U.S. Citizenship and Immigration Services

Non-Precedent Decision of the Administrative Appeals Office

MATTER OF V-K-A- INC.

DATE: AUG. 20, 2019

APPEAL OF TEXAS SERVICE CENTER DECISION

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

The Petitioner, a wholesaler and retailer of vaping products and devices, seeks to employ the Beneficiary as its President/CEO under the L-1A nonimmigrant classification for intracompany transferees. Immigration and Nationality Act (the Act) section 101(a)(15)(L), 8 U.S.C. § 1101(a)(15)(L). The L-1A classification allows a business to transfer a qualifying foreign employee to the United States to temporarily work in a managerial or executive capacity.

The Director of the Texas Service Center denied the petition, concluding that the Petitioner did not establish, as required: (1) that the Beneficiary would be employed in a managerial or executive capacity in the United States; or (2) that the Beneficiary was employed abroad in a managerial or executive capacity.

On appeal, the Petitioner asserts that the Beneficiary will be its chief representative in the U.S. office, and that he served as managing director of the entity abroad.

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

I. LEGAL FRAMEWORK

To establish eligibility for the L-1A nonimmigrant visa classification, a qualifying organization must have employed the beneficiary "in a capacity that is managerial, executive, or involves specialized knowledge," for one continuous year within three years preceding the beneficiary's application for admission into the United States. Section 101(a)(15)(L) of the Act. In addition, the beneficiary must seek to enter the United States temporarily to continue rendering his or her services to the same employer or a subsidiary or affiliate thereof in a managerial or executive capacity. *Id.*

II. U.S. EMPLOYMENT IN A MANAGERIAL OR EXECUTIVE CAPACITY

The first issue to be addressed is whether the Petitioner established that the Beneficiary will be employed in a managerial or executive capacity in the United States. Because the Petitioner has not

specified whether the Beneficiary will be employed in a managerial or executive capacity, we will address both below.

The term "managerial capacity" means an assignment within an organization in which the employee primarily manages the organization, or a department, subdivision, function, or component of the organization; supervises and controls the work of other supervisory, professional, or managerial employees, or manages an essential function within the organization, or a department or subdivision of the organization; has authority over personnel actions or functions at a senior level within the organizational hierarchy or with respect to the function managed; and exercises discretion over the day-to-day operations of the activity or function for which the employee has authority. Section 101(a)(44)(A) of the Act.

The term "executive capacity" is defined as an assignment within an organization in which the employee primarily directs the management of the organization or a major component or function of the organization; establishes the goals and policies of the organization, component, or function; exercises wide latitude in discretionary decision-making; and receives only general supervision or direction from higher-level executives, the board of directors, or stockholders of the organization. Section 101(a)(44)(B) of the Act.

When examining the managerial or executive capacity of a given beneficiary, we will look to the petitioner's description of the job duties. *See* 8 C.F.R. § 214.2(l)(3)(ii). Based on the definitions of managerial and executive capacity, the Petitioner must first show that the Beneficiary will perform certain high-level responsibilities. *Champion World, Inc. v. INS*, 940 F.2d 1533 (9th Cir. 1991) (unpublished table decision). Second, the Petitioner must prove that the Beneficiary will be *primarily* engaged in managerial or executive duties, as opposed to ordinary operational activities alongside the Petitioner's other employees. *See Family Inc. v. USCIS*, 469 F.3d 1313, 1316 (9th Cir. 2006); *Champion World*, 940 F.2d at 1533.

Beyond the required description of the job duties, we examine the company's organizational structure, the duties of a beneficiary's subordinate employees, the presence of other employees to relieve a beneficiary from performing operational duties, the nature of the business, and any other factors that will contribute to understanding a beneficiary's actual duties and role in a business. If staffing levels are used as a factor in determining whether an individual is acting in a managerial or executive capacity, we take into account the reasonable needs of the organization, in light of the overall purpose and stage of development of the organization. *See* section 101(a)(44)(C) of the Act.

