**EXPERT LETTER**

**Analysis of Positional Requirements for National Interest Waiver**

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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, Planning, Implementing, and Controlling 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

Dear USCIS,

I write this letter on behalf of Raissa Cristine Zibell in support of her application for a National Interest Waiver to advance her proposed endeavor in the areas of strategic business consulting, brand management, international market expansion, and sustainability consulting in the United States. I strongly endorse her plans to offer her extensive expertise and knowledge in these critical fields. Given the substantial merit and national importance of her proposed endeavor, it is in the best interest of the United States to waive the job offer and labor certification requirements. Her work will address vital national needs, contributing to the growth, innovation, and global competitiveness of U.S. businesses while promoting sustainable practices that align with national economic and environmental priorities.

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 advise over a dozen students each semester.

With over three decades of academic experience, I have taught a variety of 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.

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

Through the aforementioned academic and professional experiences, I have developed expert knowledge on how to analyze, evaluate, and characterize job duties, responsibilities, qualifications, and expertise.

Therefore, I believe I am qualified to issue an opinion on the level and significance of Raissa Cristine Zibell's ability, as well as evaluate the appropriateness of granting her a National Interest Waiver.

Throughout the remainder of this letter, I will provide an analysis and advisory evaluation of her ability and eligibility for a National Interest Waiver.

According to USCIS, The United States Citizenship and Immigration Services (USCIS) uses the following three-pronged system requirements for a National Interest Waiver.

* ***Requirement 1*** *- The foreign national's proposed endeavor has both substantial merit and national importance.*
* ***Requirement 2*** *- The foreign national is well-positioned to advance the proposed endeavor.*
* ***Requirement 3*** *- It would benefit the United States to waive the job offer and labor certification requirements.*

As stated previously, my opinions are limited to the information that I received and my educational and professional experience and judgment. The documents that I have reviewed for Raissa Cristine Zibell:

1. A copy of Degree and Academic Transcripts
2. Resume of Raissa Cristine Zibell
3. Business Plan of Raissa Cristine Zibell
4. Employment records
5. Support letters
6. Short course certificates

## About Raissa Cristine Zibell

Raissa Cristine Zibell has an extensive background in marketing, supported by a solid education and professional experience. She holds an Executive MBA in Marketing, Creativity, and Innovation from Faculdade INPG São José dos Campos, completed between August 19, 2016, and September 29, 2018. This advanced degree equipped her with comprehensive skills in marketing strategy and innovation. Additionally, she obtained an Associate Degree in Marketing from Centro Universitário Leonardo Da Vinci, graduating in April 2016 with the formal conferral of her diploma on January 27, 2017.

Raissa Cristine Zibell has actively pursued extra-curricular activities and professional development through various courses. These have broadened her knowledge in fields such as sociology, tax law, private equity, venture capital, and business foundations. Below are the key courses she has completed:

* **Course**: Sociology  
  **Institution**: Fundação Getúlio Vargas - FGV Online  
  **Conclusion**: April 24, 2024  
  **Workload**: 30 hours  
  **Website**: [FGV Online](https://educacao-executiva.fgv.br/cursos/online)
* **Course**: Fundamental Concepts and Principles of Tax Law  
  **Institution**: Fundação Getúlio Vargas - FGV Online  
  **Conclusion**: April 24, 2024  
  **Workload**: 5 hours  
  **Website**: [FGV Online](https://educacao-executiva.fgv.br/cursos/online)
* **Course**: Introduction to Private Equity and Venture Capital for Entrepreneurs  
  **Institution**: Fundação Getúlio Vargas - FGV Online  
  **Conclusion**: April 24, 2024  
  **Workload**: 40 hours  
  **Website**: [FGV Online](https://educacao-executiva.fgv.br/cursos/online)
* **Course**: Business Foundations  
  **Institution**: Coursera, authorized by the University of London and UCL Institute of Education  
  **Conclusion**: July 1, 2020  
  **Workload**: 40 hours  
  **Website**: [Coursera](https://www.coursera.org)

Raissa Cristine Zibell has worked in marketing for 10 years, with notable expertise in Market Intelligence, Brand Management, Product Analysis, Events, and Administration. She effectively managed operations during the pandemic, developing strategies that ensured business continuity and market recovery in the beverage sector. With strategic management skills, she has led cross-functional teams and executed successful marketing campaigns, demonstrating her ability to handle international marketing investments and manage large budgets.

Raissa Cristine Zibell is also certified with WSET Level 1 Awards in Wine and is a member of the American Management Association (AMA) and the Promotional Marketing Association (AMPRO). Her specialized knowledge in wine portfolio management and her ability to implement digital marketing strategies further highlight her adaptability and leadership in a highly competitive industry.

