alongside $8,608,449 in wages. These are the two flows the published multiplier measures	Section 6.2
"the record does not show that the claimed ripple effects will, for instance,	Wages, purchasing, and federal, state and payroll tax payments are each	Sections 6.1 to 6.3

Concern raised in the Request for Evidence, in the officer's words	How this supplement responds	Where it is addressed
affect U.S. GDP, tax revenues, or employment levels in a manner commensurate with national importance."	stated as five-year totals traced to the line in the filed model that produces them	
"Simply having the potential to employ U.S. workers, without more, does not satisfy the requirement that such potential be significant."	The positions are quantified, the recruitment channel into the area is identified, the training mechanism is a named state program, and the conditions of the receiving area are stated with the figures that describe them	Sections 6.1, 6.4 and 7.0

This supplement should be read together with the business plan already on file. The projections, organizational structure, staffing model, and financial assumptions remain unchanged. This supplement explains what stands behind them.

2.0 How the company's work reaches beyond its own clients

Whether the company's work reaches past the clients that pay for it depends on three things: how it contracts, what it has to build from, and where the gains land once a project is finished. Each is set out in turn.

2.1 The two legs of the operating model

Prikster Tech will operate on two legs that feed each other, and the distinction between them is what carries the work past the client that paid for it.

The first leg is delivery. The company will design, build, and integrate software for small and medium-sized service businesses: custom applications, workflow automation, systems integration, application security assessment, and technical leadership work. This is performed for a named client under a defined scope, and it produces the revenue in the filed forecast.

The second leg is the product. Each assignment produces components that are generalized and retained: subscription and billing logic, scheduling and dispatch modules, invoicing and payment flows, accounting system connectors, and the integration adapters that link them. These are not rebuilt for the next client. They are assembled, extended, and redeployed, and over the forecast period they consolidate into the scalable platform architecture the business plan describes.

What makes that possible is how the company will contract. Its client agreements will assign the client ownership of the configuration, data, and business logic specific to its own operations, while Prikster Tech retains the generalized components, frameworks, and integration adapters used to build them, together with the right to reuse those for other clients. That allocation is what keeps the output from

stopping at the client that paid for it. A billing module built for one field services company is the billing module offered to the next, at a materially lower build cost because the underlying work is already done.

2.2 Why this company can build that library

The components are drawn from work the founder has already done in production. The scheduling, quoting, invoicing, subscription, and payment workflows the six service lines address are the workflows he spent seven years working on at platform scale for United States service businesses.

The company is therefore not proposing to discover how service businesses schedule, quote, invoice, and collect. It is proposing to take patterns already proven at platform scale and apply them to the businesses that are too small to buy or build them, and then to keep what it builds. That is the mechanism by which a small firm's output reaches businesses that never became its clients.

2.3 How the gains travel beyond the client

Reuse is one way the work leaves the client relationship, and Section 2.1 describes it. Two others run through the client's own operations, because what the company sells is not a document but a change in how a business runs.

A construction and maintenance firm that schedules by telephone, tracks jobs on paper and invoices at the end of the month spends a fixed part of every working day on administration, and a further part waiting to be paid. When scheduling, dispatch, technician availability, customer notification, invoicing and collection are joined in a single workflow, that time returns to the work that earns money. Hours that went into rekeying, chasing and reconciling go back into billable work, and invoices that waited for a monthly cycle are raised when the job closes. The size of that shift varies by firm, which is why the plan attributes no revenue to it. None of that is a claim about software in general. It is the difference between two ways of running the same business, and it shows up in the client's own records.

What follows from that difference belongs to the client rather than to Prikster Tech, and that is the point. A firm that takes on more work without adding overhead in the same proportion buys more materials, engages more subcontractors, and reaches the point of hiring earlier than it otherwise would. Its customers wait less. Its suppliers receive larger orders. The fee is paid once and the capacity stays.

The present record shows a firm in that general position. Moseley Construction, whose letter is enclosed as Exhibit F, is a business of more than fifteen years that has grown into apartment remodeling and maintenance and states that it now needs technology-driven support for project coordination, client communication, and operational efficiency. It does not describe its current systems,

and the company does not infer them. Whatever comes of those discussions, the operational need is documented, and it is the need this section describes.

The last of the three reaches businesses that never contract with the company at all. A capability of this kind is normally bought as a subscription from a platform vendor or built by an in-house team, and the operators the company serves can do neither: they are too small for the first to be worth its price and too small for the second to exist. Assembling it from retained components changes what it costs to put in place, and a practice that is cheap enough to install is one that other operators in the same trade can see working before they buy it. The client that adopts it becomes the working example for the next firm, which is how an operating method previously affordable only at platform scale spreads to firms that were never the company's clients.

Stated as a sequence, the effect runs as follows.

Stage	What changes	Where the effect lands
Delivery	Prikster Tech installs a working system inside a service business: scheduling, dispatch, invoicing, payment, and the connectors between them	The client that contracted for the work
Released capacity	The same crew and the same office staff carry more work, because the administrative hours the previous process consumed return to production	The client's customers, who are served sooner
Growth spending	Capacity taken up is spent on materials, subcontracted labor and equipment and, at the point where the work exceeds the crew, on hiring	The client's suppliers, subcontractors and new employees
Retained components	The generalized modules built in the process are kept, extended and installed again at a materially lower build cost, because the underlying work is already done	The next service business, which never paid for the original build
Demonstrated practice	An operating method previously affordable only at platform scale becomes visible and reproducible among small operators in the same trade	Businesses in the field that are not, and may never be, clients

The endeavor therefore does not end at the company's client list. It ends in the operating practice of a class of United States businesses that the platforms the founder helped build were never priced to serve, and in the work, purchasing and employment those businesses add once that practice takes hold.

3.0 Participation in government programs and initiatives

Since the Request for Evidence was issued, the founder has approached the three public bodies whose programs govern workforce development and economic development in the area where the company will operate. All three have responded in writing. The correspondence is enclosed.

3.1 Texas Workforce Commission, Skills for Small Business

The Skills for Small Business program is administered by the Texas Workforce Commission, referred to below as the Commission, under Texas Labor Code Chapter 303 and Title 40, Part 20, Chapter 803 of the Texas Administrative Code.[1] It supports small businesses by funding training for new and incumbent workers. The grant pays up to $2,000 for each new employee and $1,000 for each existing employee in a twelve-month period, and all training is delivered by a public community or technical college. The program has no expiration date, and applications are accepted at any time.[2]

On July 29, 2026, the founder wrote to the program describing the company, its planned location in Dallas, its projected creation of 28 positions over five years, and its training and upskilling component, and asked whether a business with that profile would be eligible once operational.

On August 5, 2026, Ms. Leigh Heath of the Commission replied.[3] She opened by stating that "SSB would be an excellent fit for what you are looking for," and set out the conditions of participation: that participating businesses employ fewer than ninety-nine people; that the program emphasizes training for both new and incumbent workers; that it pays up to $2,000 in training for a new employee and $1,000 for an existing one; that training is for full-time, W-2 paid employees; that all training must be provided by a public community college, technical college, or the Texas A&M Engineering Extension Service; that training must be selected from the college's active course catalogs and schedules; that employers must pay prevailing wages in accordance with the local labor market for the trainees funded under the grant; and that the employer must hold a Commission tax account. She identified the agency's regional business liaison for the Dallas area, Mr. Seth Green, copied him on the response, and stated that he is happy to assist in understanding each program, facilitate the application process, and connect the company with its corresponding college and workforce board. She closed by commending the company for taking the first step in upskilling its workforce.

[1] Texas Workforce Commission, Skills for Small Business Program. Authority and funding: Texas Administrative Code, Title 40, Part 20, Chapter 803, and Texas Labor Code, Chapter 303. https://www.twc.texas.gov/programs/skills-small-business

[2] Texas Workforce Commission, Skills for Small Business Frequently Asked Questions. Enclosed as Exhibit B.

[3] Correspondence of Ms. Leigh Heath, Texas Workforce Commission, August 5, 2026, copying Mr. Seth Green, regional business liaison for the Dallas area. Enclosed as Exhibit A.

The company is positioned to satisfy those conditions. Its headcount peaks at 28, well below the ninety-nine-employee ceiling, and every position in the plan is a full-time W-2 role. Its plan carries a training and development function from Year Two, growing to two specialists by Year Five, and budgets $42,944 of its own employee education spending from Year Two onward. Its salaries are set against published wage data for the same occupations in the Dallas-Fort Worth-Arlington metropolitan area, which is what the prevailing wage condition addresses.[4] Obtaining the Commission tax account is a registration step scheduled in the first three months of operation, as set out in Section 5.2, and course selection from the college catalog follows at the application stage. Ms. Heath's reply sets out the program's terms and its fit with the plan the founder described; it is not an eligibility determination, and the company does not present it as one. Eligibility is established at application, once the company is registered, holds a Commission tax account, and employs the workers to be trained.

The training provider is identified by the program's own mechanics. Under the program the participating college provides the training and administers the grant, and the Commission publishes the register of participating colleges, enclosed within Exhibit B.[5] Dallas College is the public community college district serving Dallas County and operates a Small Business program drawing on course catalogs across seven campuses.[6] The company's application will be made through the participating college for its location, as Ms. Heath's response describes.

3.2 Workforce Solutions Greater Dallas and the WIOA system

Workforce Solutions Greater Dallas is the local workforce development board for Dallas County. It operates within the system established by the Workforce Innovation and Opportunity Act, the federal statute administered by the Employment and Training Administration of the United States Department of Labor.[7] In Texas that system is delivered through the Commission and twenty-eight local boards, which oversee more than one hundred and seventy Workforce Solutions offices.[8] The Dallas County board operates nine of those centers and receives federal funding under the Act.[9]

On July 29, 2026, the founder wrote to the board's business services team. His inquiry was specific. He asked whether the team works with newly established employers planning operations and hiring in the

[4] O*NET OnLine, local wages for Software Developers (15-1252), Texas and Dallas-Fort Worth-Arlington, published from Bureau of Labor Statistics Occupational Employment and Wage Statistics data, 2025. https://www.onetonline.org/link/localwages/15-1252.00?st=TX

[5] Texas Workforce Commission, Skills for Small Business Training Providers. Enclosed within Exhibit B. https://www.twc.texas.gov/partners/skills-small-business-training-providers

[6] Dallas College, About the Small Business Program. Enclosed within Exhibit B. https://www.dallascollege.edu/business-industry/small-business/skills/

[7] United States Department of Labor, Employment and Training Administration, Workforce Innovation and Opportunity Act. https://www.dol.gov/agencies/eta/wioa

[8] Texas Workforce Commission, Workforce Innovation and Opportunity Act (WIOA) Program. https://www.twc.texas.gov/programs/wioa

[9] Workforce Solutions Greater Dallas, https://www.wfsdallas.com/ ; Texas Workforce Commission directory listing, https://www.twc.texas.gov/find-locations/workforce-solutions-greater-dallas-0

Dallas area, including South Dallas and Fair Park, and what registration steps an employer must complete. He asked which employer services are available: local recruitment and job posting, candidate screening and referrals, customized hiring events, labor market and wage data, and resources for employee training, upskilling, internships, and apprenticeships. And he asked whether a dedicated representative would be assigned, and what guidance the board could give on the company's access to employer services and other locally administered resources under the Act.

On August 5, 2026, Mr. Jose J. Vega, Business Solutions Supervisor at the International District Workforce Center, replied that the board would be happy to connect and assist as needed, and named a direct point of contact for the company: Ms. Gina Hodge, Business Solution Liaison, whose office and mobile numbers and email address he provided for the company's records. He directed the company to the board's business services and labor market information resources, noted that the board operates nine centers in Dallas County, and offered further assistance in the interim.[10] On August 10, 2026, the founder confirmed to Mr. Vega that Ms. Hodge had already reached out.

What the correspondence establishes is an open channel to the county's public workforce system, with a named contact on the board's side, before the company opens its doors. The 23 positions the company adds after its first year are intended to be recruited with the assistance of that board, whose function is to place Dallas County residents, including residents of the area described in Section 6.4, into work.