A. Duties

The Petitioner is a wholesaler and retailer of vaping products and devices.[1] The petition indicated that the Beneficiary will facilitate growth, sales, and marketing strategy; and reach marketing objectives

[1] On appeal, the Petitioner states that the foreign entity decided to expand its business in the United States. It states that the U.S. office acts as a branch or subsidiary office of the foreign entity and plays an important role in its expansion. However, the two businesses have completely different product lines – one designs and manufactures children's furniture and the other sells vaping products. Further, the U.S. entity is not a branch or subsidiary of the foreign entity. The

such as revenue generation, cost reduction, and risk mitigation. In support of the petition, the Petitioner submitted a letter stating that the Beneficiary will manage teams in [redacted] and [redacted] and oversee pricing and market research activities, designing advertising and promotions. It also stated that his duties would include:

- Directing and planning, development, and execution of [redacted]'s marketing and advertising initiatives;
- Generating revenue by increasing sales through successful marketing for the company using market research, pricing, product marketing, marketing communications, advertising and public relations;
- Executing new business development, product development, distribution channel management and customer service; and
- Ensuring our products are distributed across channels to targeted audiences in order to meet sales objectives via multiple platforms.

The Petitioner re-submitted the same letter in response to the Director's request for evidence (RFE) after the Director advised the Petitioner that the duty description lacked sufficient detail regarding what the Beneficiary would be doing on a day-to-day basis. In his decision, the Director determined that the position description did not provide sufficient detail; did not provide sufficient corroborating evidence; and did not meet the four prongs of the definition of manager.

On appeal, the Petitioner states that the Beneficiary "and his team are relieved from performing daily beneficial job duties" including:

- hire new staff and fire not suitable staff
- assign staff working time table
- fix daily working time and routing;
- training newly hired staff with bare experience in selling techniques
- advertise new products online such as Yelp! And You Tube
- collect cash from the store and bank in to the bank everyday
- manage the paychecks for staffs weekly
- manage the paychecks of rent, electricity, water, internet, and cleaning companies
- approve and purchase goods from wholesale clubs
- report company status to the mother company monthly
- cooperating with the local real-estate agents to seek for new shop locations

The statement states that the Beneficiary and his team are "relieved" from these duties, but it is not clear who is actually performing the duties if the Beneficiary and his team are not.

We agree with the Director that the Petitioner did not establish that the Beneficiary would be employed in a managerial or executive capacity in the United States. The Petitioner initially provided broad statements that do not meaningfully describe what the Beneficiary will be doing on a daily basis. The duties focus primarily on marketing and advertising, but the Petitioner has not established that these

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Petitioner has not resolved the inconsistencies with independent, objective evidence. *Matter of Ho*, 19 I&N Dec. 582, 591-92 (BIA 1988).

are managerial or executive duties. The duties also include business and product development, but no development plans were submitted and the Petitioner provided no additional insight into what business or product development would entail within the scope of its operations. On appeal, the Petitioner states that the foreign entity decided to expand its business in the United States. It states that the U.S. office acts as a branch or subsidiary office of the foreign entity and plays an important role in its expansion. However, the two businesses have completely different product lines – one designs and manufactures children's furniture and the other sells vaping products. Further, the U.S. entity is not a branch or subsidiary of the foreign entity. The Petitioner has not resolved the inconsistencies with independent, objective evidence. *Matter of Ho*, 19 I&N Dec. 582, 591-92 (BIA 1988). Thus, the Petitioner's statement on appeal further confuses the record regarding the Beneficiary's duties and the Petitioner's business activities. Specifics are clearly an important indication of whether a beneficiary's duties are primarily executive or managerial in nature, otherwise meeting the definitions would simply be a matter of reiterating the regulations. *Fedin Bros. Co., Ltd. v. Sava*, 724 F. Supp. 1103, 1108 (E.D.N.Y. 1989), *aff'd*, 905 F.2d 41 (2d. Cir. 1990). Reciting a beneficiary's vague job responsibilities or broadly-cast business objectives is not sufficient; the regulations require a detailed description of the beneficiary's daily job duties.

Further, despite the Director's request in the RFE, the Petitioner did not provide time allocations for the duties, so it is not clear how the Beneficiary would allocate his time primarily to managerial or executive tasks.[2] Whether the Beneficiary is a managerial or executive employee turns on whether the Petitioner has sustained its burden of proving that their duties are "primarily" managerial or executive. *See* sections 101(a)(44)(A) and (B) of the Act. Here, the Petitioner does not document what proportion of the Beneficiary's duties would be managerial or executive functions and what proportion would be non-qualifying. The Petitioner lists the Beneficiary's duties, but does not quantify the time the Beneficiary would spend on these different duties. This lack of documentation is important because, as noted above, several of the Beneficiary's daily tasks, such as marketing and advertising, do not fall directly under managerial or executive duties as defined in the statute. For this reason, we cannot determine whether the Beneficiary would be primarily performing the duties of a manager or an executive. *See IKEA US, Inc. v. U.S. Dept. of Justice*, 48 F. Supp. 2d 22, 24 (D.D.C. 1999).