Raissa Cristine Zibell's career in the wine and beverage industry has been marked by a series of progressive roles and significant achievements. She began her professional journey at DECANTER VINHOS FINOS LTDA. on November 1, 2016, where she served as an Events Assistant until February 1, 2019. During this period, she was primarily responsible for managing internal and external information strategically to help the organization develop competitive advantages. Her role involved conducting market research, developing digital marketing strategies, and identifying opportunities to increase profit margins. Raissa Cristine Zibell also worked closely with corporate clients to establish long-lasting relationships, helping to expand Decanter’s market share by 21% through effective market intelligence and SWOT analysis. Her contributions extended to product development, optimizing distribution channels, and creating impactful advertising campaigns, which resulted in a 19% sales increase in the mainstream and HORECA channels. She played a key role in positioning Decanter’s wines in new markets, enhancing the company’s reputation, and fostering the growth of Vitis vinifera culture, especially among younger consumers.

In September 2019, Raissa Cristine Zibell transitioned to INTERFOOD IMPORTAÇÃO LTDA., where she demonstrated her exceptional skills in marketing and product management. She began as a Junior Marketing Analyst on September 13, 2019, a position she held until July 30, 2021. In this capacity, she was responsible for maintaining direct contact with international suppliers, ensuring brand growth, and implementing marketing strategies that enhanced market penetration and consumer loyalty. Her role also involved managing KPIs, budgeting, and monitoring product performance to guarantee profitability. By collaborating with other areas within the company, she successfully improved operational efficiency and built strong supplier relationships.

Her performance as a Junior Marketing Analyst led to her promotion to Junior Product Manager on August 1, 2021, a position she held until May 30, 2022. In this role, she continued to manage brand strategies, pricing, and market positioning while overseeing promotional campaigns and working closely with the sales team to execute the sales plan. Under her leadership, the company experienced significant sales growth, particularly in the wine category, where her pricing strategies and product positioning led to an improved profit margin.

From June 1, 2022, to June 20, 2023, Raissa Cristine Zibell held the position of Full Product Manager at INTERFOOD IMPORTAÇÃO LTDA. During this period, her responsibilities expanded as she managed five imported brands and led a team comprising a marketing analyst and an intern. She implemented process optimization in partnership with the Purchasing and Operations sectors, reducing costs and improving supply chain efficiency. Raissa Cristine Zibell’s innovative marketing strategies tripled the company’s wine sales, contributing to a 58% sales growth during the first half of the COVID-19 pandemic. Her ability to explore new international markets resulted in monthly sales of US$361,000 and a 29% expansion in market share. Additionally, she implemented digital marketing strategies that boosted online sales by 46% and significantly increased brand visibility. Raissa Cristine Zibell’s leadership in managing a team of 30 employees in the e-commerce sector was instrumental in enhancing the company’s online presence and achieving record sales in 2020 and 2022. Her strategic partnerships with wineries, restaurants, and retailers further solidified INTERFOOD’s position in the market, resulting in numerous collaborations and increased product availability.

Throughout her time at INTERFOOD IMPORTAÇÃO LTDA., Raissa Cristine Zibell demonstrated a keen ability to drive business growth, manage substantial financial portfolios, and optimize marketing efforts. She successfully managed US$13 million in monthly turnover, developed innovative products, and expanded the company’s market share in the French wine market. Her work in developing sustainable packaging reduced environmental impact and cut costs, reflecting her commitment to sustainability. Additionally, her influence on institutional marketing campaigns and product launches positioned INTERFOOD as a leader in the wine importation sector, with her brands consistently receiving awards from notable evaluators such as Decanter, Jancis Robinson, and James Suckling.

The testimonials provided offer strong insights into the professional accomplishments and character of Raissa Cristine Zibell, highlighting her strategic leadership and transformative impact on the wine and beverage industry. Each recommendation reflects her capability to innovate, manage large-scale projects, and significantly contribute to the success of the companies and brands she has been a part of.