3.3 City of Dallas, South Dallas and Fair Park Opportunity Fund

The South Dallas/Fair Park Opportunity Fund is a City of Dallas program administered by the Office of Economic Development in coordination with a board appointed by the City Council under Dallas City Code Sections 2-130 through 2-132.[11] It was created following the City Council's adoption of the South Dallas/Fair Park Neighborhood Preservation and Economic Development Plan. It is capitalized by a twenty-cent contribution from each amphitheater ticket sold at Fair Park and a share of the profits of Fair Park flea markets and antique shows, topped up from the Office of Economic Development's payment-in-lieu-of-taxes allocation so that the fund receives at least $500,000 in any year, together with loan repayments and interest. Its stated purpose is to promote economic development and support human development in the neighborhoods surrounding Fair Park, and its service area is limited to 2020 Census Tracts 25, 27.03, 37, 115, 203, 208 and 209.[12]

[10] Correspondence of Mr. Jose J. Vega, Business Solutions Supervisor, International District Workforce Center, Workforce Solutions Greater Dallas, August 5, 2026. Enclosed as Exhibit C.

[11] City of Dallas Office of Economic Development, South Dallas Fair Park Opportunity Fund. https://dallasecodev.org/692/South-Dallas-Fair-Park-Opportunity-Fund

[12] City of Dallas, South Dallas/Fair Park Opportunity Fund Program Statement. Enclosed as Exhibit E. https://www.dallasecodev.org/DocumentCenter/View/4889/SDFPOF-Program-Statement-1-25-Update

On July 29, 2026, the founder wrote to the Office of Economic Development describing the company, its planned location within the service area, and its projected creation of 28 positions together with a training and upskilling program, and asked whether his reading of the economic development program was correct.

On August 5, 2026, Mr. Nicholas G. Becerra, Coordinator at the City of Dallas Office of Economic Development, replied and set out the program's terms.[13] He wrote that the economic development program can support development projects in the service area which help to expand the area's tax base or create or retain jobs in the community, and he stated the limits of that support: it is gap funding for the construction or major rehabilitation portion of a project, meaning the fund cannot be the first or sole funder in a capital stack; awards are typically structured as a minimum 75 percent flexible term loan and up to 25 percent grant; and all applications must go through underwriting and be approved by the fund's board and possibly by the City Council, depending on the size of the project. He offered to continue the discussion by telephone.

The correspondence establishes, from the municipal office that administers the program, that job creation and tax base expansion in this specific service area are the declared objectives the City maintains a standing, capitalized program to pursue. A company placing 28 positions and $8.6 million of five-year payroll into the neighborhoods this program serves advances those objectives directly.

It should be said plainly that the company's launch does not depend on the fund. Prikster Tech is capitalized by the founder's committed investment of $50,000, and the terms Mr. Becerra describes apply to the construction and major rehabilitation component of real estate projects. The company cites the fund not as a source of its own financing but as documentary evidence of what the City of Dallas has formally identified as the economic development priority for the area in which the company will operate, confirmed in writing by the office that administers it.

3.4 What the three engagements establish

Taken together, the correspondence connects the company to public programs at three levels of government. At state level, the Commission has set out the conditions of participation in writing and identified its regional business liaison for the Dallas area. At the level of the federally authorized workforce system, the Dallas County board established under the Workforce Innovation and Opportunity Act has named a direct point of contact, who has made contact. At municipal level, the City of Dallas Office of Economic Development has set out the terms of the standing program through which the City pursues job creation in the service area where the company will locate.

[13] Correspondence of Mr. Nicholas G. Becerra, Coordinator, City of Dallas Office of Economic Development, August 5, 2026. Enclosed as Exhibit D.

None of these is a general statement about the importance of software. Each is a named program, a named official, a written response, and a defined set of conditions, each of which the company has scheduled the steps to satisfy.

4.0 Demand for the company's services

4.1 Interest already documented

Since the Request for Evidence was issued, the founder has approached prospective clients as well as the public bodies described in Section 3.0. Three have written back, from different states and different industries, each on its own initiative and in its own terms.

Paisano Fab & Control, LLC, of Denton, Texas, fabricates electrical control panels, custom DIN rail assemblies, and precision panel assemblies for commercial and industrial clients, using CNC milling for accuracy and repeatability, and provides pre-fabrication and modification services to other panel shops working to shorten their project timelines. Its founder and chief executive, Mr. Randy Croft, has thirty years of experience in electrical control panel fabrication, with a particular focus on oil and gas production in the southern and southwestern United States, and founded the company in February 2025.[14]

Mr. Croft writes that he has reviewed the materials describing Prikster Tech's custom software development, systems integration, and process automation services and has considered how they might align with his own operations. He states that as his business develops he expects to evaluate specialized solutions to improve the efficiency and coordination of its production-related workflows and communication, and that on the documentation provided, the services Prikster Tech intends to offer appear relevant to those prospective needs. Subject to the parties reaching mutually agreeable terms, and to further discussion of scope, project requirements, and compensation, he states his intention to engage the company as a technology and software service provider once it is operational.

Moseley Construction, a construction and property maintenance company in Crestline, California that has operated for more than fifteen years, has written on the same footing. Its owner, Mr. John Moseley, licensed as a contractor since 1984, describes the operational need behind his interest: as the business has grown and diversified into apartment remodeling and maintenance, it requires technology-driven support for project coordination, client communication, and operational efficiency. Subject to the successful establishment of Prikster Tech and the completion of mutually agreeable negotiations, it is

[14] Letter of Mr. Randy Croft, Founder and Chief Executive Officer, Paisano Fab & Control, LLC, Denton, Texas, August 13, 2026. Enclosed as Exhibit G.

his company's intention to engage Prikster Tech as a service provider, and any formal agreement will require further discussion of scope, terms, and conditions.[15]

Proteligence Inc., of Elgin, South Carolina, has provided proprietary enterprise reporting solutions to healthcare insurance providers since 2005. Its president, Mr. Tae Ho, writes that the company's internal engineering and support teams are dedicated to the continuous development, technical maintenance, and client support of that proprietary platform.[16]

Mr. Ho writes that he reviewed the materials describing Prikster Tech's custom software development, systems integration, and process automation services and recognized a complementary fit with his own operating environment. Because Proteligence's core technical team remains exclusively focused on its healthcare product, he states that engaging external expertise for non-product operational infrastructure is highly advantageous, and he identifies process automation, internal systems integration, and day-to-day workflow optimization as the services that could improve the company's operational efficiency and administrative coordination without diverting its engineers from the product roadmap. Once Prikster Tech is operational, and subject to both parties reaching mutually acceptable terms, Proteligence intends to explore entering into a service agreement; any formal agreement will depend on subsequent discussion of project scope, integration milestones, and service fees.

None of the three letters is a contract, and the company presents none of them as one. No revenue in the Year One forecast is attributed to any of them.

Their significance is in what they describe. A panel fabricator coordinating production runs and a construction firm scheduling crews across multiple properties are different trades running the same administrative spine: work that has to be tracked to completion, communicated to a customer, and invoiced once it is done. That spine is what the six service lines address, and it is what the founder spent seven years working on at platform scale. Proteligence approaches it from the other side. It is itself a software company with its own engineering team, and its interest follows precisely from that: because those engineers are committed to the product, the operational systems around the product are work it would rather buy than staff. The services Mr. Ho names fall within the process automation and systems integration lines of the forecast, and they come from a firm whose own business is building software. The three also sit where the plan says its market sits. Paisano Fab & Control is in Denton, inside the Dallas-Fort Worth metropolitan area where the company will be based and will hire, and supplies pre-fabrication and modification services to other panel shops as well as finished assemblies; Moseley Construction is in California, in construction and property maintenance; Proteligence is in South Carolina, in healthcare software. Three states, three industries. That spread

[15] Letter of Mr. John Moseley, owner, Moseley Construction, Crestline, California, August 3, 2026. Enclosed as Exhibit F.
[16] Letter of Mr. Tae Ho, President, Proteligence Inc., Elgin, South Carolina, August 17, 2026. Enclosed as Exhibit H.

matches the plan's own market definition, which describes small and medium-sized businesses across industries and regions rather than a single trade in a single city.

4.2 Where the work is expected to come from

Sixty-six pieces of work in a first year is the number the forecast rests on, so it is worth stating how they are expected to arrive and what the plan spends to find them.

The plan budgets $6,000 of marketing in Year One, or $500 a month, and $2,000 for the website. At that level the model does not depend on paid acquisition, and it is not built to. It depends on three channels that cost time rather than budget. The first is the sales representative, who is on the payroll from month one, before any engineer, and whose only function for the first two months is to open conversations. The second is referral from the founder's own network in the service software category, built over seven years working on the platforms that United States service businesses use daily. The third is inbound from the website and from direct outreach.

What those channels have to produce can be stated rather than asserted. Sixty-six projects across twelve months is five to six closings a month, at an average value of $8,917. The plan assumes one closed project for every four qualified conversations. On that assumption the company needs an average of twenty-two qualified conversations a month across all channels. Nineteen of the sixty-six projects fall in the first half of the year and forty-seven in the second, so the requirement is about thirteen conversations a month to begin with and about thirty-one by the end. That is the workload of one full-time sales representative supported by a founder who sells, which is the staffing the plan carries from month one. The assumption is not fragile: at one closed project in six the requirement is thirty-three conversations a month, and at one in eight it is forty-four, or about two a working day.

The volumes are modest at the front. Month one requires a single client; months two through eight require between two and five; the concentration falls in months nine to twelve, by which point the company has been trading for two quarters and has completed work it can refer to. This is the ordinary shape of a professional services business opening its doors, and it is why the forecast is back-loaded rather than flat.

5.0 How the company will operate

5.1 What the Year One forecast requires

The Year One figure of $588,500 is not a target worked backward. It is sixty-six pieces of work, at prices already stated in the filed sales forecast, requiring a defined number of hours, performed by a team whose size and hiring dates are fixed month by month in the plan's own appendix.

Service line	Projects	Price	Revenue	Hours each	Total hours
Custom Software Development for Small and Medium-Sized Enterprises	13	$12,000	$156,000	65	845
Digital Transformation and Process Automation Consulting	12	$10,000	$120,000	55	660
Scalable SaaS Architecture and Platform Engineering	10	$15,000	$150,000	80	800
API Development and Systems Integration	11	$7,500	$82,500	40	440
Cybersecurity Assessment	10	$5,000	$50,000	28	280
Technical Leadership, Mentorship, and Engineering Process Optimization	10	$3,000	$30,000	16	160
Total, Year 1	66		$588,500		3,185

The counts, service line names, and prices are the figures already in the filed sales forecast. The hours are the effort each piece of work requires, and they are deliberately small: sixty-five hours is roughly eight working days, which is a scoped application module rather than a full enterprise system. At these volumes the company delivers between five and six pieces of work a month on average.

The team that performs them is the one in the filed personnel plan: the founder from month one, a senior software engineer from month three, a software developer from month eight, a project manager from month eleven, and a sales representative from month one. Their combined billable capacity is 3,328 hours against the 3,185 the forecast requires. Assessed month by month, the workload runs ahead of the employed team in five months by 183 hours in total. Four of those months are funded from the direct cost of sales line already budgeted in the filed model, and the fifth is month twelve, whose bookings are delivered across the year boundary in the ordinary way. The month-by-month derivation is set out in Appendix B, and the effort and rate assumptions in Appendix A.

5.2 How the plan is carried out

Execution is staged, and each stage is a precondition for the next.

Months one to three: register the company in Texas, open the operating account, obtain the employer tax accounts including the Commission tax account required for the program described in Section 3.1, secure the office, and hire the senior software engineer. The founder and the sales representative begin client outreach in month one, which is why month one carries a single client.

Months four to eight: build the pipeline to a steady five to six pieces of work a month, complete the first custom software and platform engineering assignments, begin extracting the reusable components described in Section 2.1, and hire the software developer in month eight as volume requires a second dedicated engineer.

Months nine to twelve: absorb the second-half volume of 47 projects shown in the filed Monthly Sales Forecast, add the project manager in month eleven as concurrent delivery requires coordination, and close the year at five employees and $588,500 in booked revenue.

Years two to five: add the specialist functions the plan schedules by year. The software project manager, DevOps engineer, training and development specialist, digital transformation consultant, and administrative manager arrive in Year Two; the user experience designers, marketing specialist, and customer service function in Year Three; and further engineering and delivery positions through Years Four and Five, reaching 28 employees.

5.3 Steps already under way

The company is being assembled rather than described. Its brand, domain, corporate email, and company overview materials are in place and were used in the correspondence with the public bodies described in Section 3.0.[17] The founder has approached prospective clients and obtained the three written expressions of interest described in Section 4.1. He has approached the three public agencies whose programs the company expects to qualify for once operational, has received written responses from all three, and has been given a named point of contact by one and the named regional liaison for the Dallas area by another. The capital required to open, $50,000, is committed by the founder and consists of $18,000 in startup expenses and $32,000 in working capital, as itemized in the business plan and evidenced in the financial documentation filed with the original petition. Mr. Nogueira will be the founder and owner-manager of the company and will be self-employed in that capacity.

