



Congress of the United States
House of Representatives
Washington, DC 20515

May 19, 2025

Alan Garber
President
Harvard University
Massachusetts Hall
Cambridge, MA 02138

Dear President Garber,

We write today to request detailed information about Harvard's activities, detailed below, that create risks to U.S. national security and further the Chinese Communist Party's (CCP's) genocide in Xinjiang. Specifically:

1. Harvard repeatedly **hosted and trained members of a CCP paramilitary organization, the Xinjiang Production and Construction Corps (XPCC^a)**.
 - a. XPCC is **a primary implementer of the CCP's genocide** against the Uyghurs.¹
 - b. Harvard provided services to XPCC members multiple times *after* the Department of the Treasury placed XPCC on the Specially Designated Nationals and Blocked Persons (SDN) List in 2020, including **as recently as 2024**.²
2. Harvard researchers **collaborated with China-based academics on research funded by an agent of the Iranian government**.^b
 - a. This occurred on at least four occasions since 2020, and **as recently as 2024**.
3. Harvard researchers used **funding from the Department of Defense to partner with China-based academics on research with potential military applications**.
 - a. These projects involved Chinese universities that are linked to the Chinese military and advanced aerospace and optics research with military applications.

^a XPCC or 新疆生产建设兵团.

^b The Iranian National Sciences Foundation (INSF) is an agent of the Iranian government that was chartered and is directed and funded by Iran's Supreme Council of the Cultural Revolution, whose decisions can only be overruled by Iran's Supreme Leader. IRAN NAT'L SCI. FOUND., *What Is the INSF*, <https://insf.org/en/page/28/what-is-the-insf> (last visited Apr. 28, 2025); *Iran: Supreme Council for the Cultural Revolution (SCRC)*, GLOBALSECURITY.ORG, <https://www.globalsecurity.org/military/world/iran/scrc.htm> (last visited May 6, 2025).

4. Harvard researchers partnered with **China-based individuals linked to China's defense academic and industrial base on research that could advance China's military modernization.**
 - a. One project involved robotics research with potential military applications, conducted in partnership with a researcher at one of China's "Seven Sons of National Defense" universities.
5. Given the People's Republic of China's (PRC's) extensive record of human rights abuses against religious and ethnic minorities, including by forcibly harvesting organs from such individuals, **we request further information regarding the safeguards Harvard places around research collaborations related to organ transplantation** when such research is conducted with PRC-based researchers.

These instances raise serious concerns about whether Harvard adequately protects taxpayer funded research and U.S. national security, and whether it takes sufficient steps to ensure that its activities do not further the CCP's ongoing genocide or bolster the PRC's military capabilities.

Harvard must provide the American people an explanation for this conduct.

I. Harvard Hosted and Trained Members of a Sanctioned Chinese Paramilitary Organization Involved in the CCP's Genocide in Xinjiang

On multiple occasions, Harvard hosted and trained members of the sanctioned, paramilitary organization XPCC—one of the primary implementers of the CCP's genocide against the Uyghur people.³ As you know, the PRC has arbitrarily detained as many as 1.8 million Uyghurs, Kazakhs, Kyrgyz, and members of other Muslim minority groups in a system of extrajudicial mass internment camps, and XPCC operates at the forefront of the CCP's genocide against the Uyghur people.⁴

Harvard provided services to XPCC on multiple occasions *after* the U.S. Treasury Department listed XPCC on the SDN List in 2020.⁵ Treasury's sanctions generally prohibit U.S. persons^c from contributing or providing any funds, goods, or services by, to, or for the benefit of a designated party as well as the receipt of any contribution or provision of funds, goods, or services from any designated party.⁶

Harvard's relationship with XPCC dates back to at least 2019, well after there was significant public reporting and confirmation by the U.S. government and the United Nations of mass detentions, relentless surveillance, and gross human rights abuses against Uyghurs and other ethnic minorities in Xinjiang.⁷ In November 2019, Harvard hosted a training course on health finance in collaboration with the Chinese government, and Harvard's press release at the time specifically touted XPCC's participation (though Harvard appears to have later removed this

^c U.S. person is broadly defined to include any United States citizen, lawful permanent resident, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States. 31 C.F.R. § 583.314 (2025).

reference).⁸ Ignoring these well documented atrocities, Harvard charged ahead with training the paramilitary group responsible for carrying them out, even mentioning it in its press release.⁹