* Thiago Felipe dos Santos, a Foreign Trade and Marketing graduate with an MBA in Global Business and Logistics, emphasizes Raissa Cristine Zibell's remarkable contributions during her time at Decanter Vinhos Finos Ltda. He specifically notes her role in implementing an approval workflow system that streamlined processes and significantly reduced operational costs, setting a benchmark for the company. Additionally, her leadership in founding the ENOVI wine association demonstrated her ability to identify market gaps and create innovative solutions, which not only educated younger wine enthusiasts but also spurred economic growth in the industry.
* Katia Nunes, the Marketing Director at Interfood, praises Raissa Cristine Zibell's deep industry knowledge and her crucial role in expanding Interfood’s premium wine brands, particularly during the challenging period of the COVID-19 pandemic. Raissa’s ability to negotiate with international partners ensured the stability of product supply despite market volatility. Moreover, her innovative digital campaigns targeting younger audiences revitalized the company’s brand recognition, leading to a 50% increase in consumer engagement and solidifying Interfood’s competitive position in the market.
* Heloisa Bayerlein Xocaira de Oliveira, Marketing Manager at Interfood, highlights Raissa Cristine Zibell’s exceptional skills in resource management and marketing optimization. She notes Raissa’s strategic approach to budget management, which maximized the return on investment for premium brands. Additionally, her innovative marketing campaigns increased brand awareness and profitability, resulting in a 70% growth in revenue for the company. Heloisa further emphasizes Raissa’s forward-thinking approach, anticipating market trends and consistently delivering exceptional results for the brands she managed.
* Heloisa Hermann Dallacorte, Marketing Director at Decanter Vinhos Finos, commends Raissa Cristine Zibell for her ability to effectively manage events and implement innovative operational strategies. She highlights Raissa’s role in organizing key events such as "Decanter Wine Day" and improving operational efficiency through the introduction of inventory processes. Raissa’s dedication and organizational skills led to a significant increase in brand visibility and demand for high-quality wines, demonstrating her influence on the growth of Decanter’s market presence.
* Luis Tomás Próspero Lacerda Simões Baião, International Business Manager at Jose Maria da Fonseca Wines S.A., underscores Raissa Cristine Zibell’s strategic leadership in promoting JMF brands in Brazil. Her efforts in expanding the brand’s portfolio and implementing innovative marketing materials resulted in record-breaking sales, positioning the JMF Group as one of the top brands in Brazil. Raissa’s ability to adapt to market challenges during the pandemic further showcased her exceptional management skills, contributing to both the company’s success and the overall growth of the Brazilian wine market.

As someone with extensive experience in both academia and consulting, I understand the profound impact that strategic business expertise can have on companies and industries. Like Raissa Cristine Zibell, I have spent years advising businesses, developing strategies, and implementing solutions to help organizations grow and thrive in competitive environments. My work in strategic planning, brand management, and consulting across various industries parallels the breadth of knowledge Raissa Cristine Zibell has acquired through her career. The challenges she has navigated, such as managing international marketing campaigns and executing operational strategies in complex markets, are experiences that I, too, have encountered in my consulting endeavors. This shared background allows me to recognize the potential her skills have for contributing to the business landscape in the United States.

Raissa Cristine Zibell’s knowledge and experience position her to make a significant impact in her field within the U.S. market. Her ability to drive brand management, streamline business operations, and expand market reach will be invaluable to small and medium-sized enterprises, especially in industries seeking sustainable growth. By leveraging her deep understanding of international business and her expertise in managing complex projects, she will be able to assist U.S.-based companies in overcoming the challenges of globalization and competition. Her experience in working with diverse teams, negotiating with international suppliers, and developing strategic marketing solutions will allow her to deliver tailored consulting services that meet the evolving needs of businesses in the United States.

Raissa Cristine Zibell’s professional trajectory, marked by her education, certifications, and participation in high-impact projects, clearly demonstrates that she stands above her peers. Her academic credentials, including specialized certifications such as WSET Level 1 in wine management, coupled with her proven track record in executing successful marketing campaigns, managing multimillion-dollar budgets, and leading teams, underscore her exceptional capabilities. Her ability to adapt, innovate, and implement solutions across multiple industries reflects not only a mastery of her craft but also a dedication to continued professional growth. These qualities, combined with her strategic insight, make her a valuable asset not only to the companies she will consult but also to the broader U.S. economy.

Raissa Cristine Zibell’s credentials, experience, and demonstrated success in her field set her apart from her peers and uniquely qualify her to contribute meaningfully to the U.S. business landscape. Her expertise in strategic business consulting will undoubtedly benefit American companies by improving operational efficiency, fostering innovation, and driving long-term growth. Her work has the potential to create a lasting impact in her industry, and I fully support her pursuit of residency in the United States to further her contributions.

**The proposed endeavor**

Upon being granted residency, Raissa Cristine Zibell will establish her company, ZIBELL LLC, a Strategic Business Consulting firm based in the San Francisco-Oakland-Hayward metropolitan area in California. As the owner and managing entrepreneur, Raissa Cristine Zibell will focus on offering a comprehensive range of consulting services, specializing in business management, brand administration, and marketing solutions. The company will primarily serve a Business-to-Business (B2B) market but will also provide training and mentorship for Business-to-Customer (B2C) audiences.