By statute, eligibility for this classification requires that the duties of a position be primarily executive or managerial in nature. Here, the job description is too vague to establish that the Beneficiary's actual day-to-day duties would be managerial or executive in nature.

B. Staffing and Organizational Structure

The Petitioner claimed to have five employees at the time of filing the petition in October 2018. It submitted copies of 2018 IRS Forms W-2, Wage and Tax Statement for four employees, none of which made more than $1,500 that year. The record does not contain the Form W-2 employees' job titles,

[2] Any failure to submit requested evidence that precludes a material line of inquiry shall be grounds for denying the petition. 8 C.F.R. § 103.2(b)(14).

descriptions of their duties, or evidence of their positions within the U.S. organization. Based on the wages paid, it does not appear that the Petitioner employed any full-time employees in 2018.[3]

Despite the Director's request for an organizational chart for the U.S. entity, the Petitioner declined to provide one. Instead, on appeal, the Petitioner lists five team members, their salaries, and their job titles, including a store supervisor and four salesmen. However, none of the individuals listed in the statement on appeal match the individuals listed on the Petitioner's 2018 IRS Forms W-2. The Petitioner has not resolved this inconsistency with independent, objective evidence pointing to where the truth lies. *Matter of Ho*, 19 I&N Dec. at 591-92. Therefore, the actual staffing of the U.S. entity is not clear. Given that the 2018 Forms W-2 indicate that the Petitioner does not employ any full-time workers, it appears that the Beneficiary would be primarily performing the daily operational duties of the business.

The statutory definition of "managerial capacity" allows for both "personnel managers" and "function managers." *See* section 101(a)(44)(A)(i) and (ii) of the Act. Personnel managers are required to primarily supervise and control the work of other supervisory, professional, or managerial employees. Contrary to the common understanding of the word "manager," the statute plainly states that a "first line supervisor is not considered to be acting in a managerial capacity merely by virtue of the supervisor's supervisory duties unless the employees supervised are professional." Section 101(a)(44)(A) of the Act. If a beneficiary directly supervises other employees, the beneficiary must also have the authority to hire and fire those employees, or recommend those actions, and take other personnel actions. Section 101(a)(44)(A)(iii) of the Act.

As noted, the record does not show that the Beneficiary would primarily supervise and control the work of other supervisory, professional, or managerial employees. His job duties do not include any supervisory tasks. Although the Director requested the information, the record does not contain an organizational chart for the Petitioner, nor does it include job descriptions or provide the level of education required to perform the duties. Thus, the Petitioner has not established that any subordinates possess baccalaureate degrees and that their positions require such degrees, such that we can consider these employees to be professionals. The Petitioner has also not shown that any subordinates would supervise other employees or that they would manage a department or function, such that they can be classified as managers or supervisors. Accordingly, the Petitioner has not established that the Beneficiary qualifies as a personnel manager based on the supervision of managerial, supervisory, or professional employees.

The Petitioner also has not articulated a specific function that the Beneficiary will manage. The term "function manager" applies generally when a beneficiary does not supervise or control the work of a subordinate staff but instead is primarily responsible for managing an "essential function" within the organization. *See* section 101(a)(44)(A)(ii) of the Act. If a petitioner claims that a beneficiary will

[3] Given the staffing irregularities, it is not clear that the Petitioner is actually doing business in the United States. The regulations define a qualifying organization as one doing business as an employer in the United States. *See* 8 C.F.R. § 214.2(l)(1)(ii)(2). "Doing business," is defined as the regular, systematic, and continuous provision of goods or services. 8 C.F.R. § 214.2(l)(14)(ii)(A) and 8 C.F.R. § 214.2(l)(1)(ii)(H). The record contains financial documentation for a separate entity, [redacted] but the record does not indicate how the documentation is relevant to the Petitioner's business. In any future proceedings, the Petitioner must establish with relevant, probative, and credible evidence that it is doing business in the United States. *See Matter of Chawathe*, 25 I&N Dec. 369, 376 (AAO 2010).