Despite the imposition of sanctions against XPCC the following year, Harvard continued to provide services to XPCC multiple times over the next four years as part of its Harvard China Health Partnership (HCHP), which works closely with the CCP.¹⁰ Harvard hosted and provided training to XPCC at conferences held as part of the HCHP, including the Fifth Flagship Training Event on Health Care Financing in October 2023, an event to “aid China’s healthcare policy design.”¹¹ Notably, Harvard opted to omit XPCC from its press release¹² while the Chinese government’s press statement for the same event highlighted XPCC’s participation.¹³ Additionally, Harvard’s press release shows blurred name plates for four of five panelists, which raises questions about why Harvard wanted to keep their identities hidden.



In 2024, Harvard again held this event, and the National Healthcare Security Administration issued a press release celebrating XPCC’s involvement.¹⁴ In short, Harvard hosted and provided training to members of a genocidal, sanctioned paramilitary group on at least three occasions, including multiple times after the U.S. government imposed sanctions on XPCC.

We are deeply concerned the services and resources provided through these events may violate U.S. law and could have been deployed by XPCC to further repress the Uyghur people and other ethnic minorities in China. Harvard stated that its training was designed to help “participating policymakers ... translate the lessons from the course into tangible, effective policies[.]”¹⁵ But to XPCC, “effective policies” are those that succeed in repressing the Uyghur people. Further, XPCC has previously used the fig leaf of health care-related efforts to whitewash the CCP’s crimes in Xinjiang. For example, XPCC members conducted a health-related quality of life study in 2021, interviewing more than 1,000 Uyghurs.¹⁶ The study was retracted after an ethics complaint pointed out the study subjects lacked the autonomy to participate voluntarily.¹⁷

II. Harvard Researchers Collaborated with China-based Researchers on Projects Funded by an Agent of the Iranian Government

Harvard researchers have also worked with PRC-based collaborators on projects funded by an Iranian government agent. One Harvard researcher conducted scientific research with researchers from a PRC defense-linked university funded through a grant from this Iranian government agent.¹⁸ This research paper was written in partnership with a professor at Zhejiang

University, a Chinese university that hosts multiple Chinese defense laboratories and cooperates closely with China's military.¹⁹ The research received funding from a grant from the Iranian National Science Foundation,²⁰ a Tehran-based public organization that was chartered and is funded and directed by the Iranian government to achieve Iran's technological goals, among other purposes.²¹

This is not an isolated incident. Harvard researchers worked on multiple projects across multiple years, all funded in part by the Iranian National Sciences Foundation.²² We identified at least four such projects²³ since 2020, and one as recent as 2024.²⁴ As you may know, under the Iranian Transactions and Sanctions Regulations, the Office of Foreign Assets Control has specifically disallowed transactions incident to publication^d when they involve the Iranian government and its instrumentalities.²⁵ This funding from an Iranian government agent raises serious concerns and may violate U.S. law.

Iran has unlawfully pursued nuclear weapons, supported terrorist groups who have killed Americans, advanced missile development, and engaged in a campaign of regional aggression, leading the U.S. to impose sweeping sanctions in 2018.²⁶ This latest Iranian government-financed research took place in 2024, *after* the sanctions were imposed, *after* the U.S. government highlighted the threat from Iran's activities, and *after* Iranian proxies killed American citizens.²⁷

III. Harvard Researchers Worked with Researchers at Chinese Military Linked Institutions on U.S. DoD-Funded Projects

Further, Harvard researchers worked with researchers at Chinese universities on DoD-funded research with potential military applications. For example, Harvard researchers worked with faculty associated with Tsinghua University on research funded by the Defense Advanced Research Projects Agency (DARPA) that explored zero-indexed materials,²⁸ which has optic-chip applications,²⁹ a technology that could substantially improve artificial intelligence capabilities.³⁰

In another example, a Harvard researcher worked with a professor associated with Zhejiang University on a paper researching polymer science funded by the U.S. Air Force, among others.³¹ This polymer research holds potential applications in areas such as aircraft construction.³²

In yet a third instance, a Harvard researcher worked with academics associated with the Huazhong University of Science and Technology (Huazhong University) on research funded by the U.S. Air Force that explores materials such as shape memory alloys.³³ Shape metal alloys were noted to have aerospace applications.³⁴

All three institutions are publicly linked to China's military. Tsinghua University, General Secretary Xi Jinping's alma mater,³⁵ conducts defense research for the People's Liberation Army (PLA) and has been implicated in cyber-attacks against the United States.³⁶ Zhejiang University hosts multiple Chinese defense laboratories and is linked to economic and cyber espionage.³⁷

^d 31 C.F.R. § 560.538 (2025).