ZIBELL LLC’s core services will include strategic business consulting, brand management, international expansion consulting, and professional training. The firm will target small and medium-sized businesses, retailers, distributors, educational institutions, and companies seeking to enhance their international market presence. In addition, ZIBELL LLC will emphasize sustainability, particularly targeting wineries interested in adopting environmentally responsible practices. To meet its operational goals, the company will employ both in-person and online service delivery methods, ensuring accessibility to clients across the United States. The business will also contribute to local economies by creating jobs and promoting innovation through partnerships with local institutions and organizations.

The United States management consulting services market is semi-consolidated, with prominent local and international firms such as Deloitte, Ernst & Young, KPMG, PwC, and McKinsey dominating the sector. These firms implement competitive strategies by leveraging their expertise and investing significantly in advertising. Key factors for success in this market include quality certification, service offerings, cost efficiency, and technical capabilities, which are critical for securing new contracts[[1]](#footnote-1).

The market is valued at USD 59.03 billion in 2024 and is expected to grow to USD 82.28 billion by 2029, with a compound annual growth rate (CAGR) of 6.87%. Post-pandemic, the demand for consulting services has increased as companies seek data-driven insights and strategies to navigate dynamic markets and improve operational efficiency. These firms help organizations enhance performance by analyzing operations and addressing inefficiencies, leading to cost reductions and better profitability. The growing competition and shrinking profit margins in various industries have further increased the reliance on consulting services[[2]](#footnote-2).

Despite the rise of new research firms and business analytics tools, which provide cost-effective alternatives for data collection and decision-making, large companies, especially Fortune 500 firms, still prefer partnering with established management consulting firms due to their credibility and comprehensive service offerings. These firms are also deeply involved in strategic consulting, including corporate strategy, business transformation, mergers and acquisitions, and organizational strategy. The strategy consulting segment is expected to drive demand as companies rework their business models, particularly in response to economic shifts like those triggered by the COVID-19 pandemic. The management consulting sector has also seen strong employment growth, with the number of employees in the industry reaching over 800,000 in 2022, a significant increase from previous years. However, challenges such as cyberattacks and data breaches remain as potential threats to the industry's growth[[3]](#footnote-3).

Raissa Cristine Zibell’s proposed endeavor addresses several critical needs in today's dynamic business environment, particularly for small and medium-sized enterprises (SMEs) that require specialized consulting services to thrive in an increasingly competitive global market. The modern business landscape, characterized by rapid technological changes, economic fluctuations, and evolving consumer behavior, demands strategic foresight and tailored solutions that can guide companies through uncertainty while enabling growth and innovation. SMEs, in particular, face challenges in adopting new technologies, integrating digital tools, and maintaining cybersecurity to enhance operational efficiency and customer engagement[[4]](#footnote-4). Consulting services like those Raissa Cristine Zibell offers are essential in helping these businesses embrace digital transformation and protect their operations from growing cyber threats.

Additionally, economic fluctuations present significant risks to SMEs, which often lack the financial resilience of larger corporations. Raissa Cristine Zibell’s consulting services will provide these businesses with critical support in financial planning, risk management, and securing access to capital, ensuring they can sustain operations during downturns[[5]](#footnote-5). Furthermore, as consumer preferences shift and evolve, SMEs must stay agile and responsive. Through market research, consumer insights, and brand management expertise, her endeavor will assist businesses in understanding market trends and strengthening their brand presence, which is vital for attracting and retaining customers in a dynamic marketplace[[6]](#footnote-6). Through offering customized strategies tailored to each SME’s unique challenges, Raissa Cristine Zibell’s consulting services will foster innovation and enable sustainable growth, ensuring that these businesses can compete effectively on both a national and global scale.

ZIBELL LLC will provide comprehensive strategic business consulting services designed to enhance organizational performance, improve operational efficiency, and drive market expansion. Raissa Cristine Zibell’s consulting firm will play an integral role in aligning business strategies with organizational goals, helping businesses achieve their desired outcomes through strategic alignment. By establishing key performance indicators (KPIs), she will enable companies to monitor progress and make data-driven decisions that contribute to long-term success. This structured approach ensures that businesses are not only setting clear objectives but also tracking their performance in a measurable way, optimizing their operations in a data-focused manner.

In an era where operational efficiency is critical for maintaining competitive advantage, ZIBELL LLC will offer solutions that streamline business processes, eliminate inefficiencies, and reduce costs. Raissa Cristine Zibell will also guide companies through the integration of modern technologies, automating tasks and enhancing overall productivity. This will allow businesses to focus on core activities while benefiting from cost-saving innovations. Additionally, her expertise in market intelligence will help businesses navigate the complexities of post-pandemic market conditions. With insights into market trends, consumer preferences, and competitive landscapes, Raissa Cristine Zibell’s consulting firm will equip companies with the tools to make informed decisions that drive market expansion.

