**Expert Opinion Letter (Confidential) for L-1A**

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Professor, Management, Marketing, and Information Systems

Sam Houston State University, Huntsville, TX

**EDUCATION**

* **Ph.D.** (May 1999), University of North Texas (UNT), Denton, TX

Graduated with a Doctorate of Philosophy degree in Business Administration

Major: *Marketing; Minor: Management Science*

Completed coursework for a Doctorate of Philosophy degree in Business Administration

Major: *Management Science; Minor: Research Methods*

* **M.S.** (December 1993), University of North Texas (UNT), Denton, TX

Graduated with a Master of Science degree in Interdisciplinary Studies

Major: *Management Science; Minors: Economics and Education*

* **M.B.A.** (May 1989), Angelo State University (ASU), San Angelo, TX

Graduated with a Master of Business Administration degree

Major: *Management; Minor: Information Systems*

* **B.S.** (May 1987), Angelo State University (ASU), San Angelo, TX

Graduated with a Bachelor of Science degree

Major: *Mathematics; Minors: Computer Science, Physics, and Business Administration*

**USA ACADEMIC EXPERIENCE**

* **Sam Houston State University (SHSU), Huntsville, TX**

Department of Management, Marketing, and Information Systems

*Professor (2008 – present), Associate Professor (2002-08) and Assistant Professor (1997-02).* Received tenure in 2002.

* **University of Texas of the Permian Basin (UTPB), Odessa, TX**

School of Business

*Lecturer* (1994-1997)

* **University of North Texas (UNT), Denton, TX**

Department of Marketing

*Teaching Fellow* (1992-1994) and *Teaching Assistant* (1991-1994)

Department of Business Computer Information Systems

*Teaching Fellow* (1990-1992) and *Teaching Assistant* (1992-1994)

* **University of Texas (UTSA), San Antonio, TX**

Division of Mathematics, Computer Science, and Statistics

*Research Assistant* (1989-1990)

* **Angelo State University (ASU), San Angelo, TX**

Division of Adult and Continuing Education

*Instructor* (1988-1989)

Mathematics Department

*Graduate Assistant* (1987-1989), *Math & Microcomputer Lab Assistant* (1984-1987)

**INTERNATIONAL ACADEMIC EXPERIENCE**

* **Kazakhstan Institute of Management, Economic, & Strategic Research, Almaty, KZ**

Taught courses to both undergraduate and graduate students

* **La Universidad Iberoamericana, Puebla, MX**

Taught classes to business students from both the USA and Mexico

**NATIONAL/INTERNATIONAL SEMINARS CONDUCTED**

* Invited speaker at Apeejay University, **Sona, India** on “The Institutionalization of Academic Community Engagement (ACE): A Viable Pedagogy for Apeejay Satya University”
* Invited speaker at Faculty Colloquium Series at the Indian Institute of Technology, **New Delhi, India,** on “My Journey as an Entrepreneur in the USA”
* Invited speaker at Faculty Colloquium Series at Apajee Institute of Management, **New Delhi, India,** on “Academic Community Engagement (ACE): A Viable Pedagogy for Business Education.”
* Invited speaker at Faculty Research Seminar at Kendal College, **Chicago, IL,** on “Misuse and abuse of GIS Technologies”
* Invited speaker at Faculty Research Seminar at the Kazakhstan Institute of Management, Economic, and Strategic Research, **Almaty, Kazakhstan** on “Business Application of Geographic Information Systems”
* Invited speaker at Faculty Colloquium Series at the University of Southern Queensland, **Toowoomba, Australia,** on “Application of Geographic Information Systems in Business”
* Conducted a two-day Executive Development Seminar at **Singapore** for the Marketing Institute of Singapore on “E-commerce and Internet Marketing”

