

October 1, 2022

The Honorable Steve Sisolak
Office of the Governor
One Hundred One North Carson Street
Carson City, Nevada 89701

Ms. Brenda Erdoes, Director
Legislative Counsel Bureau
401 South Carson Street
Carson City, Nevada 89701

**Re: Annual Report
Projects with Capital Investments of \$3.5 Billion
Pursuant to NRS 360.975**

Dear Governor Sisolak and Director Erdoes:

Pursuant to NRS 360.975 the Governor's Office of Economic Development is submitting its annual report for the Qualified Project commonly known as the Tesla Gigafactory (the "Project"). The attached report is based on information provided by the Lead participant, Tesla Motors, Inc., and addresses the following statutory questions:

- (a) For the immediately preceding fiscal year;
- 1) The number of applications submitted pursuant to NRS 360.945
 - 2) The number of qualified projects for which an application was approved;
 - 3) The amount of transferable tax credits approved;
 - 4) The amount of transferable tax credits used;
 - 5) The amount of transferable tax credits transferred;
 - 6) The amount of transferable tax credits taken against each allowable fee or tax, including the actual amount used and outstanding, in total and for each qualified project;
 - 7) The number of abatements approved;

- 8) The dollar amount of the abatements;
 - 9) The number of employees engaged in construction of each qualified project who are residents of Nevada and the number of employees employed by each participant in a qualified project who are residents of Nevada;
 - 10) The number of qualified employees employed by each participant in a qualified project and the total amount of wages paid to those persons; and
 - 11) For each qualified project, an assessment of whether the participants in the qualified project are making satisfactory progress towards meeting the investment requirements necessary to support the determination by the Office that the project is a qualified project
- (b) For each abatement from taxation that the Office approved during the fiscal years which are 3 fiscal years, 6 fiscal years, 10 fiscal years and 20 fiscal years immediately preceding the submission of the report:
- 1) The dollar amount of the abatement;
 - 2) The value of infrastructure included as an incentive for the qualified project;
 - 3) The economic sector in which each participant in the qualified project operates, the number of primary jobs related to the qualified project, the average wage paid to employees employed by the participants in the qualified project and the assessed values of personal property and real property of the qualified project; and
 - 4) Any other information that the Office determines to be useful.

If further information is required, please contact me at your convenience.

Respectfully yours,



Melanie Sheldon
Director of Business Development – Southern Nevada

cc: Michael Brown, Executive Director, GOED

Annual Report
Projects with Capital Investments of \$3.5 Billion
Pursuant to NRS 360.975
(FY 2022)

A. For the immediately preceding fiscal year, the NRS requirements and responses are as follows:

- 1) The number of applications submitted pursuant to NRS 360.945: **The number of applications submitted pursuant to NRS 360.945 was zero (0) for FY 2022. In FY 2015, one application was submitted by Tesla Motors, Inc. for the project typically known as the “Tesla Gigafactory.”**
- 2) The number of qualified projects for which an application was approved: **The number of qualified projects for which an application was approved was zero (0) for FY 2022.**
- 3) The amount of transferable tax credits approved: **The amount of transferable tax credits approved for use in, FY 2022, was \$0. Total approved for all periods is \$195,000,000.**
- 4) The amount of transferable tax credits used: **The amount of transferable tax credits used by Tesla Motors, Inc., in FY 2022, was \$0.**
- 5) The amount of transferable tax credits transferred: **The amount of transferable tax credits transferred by Tesla Motors, Inc., in FY 2022, was \$0.**
- 6) The amount of transferable tax credits taken against each allowable fee or tax, including the actual amount used and outstanding, in total for each qualified project: **The amount of transferable tax credits taken against each allowable fee or tax, including the actual amount used and outstanding in total for each qualified project, were taken against Gaming License Fees imposed by NRS 463.370, in FY 2022, totaled \$0.**
- 7) The number of abatements approved: **The number of abatements approved was zero (0) in FY 2022.**
- 8) **The dollar amount of the abatements: The dollar amount of the abatements in, FY 2022, totaled \$65.8 million, including \$12.8 million in Sales Taxes on construction materials, equipment, and other property, \$14.6 million in Modified Business Tax, \$8.1 million in Real Property Tax, and \$30.2 million in Personal Property Tax. Also, 100 percent claw-back plus interest provisions are contractually activated if the project fails to reach the required minimum 10-year investment of \$3.5 billion.**