ZIBELL LLC will also address the complexities of international expansion, guiding businesses through regulatory compliance, cultural adaptation, and the formation of local partnerships. Raissa Cristine Zibell’s deep understanding of international markets and her strategic approach to brand management will help U.S. companies stand out in increasingly crowded markets. As shrinking profit margins and growing competition create pressure on businesses, ZIBELL LLC will offer the specialized expertise needed to navigate these challenges and drive sustainable growth, positioning her firm as a key player in strengthening both the local and national economy. Through fostering partnerships and promoting sustainability, Raissa Cristine Zibell’s endeavor will contribute significantly to the economic vitality of various industries across the United States, making it a vital and timely project for the U.S.

## REQUIREMENT 1

*The foreign national's proposed endeavor has both substantial merit and national importance.*

The proposed endeavor of Raissa Cristine Zibell **has significant potential to generate employment opportunities and contribute positively to the U.S. economy**. Over the first five years, the project is expected to create 11 direct jobs, with potential for further expansion as the company grows. Additionally, the multiplier effect associated with the management consulting and business advisory sector suggests that for every direct job created, approximately 2.08 indirect jobs are generated. This means that beyond the initial direct employment, the venture could indirectly generate between 16.61 to 93.71 jobs, contributing to job creation across various related industries.

From an economic perspective, the business is projected to generate a total of $2,435,370 in salaries over the first five years. Additionally, employees are expected to contribute more than $533,000 in taxes on their wages. Furthermore, the operating costs of the business, including rent, utilities, and other expenses, are estimated to total $510,900 over this period, which will further contribute to the local economy. The venture is projected to generate substantial revenue, with an anticipated $5,641,884.59 in final demand over five years, creating both direct and indirect jobs and enhancing the overall economic landscape.

The company's commitment to social and environmental sustainability, alongside its focus on providing training and supporting small businesses, will further reinforce its positive economic and social impact. Through these initiatives, the proposed business aims to contribute not only to job creation but also to the broader objectives of economic growth and environmental responsibility, aligning with the goals of sustainable development.

The lack of investment or support for endeavors like Raissa Cristine Zibell’s proposed business can have a negative impact on the American economy, particularly in areas like job creation, innovation, and competitiveness. When promising initiatives fail to receive the backing they need, it can stifle economic growth, limit the ability of small and medium-sized enterprises (SMEs) to compete globally, and reduce opportunities for workers. This situation can also create ripple effects, leading to missed opportunities in emerging industries and sustainable business practices.

Historically, the failure to invest in key industries and innovations has often resulted in economic stagnation or setbacks. During the 1970s, the U.S. automotive industry faced significant challenges from Japanese car manufacturers such as Toyota and Honda, who had invested heavily in lean manufacturing techniques and fuel-efficient technologies. These innovations gave Japanese automakers a significant competitive edge over American car companies, which were slower to modernize. As a result, U.S. manufacturers lost market share, leading to substantial job losses and a severe economic decline, especially in the industrial Midwest. The economic downturn in these regions was profound, and it took years of restructuring, investment in new technologies, and innovation for the U.S. auto industry to regain its footing.

Similarly, the decline of the American steel industry in the late 20th century serves as another example of the consequences of failing to invest in modernization. The U.S. steel industry was slow to adopt new technologies, such as continuous casting, which had already been embraced by competitors in Japan and Europe. This technological lag resulted in decreased competitiveness, leading to plant closures and the loss of tens of thousands of jobs. The economic consequences extended beyond the steel industry itself, deeply impacting the regional economies that relied on steel production. The ripple effect of these closures reduced employment opportunities, decreased tax revenue, and diminished regional prosperity. These historical examples illustrate the critical need for continuous investment and innovation to maintain competitiveness and economic stability in key industries.

In the case of Raissa Cristine Zibell’s proposed business, a lack of investment or support could limit the ability of U.S. companies to access the innovative strategies, brand management expertise, and international market expansion services that her firm aims to provide. This could hinder the growth of SMEs, reduce their competitiveness, and limit their ability to scale in global markets. Furthermore, the potential for job creation would be diminished, leaving local economies without the additional employment opportunities and tax revenue that her business would generate.

Without support for endeavors like this, industries and businesses that rely on strategic consulting and market expertise may struggle to innovate or capitalize on emerging trends, resulting in missed economic opportunities. In supporting such endeavors, the U.S. economy can maintain its competitive edge, foster entrepreneurship, and stimulate growth across various sectors.