**CONSULTING**

* Proeats, LLC, DBA Taco Bell (2008-present), Owners Sanjay S. and Gurinderjit B. Mehta, Plan, Implement and Control the daily operations and strategic direction of a Chain of Taco Bell Restaurants in and around Orlando, FL.
* Mehta & Associated (2000-present), Owned by Sanjay S. Mehta, provides strategy development consulting services to small and medium enterprises.
* Kavanaugh & Associates (2010-19), Owner - Joseph Kavanaugh, assisted in analyzing an Organizational Environment Survey and the Denison Organizational Culture Survey for the City of Houston Building Services Employees. Assisted in analyzing the Denison Organizational Culture Survey for Bridgeway Software (a private organization that writes software for lawyer offices and DOL). Assisted in analyzing the Denison Organizational Culture Survey for Stress Engineering (a firm specializing in field services within the oil industry).
* Founding Board Member of the Montgomery Youth Soccer Club (2007-09), a non-profit organization in Montgomery, TX.
* Business Plan Development (1999-2000), IndiaConnection.Com, Chief Executive Officer: Sanjay K. Khurana. This was an e-commerce business for Asian Indians around the world. The primary purpose was to seek seed money from venture capitalists.
* Image and customer satisfaction study (1996-97), Kent Kwik Convenience stores and AVIS Lube centers, Owner - Bill Kent.

**ACADEMIC HONORS**

* Sam Houston State University David Payne Excellence in Community Engagement Award (2016).
* Federation of Business Disciplines Outstanding Educators Award (2016), Association of Collegiate Marketing Educators Conference.
* Teaching Excellence Award (2015), Marketing Management Association.
* Outstanding Faculty Contributions to Service-Learning Instruction in Higher Education (2015), Gulf South Summit.
* Sam Houston State University Excellence in Research Award (2004).
* Listed in Who’s Who in Business Higher Education (2003)
* Allied Academics Distinguished Research Awards (2000) & (2002)
* Listed in Who's Who Among America’s Teachers (1998), (2002), (2004), and (2005)
* The Management Science Academic Excellence Award (1991)

**REVIEWER/EXAMINER**

* **Review Portfolio for Marketing Faculty seeking promotion to Full Professor at:**

The University of Texas, Tyler, TX

Texas State University, San Marcos, TX

Lamar University, Beaumont, TX

* **Examiner for Ph.D. dissertations at:**

Central Queensland University, Rockhampton, Australia.

Macquarie University, Sydney, Australia.

University of South Australia, Adelaide, Australia

University of Mauritius, Réduit, Republic of Mauritius.

The University of Newcastle, Callaghan, Australia.

University of Southern Queensland, Toowoomba, Australia.

* **Reviewer for Academic Journals**

Journal of Business Strategies

Journal of Business and Entrepreneurship

Journal of International Business and Entrepreneurship Development

International Journal of Internet Marketing and Advertising

Journal of International Business Research

International Journal of Electronic Business

Journal of Business and Entrepreneurship

Federation of Business Decisions Journal

Journal of Developing Areas

Journal of Business Research

Journal of Global Business Advancements

Journal of Asian Marketing

Journal of Retailing and Consumer Services

Benchmarking: An International Journal

International Journal of Sports Marketing & Sponsorship

Journal of Marketing Channels

**United States Department of Homeland Security**

Citizenship & Immigration Services

September 23, 2024

**Re: Expert Opinion Letter for the Classification of EB-2**

To Whom It May Concern:

I have been asked to evaluate Leonardo Miele do Espírito Santo's academic, professional, and employment credentials in the areas of business administration, sales leadership, and the cybersecurity sector, with a focus on his experience in executive management, business strategy, and operational efficiency. This evaluation is conducted in the context of his classification as a qualified executive under the L-1A visa category for intracompany transferees in managerial or executive roles. This letter has been written to support Leonardo Miele do Espírito Santo’s application for the L-1A visa, which allows multinational executives and managers to transfer to a U.S. branch, affiliate, or subsidiary of their employer.

Having reviewed the Curriculum Vitae, academic credentials, and certifications, it is my opinion that the evidence strongly supports Leonardo Miele do Espírito Santo’s eligibility for the L-1A visa. His experience as a senior executive leading global sales strategies, managing key business operations, and driving growth in competitive markets demonstrates his exceptional managerial and executive abilities. Leonardo Miele do Espírito Santo is well-qualified for this visa category as he satisfies the relevant legal criteria by holding an executive role for a qualifying company and demonstrating his ability to direct and manage high-level operations within a multinational context. His leadership expertise and significant contributions to the cybersecurity and technology sectors underscore his eligibility for this visa, which is designed for individuals in managerial or executive capacities within multinational organizations. The documents that I have reviewed for Leonardo Miele do Espírito Santo are as follows:

* CV/Resume of Leonardo Miele do Espírito Santo
* List of job duties and responsibilities in the US entity
* Petitions letter
* Document about the company

I certify under penalty of perjury that I have earned a Doctor of Philosophy degree in Business Administration from The University of North Texas in Denton, TX. Additionally, I have a Master of Science degree in Interdisciplinary Studies from The University of North Texas in Denton, TX, a Master of Business Administration degree in Management from Angelo State University, San Angelo, TX, and a Bachelor of Science degree in Mathematics from Angelo State University, San Angelo, TX.