[17] Prikster Tech company overview. Enclosed as Exhibit I.

6.0 Employment and economic effect

6.1 Direct employment and payroll

The company's headcount grows from 5 employees in Year One to 28 in Year Five. The positions are technology and technology-adjacent roles: senior software engineers, software developers, software project managers, DevOps engineers, user experience designers, digital transformation consultants, training and development specialists, and the sales, marketing, administrative, and customer service functions that support them.

The payroll attached to those positions is the more useful measure, because it is what enters the local economy. Annual payroll rises from $344,600 in Year One to $3,265,663 in Year Five. Over the five-year forecast the company pays **$8,608,449 in wages** to employees hired and working in the United States, at rates set against published Dallas metropolitan area wage data rather than below them.[18]

	Year 1	Year 2	Year 3	Year 4	Year 5	Five-year total
Employees	5	10	16	21	28	
Payroll	$344,600	$1,054,650	$1,667,582	$2,275,954	$3,265,663	$8,608,449
Revenue	$588,500	$1,544,813	$2,433,080	$3,321,154	$4,533,375	$12,420,922

6.2 Indirect employment

The business plan applies the national employment multipliers published by the Economic Policy Institute for the computer systems design and related services industry, under which 100 direct jobs support a further 283.4 indirect and induced positions.[19] Applied to 28 direct positions, the company supports approximately 79 further positions, for approximately 107 in total.

The connection between the company's activities and that broader figure runs through its own purchasing, which is set out line by line and year by year in the filed Pro Forma Profit and Loss. Over the five-year forecast, non-payroll spending totals **$1,489,300**, composed as follows.

Category, five-year total	Amount
Contracted technical specialists, design and infrastructure vendors engaged on client projects (direct cost of sales)	$993,673
Equipment, hardware and technical tooling	$201,040
Office lease, Dallas	$160,739

[18] O*NET OnLine, local wages for Software Developers (15-1252), Texas and Dallas-Fort Worth-Arlington, published from Bureau of Labor Statistics Occupational Employment and Wage Statistics data, 2025. https://www.onetonline.org/link/localwages/15-1252.00?st=TX

[19] Economic Policy Institute, Updated Employment Multipliers for the U.S. Economy, January 23, 2019. https://www.epi.org/publication/updated-employment-multipliers-for-the-u-s-economy/

Category, five-year total	Amount
Marketing, website and digital communications services	$44,650
Employee education and external training	$42,944
Commercial insurance	$17,860
Accounting and bookkeeping	$15,000
Utilities, internet and telephone service	$13,394
Total	$1,489,300

Every line above is a payment to another firm. The office lease and its utilities are spent in Dallas by definition; the remainder is spent with equipment suppliers, insurers, accountants, and the contracted specialists and vendors engaged on client projects. Alongside that purchasing, the $8,608,449 in wages set out in Section 6.1 is earned by employees who spend it where they live. Of the two flows the wage flow is the larger by a factor of roughly six, and it is the flow the induced component of the published multiplier measures; the purchasing is the indirect component. Together they are what the multiplier for this industry describes.

6.3 Tax contribution

Federal, state, and payroll tax payments rise from $58,101 in Year One to $444,386 in Year Five, for a cumulative contribution of approximately $1.25 million over the five-year period. These are payments to the United States Treasury and to the State of Texas that would not otherwise be made.

6.4 The area where the company will operate

The company will lease premises in Dallas and has identified the South Dallas and Fair Park area, within ZIP code 75215, as its intended location. Premises will be secured in the first three months of operation, as set out in Section 5.2. The Opportunity Fund's service area described in Section 3.3 is defined by census tract rather than by ZIP code, and the two boundaries are not coextensive; whether the premises ultimately fall inside one of those seven tracts will be determined when the lease is signed.

The Economic Innovation Group's Distressed Communities Index places this ZIP code in the most distressed band in Texas, with a distress score of 92.2 out of 100 and a rank of 1,392 out of 1,564 Texas ZIP codes, where a higher rank denotes greater distress.[20] The figures behind that score describe the conditions of the area: 28.5 percent of residents live in poverty; 27.5 percent of adults are not working; median income is 41.7 percent of the national figure; 26.6 percent of adults have no high school

[20] Economic Innovation Group, Distressed Communities Index, ZIP code 75215, Dallas, Texas. https://eig.org/distressed-communities/?regions%5B0%5D=75215&geo=zctas&lat=32.75&lon=-96.78&z=12.58

diploma, against a national figure of 11.1 percent; and the housing vacancy rate of 14.6 percent is nearly double the national rate of 7.6 percent.

Two features of the company's employment matter against that background. The positions are skilled and are paid against Dallas metropolitan wage benchmarks rather than against the local median income cited above. And the company's recruitment is intended to run with the assistance of the Dallas County workforce board described in Section 3.2, whose function is to place county residents into employment, which is the mechanism by which positions located in an area become positions available to the people who live in it.

7.0 Workforce development and knowledge transfer

Training runs through three separate parts of the company's operation, each of which produces transferable technical skill in United States workers.

The first is internal. The plan carries a training and development function from Year Two, growing to two specialists by Year Five, responsible for the engineering practices, code review standards, and development workflows the company applies, and it budgets $42,944 of employee education spending from Year Two onward.

The second is external and billed. Technical Leadership, Mentorship, and Engineering Process Optimization is one of the six revenue lines, at 10 assignments in Year One growing to 63 by Year Five. This work places the company's engineering practices inside client organizations, so that the client's own technical staff can maintain and extend what has been built rather than depending on the company indefinitely. It is priced at $3,000 an assignment so that small businesses can afford it.

The third is the public program described in Section 3.1. The Skills for Small Business grant funds up to $2,000 of college-delivered training for each new employee and $1,000 for each existing employee per twelve-month period, delivered by the participating community or technical college. Applied to a company that will hire 23 employees after its first year and retain those already in place, it offers a defined and funded mechanism for continuing technical education, administered by the State of Texas and delivered through the public college system of the county in which the company will operate. The Commission has set out the conditions of participation in writing and identified the regional liaison who will assist with the application.

8.0 Conclusion

The company's output is built to reach past its own client list. The components extracted from each assignment, which the company's client agreements will reserve to it, consolidate into the platform

architecture the plan describes, so that what is built once is deployed many times to businesses that never commissioned it.

The company is connected to specific government programs, and the connection is documented. The Texas Workforce Commission has written that its Skills for Small Business program would be an excellent fit for the training plan the company described, has set out the conditions of participation, and has identified its regional business liaison for the Dallas area. The Dallas County workforce board established under the Workforce Innovation and Opportunity Act has named a direct point of contact, who has made contact. The City of Dallas Office of Economic Development has set out the terms of the standing program through which the City pursues job creation and tax base expansion in the service area where the company will locate.

The projections rest on operational drivers rather than on assumption. The Year One revenue of $588,500 comes from 66 pieces of work at prices already filed, requiring 3,185 hours of effort against a billable capacity of 3,328 hours, performed by a team whose composition and hiring dates are fixed in the plan and assessed month by month. Demand is documented by written approaches from three prospective clients, one of them in the Dallas-Fort Worth metropolitan area, and quantified as the conversation volume the plan's own sales staffing has to produce.

The employment and economic effect is quantified rather than asserted. Twenty-eight direct positions and approximately 79 indirect and induced positions; $8,608,449 in wages and $1,489,300 of purchasing from other firms over five years; approximately $1.25 million in federal, state, and payroll taxes; located in a ZIP code where 28.5 percent of residents live in poverty and 27.5 percent of adults are not working; recruited with the assistance of the public workforce board whose function is to place those residents in work; and trained through a state program delivered by the county's public college system.

Appendix A: Year One work assumptions and rates

The Year One revenue of $588,500 is built from 66 pieces of work across six service lines. The counts, service line names, and unit prices are those already stated in the Annual Sales Forecast Table of the business plan. The effort column states the hours each requires, from which the capacity assessment in Appendix B is derived.

Service line	Projects	Unit price	Revenue	Hours per project	Total hours	Implied rate
Custom Software Development for Small and Medium-Sized Enterprises	13	$12,000	$156,000	65	845	$185
Digital Transformation and Process Automation Consulting	12	$10,000	$120,000	55	660	$182
Scalable SaaS Architecture and Platform Engineering	10	$15,000	$150,000	80	800	$188
API Development and Systems Integration	11	$7,500	$82,500	40	440	$188
Cybersecurity Assessment	10	$5,000	$50,000	28	280	$179
Technical Leadership, Mentorship, and Engineering Process Optimization	10	$3,000	$30,000	16	160	$188
Total, Year 1	66		$588,500		3,185	$185

The effort figures reflect the scope of each piece of work. Sixty-five hours is roughly eight working days, a scoped application module or a workflow replacement rather than a full enterprise system. Eighty hours is ten working days of architecture and implementation. Forty hours is one week of connector work against a defined interface. Twenty-eight hours is three and a half days of application and integration review. Sixteen hours is two days of practice review and team mentoring. These are

deliberately small assignments, sized and priced for businesses that have not previously been able to commission custom software engineering.

Dividing the Year One revenue by the 3,185 hours gives a blended rate of approximately $185 an hour. That figure is an output of the model rather than an assumption, and two independent references bear it out. Bureau of Labor Statistics Occupational Employment and Wage Statistics data, published through O*NET OnLine, gives a 2025 median annual wage of $133,290 for Software Developers in the Dallas-Fort Worth-Arlington metropolitan area.[21] That median, loaded with the 10 percent payroll tax rate the business plan carries and with the plan's own non-payroll operating expense spread across the team's billable hours, produces a delivered cost in the region of $120 an hour, against which a blended rate of $185 is an ordinary professional services margin. Separately, published rate guides compiled by United States development firms place United States based providers between approximately $95 and $220 an hour, with senior engineers at established United States agencies billing between $130 and $190.[22]

The effort figures are held constant across the forecast. As the component library described in Section 2.1 consolidates, the hours required per assignment are expected to fall; holding them flat while unit prices rise 5 percent a year is the conservative assumption, and the capacity assessment in Appendix B is built on it.

Appendix B: Year One delivery capacity

Available working hours are calculated as 2,080 scheduled hours a year, less public holidays and paid time off, giving 1,920 hours a year or 160 hours a month. The billable share reflects the non-delivery responsibilities each role carries. The joining months are taken from the Monthly Personnel Plan in the business plan appendix. The founder is engaged from the first month and begins drawing compensation in the second, which is why the month one payroll line carries only the sales representative.

Role	Joins in month	Months worked	Available hours	Billable share	Billable hours
Founder, General Manager and Senior Software Engineer	1	12	1,920	65%	1,248
Senior Software Engineer	3	10	1,600	80%	1,280
Software Developer	8	5	800	80%	640
Project Manager	11	2	320	50%	160

[21] O*NET OnLine, local wages for Software Developers (15-1252), Texas and Dallas-Fort Worth-Arlington, published from Bureau of Labor Statistics Occupational Employment and Wage Statistics data, 2025. https://www.onetonline.org/link/localwages/15-1252.00?st=TX

[22] FullStack Labs, Software Development Price Guide and Hourly Rate Comparison, 2026. https://www.fullstack.com/labs/resources/blog/software-development-price-guide-hourly-rate-comparison

Role	Joins in month	Months worked	Available hours	Billable share	Billable hours
Sales Representative	1	12	1,920	0%	0
Total			6,560		3,328

The founder carries the lowest billable share because he also runs the company: he sells alongside the sales representative, recruits, and manages the client relationships. The two engineering positions carry the highest because they do not sell and do not manage. The project manager coordinates delivery and is credited with half his time as billable. The sales representative is not credited with billable hours at all. These shares are the founder's own estimates. His own share is set at a single figure across the year rather than varied month by month, which understates the early months, when there is no team to manage and one or two clients to serve, and overstates the later ones.

Set against the monthly bookings in the filed Monthly Sales Forecast, the position is as follows.

Month	Effort required	In-house billable capacity	Gap	How the gap is carried
1	65	104		
2	120	104	16	Contracted specialist, $1,520 of $1,760 budgeted
3	185	232		
4	175	232		
5	244	232	12	Contracted specialist, $1,140 of $3,600 budgeted
6	219	232		
7	229	232		
8	204	360		
9	368	360	8	Contracted specialist, $760 of $5,440 budgeted
10	349	360		
11	488	440	48	Contracted specialist, $4,560 of $7,200 budgeted
12	539	440	99	Delivered across the year boundary
Year 1	3,185	3,328	183 (sum of monthly shortfalls)	

In seven of the twelve months the employed team carries the workload within its own hours. In five months the workload runs ahead of it, by 183 hours in total, and two distinct mechanisms carry that load.