manage an essential function, it must clearly describe the duties to be performed in managing the essential function. In addition, the petitioner must demonstrate that "(1) the function is a clearly defined activity; (2) the function is 'essential,' i.e., core to the organization; (3) the beneficiary will primarily *manage*, as opposed to *perform*, the function; (4) the beneficiary will act at a senior level within the organizational hierarchy or with respect to the function managed; and (5) the beneficiary will exercise discretion over the function's day-to-day operations." *Matter of G- Inc.*, Adopted Decision 2017-05 (AAO Nov. 8, 2017). In this matter, the Petitioner has not described or provided evidence that the Beneficiary manages an essential function. As previously noted, the Petitioner has not clearly described the Beneficiary's duties, and its statement on appeal further confuses the record regarding the Beneficiary's duties and the Petitioner's business activities. Without an organizational chart or an understanding of the Petitioner's staffing, it is not clear that the Beneficiary would act at a senior level within the organizational hierarchy or with respect to the function managed, or that he would exercise discretion over the function's day-to-day operations.

The Petitioner has not established, in the alternative, that the Beneficiary would be employed in an executive capacity. The statutory definition of the term "executive capacity" focuses on a person's elevated position within a complex organizational hierarchy, including major components or functions of the organization, and that person's authority to direct the organization. Section 101(a)(44)(B) of the Act. Under the statute, a beneficiary must have the ability to "direct the management" and "establish the goals and policies" of that organization. Inherent to the definition, the organization must have sufficient employees to relieve the Beneficiary from performing operational duties and to allow the Beneficiary to primarily focus on the broad goals and policies of the organization rather than the day-to-day operations of the enterprise. An individual will not be deemed an executive under the statute simply because they have an executive title or because they "direct" the enterprise as the owner or sole managerial employee.

The Petitioner has not provided sufficient detail or supporting evidence to support a claim that he would direct the management of the organization and that he would primarily focus on the broad goals and policies of the organization, rather than on its day-to-day operations. Based on the discrepancies in the staffing and the lack of an organizational chart, the Petitioner has not identified who actually provides its wholesale and retail services, and it has not demonstrated that the Beneficiary is relieved from performing the operational tasks of the business. It has not shown that it has the infrastructure to support the Beneficiary in either an executive or a managerial capacity.

Accordingly, the Petitioner has not met its burden to establish that it would employ the Beneficiary in a primarily managerial or executive capacity.

III. EMPLOYMENT ABROAD IN A MANGERIAL OR EXECUTIVE CAPACITY

The second issue to be addressed is whether the Petitioner established that the Beneficiary is employed abroad in a managerial or executive capacity. As with the U.S. position, we will discuss evidence regarding the Beneficiary's job duties along with evidence of the nature of the foreign entity's business, its staffing levels, and its organizational structure.

A. Duties

The Petitioner indicated on the petition that the Beneficiary has been the sole owner and managing director of [redacted] in Hong Kong since 1996, which specializes in the design and manufacture of children's furniture.[4] It stated that he has been serving as operational leader as the CEO/President "where he is responsible for the overall management and direction of the Company; determining, formulating and implementing policies to meet financial and operational goals; and directing the organization's financial activities to fund operations and increase efficiency." In a letter in support of the petition, [redacted] indicated that the Beneficiary is also the principal product designer of [redacted] and that he provides professional design ideas to customers. The petitioner also stated in a support letter that the company has manufacturing and production facilities in China and a distribution center in Hong Kong.

In response to the Director's request for clarification regarding the Beneficiary's day-to-day duties, the Petitioner submitted the same support letters from the Petitioner and the foreign entity that were submitted with the initial petition. In his decision, the Director determined that the position description did not provide sufficient detail; did not provide sufficient corroborating evidence; and did not meet the four prongs of the definition of manager.