I am a progressive academic leader with a strong consulting background and extensive experience in both domestic and international higher education. According to Google Scholar, 100+ scholars have cited my research 1,500+ times. I have conducted numerous workshops/seminars, evaluated Ph.D. dissertations, reviewed articles for journals, organized conferences, and participated in study abroad programs. I have published fifty journal articles, five book chapters, and three case studies, reviewed and contributed to twenty textbooks, and made 173 conference presentations.

At the university, I served as chair/member of the marketing curriculum committee, faculty search committee, college accreditation committee, engaged scholar committee, department tenure and promotion committee, and critical thinking committee. Additionally, I mentor and advisor to over a dozen students each semester.

With over three decades of academic experience, I have taught various courses in several disciplines. These include Introductory Marketing, Marketing Research, Marketing Strategy, E-Marketing, International Marketing, Logistics Management, Sports Marketing, Promotion, Retail Management, Channel Management, Sales Management, Marketing Management, Management Science, Statistics, Business Mathematics, Entrepreneurship, etc.

Moreover, as an evaluator, I am responsible for reviewing academic and experiential qualifications that form part of a candidate's evaluation report, providing a detailed analysis of the academic background and occupational experience that a person has received inside or outside the United States.

I offer this letter as an independent expert, never having professionally or personally engaged with the applicant. Recognizing his performance in executive management and leadership within multinational business operations, I render my highest opinion of his executive abilities, managerial expertise, and the significant contributions he will continue to bring to the U.S. operations of his company.

In adjudicating L-1A petitions, United States Citizenship & Immigration Services (USCIS) evaluates the foreign national's eligibility under the criteria outlined in the Immigration and Nationality Act. Specifically, the L-1A visa focuses on intracompany transferees who are coming to the U.S. to serve in a managerial or executive capacity within a qualifying organization. To establish eligibility for the L-1A visa, the petitioner must demonstrate that:

* + *The foreign national has been employed in a managerial or executive capacity for at least one year by the foreign employer within the three years preceding the application;*
  + *The foreign national is being transferred to a U.S. branch, affiliate, or subsidiary of the same employer to serve in a managerial or executive capacity;*
  + *The foreign employer is a qualifying organization, with a sufficiently close relationship to the U.S. entity (e.g., branch, parent, subsidiary, or affiliate);*
  + *The U.S. entity to which the foreign national is being transferred will employ the individual in a bona fide managerial or executive capacity.*

The focus of the L-1A petition is to demonstrate that Leonardo Miele do Espírito Santo holds a qualifying executive role and will continue to fulfill such a role within the U.S. operations, contributing to the organization’s business strategy and leadership on a multinational scale.

**The foreign national has been employed in a managerial or executive capacity for at least one year by the foreign employer within the three years preceding the application.**

Leonardo Miele do Espírito Santo has been employed in an executive capacity with Asper for over a year, fulfilling the role of Chief Sales Officer (CSO). In this position, he has demonstrated exceptional leadership in overseeing and directing the company’s global sales strategy, aligning these efforts with Asper’s overall business objectives. His responsibilities include leading a high-performing sales team, managing key client relationships, and driving revenue growth within the cybersecurity sector, a field where Asper maintains a significant presence.

As Chief Sales Officer, Leonardo Miele do Espírito Santo is responsible for developing and executing comprehensive sales strategies to expand market share and achieve revenue targets. He has played a critical role in establishing Asper’s presence in new markets, identifying and capitalizing on business opportunities, and maintaining strong relationships with key clients. His duties also include leading cross-functional collaborations with other departments such as marketing and product development, ensuring that Asper’s sales strategies are aligned with the company's broader business goals.

Throughout his tenure at Asper, Leonardo Miele do Espírito Santo has proven his ability to operate in a high-level executive capacity, managing a team of professionals while being directly accountable for the company’s sales performance. His leadership has not only contributed to the company’s growth but has also positioned Asper as a prominent player in the cybersecurity industry. This experience underscores his qualification under the L-1A visa requirements, as he has clearly been employed in an executive capacity for more than one year during the three years preceding the application. His role at Asper exemplifies the type of managerial and executive functions that satisfy the USCIS criteria for intracompany transferees.