Four of those months, two, five, nine and eleven, account for 84 of the 183 hours. These are funded from the direct cost of sales line, which is budgeted at 8 percent of revenue, totals $47,080 in Year One, and is distributed month by month in proportion to bookings. At the low end of published rates for United States software development work, approximately $95 an hour, 84 hours of contracted specialist time costs $7,980 against the $18,000 the line carries in those four months, leaving $10,020, or 56 percent of it, for the third-party components the line also funds. Across the year the contracted time absorbs 17 percent of the line, leaving $39,100.

The fifth month is month twelve, where the workload runs 99 hours ahead of the employed team. This is not a funding question. Ten pieces of work are booked in the final month of the financial year, each scoped at between two and ten working days, and work sold in the last weeks of a year is completed in that year or the next. Bookings fall within a twelve-month window; delivery of the final month's bookings runs across the year boundary in the ordinary way. No revenue figure changes, and no permanent headcount is added.

Appendix C: Benchmarks and sources

Benchmark	Figure	Source
Software Developers (15-1252), Dallas-Fort Worth-Arlington, 2025: 10th percentile	$85,920	BLS OEWS via O*NET OnLine
Software Developers (15-1252), Dallas-Fort Worth-Arlington, 2025: median	$133,290	BLS OEWS via O*NET OnLine
Software Developers (15-1252), Dallas-Fort Worth-Arlington, 2025: 90th percentile	$179,400	BLS OEWS via O*NET OnLine
United States based software development providers, hourly	$95 to $220	Published United States rate guides
Senior engineers at established United States agencies, hourly	$130 to $190	Published United States rate guides
Employment multiplier, computer systems design and related services	100 direct jobs support a further 283.4	Economic Policy Institute
ZIP code 75215, Distressed Communities Index	Score 92.2 of 100; rank 1,392 of 1,564 Texas ZIP codes	Economic Innovation Group

The Year One salary figures in the filed personnel plan are partial-year amounts, because every position other than the sales representative joins during the year and the plan records only the months actually

paid. Restated at the monthly rates the plan carries, the senior software engineer is budgeted at $117,600 a year, the software developer at $108,000, and the project manager at $117,600, each between the tenth percentile and the median above. The founder's compensation begins as a ramped draw and settles at the Year Two rate of $138,000 shown in the filed plan. This is the basis on which Section 3.1 states that the company's salaries are set against published wage data for the same occupations.

Wage figures are Bureau of Labor Statistics Occupational Employment and Wage Statistics data for 2025, published through O*NET OnLine.[23] Hourly rate ranges are drawn from published rate guides compiled by United States development firms.[24] The employment multiplier is the Economic Policy Institute's updated multiplier for computer systems design and related services.[25] Area conditions are from the Economic Innovation Group's Distressed Communities Index for ZIP code 75215.[26]

Exhibits

Exhibit	Document
A	Correspondence with the Texas Workforce Commission, Skills for Small Business program, July 29 to August 10, 2026, including the response of Ms. Leigh Heath dated August 5, 2026 copying Mr. Seth Green, regional business liaison for the Dallas area
B	Texas Workforce Commission, Skills for Small Business program page, Frequently Asked Questions, and published register of Skills for Small Business training providers, together with the Dallas College Small Business program page
C	Correspondence with Workforce Solutions Greater Dallas, July 29 to August 10, 2026, including the response of Mr. Jose J. Vega, Business Solutions Supervisor, dated August 5, 2026 naming Ms. Gina Hodge, Business Solution Liaison, as the company's direct point of contact
D	Correspondence with the City of Dallas Office of Economic Development, July 29 to August 10, 2026, including the response of Mr. Nicholas G. Becerra, Coordinator, dated August 5, 2026
E	City of Dallas, South Dallas/Fair Park Opportunity Fund Program Statement and program flyer
F	Letter of interest, Moseley Construction, Mr. John Moseley, owner, dated August 3, 2026
G	Letter of interest, Paisano Fab & Control, LLC, Mr. Randy Croft, Founder and Chief Executive Officer, dated August 13, 2026
H	Letter of interest, Proteligence Inc., Mr. Tae Ho, President, dated August 17, 2026
I	Prikster Tech company overview

[23] O*NET OnLine, local wages for Software Developers (15-1252), Texas and Dallas-Fort Worth-Arlington, published from Bureau of Labor Statistics Occupational Employment and Wage Statistics data, 2025. https://www.onetonline.org/link/localwages/15-1252.00?st=TX

[24] FullStack Labs, Software Development Price Guide and Hourly Rate Comparison, 2026. https://www.fullstack.com/labs/resources/blog/software-development-price-guide-hourly-rate-comparison

[25] Economic Policy Institute, Updated Employment Multipliers for the U.S. Economy, January 23, 2019. https://www.epi.org/publication/updated-employment-multipliers-for-the-u-s-economy/

[26] Economic Innovation Group, Distressed Communities Index, ZIP code 75215, Dallas, Texas. https://eig.org/distressed-communities/?regions%5B0%5D=75215&geo=zctas&lat=32.75&lon=-96.78&z=12.58

Exhibit A - C.I - First Prong - National Importance: Documented Demand from Prospective Clients: Letter of Interest, Paisano Fab & Control, LLC (Mr. Randy Croft, Founder and CEO), dated August 13, 2026

August 13, 2026

To Whom It May Concern,

My name is Randy Croft, and I am the Founder and CEO of Paisano Fab & Control, LLC, based in Denton, Texas. I have 30 years of experience in electrical control panel fabrication, with a particular focus on oil and gas production in the southern and southwestern United States. I founded Paisano Fab & Control in February 2025 to apply that experience through an independent company.

Paisano Fab & Control specializes in the fabrication of electrical control panels, custom DIN rail assemblies, and precision electrical control panel assembly for commercial and industrial clients. Our operations prioritize accuracy and repeatability, utilizing CNC milling to ensure high-quality delivery. We also provide pre-fabrication and modification services for other panel shops seeking to accelerate their project timelines.

Mr. Breno de Castro Nogueira has presented me with information regarding Prikster Tech, the software consulting company he is establishing in Dallas, Texas, and the custom software development, systems integration, and process automation services it intends to provide. I have reviewed these materials and analyzed how Prikster Tech's proposed capabilities might align with the operational needs of Paisano Fab & Control.

As our business continues to develop, we expect to evaluate specialized solutions to improve the efficiency and coordination of our production-related workflows and communication. Based on the documentation provided, the services Prikster Tech intends to offer appear relevant to these prospective business needs.

Accordingly, once Prikster Tech is operational, it is my intention to engage its services as a technology and software service provider, subject to the parties reaching mutually agreeable terms. Any future engagement will depend on further discussions and negotiations regarding the specific scope of services, project requirements, and compensation.

This letter is provided in good faith to confirm Paisano Fab & Control's present interest and future intention to establish a professional relationship with Prikster Tech. Please feel free to contact me at the phone number or email address below should you have any questions or require additional information.

Sincerely,

Randy Croft
Founder and CEO, Paisano Fab & Control, LLC
(469) 822-1961 | randy@paisanofab.com

Exhibit B - Letter of Interest, Moseley Construction (Mr. John Moseley, owner), dated August 3, 2026

Moseley Construction

P.O. Box 2578, Crestline, CA 92325

August 3, 2026

To Whomever It May Concern,

My name is John Moseley, and I am the owner of Moseley Construction, a construction and property maintenance company based in Crestline, California. I received my contractor's license in 1984 and have been operating in the construction industry ever since. Moseley Construction has been in operation for over 15 years and is currently focused on remodeling and maintenance services for apartment complexes.

Over the course of my career, our company's focus has evolved significantly. In the early years, Moseley Construction was primarily engaged in new construction projects, including custom homes, hotels, office buildings, and condominiums. Over time, the company expanded its focus to remodeling, room additions, and apartment maintenance and repair services. Our scope of work includes coordinating major improvements such as new roofs and parking lots, as well as ongoing maintenance, repairs, and unit remodeling, including cabinetry, lighting, plumbing fixtures, and related upgrades.

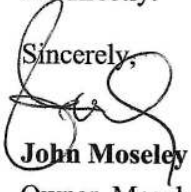
It is in this context that I write to express my genuine interest and intention to enter into a service agreement with Prikster Tech, the company being established by Mr. Breno de Castro Nogueira. I became acquainted with Mr. Nogueira's professional background and the services Prikster Tech intends to offer, and I believe there is a strong alignment between his company's capabilities and the operational needs of Moseley Construction.

As our business continues to grow and diversify, we recognize an increasing need for technology-driven solutions to support project coordination, client communication, and operational efficiency. Subject to the successful establishment of Prikster Tech and the completion of mutually agreeable negotiations, it is our intention to engage Prikster Tech as a service provider. We understand that any formal agreement will require further discussions regarding scope, terms, and conditions, and we look forward to those conversations in due course.

I am confident that Mr. Nogueira's expertise and the services offered by Prikster Tech would be a valuable asset to our operations. I write this letter in good faith to affirm our interest and forward-looking intention to establish a professional relationship.

Should you have any questions or require additional information, please do not hesitate to contact me directly.

Sincerely,



John Moseley
Owner, Moseley Construction
(951) 453-6495 | john@moseleyconstruction.com

Exhibit C - Letter of Interest, Proteligence Inc. (Mr. Tae Ho, President), dated August 17, 2026

Proteligence Inc.
166 Woodcreek Rd, Elgin, SC 29045
www.proteligence.com

August 17, 2026

Dear Interested Party,

I serve as the President of Proteligence Inc., a specialized software company based in Elgin, South Carolina. Founded in 2005, Proteligence has provided proprietary enterprise reporting solutions to healthcare insurance providers for over 20 years. Our business centers on our proprietary platform, while our internal engineering and support teams remain dedicated to its continuous development, technical maintenance, and client support.

Mr. Breno de Castro Nogueira was introduced to me through a mutual professional contact and presented information regarding Prikster Tech, the software consulting company he is establishing in Dallas, Texas, as well as the custom software development, systems integration, and process automation services it intends to provide.

After reviewing these materials, I recognized that Prikster Tech's capabilities present a valuable complementary fit for our operational environment. Because Proteligence's core technical team remains exclusively focused on our proprietary healthcare product, engaging external expertise for non-product, operational infrastructure is highly advantageous. Specifically, Prikster Tech's proposed services in process automation, internal systems integration, and day-to-day workflow optimization can enhance our operational efficiency and administrative coordination without diverting our internal engineering resources away from our core product roadmap.

Accordingly, once Prikster Tech becomes fully operational, Proteligence Inc. intends to explore entering into a service agreement with Prikster Tech to support our day-to-day operational needs, subject to both parties reaching mutually acceptable terms. Any formal agreement will depend on subsequent discussions regarding specific project scopes, integration milestones, and service fees.

I write this letter in good faith to confirm our interest and forward-looking intention to explore a professional relationship with Prikster Tech. Please feel free to contact me at the telephone number or email address below should you require any additional information.

Tae Ho

Tae Ho
President, Proteligence Inc.
803-699-6497 | tae.ho@proteligence.com

Exhibit D – C.II - First Prong - National Importance: Government Programs Tied to the Distressed Area:

Gmail

Breno Nogueira <breno.nogueira@prikster-tech.com.br>

Prikster Tech - Skills for Small Business program

2 mensagens

Breno Nogueira <breno.nogueira@prikster-tech.com> 29 de julho de 2026 às 11:36
Para: skills@twc.texas.gov

Dear Skills for Small Business Program Staff,
I hope this message finds you well.

My name is Breno de Castro Nogueira, founder of Prikster Tech, a software development and digital automation company planned to be established in Dallas, Texas. The company's five-year business plan projects the creation of 28 skilled technology and support positions, together with a training and upskilling program for its U.S. workers.

I have reviewed the Skills for Small Business program page. My understanding is that private, for-profit businesses with fewer than 100 full-time employees are eligible to apply for training provided through a public community or technical college, which aligns closely with the training component of Prikster Tech's plan.

Could you confirm that this reading is correct for a company with this profile, once operational?

Thank you very much for your time.

Kind regards,
Breno de Castro Nogueira
Founder – Prikster Tech

Prikster-Tech-Overview.pdf
25K

Breno Nogueira <breno.nogueira@prikster-tech.com.br> 5 de agosto de 2026 às 12:06
Para: skills@twc.texas.gov

Dear Skills for Small Business Program Staff,

I hope this message finds you well. I am writing to kindly follow up on my email below from last week, in case it did not reach you. I remain very interested in confirming my understanding of the program, and I would be glad to provide any additional information that might be helpful.