Source: Storey County Assessor's Office, Nevada Department of Taxation

9) The number of employees engaged in construction of each qualified project who are residents of Nevada and the number of employees employed by each participant in a qualified project who are residents of Nevada: **The number of employees engaged in construction of each qualified project who are residents of Nevada and the number of employees employed by each participant in a qualified project who are residents of Nevada are included below:**

- i. **Total number of construction employees who are Nevada residents: 9,205**
- ii. **Total number of Nevada residents who are employees of participants: 9,437 total Nevada residents, which includes 5,339 for Tesla Motors, 3,942 for Panasonic Electronics North America (PENA) and 156 for H&T Nevada, LLC**

Source: Tesla Motors, Inc. / Eide Bailly LLP– Report of Independent Accountants on Applying Agreed Upon Procedures

10) The number of qualified employees employed by each participant in a qualified project and the total amount of wages paid to those persons: **The number of qualified employees (QEs) employed by each participant in a qualified project and the total amount of wages paid to those persons is as follows:**

- i. **Total number of QEs of participants: 10,521 total QEs; 6,309 for Tesla Motors, 4,026 for Panasonic Electronics North America (PENA), and 186 for H&T Nevada, LLC**
- ii. **Total wages paid: \$1.138 billion in wages were paid to 10,521 QEs to date which, adjusted for actual hours, equates to \$49.71 per hour**

Source: Tesla Motors, Inc. – internal reporting

11) For each qualified project, an assessment of whether the participants in the qualified project are making satisfactory progress towards meeting the investment requirements necessary to support the determination by the Office that the project is a qualified project: **For each qualified project, GOED provides an assessment of whether the participants in the qualified project are making satisfactory progress towards meeting the investment requirements necessary to support the determination by the Office that the project is a qualified project:**

- i. **Tesla reports an estimated total combined investment of \$6.2 billion through June 30, 2022**
- ii. **Based on this investment, and observations of physical progress at the site, GOED has determined for FY 2022 that Tesla is making satisfactory progress towards meeting the investment requirements necessary to maintain its status as a qualified project**

Source: Tesla Motors, Inc. / Eide Bailly LLP– Report of Independent Accountants on Applying Agreed Upon Procedures

B. For each abatement from taxation that the Office approved during the fiscal years which are 3 fiscal years, 6 fiscal years, 10 fiscal years and 20 fiscal years immediately preceding the submission of the report:

1) The dollar amount of the abatement:

	2015	2016	2017	2018	2019	2020	2021	2022	Combined total
RPT	-	\$ 2,364,797	\$ 5,595,710	\$ 6,139,331	\$ 6,284,005	\$ 6,220,544	\$ 7,363,690	\$ 8,130,218	\$ 42,098,295
PPT	-	\$ 334	\$ 156,993	\$ 17,377,826	\$ 27,964,821	\$ 34,363,259	\$ 30,348,465	\$ 30,222,719	\$ 140,434,417
MBT	\$ 59,067	\$ 396,916	\$ 1,251,559	\$ 2,772,508	\$ 4,284,572	\$ 7,057,628	\$ 11,067,153	\$ 14,608,017	\$ 41,497,420
SUT	\$ 2,532,930	\$ 5,136,661	\$ 68,832,963	\$ 51,163,942	\$ 17,417,131	\$ 13,809,902	\$ 14,973,912	\$ 12,790,692	\$ 186,658,133
Total	\$ 2,591,997	\$ 7,898,708	\$ 75,837,225	\$ 77,453,607	\$ 55,950,529	\$ 61,451,333	\$ 63,753,220	\$ 65,751,645	\$ 410,688,264

Source: Storey County Assessor's Office, Nevada Department of Taxation

2) The value of infrastructure included as an incentive for the qualified project: **No infrastructure was provided as an incentive for this qualified project.**

3) The economic sector in which each participant in the qualified project operates, the number of primary jobs related to the qualified project, the average wage paid to employees employed by the participants in the qualified project and the assessed values of personal property and real property of the qualified project:

Project to date

	Tesla	PENA	H&T	Valeo
Economic Sector	Manu.	Manu.	Manu.	Manu.
New Qualified Employees (NQE's)	6,309	4,026	186	0
Number of Nevadan residents NQE's	5,339	3,942	156	0
NQE Residency Percentage	85%	98%	84%	0
Average Wage	\$ 49.36	\$ 30.06	\$ 33.03	0

Source: Tesla Motors, Inc. / Eide Bailly LLP – Report of Independent Accountants on Applying Agreed Upon Procedures

RPT Assessed Values	Tesla	PENA	H&T	Valeo
2016-17	\$ 68,332,897	-	-	-
2017-18	\$ 161,692,999	-	-	-
2018-19	\$ 177,401,419	-	-	-
2019-20	\$ 181,581,894	-	-	-
2020-21	\$ 179,748,133	-	-	-
2021-22	\$ 212,780,370	-	-	-
2022	\$ 234,929,861	-	-	-

Source: Storey County Assessor's Office

PPT Assessed Values	Tesla	PENA	H&T	Valeo
2015-16	\$ 9,649	-	-	-
2016-17	\$ 4,516,053	\$ 20,415	-	-
2017-18	\$ 151,257,236	\$ 342,638,323	\$ 3,663,453	\$ 4,588,69
2018-19	\$ 284,186,838	\$ 503,860,156	\$ 15,989,255	\$ 4,032,091
2019-20	\$ \$391,154,268	\$ 569,965,152	\$ 27,868,252	\$ 3,969,230
2020-21	\$ 323,495,816	\$ 520,883,391	\$ 28,558,656	\$ 4,007,999
2021-22	\$ 321,860,449	\$ 525,905,074	\$ 22,771,531	\$ 2,775,245

Source: Storey County Assessor's Office



Agreed-Upon Procedures
Period of July 1, 2021 through June 30, 2022
Tesla, Inc.



Independent Accountant's Report

To the Board of Directors and Management
Tesla, Inc.
Palo Alto, California

We have performed the procedures enumerated below, which were agreed to by the Board of Directors and Management of Tesla, Inc. (the "Company" or "Lead Participant") and the State of Nevada (the "Regulator") (collectively the "Specified Parties"), related to the Company's schedules of qualified employees and construction employees and to the Company's listing of all capital investments made by each Participant (as defined in the SB1 Incentive Compliance Agreement) in the State of Nevada for the period of July 1, 2021 through June 30, 2022 (the "Period"). The Company's management is responsible for the Company's compliance with the State of Nevada SB1 Incentive Compliance agreement for the period of July 1, 2021 through June 30, 2022.

The Company has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of assisting users in understanding the Company's compliance with the State of Nevada SB1 Incentive Compliance Agreement during the period of July 1, 2021 through June 30, 2022, and we will report our findings based on the procedures performed. Additionally, the State of Nevada has agreed to and acknowledged that the procedures performed are appropriate for their purposes. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures and the associated findings are as follows:

Required Qualified Employee Audit Data (Exhibits A-D)

1. We obtained a schedule from each Participant listing all qualified employees of the Project Site for the period of July 1, 2021 through June 30, 2022, except for Valeo North America, Inc. who did not report any qualified employees.
2. We selected a sample of 25% of the qualified employee additions during the period per the summary sheet. For each selected qualified employee: we agreed wages paid to a paystub or W-2 form (or equivalent system-generated payroll report) to include wages, 401(k) contributions, and cafeteria plan contributions; we agreed residency status to a copy of their

current (during the period under review) and valid Nevada driver's license, a copy of their current (during the period under review) motor vehicle registration, or other Nevada DMV proof of residency; and we agreed qualified employee status to the payroll information obtained above to verify that the qualified employee was employed full-time and scheduled to work for an average of 30 hours per week at the Project site and had been for at least three consecutive months as of June 30, 2022, as well as proof that the qualified employee was offered coverage under a plan of health insurance provided by the Participant. Our sample selected resulted in the 90% accuracy threshold being met.