Huazhong University hosts a significant number of PLA-linked defense laboratories and has close links to China's defense industry.³⁸

The DoD funds research in areas that further U.S. defense capabilities.³⁹ The United States must maintain an edge in science, technology, and development to counter national security threats from the PRC.⁴⁰ Harvard's collaboration with PRC military-linked institutions blunts this edge in two primary ways. First, it trains researchers at PRC military-linked institutions in scientific areas that could be critical in a future conflict. This research holds obvious military applications since the DoD funded these projects. The PRC military benefits from sharing the wealth of knowledge these research projects generate. Harvard researchers should not be contributing to the military capabilities of a potential adversary. Second, this collaboration provides the PRC with insight into U.S. military priorities. When researchers work on DoD-funded projects, PRC-based researchers gain valuable knowledge about the scientific areas the DoD considers essential for future warfighting capabilities. U.S. research institutions should not become a backdoor for potential adversaries to learn the thought processes of one of the most critical institutions charged with keeping Americans safe.

IV. Harvard Researchers Worked with PRC Military Linked Institutions on Research That Can Advance PRC Military Capabilities

Harvard researchers also routinely worked with PRC military-linked institutions on dual-use research.⁴¹ Within these dual-use areas, the DoD recognized the importance of certain disciplines such as microelectronics, artificial intelligence, and quantum science.⁴² The Select Committee on the Chinese Communist Party noted Harvard researchers collaborating with PRC military-linked institutions on research in these critical defense areas. For example, Harvard researchers worked with researchers associated with Tsinghua University and Zhejiang University on the "first controlled flight of a microrobot powered by soft artificial muscles"⁴³—robotics with clear potential military applications.⁴⁴

In another instance, Harvard researchers worked with PRC military-linked institutions on soft robots for deep-sea exploration,⁴⁵ a technology which could easily be applied to undersea surveillance and reconnaissance.⁴⁶ This research team included scientists from the Beihang University, which is one of the PRC's "Seven Sons of National Defense."⁴⁷

In a third example, a Harvard researcher worked with a Tsinghua University researcher on Field-Programmable Gate Arrays (FPGA).⁴⁸ FPGAs give the military a critical edge in everything from analyzing radar information to communications systems.⁴⁹ This dual-use technological research risks advancing the PRC's military capabilities.

V. Harvard Researchers' Organ Transplantation Research Raises Questions about Harvard's Safeguard for Medical Research

The PRC has been repeatedly implicated in forcible organ harvesting activities, including illicit organ harvesting targeting ethnic and religious minorities. The U.S. House of Representatives passed a resolution in 2016 addressing the "persistent and credible reports of

systematic, state-sanctioned organ harvesting. . . in the People’s Republic of China.”⁵⁰ In 2019, the Independent Tribunal into Forced Organ Harvesting from Prisoners of Conscience in China produced extensive evidence of organ harvesting practices.⁵¹ Expert testimony before Congress in March 2024 provides evidence that this practice continues in the PRC,⁵² and the PRC has aggressively cracked down on any information sharing related to ongoing human rights abuses.⁵³

The Select Committee identified multiple instances where Harvard researchers worked with Chinese researchers on organ transplantation-related research. The chart below includes seven recent examples of this research.

Title	Publication Year
Genetic polymorphisms of Leukocyte Immunoglobulin-Like Receptor B3 (LILRB3) gene in African American kidney transplant recipients are associated with post-transplant graft failure	2024
Transplanting old organs promotes senescence in young recipients	2024
Leveraging the tolerogenic potential of TNF-a and regulatory B cells in organ transplantation	2023
A randomized-controlled trial of ischemia-free liver transplantation for end-stage liver disease	2023
The Reality of Inadequate Patient Care and the Need for a Global Action Framework in Organ Donation and Transplantation	2022
Transplantation of a beating heart: A first in man	2022
Everolimus Alleviates Renal Allograft Interstitial Fibrosis by Inhibiting Epithelial-to-Mesenchymal Transition Not Only via Inducing Autophagy but Also via Stabilizing IκB-α	2022

Given the PRC’s record of human rights abuses in harvesting organs from religious and ethnic minorities, we seek information regarding the oversight and protections that Harvard has put in place related to such research collaborations.