Thank you very much for your time.

Kind regards,
Breno de Castro Nogueira
Founder – Prikster Tech

[Texto das mensagens anteriores oculto]

Gmail

Breno Nogueira <breno.nogueira@prikster-tech.com.br>

FW: Prikster Tech - Skills for Small Business program # Solved

2 mensagens

Heath,Leigh <leigh.heath@twc.texas.gov> 5 de agosto de 2026 às 19:40
Para: "breno.nogueira@prikster-tech.com.br" <breno.nogueira@prikster-tech.com.br>
Cc: "Green,Seth C" <seth.green@twc.texas.gov>

Hello, thank you for reaching out. SSB would be an excellent fit for what you are looking for: Participating businesses must have **fewer than 99 employees**, emphasizing training for new and incumbent workers. Skills for Small Business Program - Texas Workforce Commission

-The program pays up to $2,000 in training for new employees (employed 12 months or less) and $1000 for existing employees.

-Training is for **full-time/W2 paid** employees.

-TWC will work with the **participating college** in processing applications and funding training opportunities for applicants.

-All training must be provided by a **public community college**, technical college, or the Texas A&M Engineering Extension Service (TEEX).

-Training must be selected from **active course catalogs/schedules**— credit, continuing education, online, or other available unpublished courses.

-Employers must **pay prevailing wages** in accordance with the local labor market for the trainees funded under the grant.

-A TWC tax account is required by the employer to participate

-More information on our SSB program can be found Skills for Small Business for Employers —TWC (texas.gov)

Our regional business liaison for the Dallas area is Seth Green, he is copied on this email response.

He is happy to assist in understanding each program, facilitate the application process, and connect you with your corresponding college and workforce board.

We commend you for taking the first step in upskilling your workforce and hope to hear from you soon.

Warm regards,

Leigh Heath

Regional Business Liaison, Employer Engagement and Community Outreach

Texas Workforce Commission

325-650-4303

twc.texas.gov/skills

Train Your Workforce Transform Your Business

From: Breno Nogueira <breno.nogueira@prikster-tech.com.br>
Sent: Wednesday, August 5, 2026 10:06 AM
To: Skills @ twc.state.tx.us <skills@twc.texas.gov>
Subject: Re: Prikster Tech - Skills for Small Business program

Some people who received this message don't often get email from breno.nogueira@prikster-tech.com.br. Learn why this is important

CAUTION: Email not from TWC System. Use care when clicking links and opening attachments.

Dear Skills for Small Business Program Staff,

I hope this message finds you well. I am writing to kindly follow up on my email below from last week, in case it did not reach you. I remain very interested in confirming my understanding of the program, and I would be glad to provide any additional information that might be helpful.

Thank you very much for your time.

Kind regards,
Breno de Castro Nogueira
Founder – Prikster Tech

Em qua., 29 de jul. de 2026 às 11:36, Breno Nogueira <breno.nogueira@prikster-tech.com> escreveu:

> Dear Skills for Small Business Program Staff,
> I hope this message finds you well.
>
> My name is Breno de Castro Nogueira, founder of Prikster Tech, a software development and digital automation company planned to be established in Dallas, Texas. The company's five-year business plan projects the creation of 28 skilled technology and support positions, together with a training and upskilling program for its U.S. workers.
>
> I have reviewed the Skills for Small Business program page. My understanding is that private, for-profit businesses with fewer than 100 full-time employees are eligible to apply for training provided through a public community or technical college, which aligns closely with the training component of Prikster Tech's plan.
>
> Could you confirm that this reading is correct for a company with this profile, once operational?
>
> Thank you very much for your time.
>
> Kind regards,
> Breno de Castro Nogueira
> Founder – Prikster Tech

Breno Nogueira <breno.nogueira@prikster-tech.com.br> 10 de agosto de 2026 às 10:43
Para: "Heath,Leigh" <leigh.heath@twc.texas.gov>

Dear Ms. Heath,

Thank you very much for the detailed and encouraging response. It is great to confirm that the Skills for Small Business program aligns so well with the training component of Prikster Tech's plan.

As the company is currently in its formation stage, I will reach out to Mr. Green once we are operational and ready to apply, so we can move forward with the application and the connection to the corresponding college and workforce board.

Thank you again for your time and for pointing me in the right direction.

Kind regards,
Breno de Castro Nogueira
Founder – Prikster Tech
[Texto das mensagens anteriores oculto]

Exhibit E - Texas Workforce Commission Skills for Small Business program page, Frequently Asked Questions, and register of training providers

Skills for Small Business Program

Overview



The Skills for Small Business grant supports businesses with fewer than 100 employees. The program focuses on training new and incumbent employees. Up to $2 million is available for supporting our state's small employers. With more than 3.5 million small businesses in Texas, small employers are a key part of the business community.

Small businesses can apply to Texas Workforce Commission (TWC) for training provided by a local community college. TWC will process the application and work with colleges business is then able to select the courses to customize training to their nee

CHAT
We're online.

Program Details

- This program emphasizes new and incumbent employees for small businesses.
- The program funds $2000 per new employee and $1000 per incumbent employee.
- Funding for training is for full-time employees.
- All training must be provided by a public community or technical college.
- Employers must pay the prevailing wage in their local labor markets.
- Common training courses include: Customer Services, Quickbooks, CPR, Sales/Marketing.
- Managers and business owners may be eligible to participate, dependent on job duties.

What We Do



Information



Education & Training



Employment Services

Services

Skills Development

Find out about TWC's Skills Development program.

Self Sufficiency

Learn about the Self Sufficiency Program.

Skills for Success (Soft Skill Training)

Pilot program for soft skill training.

Resources

Apply Now

America's Small Business Development Centers

Employer Interest Form

Skills for Small Business FAQs

Workforce Development Employer Engagement and Community Outreach Map

Workforce Training Grant Opportunities

Authority & Funding

Skills for Small Business is administered by the Texas Workforce Commission. The program is governed by the following rules and regulations:

- Texas Administrative Code, Title 40, Part 20, Chapter 803
- Texas Labor Code, Chapter 303

Contact Us

Business Services

877-463-1777

TWC Main Office Address

101 E 15th Street
Austin, TX 78778
United States

We are an Equal Opportunity Employer/Program.

Auxiliary aids and services are available upon request to individuals with disabilities. Deaf, hard-of-hearing or speech-impaired customers may contact TWC through the relay service provider of their choice.

For questions, compliments or complaints, call 800-628-5115.

2020 Census

Texas Veterans Portal

Texas Homeland Security

TRAIL Statewide

Texas.gov

211 Texas

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SKILLS For Small Business

These Frequently Asked Questions (FAQ) were developed as a supplement to the Skills for Small Business (SSB) application. The Docusign application, FAQ updates and more Skills for Small Business information can be found on the Skills for Small Business webpage. Any questions about this document can be directed to skills@twc.texas.gov.

1. How long will the program be available?

Skills for Small Business has no expiration. Therefore, businesses may submit applications to the Texas Workforce Commission Business and Education Grants Department at any time.

The recently passed initiative allows childcare facilities to receive training through the Skills for Small Business Program.

2. What is the purpose of the Skills for Small Business Program?

The purpose of the program is for small businesses to enhance their businesses' operations by obtaining training needed to upgrade their new and incumbent employee's skills.

3. What types of courses are funded?

Credit, continuing education, online and non-published courses that are applicable to the business needs and operations are eligible for funding. The college must be able to document and track all courses for reporting purposes. The business will be asked on the application to explain how the course(s) and resulting training will enhance its operations.

Note: College catalog course descriptions are not the same explanation of training need/benefit to the business.

4. Are there courses that TWC would not consider for funding?

TWC will not consider funding for training used to obtain or further a degree. The intent of this program is not to fund an individual's pursuit of a degree,

but to enhance the performance of the entire business. Therefore, courses that are core requirements of a degree program that an individual is pursuing that do not have an immediate positive impact on and/or clear connection to the business' operations will not be funded. An example would be a window installation business that applies for funding for one of its workers who wants to take courses in English and Biology as part of his bachelor's degree program.

5. What is the benefit of a small business applying for a Skills for Small Business grant instead of a regular Skills Development Fund grant?

The benefit of applying to the Skills for Small Business program is that, if the application is approved, the business can access published or non-published courses in the technical or community college and receive the training the business needs for their employees faster and without the need to customize or develop the courses.

If a small business needs customized courses or program development then they should contact TWC's Employer Outreach Team at (877) 463-1777 or by email at skills@twc.texas.gov to discuss the Skills Development Fund program which does allow for customized course development.

6. Can a business participate in both Skills for Small Business and Skills Development Fund grant simultaneously?

Yes. The specific training being offered under each grant program for the business must be different. No duplication of the same skill training between the two grants is allowed.

7. If a trainee participates in one fiscal year, can the business reapply for that individual to participate in the next fiscal year?

Training is not based on a fiscal year, but rather on a 12-month period. The program pays up to $2,000 for each new employee being trained and $1,000 for incumbent employees per 12- month period.

8. Does this program restrict a business from leveraging the funding from a Skills for Small Business grant with other grants or funding sources, such as Texas Public Education Grants (TPEG) and Pell Grants?

No.

9. Who are the grant applicants and administrators for these grants?

Technical and community colleges, the Texas A&M Engineering Extension Service (TEEX), and the Texas A&M Engineering Experiment Station (TEES) are the administrators of the Skills for Small Business grant. However, not all colleges chose to participate in the Skills for Small Business program, the small business can reach out to TWC via email at skillsforsmallbusiness@twc.texas.gov to request assistance with a Skills for Small Business interest form to get started. At this point and time, the business will be connected with their Employer Outreach Regional Business Liaison to further assist them in the process. If a college does not currently participate, TWC's Employer Outreach Team staff will reach out to them to see if they would like to participate.

The small business is the grant applicant and must complete the employer interest form, followed by an application, which identifies the training needs and requested course(s) and submits it directly to TWC. TWC evaluates the application and sends a funding notice to the small business and college. The college will provide the training and administer the grant.

10. If a trainee lives in one college district and works in another, how is enrollment eligibility determined?

In most cases, the eligible college will be determined based on the location of the business.

11. Do businesses pay the college for the training and be reimbursed by TWC?

No funds are disbursed to businesses. The college receives funding through a grant from TWC for the approved training. In some cases, the grant funding covers all tuition and fees, and in others it covers only a portion of those costs. The business is responsible for any costs not covered by the grant.

12. Is the application online?

Yes, the employer interest form and the online application can be found in the following link: Skills for Small Business Program - Texas Workforce Commission

BUSINESS QUESTIONS

13. Is the business required to pay participating employee(s) prevailing wage when training starts or by the completion of the training course(s)?

The prevailing wage is a statutory requirement and must be paid to employees at the time the application is submitted. As part of the review process, TWC will determine if the wages identified in the application meet this requirement.

14. Is the business required to provide benefits for participating employee(s)?

No. However, businesses must comply with the Fair Labor Standards Act (FLSA), 29 U.S.C. Chapter 8. (If employees are required by the business to attend the identified courses outside of standard work hours, the business must ensure appropriate compensation, in compliance with the FLSA.)

15. Must participating businesses provide matching funds or make an in-kind contribution?

No.

16. Is the business responsible for collecting Social Security numbers (SSN), wage and hire date information, and providing it to TWC and the college?

Yes. Once a business' application is determined to be fundable, TWC will notify the business and the college, an attachment will be included for the business to provide TWC and the college with the required information from each participating employee, including:

- Employee's full name, middle initial (if applicable), and last name
- Employee's Social Security number*
- Employee's mailing address
- Employee's birth date
- Employee's veteran status (Yes or No)
- Employee's hire date

IMPORTANT: There is no alternative to the use of an SSN as the identifier of individual employees participating in the Skills for Small Business program. Employees who do not allow the release of this information to TWC

will not be able to participate in the program.

17. Is there a minimum or maximum number of employees that a business must have participating in training?

No. A business may have any or all employees participate in training. Since a small business is defined as one that employs at least one individual and not more than 99 individuals' companywide, the minimum number of employees is one and the maximum number is 99.

Self-employed individuals are not eligible to participate in the Skills for Small Business program.

18. Are there restrictions on companies who are affiliated with corporations?

Yes. The program does not extend to those business entities that are associated with a corporate office, or part of a larger business, multiple business entity, or corporation; the program was designed to assist stand-alone business entities with training needs.

Funding for these types of entities may be applied for under the Skills Development Fund program.