**The foreign national is being transferred to a U.S. branch, affiliate, or subsidiary of the same employer to serve in a managerial or executive capacity.**

Leonardo Miele do Espírito Santo is being transferred to the U.S. branch of Asper to serve as Chief Sales Officer (CSO) for Asper USA, following his successful tenure in a similar role at Asper Brazil. In this capacity, he will be responsible for leading and overseeing the company’s U.S. market entry, leveraging his extensive experience in sales strategy development, client acquisition, and cybersecurity expertise. Leonardo Miele do Espírito Santo’s role involves crafting and implementing comprehensive sales strategies to penetrate the competitive U.S. cybersecurity market while aligning these efforts with Asper’s global objectives.

Asper is expanding its operations into the U.S. market, focusing on sectors such as financial services, healthcare, and retail, which are increasingly reliant on advanced cybersecurity solutions. Leonardo Miele do Espírito Santo’s leadership will be instrumental in guiding this expansion, as he will lead a high-performance sales team, build strategic partnerships, and ensure that Asper’s offerings meet the specific needs of U.S.-based enterprises. His responsibilities include forging relationships with key clients and partners, securing new business opportunities, and ensuring the U.S. branch’s revenue growth and market success.

In his role at Asper USA, Leonardo Miele do Espírito Santo will also oversee the cross-functional collaboration between the U.S. and Brazilian branches, ensuring that best practices are shared, and innovations in cybersecurity solutions are integrated across both regions. His dual role allows him to maintain strategic oversight of the Brazilian operations while leading Asper’s growth in the U.S. market, ensuring cohesion and alignment with the company’s global vision.

Leonardo Miele do Espírito Santo’s transfer to Asper USA reflects his capacity to manage high-level executive responsibilities across multiple regions. His proven track record of leadership, coupled with his expertise in driving market expansion, positions him to make significant contributions to Asper’s success in the U.S. market. His role as CSO in both regions underscores his importance to the company's global operations, ensuring that Asper continues to grow as a leader in the cybersecurity sector both in the U.S. and internationally

**The foreign employer is a qualifying organization, with a sufficiently close relationship to the U.S. entity (e.g., branch, parent, subsidiary, or affiliate).**

Asper, the foreign employer of Leonardo Miele do Espírito Santo, qualifies as a multinational organization with a sufficiently close relationship to its U.S. entity. Asper Technology, headquartered in Brazil, is expanding its operations into the United States by establishing Asper USA as a direct subsidiary. This relationship between Asper Brazil and Asper USA forms the foundation for the transfer of Leonardo Miele do Espírito Santo, ensuring that the foreign and U.S. entities are closely integrated in terms of ownership, control, and operations.

Asper Brazil and Asper USA share common leadership and strategic objectives, with Asper Brazil providing overarching direction and operational expertise to its U.S. subsidiary. Asper USA will mirror the cybersecurity solutions and services developed by Asper Brazil, including advanced security operations, endpoint protection, and managed security services, while adapting these offerings to meet the specific demands of the U.S. market. This organizational structure allows Asper to maintain consistent standards across its global operations and to ensure seamless collaboration between its branches.

The close relationship between Asper Brazil and Asper USA is evident through their shared leadership under Leonardo Miele do Espírito Santo, who will continue to oversee both entities' strategic sales and market expansion initiatives. His dual role reinforces the connection between the two entities, fostering the exchange of best practices and ensuring that Asper’s global mission is implemented effectively in both regions. This alignment of leadership and operations demonstrates that Asper Brazil and Asper USA are part of the same qualifying multinational organization, fulfilling the requirements for Leonardo Miele do Espírito Santo's L-1A transfer.

**The U.S. entity to which the foreign national is being transferred will employ the individual in a bona fide managerial or executive capacity.**

Leonardo Miele do Espírito Santo will be employed by Asper USA in a bona fide executive capacity upon approval of his L-1A visa. As the Chief Sales Officer (CSO) of Asper USA, Leonardo Miele do Espírito Santo will have the full responsibility for leading the company’s sales and business development efforts within the U.S. market. His executive role includes designing and executing Asper’s U.S. sales strategy, with a focus on rapid market penetration, sustainable revenue growth, and aligning the sales approach with Asper’s global objectives.