The proposed endeavor of Raissa Cristine Zibell, through **ZIBELL LLC, is not only set to contribute to economic growth but also to the broader enhancement of societal welfare**. By providing strategic business consulting services, Raissa Cristine Zibell will empower small and medium-sized enterprises (SMEs) to thrive in an increasingly competitive market. This will not only drive the success of individual businesses but also promote sustainable business practices, environmental responsibility, and innovation across industries. Her firm’s focus on helping companies improve efficiency, adopt sustainable practices, and expand their market presence will contribute to long-term economic stability and resilience in communities across the United States.

In addition to fostering economic growth, Raissa Cristine Zibell’s venture will play a crucial role in workforce development. By offering professional training and mentorship, ZIBELL LLC will equip American workers with the skills and knowledge necessary to adapt to the rapidly changing global economy. This will enhance the employability and productivity of workers, contributing to higher wages, job security, and overall societal welfare. Furthermore, the focus on environmentally sustainable practices within her consulting services promotes a greater awareness of environmental stewardship, encouraging businesses to adopt green practices that benefit both society and the planet.

Moreover, Raissa Cristine Zibell’s firm will support social equity by helping underrepresented or struggling businesses—particularly those from underserved communities—access the strategic expertise needed to succeed. By leveling the playing field for these businesses, she will contribute to reducing income inequality, fostering entrepreneurship, and strengthening local economies. In doing so, her endeavor will have a far-reaching impact, enhancing societal welfare not only by creating jobs and driving economic activity but also by promoting fairness, sustainability, and opportunity for all.

Raissa Cristine Zibell’s proposed endeavor has both national and global implications within the field of **strategic business consulting**, particularly focused on **brand management, international market expansion,** and **sustainability consulting**. These areas are crucial as businesses across the globe seek to remain competitive in a rapidly evolving global marketplace.

At the national level, her consulting services will help U.S. companies, particularly small and medium-sized enterprises (SMEs), improve their operational efficiency, expand into international markets, and adopt sustainable practices. As more businesses prioritize sustainability and seek to reduce their environmental impact, ZIBELL LLC's emphasis on integrating sustainable business practices into strategic planning aligns with growing global environmental concerns. This directly supports national goals of fostering innovation, improving business competitiveness, and contributing to sustainable economic development.

Globally, Raissa Cristine Zibell’s expertise in brand management and market expansion will assist U.S. companies in navigating international markets, enabling them to reach new audiences and increase their global presence. By helping businesses optimize their market strategies and expand across borders, her endeavor will influence international trade relations, cross-border partnerships, and the broader globalization of American enterprises. Her work in sustainability consulting also carries global significance, as environmentally responsible business practices are a key concern for industries worldwide, and her approach promotes solutions that are beneficial both to businesses and the planet.

Raissa Cristine Zibell’s proposed endeavor aligns with several key areas that have been identified by U.S. government entities as matters of national importance, particularly in the fields of **sustainability, small business development, and international trade**.

One of the significant areas impacted by her work is **sustainability**, which is a central focus of the **Environmental Protection Agency (EPA)** and the **U.S. Department of Energy (DOE)**. Through ZIBELL LLC, Raissa Cristine Zibell will assist businesses in adopting environmentally sustainable practices, which directly supports the U.S. government's initiatives such as the **EPA’s Sustainability Program**. This program encourages businesses to integrate sustainable practices that reduce environmental impact, improve energy efficiency, and promote greener supply chains. Her consulting services will contribute to these national goals by helping companies become more sustainable, thus supporting national environmental priorities.

Her proposed business also aligns with the **Small Business Administration (SBA)’s** efforts to foster **small business growth and competitiveness**. The SBA has long emphasized the importance of small and medium-sized enterprises (SMEs) to the national economy, and ZIBELL LLC’s focus on providing strategic business consulting to SMEs directly contributes to this national initiative. By helping small businesses improve their operational efficiency, scale internationally, and adopt modern business practices, Raissa Cristine Zibell’s endeavor supports the SBA’s mission of promoting entrepreneurial success and small business development across the U.S.

Additionally, her work in **international market expansion** aligns with the **U.S. Department of Commerce’s International Trade Administration (ITA)**, which promotes **export growth** and **global market competitiveness** for American businesses. Through her services, Raissa Cristine Zibell will enable American companies to expand their market reach and engage in international trade, contributing to national initiatives aimed at increasing U.S. exports and strengthening the country’s position in global markets. This is particularly relevant in the context of **Export.gov**, a key platform for promoting U.S. goods and services abroad.

*The first prong, substantial merit and national importance, focuses on the specific endeavor that the foreign national proposes to undertake. The endeavor's merit may be demonstrated in a range of areas such as business, entrepreneurialism, science, technology, culture, health, or education. In determining whether the proposed endeavor has national importance, USCIS considers its potential prospective impact.*

The proposed endeavor of Raissa Cristine Zibell, through her strategic business consulting firm ZIBELL LLC, clearly meets the requirements of **substantial merit and national importance**. This endeavor will operate in the domain of **business and entrepreneurialism**, with a focus on enhancing the operational efficiency, international expansion, and sustainability of small and medium-sized enterprises (SMEs) in the United States. The scope and impact of her proposed work demonstrate both substantial merit and the potential to address matters of national importance.