19. Can a new employee take more than one course in a 12-month period if the total cost of those courses does not exceed the $2,000 limit covered under this program?

Yes, the program will cover up to $2,000 of tuition costs in a 12-month period for a new employee.

20. Are only full-time employees eligible training participants or will part-time employees be able to participate as well?

Only full-time, permanent employees may participate in the program.

21. Is there someone available to help a business fill out the application form?

There are several options for businesses to receive assistance. TWC's Employer Outreach Team is available and can be reached at (877) 463-1777 or by e-mail at skillsforsmallbusiness@twc.texas.gov.

22. I am a small business owner; do I qualify for training funds?

Business owners who are W-2 employees and meet all eligibility criteria could be considered for Skills for Small Business-funded training.

23. What types of businesses are eligible to participate in this program?

Private for profit and private non-profit businesses are eligible to participate.

A separate $1M initiative was approved to allow private for profit and private non-profit childcare facilities to receive training.

24. What if a business requests a training course the college does not offer?

Businesses must use the active college catalogs and course schedules to select requested training.

25. What is the deadline for submitting an application for training under Skills for Small Business?

Applications should be submitted at least two weeks prior to and no more than six weeks in advance of requested training. This will provide enough time for application processing and working with the local community college to enroll employees in any approved selected training. Training cannot be considered or funded retroactively.

Please note unreadable or incomplete applications cannot be accepted. Any unreadable documents received will be returned with required information identified for revision/completion and application resubmission.

NOTE: The application must be submitted within 90 days of the course start date. If training does not begin within 90 days of application submission, a new application would need to be submitted.

26. Will the Local Workforce Development Board be made aware of a business' Skills for Small Business award?

When a project is approved by TWC, the Board will be copied on the e-mail notification to the business and college.

27. Is the business required to list job postings in Work in Texas?

It is not a requirement, but we encourage businesses to take advantage of this service.

FUNDING QUESTIONS

28. Is third-party training vendors allowed to participate in this initiative?

No. The program will only cover course offerings provided by participating public community and technical colleges, Texas A&M Engineering Extension Service (TEEX), and the Texas A&M Engineering Experiment Station (TEES). It will not cover costs for course offerings from third- party vendors, universities, proprietary or vocational schools.

29. Will specialized courses be allowable, such as language acquisition, soft skills, OSHA and other safety training?

Requests for such training will be considered if the courses are offered by a participating public community or technical college, TEEX, or TEES. The business must provide adequate justification in the application for why the training is needed and how it will benefit the business' operations.

30. If a business requests a course that the college offers but is not in the catalog, will it be considered for funding?

Yes. Some colleges offer certain courses that may be of interest to local businesses, but that are not published in the course schedules. If a business knows about these courses, it can work with the college to schedule the course.

31. Can a training course that was customized for another business and is not listed in a catalog be funded?

Yes, if the course originated from a prior customized Skills training program and is now considered a regular open enrollment course offered by the college, and listed in their college catalog. However, if the business is requesting new courses that must be customized, then the business should work with the college to develop a Skills Development Fund project.

32. What is the reimbursement rate, and what does it cover?

Training for an employee hired within the twelve months prior to the submission of the application is considered a new hire, and the program will

cover course tuition costs up to $2,000 within the 12-month period following an approved application for that newly hired employee. For an incumbent employee, the program will cover course tuition costs up to $1,000 in the 12-month period following an approved application for the incumbent employee. The program covers only the course tuition listed in the college catalog, including lab and computer fees. There is no minimum or maximum number of required contact hours or required rate per hour.

33. What will not be funded under this program?

Costs associated with registration for credit courses are examples of costs that will not be funded through this program. Also, any course tuition and fees that exceed the amount allowable within a 12-month period must be paid for by the business or other funding source.

34. Will this program pay for courses that last more than 12 months, including pre-requisite courses?

The application should only include courses that can be completed within a 12-month period. However, a request for an extension from the college, or a second application for an additional 12-month period may be submitted for consideration once the initial 12-month period has elapsed.

35. If a business wants a new employee to take a course that requires a pre-requisite, who will be responsible for paying the difference if the combined cost of the courses is over $2,000?

The business is ultimately responsible for costs that exceed the $2,000 cap; however, it may leverage other funding sources to cover those costs.

COLLEGE QUESTIONS

36. What happens when administrative monies go to a department other than Continuing Education or contract training?

Administrative funds are intended to cover the costs incurred by the college to administer the grant, including program and financial reporting. Contract language states that grant funds shall only be expended for the costs incurred for authorized activities or performances rendered. TWC encourages all colleges to keep accurate records to document costs incurred in performing these functions.

37. How does the contracting process work with the colleges?

A technical or community college, TEEX, and TEES can contact TWC at (877) 463-1777 or by e- mail at skillsforsmallbusiness@twc.texas.gov and request information about the program or request to initiate a contract for the Skills for Small Business program. Contracts have a minimum amount of $20,000 plus 5% administration costs (total contract of $21,000) or the total cost of the approved training, whichever is higher.

The recently passed initiative to allow childcare facilities employees to be able to receive training through the Skills for Small Business Program requires the addition of childcare funds. If a college already has a Skills for Small Business contract, they need to contact their grant manager to request childcare funds be added and amended into their current contract.

38. When will the colleges know a business is requesting training?

Unless the business has talked with college staff in advance, the college will not know about the requested training until after the application has been submitted. Once TWC received an application it will notify the college that it has received an application from a business to take a course at their college. After TWC has reviewed and determined that an application is fundable, it will send a funding notice with instructions to the business and the college.

39. Is it possible for the college to group employees according to start time for reporting purposes, so that they can be treated as a cohort despite the variety of courses in which their employees are enrolled and for the number of different companies that are participating?

The Skills for Small Business program is intended to meet the immediate training needs of small businesses at times and in locations that are convenient to the business. The college can set up a reporting structure that is convenient for them if it meets TWC reporting requirements and does not adversely affect the business' participation.

40. How will colleges work together when a requested course is not offered at the college in the area where the business is located, but at a neighboring college?

Many neighboring colleges have established regional agreements to address service area issues so that business training needs are prioritized. In the event no such agreement is in place, TWC will work with the business and the colleges to achieve a viable solution.

41. How will contracts between TWC and colleges be managed?

Eligible grantees and TWC will work together to manage Skills for Small Business contracts. Colleges should direct contract management questions to their TWC contract manager.

42. What if a trainee does not complete the course either by not going to class or by dropping out?

The College is responsible for trainee tracking and reporting, including attendance confirmation and contact hours completed. The college will not be held responsible for performance if a trainee does not complete a course. The application requires the business to sign assurances that trainees will attend classes and complete the training. Although the business will not be penalized if enrolled trainees fail to attend class or drop out, it could impact approval of any future training requests. Additionally, Skills for Small Business cannot approve any requests for trainees to repeat previously approved courses.

43. What if an employee separates from the business?

The 60-day retention requirement in the Skills Development Fund contracts does not apply to the Skills for Small Business program.

44. If an individual is approved for training while employed by "Business A," but then goes to work for "Business B" while in the middle of the course, will the individual be allowed to complete the course?

Yes.

MARKETING QUESTIONS

45. How are the Local Workforce Development Boards (Boards) involved?

The Boards are an important part of this initiative. They are involved in marketing the program, convening businesses, and participating in the Governor's Small Business Forums. They can also identify locally targeted occupations and assist businesses with the application process.

46. How is the program marketed to the small businesses of Texas?

Marketing efforts to promote the Skills for Small Business program include press releases, brochures, a dedicated Skills for Small Business webpage, and participation in the Governor's Small Business Forums. Program brochures and information are available through the TWC Employer Engagement and Community Outreach Team, Local Workforce Development Boards, public community and technical colleges, economic development entities and Small Business Development Centers. TWC encourages community colleges to attend the Governor's Small Business Forums to promote courses and provide contact for future project development.

47. Can colleges receive a list of small businesses to recruit?

Yes. The TWC Employer Engagement and Community Outreach Team can provide colleges with local small business data. You may contact us at (877) 463-1777 or by email at skills@twc.texas.gov.

48. Will colleges be provided with documentation regarding this initiative to distribute to the appropriate departments within their institution's college?

Yes. The Skills for Small Business application and additional information are currently posted on the Skills for Small Business webpage. If additional information is needed, you may contact TWC's Employer Engagement and Community Outreach Team at (877) 463-1777 or by email at skills@twc.texas.gov.

Exhibit F - Correspondence with the Texas Workforce Commission, Skills for Small Business program (July 29 to August 10, 2026), including the response of Ms. Leigh Heath dated August 5, 2026, copying Mr. Seth Green, regional business liaison for the Dallas area

Gmail **Breno Nogueira <breno.nogueira@prikster-tech.com.br>**

Employer services inquiry – software company planning operations in Dallas

5 mensagens

Breno Nogueira <breno.nogueira@prikster-tech.com> 29 de julho de 2026 às 12:11
Para: info@wfsdallas.com

Dear Workforce Solutions Greater Dallas Business Services Team,
I hope this message finds you well.

My name is Breno de Castro Nogueira, and I am the founder of Prikster Tech, a software consulting company planning to establish operations in Dallas, with hiring projected across technology and support roles over its first five years, including a training and upskilling component for U.S. workers.

As we prepare our hiring and workforce development plans, we would appreciate guidance regarding the employer services available through Workforce Solutions Greater Dallas. Specifically, we would like to know:

1. Whether your Business Services team works with early-stage or newly established employers planning operations and hiring in the Dallas area, including the South Dallas / Fair Park area;
2. Which employer services may be available to support:
    - local recruitment and job posting;
    - candidate screening or referrals;
    - customized hiring events or job fairs;
    - labor-market information and wage data;
    - resources for employee training, upskilling, internships, or apprenticeship programs; and
    - partnerships with local workforce development organizations;
3. What the specific steps, registration requirements, or documentation are for an employer to begin utilizing these services;
4. Whether there is a dedicated Business Services representative or workforce specialist we should coordinate with as our hiring plans become more defined; and
5. Based on the plans described above, whether you could provide general guidance on Prikster Tech's potential to access employer services or other locally administered resources under the Workforce Innovation and Opportunity Act (WIOA), as well as the applicable requirements and next steps.

At this stage, we seek to understand the appropriate processes and available resources so that our future recruitment and personnel development activities can be planned responsibly and in coordination with the local workforce infrastructure.

Thank you for your time and guidance. We would be pleased to provide any additional information about the company, our planned operations, and our anticipated workforce needs.

Sincerely,
Breno de Castro Nogueira
Founder, Prikster Tech

Prikster-Tech-Overview.pdf
25K

Breno Nogueira <breno.nogueira@prikster-tech.com.br> 5 de agosto de 2026 às 12:06
Para: info@wfsdallas.com

Dear Workforce Solutions Greater Dallas Team,

I hope this message finds you well. I am writing to kindly follow up on my email below from last week, in case it did not reach you. I would be glad to provide any additional information that might be helpful.

Thank you very much for your time.

Kind regards,
Breno de Castro Nogueira
Founder – Prikster Tech

[Texto das mensagens anteriores oculto]

Jose Vega <jvega@wfsdallas.com> 5 de agosto de 2026 às 13:53
Para: "breno.nogueira@prikster-tech.com.br" <breno.nogueira@prikster-tech.com.br>

Hello, Mr. Breno. Thank you for your email. We would be happy to connect and assist as needed. Your direct POC is Ms. Gina Hodge. She is currently at an onsite meeting but should be following up with you soon. I am providing you with her direct contact information for your use and records. Additionally, I've listed the link below to where you can find services and resources available to employers.

Gina Hodge, Business Solution Liaison
ghodge@wfsdallas.com
Office: 972-573-3518
Mobile Number: 469 430 6316

Home - Workforce Solutions Greater Dallas

- **Business Services**
- **Labor Market Information**
- **Visit a Center; we have nine centers in Dallas County**

Should you need anything before connecting with Ms. Gina, just let me know. ~Jose

Jose J. Vega
Business Solutions Supervisor

International District Workforce Center

5757 Alpha Road, Suite 800, Dallas, TX 75240
jvega@wfsdallas.com

Office: 972-388-5615

Mobile: 945-247-0484

Fax: 972-388-5699
www.wfsdallas.com

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From: Breno Nogueira <breno.nogueira@prikster-tech.com.br>
Sent: Wednesday, August 5, 2026 10:07 AM
To: info@wfsdallas.com
Subject: Re: Employer services inquiry – software company planning operations in Dallas

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Breno Nogueira <breno.nogueira@prikster-tech.com.br> 10 de agosto de 2026 às 10:43
Para: Jose Vega <jvega@wfsdallas.com>

Hello Mr. Vega,

Thank you very much for your response and for connecting me with Ms. Hodge — she has already reached out, and I appreciate the smooth coordination.