We agree with the Director's determination that the submitted position description does not demonstrate that the Beneficiary primarily performs managerial or executive duties. The position description consists mainly of broad duties that could apply to any senior position, and does not provide insight into the nature of the Beneficiary's day-to-day duties as the managing director. General statements, such as "responsible for the overall management and direction of the Company;" "determining, formulating and implementing policies to meet financial and operational goals;" and "directing the organization's financial activities to fund operations and increase efficiency" do not describe the types of tasks the Beneficiary performs. Conclusory assertions regarding the Beneficiary's employment capacity are not sufficient. Merely repeating the language of the statute or regulations does not satisfy the Petitioner's burden of proof. *Fedin Bros.,* 724 F. Supp. at 1108, *aff'd*, 905 F. 2d 41 (2d. Cir. 1990). The Petitioner did not describe any specific policies he implemented or provide examples of any policies he developed, nor did it provide details on the financial activities he directs, or explain who assists him with these activities. Further, the Beneficiary serves as principal product designer of the foreign entity, and the Petitioner has not established that designing children's furniture is a managerial or executive duty.

Further, despite the Director's request in the RFE, the job description did not provide time allocations for the Beneficiary's duties, so it is not clear what proportion of the Beneficiary's duties are managerial or executive functions and what proportion are non-qualifying. This lack of documentation is important because, as noted above, the Beneficiary's role as principal product designer does not qualify as a managerial or executive duty as defined in the statute. For this reason, we cannot determine whether the Beneficiary is primarily performing the duties of a manager or an executive. *See IKEA US, Inc. v. U.S. Dept. of Justice*, 48 F. Supp. 2d at 24.

[4] The record indicates that the Beneficiary was previously granted L-1 nonimmigrant status with the Petitioner, valid from June 8, 2016, to June 7, 2017.

Like the U.S. position, the job description here is too vague to establish that the Beneficiary's actual day-to-day duties abroad are managerial or executive in nature.

B. Staffing and Organizational Structure

With the petition, the Petitioner submitted a company profile for the foreign entity which identifies the beneficiary as a managing director and also includes a director, sales and marketing manager, three operations personnel who oversee outlets in different cities, one administrative officer, and one supervisor of delivery/installation.[5] In the RFE, the Director requested an organizational chart showing the foreign entity's organizational structure and staffing. In response, the Petitioner submitted another company profile for the foreign entity which identifies the Beneficiary as director/chief designer and also includes a director, sales and marketing manager, four operations personnel who oversee outlets in different cities, one customer services officer, and one supervisor of delivery/installation. It does not detail the organizational hierarchy of the workers within the entity.

In his decision, the Director noted the deficiencies in the record with respect to the submitted job description and the lack of evidence that the Beneficiary's subordinates relieved him from performing operational activities associated with his area of responsibility. However, on appeal, the Petitioner submits no new evidence regarding the Beneficiary's position abroad.

The record does not show that the Beneficiary primarily supervises and controls the work of other supervisory, professional, or managerial employees. His job duties do not include any supervisory tasks. Although the Director requested the information, the record does not contain an organizational chart showing the hierarchy of the workers employed by the foreign entity, nor does it include job descriptions or provide the level of education required to perform the duties. Thus, the Petitioner has not established that any subordinates possess baccalaureate degrees and that their positions require such degrees, such that we can consider these employees to be professionals. The Petitioner has also not shown that any subordinates supervise other employees or that they manage a department or function, such that they can be classified as managers or supervisors. Accordingly, the Petitioner has not established that the Beneficiary qualifies as a personnel manager based on his supervision of managerial, supervisory, or professional employees abroad.

The Petitioner also has not articulated an essential function that the Beneficiary manages. As previously noted, the Petitioner has not clearly described the Beneficiary's duties, and without an organizational chart or a clear understanding of the duties of the other workers employed by the foreign entity, it is not clear that the Beneficiary acts at a senior level within the organizational hierarchy or with respect to the function managed, or that he exercises discretion over the function's day-to-day operations.

The Petitioner has not established, in the alternative, that the Beneficiary is employed in an executive capacity. The Petitioner has not provided sufficient detail or supporting evidence to support a claim that the Beneficiary directs the management of the organization or that he is primarily focused on the broad goals and policies of the foreign organization, rather than on its day-to-day operations. Based

[5] There are no subordinate employees listed below this supervisor.

on the lack of an organizational chart and his position as chief designer, the Petitioner has not demonstrated that the Beneficiary is relieved from performing the operational tasks of the company.