3. We recalculated the average wage of qualified employees to verify that the minimum average wage of \$22.00 was met without exception.
4. We recalculated the residency as a percentage of qualified employees for the project to date to verify the percentage reported and that at least 50% of qualified employees are Nevada residents, as required, was met without exception.
5. We agreed the schedule of qualified employees obtained from each participant to the Required Qualified Employee Audit Data form without exception.

We noted that in prior reporting periods, the Company exceeded the goal of hiring 6,000 employees per the SB1 Incentive Compliance agreement and earned the maximum qualified employee tax credit of \$75,000,000.

Combined Required Construction Employee Audit Data (Exhibit I)

1. We obtained a schedule listing all construction employees of the Project Site for the period of July 1, 2021 through June 30, 2022.
2. We selected a sample of 25% of the construction employee additions during the period listed as Nevada residents per the summary sheet. For each selected construction employee, we agreed residency status to a current (during the period under review) and valid Nevada driver's license, a copy of their current (during period under review) motor vehicle registration, or other Nevada DMV proof of residency. Our sample selected resulted in the 90% accuracy threshold being met.
3. We recalculated the residency as a percentage of construction employees for the project to date to verify the percentage reported and that at least 50% of construction employees are Nevada residents, as required, was met without exception.
4. We agreed the schedule of construction employees obtained from each participant to the Combined Required Construction Employee Audit Data form without exception.

Required Property Audit Data (Exhibits A, E-H)

1. We obtained the real and personal property listings from each Participant listing all capital investments made by each Participant in the State of Nevada for the period of July 1, 2021 through June 30, 2022, except for Valeo North America, Inc. who did not report any capital investments.
2. We selected a sample of property additions of 25% of the total book value of property additions during the period.
3. We reviewed the supporting documentation obtained for the sampled property additions to determine that the addition met the definition of a capital investment per the Incentive Agreement, and verified determination of depreciable life. Our sample selected resulted in the 90% accuracy threshold being met.
4. We footed the listings by asset class/depreciable life without exception.
5. We agreed the listings obtained from each participant to the Required Property Audit Data form, by asset class/depreciable life grouping and in total without exception.

We noted that in prior reporting periods, the Company exceeded the goal of \$3,500,000,000 in capital investment spend per the SB1 Incentive Compliance agreement and earned the maximum capital investment tax credit of \$120,000,000.

We were engaged by the Company to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or a review, the objective of which would be the expression of an opinion or conclusion, respectively, on compliance with the State of Nevada SB1 Incentive Compliance agreement during the period of July 1, 2021 through June 30, 2022. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures; other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Company and to meet our other ethical responsibilities, in accordance with relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Board of Directors and Management of Tesla, Inc. and the State of Nevada and is not intended to be, and should not be, used by anyone other than these Specified Parties.

The image shows a handwritten signature in cursive script that reads "Eide Bailly LLP". The signature is written in black ink and is positioned in the lower-left quadrant of the page.

Reno, Nevada
September 15, 2022

Exhibit A

Combined Summary and Transferable Tax Credit

Qualified Project Name:	Gigafactory Project
Lead Participant:	Tesla, Inc. (FKA: Tesla Motors, Inc.)
Reporting Period:	July 1, 2021 - June 30, 2022
Project to Date Period:	October 17, 2014 - June 30, 2022

	Reporting Period *	Project to Date Period
Number of New Qualified Employees (NQE)	1,947	10,521
Number of NQEs who are Nevada Residents	1,903	9,437
Residency as a Percent		90%
Average Wage of Qualified Employees		\$ 42.35
Nevada residency requirements verified:		Yes
Qualified Employees requirements verified:		Yes
Total Capital Investment	\$ 161,586,739	\$ 6,185,813,077
Number of Qualified Employees (NQE)	-	6,000
Dollar Credit per NQE (up to 6,000 NQE's)	\$ 12,500	\$ 12,500
Qualified Employee Tax Credit	\$ -	\$ 75,000,000
Capital Investment at 5%	\$ -	\$ 1,000,000,000
Percent Credit (5% up to \$1 Billion)	5%	5%
Capital Investment Tax Credit at 5%	\$ -	\$ 50,000,000
Capital Investment at 2.8%	\$ -	\$ 2,500,000,000
Percent Credit (2.8% up to \$2.5 Billion)	2.8%	2.8%
Capital Investment Tax Credit at 2.8%	\$ -	\$ 70,000,000
Total Transferable Tax Credit	\$ -	\$ 195,000,000

* The total number of new qualified employees hired by all participants during the reporting period was 2,962. The numbers above reflect the number of qualified employees added during the reporting period less the number of previously qualified employees that left during the reporting period.

