

I. INTRODUCTION AND PARTIES

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II. PROCEDURAL HISTORY

A. Notice of Intent

5. On May 19, 2014, p

10. On February 4, 2014, Dr. Michael Pryles, an Australian national, accepted his appointment by Claimant as a

proceeding.

submitted its

(a) International Center for Settlement of Investment Disputes (ICSID) under the Convention on the Settlement of Disputes between States and Nationals of Other States, done at

IV. FACTUAL BACKGROUND

32.

Jiangsu-Sheng and Sheyang-Xian had approved the

44. On May 27, 2008, the Sheyang-Xian government awarded Ansung the land use rights for 100 *mu* at a price higher than originally agreed, and refused to provide the further 200 *mu*. This left Ansung unable to develop the condominiums.²⁴
45. On June 30, 2009, with the first phase almost complete, the Committee arranged for a third-party development company to loan funds to Mirage to expedite construction of the clubhouse.²⁵
46. In August 2009, Ansung learned that Sheyang Island Park had become an operating 18-hole golf course, and complained to various government officials.²⁶ Although the hole hole

in this project” and, yet, Secretary You took no action and thereafter “he has refused to meet with Ansong for any matter

52. As also pleaded in the introduction to the Request for Arbitration: “As a consequence of the foregoing, Ansung was forced to dispose of its entire investment in Sheyang-