Best regards,
Breno de Castro Nogueira
Founder, Prikster Tech

[Texto das mensagens anteriores oculto]

Jose Vega <jvega@wfsdallas.com> 10 de agosto de 2026 às 10:49
Para: Breno Nogueira <breno.nogueira@prikster-tech.com.br>

Hello, Mr. Breno. That is good to hear. Have a great week. ~Jose

[Texto das mensagens anteriores oculto]
[Texto das mensagens anteriores oculto]

Follow-Up

5 mensagens

Gina Hodge <ghodge@wfsdallas.com> qui., 6 de ago. de 2026 às 21:21
Para: breno.nogueira@prikster-tech.com <breno.nogueira@prikster-tech.com>

Hello,

My name is Gina Hodge and I would like to be of assistance with your upcoming staffing needs.

As a partner of the Texas Workforce Commission (TWC), Workforce Solutions Greater Dallas helps over 40,000 employers each year find qualified applicants. With a database of over 200,000 job seekers, we help employers with all of their hiring needs at no cost. Services have already been paid for you with your tax money.

We are happy to help you with:
* Display your event on our WorkInTexas.com website.
* Circulate your event to our community network.
* Run our Job Matching application to find and filter qualified applications.

As mentioned, our services are NO COST to you as an employer. The service has already been paid for you by your tax dollars. For more information and the next strps, contact me at ghodge@wfsdallas.com or by phone at 469 430 6316.

Best regards,

Gina Hodge
Business Solution Liaison
Irving North Office
2110 W Walnut Hill Lane Suite 100
Irving, Texas 75038
ghodge@wfsdallas.com
Office: 972-573-3518
Mobile Number: 469 430 6316
www.wfsdallas.com

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Gina Hodge <ghodge@wfsdallas.com> seg., 17 de ago. de 2026 às 11:23
Para: Breno Nogueira <breno.nogueira@prikster-tech.com.br>

Good Morning,

We would be delighted to support your requirement to hire within the Dallas County area. We must first set up your account in our WorkinTexas system. Some information is required for the next step. Could we please have your UI number from the Texas Workforce Commission and your FIN to proceed with your account activation? If you are using PEO for your payroll duties, we will also need their information.

City and zip code of job openings:
Employer:
Employer POC Name:
Employer Contact Info: i.e. telephone # and email address
Employer FEID #:
Employer UI #:

If you are using PEO for your payroll duties we will need the following:
PEO:
PEO POC Name:
PEO Contact Info: i.e. telephone # and email address
PEO FEID # for payroll:

Using Third Party Administrator (TPA) to post job orders? Yes or No
TPA:
TPA POC Name:
TPA Contact Info: i.e. telephone # and email address
TPA FEID #:

Do not hesitate to reach out if you have questions.

Gina Hodge
Business Solution Liaison
Irving North Office
2110 W Walnut Hill Lane Suite 100
Irving, Texas 75038
ghodge@wfsdallas.com

Office: 972-573-3518
Mobile Number: 469 430 6316
www.wfsdallas.com

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Book a time to meet with me

From: Breno Nogueira <breno.nogueira@prikster-tech.com.br>
Sent: Monday, August 17, 2026 7:54 AM
To: Gina Hodge <ghodge@wfsdallas.com>
Subject: Re: Follow-Up
[Texto das mensagens anteriores oculto]

Breno Nogueira <breno.nogueira@prikster-tech.com.br> seg., 17 de ago. de 2026 às 13:09
Para: Gina Hodge <ghodge@wfsdallas.com>

Dear Ms. Hodge,

Thank you very much for your response and for confirming that Workforce Solutions Greater Dallas would be able to support our hiring in the Dallas County area — that is exactly what we needed to understand at this stage.

As Prikster Tech is currently in the planning phase and not yet incorporated, we do not yet have the registration details you listed (FEID, UI number, or job opening locations). Once the company is established and we are ready to begin hiring, I will be glad to return with the complete information to set up our account in the WorkInTexas system.

Thank you again for your availability and guidance, it has been very helpful for our workforce planning.

Best regards,
Breno de Castro Nogueira
Founder, Prikster Tech
[Texto das mensagens anteriores oculto]

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Exhibit G – Correspondence with the City of Dallas Office of Economic Development (July 29 to August 10, 2026), including the response of Mr. Nicholas G. Becerra dated August 5, 2026

Gmail **Breno Nogueira <breno.nogueira@prikster-tech.com.br>**

Prikster Tech - SDFPOF Economic Development program

4 mensagens

Breno Nogueira <breno.nogueira@prikster-tech.com> 29 de julho de 2026 às 11:31
Para: nicholas.becerra@dallas.gov

Dear Mr. Becerra,
I hope this message finds you well.

My name is Breno de Castro Nogueira, founder of Prikster Tech, a software development and digital automation company planned to be established in Dallas, Texas, within the South Dallas/Fair Park Opportunity Fund service area. The company's five-year business plan projects the creation of 28 skilled technology and support positions, together with a training and upskilling program for U.S. workers.

I have reviewed the SDFPOF Program Statement (1-25 update). My understanding is that the Economic Development program supports projects or programs that create new jobs, retain existing jobs, or increase the Service Area tax base, with applications accepted on a rolling basis, which aligns closely with what Prikster Tech is being planned to do in the area. Could you confirm that this reading is correct for a company with this profile?

Thank you very much for your time and for the work the Office does for the South Dallas community.

Kind regards,
Breno de Castro Nogueira
Founder – Prikster Tech

Prikster-Tech-Overview.pdf
25K

Breno Nogueira <breno.nogueira@prikster-tech.com.br> 5 de agosto de 2026 às 12:05
Para: nicholas.becerra@dallas.gov

Dear Mr. Becerra,

I hope this message finds you well. I am writing to kindly follow up on my email below from last week, in case it did not reach you. I remain very interested in confirming my understanding of the Economic Development program, and I would be glad to provide any additional information that might be helpful.

Thank you very much for your time.

Kind regards,
Breno de Castro Nogueira
Founder – Prikster Tech

[Texto das mensagens anteriores oculto]

Becerra, Nicholas <nicholas.becerra@dallas.gov> 5 de agosto de 2026 às 12:57
Para: Breno Nogueira <breno.nogueira@prikster-tech.com>

Hi Bruno,

Thanks for reaching out. Sorry I missed this message last week!

Yes, that is correct. The SDFPOF's economic development program can support development projects in the service area which help to expand the area's tax base or create/retain jobs in the community. The program provides *gap funding* – meaning we cannot be the first or sole funder in your capital stack - for the construction/major rehab portion of a project. The awards are structured, typically, as a minimum 75% flexible term loan and up to 25% grant. All

applications must go through underwriting, which helps us structure a potential package, and must be approved by the SDFPOF board and possibly City Council, depending on the size of the project.

I would be happy to chat on the phone if you have more questions!

Nicholas G. Becerra, *Coordinator*
City of Dallas | Office of Economic Development

Office: (214) 670-1695 | **Cell:** (972) 809-9137

From: Breno Nogueira <breno.nogueira@prikster-tech.com>
Sent: Wednesday, July 29, 2026 9:32 AM
To: Becerra, Nicholas <nicholas.becerra@dallas.gov>
Subject: Prikster Tech - SDFPOF Economic Development program

External Email!

[Texto das mensagens anteriores oculto]

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Breno Nogueira <breno.nogueira@prikster-tech.com.br> 10 de agosto de 2026 às 10:42
Para: "Becerra, Nicholas" <nicholas.becerra@dallas.gov>

Dear Mr. Becerra,

Thank you very much for the confirmation and for the clear overview of how the program is structured. This is very helpful for our planning as we work to establish the company within the service area, and I will be glad to reach back out as our operations take shape.

Thank you again for your time and for the work the Office does for the South Dallas community.

Kind regards,
Breno de Castro Nogueira
Founder – Prikster Tech

[Texto das mensagens anteriores oculto]

Exhibit H - City of Dallas, South Dallas / Fair Park Opportunity Fund Program Statement and program flyer

CITY OF DALLAS
SOUTH DALLAS/FAIR PARK OPPORTUNITY FUND
PROGRAM STATEMENT

HISTORY

In 1987, the City Council adopted the South Dallas/Fair Park Neighborhood Preservation and Economic Development Plan (CR 87-0632), a land use plan for the neighborhoods surrounding Fair Park. One of the plan recommendations was to "establish a South Dallas/Fair Park Trust Fund that is capitalized with a special assessment on admissions to Fair Park to generate funding for the Trust Fund." In 1989, the City Council established a Fair Park Task Force to develop a strategy to invest funds generated by Fair Park into the surrounding community (CR 89-1159). Among other things, the Task Force recommended creation of an advisory board to oversee administration of the funds and recommended annual funding from Fair Park activities, amphitheater tickets sales, general fund contributions, and other sources. The Task Force funding recommendations were adopted by CR 89-3605, and the advisory board was codified in Dallas City Code Sections 2-130 through 2-132. The trust fund funding, policies, and purpose have been amended a number of times over the past 35 years. This program statement is intended to provide a clear summation of the current program, and replaces and supersedes all prior City Council actions related to the trust fund. Pursuant to Ordinance No. 30905 approved by City Council on June 27, 2018, the name of the advisory board was amended to the "South Dallas/Fair Park Opportunity Fund board," and, therefore, the funds the board directs are referred to herein as the "South Dallas/Fair Park Opportunity Fund."

PURPOSE

The purpose of the South Dallas/Fair Park Opportunity Fund (the "Opportunity Fund") is to provide loans and grants to promote economic development and support human development initiatives in the neighborhoods surrounding Fair Park.

SERVICE AREA

The Opportunity Fund will only issue loans or grants to businesses or entities located within, relocating to, or serving a population at least 90% of which are residents of the following 2020 Census tracts (the "Service Area"): 25, 27.03, 37, 115, 203, 208, and 209. A map of the Service Area is attached as **Exhibit B**.

ADMINISTRATION

The Opportunity Fund is administered by the City of Dallas Office of Economic Development, in coordination with the South Dallas/Fair Park Opportunity Fund board. The board is appointed by the City Council in conformance with Dallas City Code 2-130 through 2-132. The Opportunity Fund shall reimburse the Office of Economic Development for staff time and expenses allocable to oversight and administration of the Opportunity Fund.

FUNDING SOURCES

The funding sources of the Opportunity Fund are:

1. **FAIR PARK ACTIVITIES**: For each ticket sold for an event at the amphitheater located in Fair Park, 20 cents will be contributed to the Opportunity Fund. Additionally, half of all profits from flea markets and antique shows at Fair Park will be contributed to the Opportunity Fund annually. The City's Park and Recreation Department is responsible for calculation of the Fair Park Activities payments and for the annual transfer of the payment to the Opportunity Fund administered by the Office of Economic Development.

2. **PILOT**: If Fair Park Activities generate less than $500,000 in any year, the Office of Economic Development will allocate a portion of its annual PILOT funding allocation to make up the balance so that the minimum amount of Fair Park Activities plus PILOT funds paid to the Opportunity Fund in any year is $500,000.

3. **REVENUE**: This includes operating revenue such as loan repayments and earned interest.

FINANCIAL AWARDS

The following general provisions apply to financial awards from the Opportunity Fund:

1. Funds may be used for human development contracts or economic development projects, as defined below.

2. In each fiscal year:

a. a maximum of 25% of budgeted funds may be awarded as grants;

b. a minimum of 75% of budgeted funds must be awarded as repayable loans;

c. a maximum of $200,000 may be awarded for human development contracts with all other funds awarded for economic development projects, as both terms are defined below;

d. other than as described above, there is no minimum or maximum loan or grant size; and

e. unawarded or reprogrammable funds from any fiscal year roll into the next fiscal year's budget.