Exhibit B

Required Qualified Employee Audit Data

Qualified Project Name: Gigafactory Project
Participant: Tesla, Inc. (FKA: Tesla Motors, Inc.)
Reporting Period: July 1, 2021 - June 30, 2022
Project to Date Period: October 17, 2014 - June 30, 2022

<u>Workforce Composition</u>	Reporting Period *	Project to Date Period
Number of New Qualified Employees (NQE)	665	6,309
Number of NQEs who are Nevada Residents	670	5,339
Residency as a Percent		85%
Average Wage of Qualified Employees		\$ 49.36

* The total number of new qualified employees hired by Tesla, Inc. during the reporting period was 1,577. The numbers above reflect the number of qualified employees added during the reporting period less the number of previously qualified employees that left during the reporting period.

Exhibit C

Required Qualified Employee Audit Data

Qualified Project Name: Gigafactory Project
Participant: Panasonic Energy Corporation of North America
Reporting Period: July 1, 2021 - June 30, 2022
Project to Date Period: October 17, 2014 - June 30, 2022

Workforce Composition

	Reporting Period	Project to Date Period
Number of New Qualified Employees (NQE)	1,336	4,026
Number of NQEs who are Nevada Residents	1,279	3,942
Residency as a Percent		98%
Average Wage of Qualified Employees		\$ 30.06

Exhibit D

Required Qualified Employee Audit Data

Qualified Project Name: Gigafactory Project
Participant: H&T Nevada, LLC
Reporting Period: July 1, 2021 - June 30, 2022
Project to Date Period: October 17, 2014 - June 30, 2022

<u>Workforce Composition</u>	Reporting Period *	Project to Date Period
Number of New Qualified Employees (NQE)	(54)	186
Number of NQEs who are Nevada Residents	(46)	156
Residency as a Percent		84%
Average Wage of Qualified Employees		\$ 33.03

* The total number of new qualified employees hired by H&T Nevada, LLC during the reporting period was 49. The numbers above reflect the number of qualified employees added during the reporting period less the number of previously qualified employees that left during the reporting period.

Exhibit E

Required Property Audit Data

Qualified Project Name: Gigafactory Project
Participant: Tesla, Inc. (FKA: Tesla Motors, Inc.)
Reporting Period: July 1, 2021 - June 30, 2022
Project to Date Period: October 17, 2014 - June 30, 2022

	Reporting Period	Project to Date Period
Real Property		
Land	\$ -	\$ 41,989,595
Building/Structure	\$ 9,432,341	\$ 1,018,075,703
Building/Structure - CIP	\$ -	\$ 1,074,092,485
Subtotal	<u>\$ 9,432,341</u>	<u>\$ 2,134,157,783</u>
Personal Property		
3- year life	\$ (657,144)	\$ 28,239,822
4- year life	\$ -	\$ 25,502,965
5- year life	\$ 106,546	\$ 203,623
7- year life	\$ 2,678,900	\$ 29,753,958
10- year life	\$ -	\$ 2,539,570
12- year life	\$ (1,787,366)	\$ 1,422,568,785
15- year life	\$ (282,960)	\$ 25,128,156
20- year life	\$ -	\$ -
30- year life	\$ -	\$ -
35- year life	\$ 10,296	\$ 10,296
CIP - Life TBD	\$ 3,836,089	\$ 22,427,914
Other Property	\$ 467,742	\$ 1,024,521
Expensed Property	\$ 64,430,743	\$ 288,079,138
Subtotal	<u>\$ 68,802,846</u>	<u>\$ 1,845,478,748</u>
Total Capital Investment	<u><u>\$ 78,235,187</u></u>	<u><u>\$ 3,979,636,531</u></u>

Exhibit F

Required Property Audit Data

Qualified Project Name:	Gigafactory Project
Participant:	Panasonic Energy Corporation of North America
Reporting Period:	July 1, 2021 - June 30, 2022
Project to Date Period:	October 17, 2014 - June 30, 2022