Raissa Cristine Zibell’s business consulting services will help U.S. companies navigate complex market conditions, streamline their operations, and expand their reach into international markets. Given the prominent role SMEs play in the U.S. economy—driving innovation, creating jobs, and contributing to GDP growth—her work supports nationally recognized goals of fostering entrepreneurship and economic resilience. This focus on improving business performance, combined with her sustainability consulting efforts, aligns with government initiatives aimed at reducing environmental impact and promoting energy-efficient practices in businesses, as outlined by the **Environmental Protection Agency (EPA)**.

Moreover, her endeavor supports national priorities like **export growth** and **global market competitiveness**, as identified by the **U.S. Department of Commerce's International Trade Administration (ITA)**. By assisting businesses in expanding their global presence, Raissa Cristine Zibell will contribute to strengthening the U.S. export economy, which has national importance in maintaining the country's competitive edge on the global stage. Her services will have a long-term impact on improving the global positioning of American enterprises, further supporting the national economy and contributing to sustainable economic development.

In conclusion, Raissa Cristine Zibell’s proposed endeavor has substantial merit due to its contribution to business efficiency, international trade, and sustainability. Additionally, it addresses matters of national importance by supporting key economic initiatives and contributing to the overall economic and environmental health of the United States. Her consulting firm’s prospective impact, particularly on SMEs, underscores its alignment with the goals of fostering national economic growth and resilience.

## REQUIREMENT 2

*The foreign national is well-positioned to advance the proposed endeavor.*

*The second prong of Dhanasar shifts the focus from the proposed endeavor to the foreign national. To determine whether he or she is well-positioned to advance the proposed endeavor, USCIS considers factors including, but not limited to: the individual's education, skills, knowledge, and record of success in related or similar efforts; a model or plan for future activities; any progress towards achieving the proposed endeavor; and the interest of potential customers, users, investors, or other relevant entities or individuals.*

Raissa Cristine Zibell is exceptionally well-positioned to advance her proposed endeavor, ZIBELL LLC, due to her extensive background in strategic business consulting, brand management, and international market expansion. Her **education** includes advanced degrees and certifications that directly relate to her proposed business activities, such as her MBA in marketing and her WSET certification in wine management, which equip her with the specialized knowledge necessary to provide expert consulting services. Additionally, Raissa Cristine Zibell has cultivated **skills and knowledge** through her career, managing multimillion-dollar budgets, spearheading international marketing campaigns, and executing sustainability initiatives for prominent companies.

Her **record of success in similar efforts** further demonstrates her capability. Throughout her career, Raissa Cristine Zibell has consistently delivered impactful results, such as increasing market share and driving revenue growth for the companies she has worked with. She has successfully negotiated with international suppliers, managed product portfolios, and led teams to implement complex strategies—all of which are directly aligned with the services she proposes to offer through ZIBELL LLC.

Raissa Cristine Zibell has also laid out a clear **model and plan for future activities**. Her business plan outlines her approach to delivering consulting services, including strategic management, brand development, and sustainability solutions tailored to small and medium-sized enterprises (SMEs) in the U.S. Additionally, there is already **evidence of progress** towards achieving her proposed endeavor. She has built strong relationships with potential clients and partners in the international business community, many of whom have expressed interest in engaging her services once her business is operational in the U.S.

Although there may not be explicit evidence of investor backing at this time, Raissa Cristine Zibell’s track record and reputation make it likely that **potential customers and relevant entities** will engage with her consulting services. Her demonstrated ability to improve business performance and expand market opportunities will be attractive to businesses seeking to enhance their competitiveness in a challenging global market.

Overall, Raissa Cristine Zibell’s **education**, **skills**, **experience**, and **track record of success** clearly indicate that she is well-positioned to advance her proposed endeavor and make a significant impact in the U.S.