3. "**Human development contracts**" are defined as contracts for services directly benefitting residents of the Service Area which accomplish one of the five goals identified in Section 3(e) below.

a. **Eligibility**. Human development applicants, including their affiliates and subsidiaries, shall only be eligible for Opportunity Funds awards twice in any 5-year period. Human development contracts shall only be awarded for new or expanded services to residents of the Service Area and shall only be used to pay for costs attributable

to that new or expanded service. Funds shall not be awarded to persons or entities who have outstanding city liens or tax liens, who are party to a lawsuit against the City, who have filed for bankruptcy in the previous 5 years, who are currently in default under any other agreement with the City, or who have in the previous 5 years been party to a contract with the City that was terminated due to default.

b. **Payment**. Human development contract awards will be paid as a reimbursement of actual expenses and shall not be paid more often than quarterly. Each request for reimbursement shall include evidence of the expense satisfactory to the Director of the Office of Economic Development in his or her sole discretion, as well as an explanation of how the expense was related to the human development program.

c. **Match**. Each human development contract application must include evidence of a dollar-for-dollar match from a third-party funding source or as cash-on-hand. If a grant, the match must be specific to the human development program and must be received within the contract term. At least 80% of the match must be in the form of cash. Up to 20% of match may be in the form of volunteer labor or other in-kind source acceptable to and valued by the Director of the Office of Economic Development in his or her sole discretion. Volunteer labor will be valued at the then-current federal minimum wage. Evidence of the volunteer labor match must be submitted with each reimbursement request in the form of a volunteer hours log on awardee letterhead. Each entry must include the date and hours of service, as well as the legible printed name, address, phone number, and signature of each volunteer.

d. Persons Served. Human development services must be targeted to residents of the Service Area. Unless located entirely in the Service Area, each awardee must keep records documenting that at least 90% of the persons served under the contract are residents of the Service Area. This documentation must be submitted to the City with each reimbursement request.

e. **Contracts**. Human development contracts must include a provision requiring the awardee to track and report measurable outcomes to demonstrate progress toward one of the following goals in the Service Area: (i) increase workforce participation and readiness; (ii) stimulate small business activity and growth, including the creation of a microgrant program; (iii) improve health outcomes; (iv) improve public safety; and (v) improve educational outcomes.

4. "**Economic development projects**" are defined as projects or programs that result in the creation of new jobs, the retention of existing jobs, or an increase in the Service Area tax base.

a. **Eligibility**. Loans or grants shall not be awarded to persons or entities who have outstanding city liens or tax liens, who are party to a lawsuit against the City, who have filed for bankruptcy in the previous 5 years, who are currently in default under any other agreement with the City, or who have in the previous 5 years been party to a contract with the City that was terminated due to default.

b. **Contracts**. Economic development project contracts must include a provision requiring the grantee or borrower to track and report measurable outcomes to demonstrate progress toward one of the following goals in the Service Area: (i) creation of jobs; (ii) retention of jobs; (iii) an increase in Service Area tax base; (iv) stimulation of small business activity and growth

PUBLIC PURPOSE

All loans and grants must accomplish a public purpose, as required by the Office of Economic Development's underwriting criteria. The City Council finds that the human development contracts and economic development projects described herein serve a valid public purpose.

Each proposal will be analyzed to ensure that the incentive serves a public purpose and provides a public benefit in conformance with this program statement and in conformance with state law and controlling caselaw. Financial awards will be documented in written agreements to ensure that the City retains control over the public funds to guarantee that the public purpose is actually accomplished as a return benefit to the City.

APPLICATION

Economic Development Projects:

- Applications for economic development loans and grants will be accepted on a rolling basis. The application form and underwriting criteria will be the current forms and criteria in use by the Office of Economic Development, and the size of any loan or grant will be determined based on that underwriting criteria.

- Staff will review each application for completeness to ensure that the proposed project meets the criteria of this program statement and to ensure that the proposal complies with all underwriting criteria of the Office of Economic Development.

- Based on the review and underwriting findings, staff will either decline the application or recommend funding.

- Projects recommended by staff for funding will be briefed to the South Dallas/Fair Park Opportunity Fund board and, if recommended by the South Dallas/Fair Park Opportunity Fund board, will then proceed through the City of Dallas approval process in conformance with Office of Economic Development policies.

Human Development Contracts:

- Applications for human development awards will be accepted on an up to bi-annual basis in response to a Notice of Funding Availability (NOFA) issued by the Office of Economic Development.

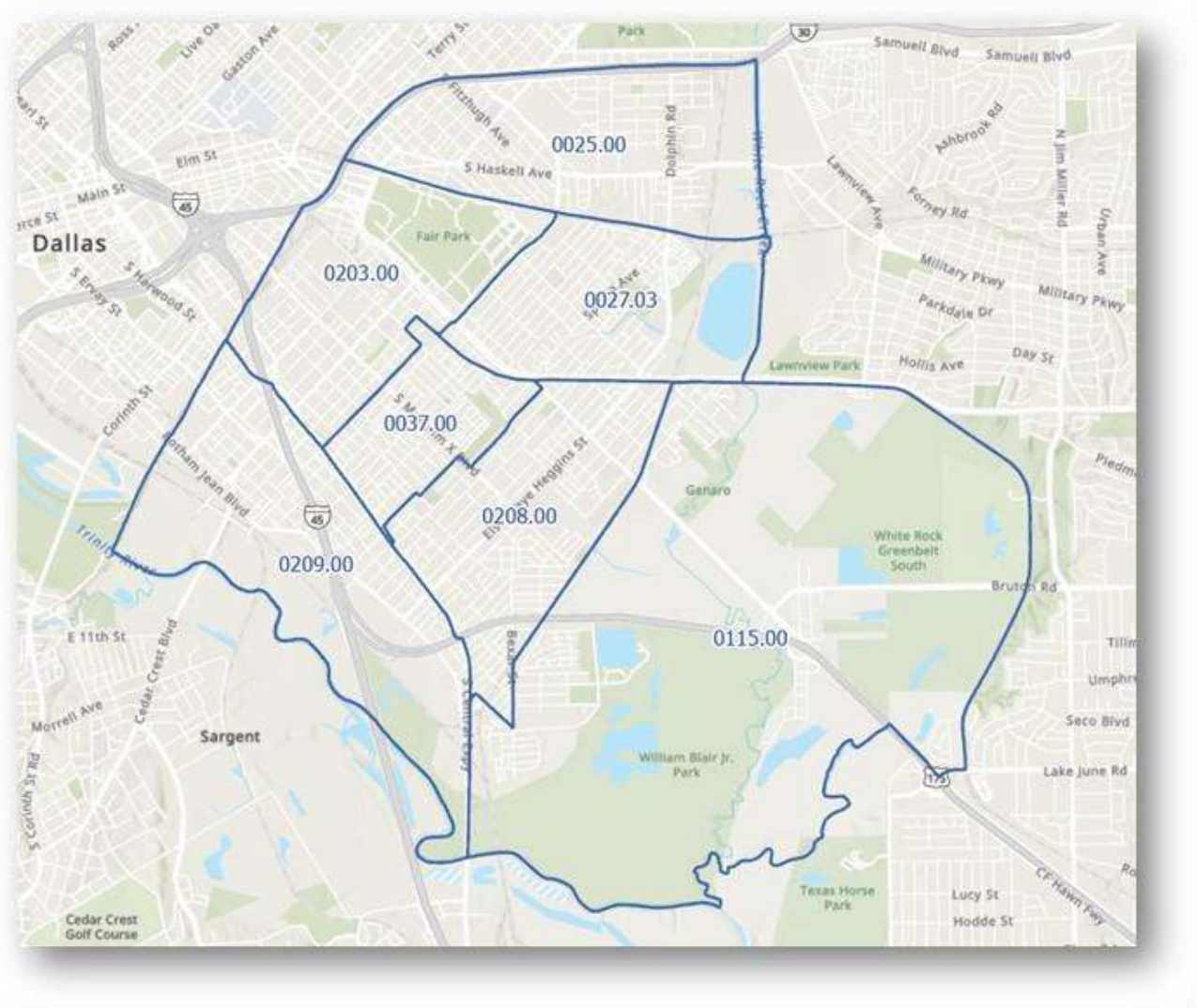
- The application form, procedures, and evaluation criteria will be released as exhibits to each NOFA. The size of any grant will be determined in conformance with programmatic and NOFA guidelines.

- Staff will review all applications for completeness and for compliance with the NOFA and this

program statement.

- Projects recommended by staff for funding will be briefed to the South Dallas/Fair Park Opportunity Fund board, and, if recommended by the South Dallas/Fair Park Opportunity Fund board, will then proceed through the City of Dallas approval process in conformance with Office of Economic Development policies.

Exhibit B
Service Area Map



THE SOUTH DALLAS/FAIR PARK OPPORTUNITY FUND

City of Dallas | Economic Development







The South Dallas/Fair Park Opportunity Fund (SDFPOF) offers dedicated funding to empower and assist South Dallas businesses and nonprofits. Since 2021, more than $2.5 million has been approved by the SDFPOF board for the community. The fund offers two programs that support entities located in or serving the SDFPOF service area.

HUMAN DEVELOPMENT

The human development program provides grants to **nonprofit organizations** launching new or expanded projects that create measurable improvements in:

- Workforce participation
- Small business growth
- Health outcomes
- Public safety
- Educational outcomes

Funding for human development projects is offered up to two times a year through a Notice of Funding Availability.

ECONOMIC DEVELOPMENT

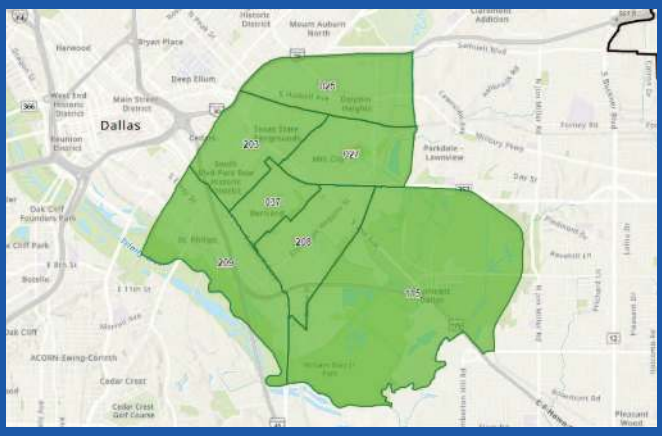
Economic development funding is focused on **real estate** projects that:

- Create jobs
- Retain existing employment
- Increase the area's tax base

Awards are structured as a minimum of 75% loan and up to 25% grant funding, enabling sustainable economic growth in the community and ensuring fund availability for future years.

Economic development applications are accepted on an ongoing basis.

SDFPOF SERVICE AREA



SDFPOF funding is limited to projects in its designated service area, comprised of 2020 Census Tracts 25, 27.03, 37, 115, 203, 208, and 209.

To learn more, scan the QR code.

Exhibit I - C.III - The Proposed Endeavor:

PRIKSTER TECH

Custom Software Development & Digital Automation for U.S. Small and Mid-Sized Businesses

Dallas, Texas (planned)

> "To design, develop, and evolve SaaS solutions and customized software systems that improve operational efficiency, service automation, and digital management capabilities for small and mid-sized service-based businesses across the United States."

THE FOUNDER

Prikster Tech is founded by **Breno de Castro Nogueira**, a senior software engineer with over 10 years of professional experience, including 7+ years building production-grade SaaS for U.S. service businesses at leading field service management platforms such as Kickserv and Joist (EverCommerce). His hands-on expertise covers backend development and API design, scheduling, estimates-to-invoice workflows, subscription and billing systems, payment processing, and accounting integrations (QuickBooks, Xero, Stripe).

THE PROBLEM WE ADDRESS

Many U.S. small and mid-sized businesses still run on manual workflows, fragmented software tools, or legacy applications that were never designed to integrate or scale. The result: operational inefficiency, data inconsistency, and limited visibility into business performance, often without internal technical expertise to fix it.

SERVICES

01 Custom software development for small and medium-sized enterprises

02 Digital transformation and process automation

03 Scalable SaaS architecture and platform engineering

04 API development and systems integration

05 Cybersecurity assessment

06 Technical leadership, mentorship, and engineering process optimization

WHO WE SERVE

Service-based small and mid-sized businesses across industries and regions: companies that depend on scheduling, quoting, invoicing, payments, and integrated day-to-day operations to run and grow.

WHY PRIKSTER TECH

Platform-builder insight, applied to the client side: the founder helped build the SaaS platforms that U.S. service businesses run on every day. That inside-out knowledge of how these systems work, and where they fall short, translates into solutions that integrate cleanly with the tools a business already uses, instead of replacing them.

HOW WE WORK

Prikster Tech operates a hybrid model in which hands-on consulting and implementation services support and validate the development of scalable software platforms, combining immediate client value with long-term, repeatable solutions adaptable across industries and regions. The company also invests in people: developer training, mentorship, and modern engineering practices that strengthen the domestic software workforce.

STATUS

The company is planned to be established in Dallas, Texas, with initial capital committed and a five-year business plan projecting the creation of 28 skilled positions, including a training and upskilling program for U.S. workers.

Breno de Castro Nogueira, Founder | breno.nogueira@prikster-tech.com | linkedin.com/in/brenocnogueira