Leonardo Miele do Espírito Santo’s responsibilities will extend beyond traditional sales management. He will be responsible for building a high-performance sales team in the U.S., overseeing the recruitment, mentoring, and leadership development of key team members. His role also involves securing and managing strategic partnerships with major U.S. enterprises in sectors such as finance, healthcare, and government, ensuring Asper’s cybersecurity solutions are tailored to meet the specific needs of these critical industries. His direct involvement in large-scale contract negotiations and client relationship management underscores his executive oversight and decision-making authority within the U.S. subsidiary.

Additionally, Leonardo Miele do Espírito Santo will oversee revenue management and sales forecasting, ensuring Asper USA meets aggressive revenue targets that align with the company’s overall business goals. He will also collaborate with the U.S.-based product development and marketing teams to ensure that Asper’s cybersecurity solutions remain competitive and relevant in the U.S. market, while establishing a feedback loop to inform product innovation based on market demands and customer needs.

The position clearly satisfies the criteria for executive capacity, as Leonardo Miele do Espírito Santo will have significant authority to make critical business decisions, develop and implement high-level strategies, and manage key functions that are essential to Asper’s success in the U.S. His dual role overseeing operations in both the U.S. and Brazil further highlights his ability to manage cross-regional leadership responsibilities, ensuring that Asper’s global strategy is implemented cohesively across its various branches.

**CONCLUSION**

In conclusion, Leonardo Miele do Espírito Santo is exceptionally qualified for the L-1A visa, demonstrating the executive leadership, strategic vision, and international experience required for the role. With a proven track record of success as Chief Sales Officer at Asper Brazil, Leonardo Miele do Espírito Santo has not only led Asper’s rapid market expansion in Brazil but has also been pivotal in driving key revenue growth and securing high-impact client relationships in the cybersecurity sector. His role in the company’s successful merger and his ability to manage complex sales operations across multiple regions have positioned him as a leader capable of navigating Asper’s entry into the highly competitive U.S. market.

Leonardo Miele do Espírito Santo’s transfer to Asper USA reflects his ability to continue performing in an executive capacity, managing critical business functions such as sales strategy development, team leadership, and client acquisition. He will lead the U.S. subsidiary’s sales efforts, crafting a market-specific strategy that aligns with Asper’s global objectives while building and mentoring a high-performing sales team. His dual role, overseeing both the U.S. and Brazilian operations, ensures seamless integration of Asper’s global strategy, fostering innovation and growth across both markets.

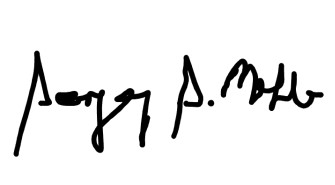
Furthermore, Asper’s U.S. expansion signifies a strategic move into a vital cybersecurity landscape, and Leonardo Miele do Espírito Santo’s leadership is essential to its success. His responsibilities, which include negotiating large-scale contracts, forging key partnerships, and ensuring revenue growth, emphasize his authority and decision-making power in guiding Asper USA. His direct involvement in critical business operations, as well as his cross-functional collaboration with product development and marketing teams, ensures that Asper’s cybersecurity solutions remain competitive and relevant in the U.S. market.

Given his extensive experience, leadership, and contributions to Asper’s global operations, Leonardo Miele do Espírito Santo’s L-1A visa petition is fully supported. His transfer to Asper USA is vital to the company’s growth and success in the United States, further solidifying Asper’s position as a global leader in cybersecurity. His continued executive oversight will ensure the successful execution of Asper’s U.S. market strategy, reinforcing his critical role within the multinational organization. Therefore, the approval of his L-1A visa will be integral not only to Asper’s business goals but also to the broader cybersecurity industry in the U.S.

The above letter is strictly my professional opinion and does not represent the opinion of any of the universities I am affiliated with or their departments or affiliates.

Please feel free to contact me if you have any questions or concerns.

Sincerely,



Sanjay S. Mehta, Ph.D.

*Professor*, Management, Marketing, and Information Systems

Sam Houston State University

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September 23, 2024

**REFERENCES**

* https://www.uscis.gov/working-in-the-united-states/temporary-workers/l-1a-intracompany-transferee-executive-or-manager
* https://www.upcounsel.com/l1a-visa
* https://www.globalcitizensolutions.com/usa-l-1-visa/
* https://www.path2usa.com/us-visas/l1-l2-visa/l1a-visa