* * * *

U.S. educational institutions such as Harvard receive tax-exempt status, among other benefits, due to their educational mission of teaching, research, and public service.⁵⁴ Assisting known, sanctioned paramilitary human rights abusers in developing policy and advancing their foreign military capabilities may undermine Harvard’s nonprofit mission.

We therefore request the following documents and testimony⁵⁵ by June 2, 2025, for the period January 1, 2019 (unless otherwise noted) to the date of this letter:

1. All documents and communications between Harvard (all schools) and any individuals affiliated with any entities blacklisted by the U.S. government and listed on any one of the following lists:
 - a. The U.S. Department of the Treasury's Non-Specially Designated National Chinese Military-Industrial Complex Companies List
 - b. The U.S. Department of the Treasury's SDN List
 - c. The U.S. DoD's list of PRC military companies designated under Section 1260H of the National Defense Authorization Act for Fiscal Year (FY) 2021
 - d. The U.S. Department of Homeland Security's list of PRC companies involved in forced labor designated under the Uyghur Forced Labor and Prevention Act Entity List
 - e. The U.S. Department of Commerce's Military End User List
 - f. The U.S. Department of Commerce's Entity List
 - g. The U.S. Department of Commerce's Denied Persons List
 - h. The U.S. Department of State's Debarred Persons List
 - i. The list of PRC telecommunications companies designated under Section 889 of the National Defense Authorization Act for FY 2019 as posing national security risks to the United States
 - j. The list of PRC semiconductor companies and affiliates designated under Section 5949 of the National Defense Authorization Act for FY 2023 as posing national security risks to the United States
 - k. The Federal Communications Commission's "Covered List"
2. All documents related to any engagement, partnership, or other formal or informal collaboration between Harvard (all schools) and any individuals affiliated with any entities blacklisted by the U.S. government and listed on any of the following lists:
 - a. The U.S. Department of the Treasury's Non-Specially Designated National Chinese Military-Industrial Complex Companies List
 - b. The U.S. Department of the Treasury's SDN List
 - c. The DoD's list of PRC military companies designated under Section 1260H of the National Defense Authorization Act for Fiscal Year (FY) 2021
 - d. The U.S. Department of Homeland Security's list of PRC companies involved in forced labor designated under the Uyghur Forced Labor and Prevention Act Entity List

- e. The U.S. Department of Commerce's Military End User List
 - f. The U.S. Department of Commerce's Entity List
 - g. The U.S. Department of Commerce's Denied Persons List
 - h. The U.S. Department of State's Debarred Persons List
 - i. The list of PRC telecommunications companies designated under Section 889 of the National Defense Authorization Act for FY 2019 as posing national security risks to the United States
 - j. The list of PRC semiconductor companies and affiliates designated under Section 5949 of the National Defense Authorization Act for FY 2023 as posing national security risks to the United States
 - k. The Federal Communications Commission's "Covered List"
- 3. All documents pertaining to the Harvard Training Event on Health Care Financing for all years held.
 - 4. Testimony from Winnie Yip, Professor of the Practice of Global Health Policy and Economics, about the above events, her interactions with the CCP, and communications with U.S sanctioned parties (including XPCC).
 - 5. All documents detailing Harvard's sanctions and export control compliance programs, including, but not limited to, all copies of:
 - a. Documents related to screening protocols, including but not limited to false positive identification protocols and escalation procedures.
 - b. Documents related to the use and configuration of any software utilized as part of Harvard's sanctions or export control compliance programs.
 - c. All licenses issued by the Office of Foreign Assets Control, Directorate of Defense Trade Controls, the Nuclear Regulatory Commission, and the Bureau of Industry and Security.
 - d. Procedures for ensuring compliance with specific licenses, license exceptions, and general license conditions.
 - 6. All communications between Harvard (all schools) and any individual who is a member or affiliate of the CCP.
 - 7. All documents related to any gifts, donations, or other contribution from T.H. Chan to Harvard University (including but not limited to the \$350 million gift), including any stipulations related to the use of those gifts, whether applied before or after the gift, donation, or other contribution was provided.