# *REQUIREMENT 3*

*It would benefit the United States to waive the job offer and labor certification requirements.*

*The third prong of Dhanasar 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. In performing this analysis, USCIS may evaluate factors such as: whether, in light of the nature of the foreign national's qualifications and/or the proposed endeavor, it would be impractical either for the foreign national to secure a job offer or for the petitioner to obtain a labor certification; whether, even assuming that other qualified U.S. workers are available, the United States would still benefit from the foreign national's contributions, that she is not displacing US workers; and whether the national interest in the foreign national's contributions is sufficiently urgent to warrant forgoing the labor certification process. In each case, the factor(s) considered must, taken together, indicate 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.*

Raissa Cristine Zibell’s proposed endeavor clearly meets the third prong of Dhanasar, demonstrating that it would be beneficial to the United States to waive the requirements of a job offer and labor certification. Given her specialized qualifications and the unique nature of her business consulting venture, it would be **impractical** for her to secure a traditional job offer or undergo the labor certification process. Raissa Cristine Zibell’s expertise in strategic business consulting, international market expansion, and brand management, particularly with a focus on sustainability, places her in a niche that would be difficult for a U.S. employer to accurately assess through standard hiring practices. Her entrepreneurial approach requires the freedom and flexibility to engage directly with clients, which is outside the scope of the traditional employer-employee framework.

Even if other U.S. workers possess qualifications in business consulting or brand management, the United States would still benefit uniquely from Raissa Cristine Zibell’s contributions due to her **international experience** and proven track record of success. Her ability to drive market expansion for U.S. companies into international markets and to offer sustainable business solutions is a distinctive combination of skills that is highly relevant in today’s global and environmentally conscious economy. By waiving the labor certification requirement, the U.S. can immediately leverage her expertise to improve the competitiveness of American companies, particularly small and medium-sized enterprises (SMEs), without delaying the process for certification, which may not capture the specialized nature of her work.

Furthermore, Raissa Cristine Zibell’s **proposed endeavor will lead to job creation** in the U.S. Her business plan outlines the creation of 11 direct jobs within the first five years, with further potential for expansion. Additionally, her work is projected to generate a multiplier effect, indirectly creating even more jobs across the industries she supports. This self-employed, entrepreneurial endeavor does not **displace U.S. workers** but rather adds value to the American economy by enhancing the operational efficiency of U.S. businesses and fostering innovation.

The **national interest** in supporting Raissa Cristine Zibell’s contributions is sufficiently urgent, especially in the context of post-pandemic economic recovery, where businesses are seeking expert guidance on improving sustainability and expanding their global market reach. Her consulting services are aligned with key national priorities, such as supporting entrepreneurship, promoting sustainability, and enhancing U.S. competitiveness in international markets.

In summary, the factors considered together—Raissa Cristine Zibell’s specialized qualifications, the impracticality of traditional employment arrangements, her non-displacement of U.S. workers, the potential for job creation, and the alignment of her endeavor with national interests—indicate that it would be beneficial for the United States to waive the job offer and labor certification requirements. This waiver will enable her to continue making meaningful contributions to the U.S. economy and business landscape.

# CONCLUSION

In my professional opinion, Raissa Cristine Zibell clearly satisfies the three essential requirements set forth by the USCIS to evaluate requests for a National Interest Waiver. The first requirement concerns the substantial merit and national importance of her proposed endeavor. Raissa Cristine Zibell’s business consulting firm, ZIBELL LLC, will provide crucial services that enhance the operational efficiency, global market presence, and sustainability of small and medium-sized enterprises (SMEs) in the United States. These services are integral to improving national economic resilience, competitiveness, and environmental sustainability, thereby establishing the national importance of her endeavor.

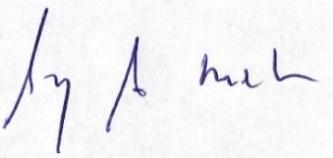
The second requirement, which focuses on whether the foreign national is well-positioned to advance the proposed endeavor, is fully met by Raissa Cristine Zibell. Her extensive education, professional experience, and track record of success in similar roles clearly demonstrate her capability to execute the objectives of ZIBELL LLC. Her deep knowledge of strategic business management, brand development, and international trade, coupled with her ability to implement sustainable business practices, positions her uniquely to deliver significant results in the U.S. market.

Finally, Raissa Cristine Zibell satisfies the third requirement, as it would be beneficial to the United States to waive the job offer and labor certification requirements in her case. Her entrepreneurial focus, specialized expertise, and ability to create jobs through her consulting firm all demonstrate that her contributions will positively impact the U.S. economy. Her proposed endeavor will not displace U.S. workers but instead drive innovation, competitiveness, and employment growth, aligning with national economic goals. Therefore, granting her a National Interest Waiver is both appropriate and advantageous for the United States.

The foregoing is an analysis and advisory evaluation of Raissa Cristine Zibell's request for a National Interest Waiver based on documents provided by her as well as information based on my research. The documents are represented to be authentic copies of the original documents. The above letter is strictly my opinion and is not the opinion of any of the universities with which I am affiliated or any of their departments or affiliates.

To the best of my knowledge, I have no reason to doubt the authenticity and accuracy of these documents.

Sincerely,



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October 7, 2024

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