	Reporting Period	Project to Date Period
Real Property		
Land	\$ -	\$ -
Building/Structure	\$ -	\$ -
Building/Structure - CIP	\$ -	\$ -
Subtotal	\$ -	\$ -
Personal Property		
3- year life	\$ 4,239,075	\$ 34,081,163
4-year life	\$ -	\$ -
5- year life	\$ 56,449	\$ 387,805
7- year life	\$ 76,035,678	\$ 1,649,620,760
10- year life	\$ -	\$ -
12-year life	\$ -	\$ -
15- year life	\$ -	\$ 44,153,374
20- year life	\$ -	\$ -
30- year life	\$ -	\$ -
35- year life	\$ -	\$ -
CIP - Life TBD	\$ 106,321	\$ 319,700,717
Other Property	\$ -	\$ -
Expensed Property	\$ (452,674)	\$ 9,312,874
Subtotal	\$ 79,984,849	\$ 2,057,256,693
Total Capital Investment	\$ 79,984,849	\$ 2,057,256,693

Exhibit G

Required Property Audit Data

Qualified Project Name:	Gigafactory Project
Participant:	H&T Nevada, LLC
Reporting Period:	July 1, 2021 - June 30, 2022
Project to Date Period:	October 17, 2014 - June 30, 2022

	Reporting Period	Project to Date Period
Real Property		
Land	\$ -	\$ -
Building/Structure	\$ -	\$ 526,104
Building/Structure - CIP	\$ -	\$ -
Subtotal	\$ -	\$ 526,104
Personal Property		
3- year life	\$ 265,211	\$ 1,360,634
4-year life	\$ -	\$ -
5- year life	\$ 11,385	\$ 1,675,609
7- year life	\$ -	\$ 463,207
10- year life	\$ 27,990,982	\$ 134,269,816
12-year life	\$ -	\$ -
15- year life	\$ -	\$ -
20- year life	\$ -	\$ -
30- year life	\$ -	\$ -
35- year life	\$ -	\$ -
CIP - Life TBD	\$ (24,900,875)	\$ 1,748,009
Other Property	\$ -	\$ -
Expensed Property	\$ -	\$ -
Subtotal	\$ 3,366,703	\$ 139,517,275
Total Capital Investment	\$ 3,366,703	\$ 140,043,379

Exhibit H

Required Property Audit Data

Qualified Project Name: Gigafactory Project
Participant: Valeo North America, Inc.
Reporting Period: July 1, 2021 - June 30, 2022
Project to Date Period: October 17, 2014 - June 30, 2022

	Reporting Period	Project to Date Period
Real Property		
Land	\$ -	\$ -
Building/Structure	\$ -	\$ -
Building/Structure - CIP	\$ -	\$ -
Subtotal	<u>\$ -</u>	<u>\$ -</u>
Personal Property		
3- year life	\$ -	\$ -
4-year life	\$ -	\$ -
5- year life	\$ -	\$ -
7- year life	\$ -	\$ 8,876,474
10- year life	\$ -	\$ -
12-year life	\$ -	\$ -
15- year life	\$ -	\$ -
20- year life	\$ -	\$ -
30- year life	\$ -	\$ -
CIP - Life TBD	\$ -	\$ -
Other Property	\$ -	\$ -
Expensed Property	\$ -	\$ -
Subtotal	<u>\$ -</u>	<u>\$ 8,876,474</u>
Total Capital Investment	<u><u>\$ -</u></u>	<u><u>\$ 8,876,474</u></u>

Exhibit I

Combined Required Construction Employee Audit Data

Qualified Project Name: Gigafactory Project
Lead Participant: Tesla, Inc. (FKA: Tesla Motors, Inc.)
Reporting Period: July 1, 2021 - June 30, 2022
Project to Date Period: October 17, 2014 - June 30, 2022

<u>Workforce Composition</u>	Reporting Period	Project to Date Period
Number of Construction Employees (CE)	110	16,506
Number of CEs who are Nevada Residents	57	9,205
Residency as a Percent		56%
Nevada residency requirements verified:		Yes