We also note that the foreign entity is a designer and manufacturer of children's furniture. While the record indicates that the Beneficiary is the principal product designer, there are no other designers listed in the company profile, and none of the job titles indicate that anyone is actually manufacturing furniture. Doubt cast on any aspect of the petitioner's proof may undermine the reliability and sufficiency of the remaining evidence offered in support of the visa petition. *Matter of Ho*, 19 I&N Dec. at 591-92.

In light of the Beneficiary's broad position description and the absence of an understanding of the staffing and organizational hierarchy, the Petitioner has not met its burden to show that the Beneficiary primarily manages or directs the foreign entity's activities or that the foreign entity has staff to relieve the Beneficiary from performing the operational and administrative tasks associated these activities. Accordingly, the Petitioner has not met its burden to establish that the Beneficiary is employed abroad in a primarily managerial or executive capacity.

IV. QUALIFYING RELATIONSHIP

Although not addressed in the Director's decision, we further find that the Petitioner has not submitted evidence of its qualifying relationship with the Beneficiary's foreign employer.

To establish a "qualifying relationship," the Petitioner must show that the Beneficiary's foreign employer and the proposed U.S. employer are the same employer (i.e. one entity with "branch" offices), or related as a "parent and subsidiary" or as "affiliates." *See* section 101(a)(15)(L) of the Act; *see also* 8 C.F.R. § 214.2(l)(1)(ii) (providing definitions of the terms "parent," "branch," "subsidiary," and "affiliate"). On appeal, the Petitioner claims that it is both a subsidiary and a branch office of the foreign entity. However, it appears that it is trying to establish the companies as affiliates. If an individual owns and controls the Petitioner and the foreign entity, then the companies will be deemed to be affiliates under the definition even if the entities have multiple owners. *See* 8 C.F.R. § 214.2(l)(1)(ii)(L)(*1*).

As noted, the Petitioner stated that the Beneficiary was employed abroad by [redacted] The record shows that [redacted] is solely owned by the Beneficiary. The Petitioner must establish that it and the foreign employer share common ownership and control. Control may be "*de jure*" by reason of ownership of 51 percent of outstanding stocks of the other entity or it may be "*de facto*" by reason of control of voting shares through partial ownership and possession of proxy votes. *Matter of Hughes*, 18 I&N Dec. 289 (Comm'r 1982).

The Petitioner is owned 50% by the Beneficiary and 50% by his brother who has the same name. The Petitioner asserted on the petition that the Beneficiary holds managerial control over both companies. However, absent documentary evidence such as voting proxies or agreements to vote in concert, the

Petitioner has not established that the same individual, the Beneficiary, controls both entities.[6] Thus, the companies are not affiliates as they are not owned and controlled by the same individual. Based on the evidence submitted, the Petitioner has not established that it has a qualifying relationship with the Beneficiary's foreign employer. For this additional reason, the petition cannot be approved.

V. CONCLUSION

The appeal will be dismissed for the above stated reasons, with each considered an independent and alternative basis for the decision. In visa petition proceedings, it is the petitioner's burden to establish eligibility for the immigration benefit sought. Section 291 of the Act, 8 U.S.C. § 1361. The Petitioner has not met that burden.

ORDER: The appeal is dismissed.

Cite as *Matter of V-K-A-, Inc.*, ID# 05441536 (AAO Aug. 20, 2019)

[6] Ownership refers to the direct or indirect legal right of possession of the assets of an entity with full power and authority to control; control means the direct or indirect legal right and authority to direct the establishment, management, and operations of an entity. *Matter of Church Scientology Int'l*, 19 I&N Dec. 593, 595 (Comm'r 1988). A petitioning company must disclose all agreements relating to the voting of shares, the distribution of profit, the management and direction of the entity, and any other factor affecting control of the entity. *See Matter of Siemens Med. Sys., Inc.*, 19 I&N Dec. 362, 365 (Comm'r 1986). Proxy votes, if any, must be irrevocable from the time of filing the L-1 petition through adjudication to establish a qualifying relationship. USCIS Policy Memorandum PM-602-0155, L-1 Qualifying Relationships and Proxy Votes 4 (Dec. 29, 2017), https://www.uscis.gov/sites/default/files/USCIS/Laws/Memoranda/2017/2017-12-29-PM-602-0155-L-1-Qualifying-Relationships-and-Proxy-Votes.pdf.