8. A description of all safeguards in place to protect against disclosure of nuclear-related information, including the date of implementation.
9. A description of all safeguards in place to protect against furthering research that assists the PRC's organ harvesting and military efforts, including the date of implementation.
10. A detailed description and explanation of why Harvard researchers worked with PRC military-linked institutions on projects funded by the U.S. DoD (or its subdivisions).
11. A detailed list in native Microsoft Excel of all projects in which an individual affiliated with Harvard received funding from any entity within the DoD that included a PRC-based collaborator.
12. A detailed list in native Microsoft Excel of all projects in which an individual affiliated with Harvard collaborated with any other individual who received funding from the Iranian government or its instrumentalities.
13. A detailed list in native Microsoft Excel of all projects in which an individual affiliated with Harvard collaborated with any other individual who was affiliated with a PLA-linked institution.

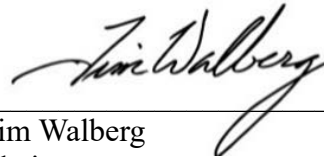
House Resolution 5 delegates to the Select Committee broad authority to investigate and submit policy recommendations on countering the economic, technological, security, and ideological threats of the Chinese Communist Party to the United States and allies and partners of the United States.⁵⁶ Under House Rule X, the Committee on Education and Workforce (Committee) has legislative and oversight jurisdiction over “education or labor generally.”⁵⁷ The information sought here will further the Committees’ understanding of these issues and inform their legislative and policy recommendations.

To make arrangements to deliver a response and organize a briefing, please contact Select Committee staff at (202) 226-9678.

Sincerely,



John Moolenaar
Chairman
Select Committee on the CCP



Tim Walberg
Chairman
Committee on Education and Workforce



Elise Stefanik
Chairwoman
House Republican Conference

¹ U.S. DEP’T OF THE TREASURY, *Treasury Sanctions Chinese Entity and Officials Pursuant to Global Magnitsky Human Rights Executive Order* (July 31, 2020), <https://home.treasury.gov/news/press-releases/sm1073>.

² U.S. DEP’T OF THE TREASURY, *Treasury Sanctions Chinese Entity and Officials Pursuant to Global Magnitsky Human Rights Executive Order* (July 31, 2020), <https://home.treasury.gov/news/press-releases/sm1073>.

³ See U.S. DEP’T OF THE TREASURY, *Treasury Sanctions Chinese Entity and Officials Pursuant to Global Magnitsky Human Rights Executive Order* (July 31, 2020), <https://home.treasury.gov/news/press-releases/sm1073>; 新疆生产建设兵团的历史与发展 [The History and Development of the Xinjiang Production and Construction Corps], STATE COUNCIL INFORMATION OFF. OF THE PEOPLE’S REPUBLIC OF CHINA (Oct. 5, 2014), https://www.gov.cn/zhengce/2014-10/05/content_2760794.htm.

⁴ *Uyghur Forced Labor Prevention Act*, H.R. 1155, 117th Cong. § 2(1) (2021) (as introduced), <https://www.congress.gov/bill/117th-congress/house-bill/1155/text>; 新疆生产建设兵团的历史与发展 [The History and Development of the Xinjiang Production and Construction Corps], STATE COUNCIL INFORMATION OFF. OF THE PEOPLE’S REPUBLIC OF CHINA (Oct. 5, 2014), https://www.gov.cn/zhengce/2014-10/05/content_2760794.htm.

⁵ U.S. DEP’T OF THE TREASURY, *Treasury Sanctions Chinese Entity and Officials Pursuant to Global Magnitsky Human Rights Executive Order* (July 31, 2020), <https://home.treasury.gov/news/press-releases/sm1073>.

⁶ 31 C.F.R. §§ 583.201(a), (b) (2025). The last date of “wind-down” transactions was September 30, 2020. U.S. DEP’T OF THE TREASURY, *Treasury Sanctions Chinese Entity and Officials Pursuant to Global Magnitsky Human Rights Executive Order* (July 31, 2020), <https://home.treasury.gov/news/press-releases/sm1073>.

⁷ In the 2017 International Religious Freedoms Report, the U.S. State Department highlighted that the Chinese government forcibly sent Uyghur Muslims to “re-education” camps. U.S. DEP’T OF STATE, 2017 Report on International Religious Freedom: China (Includes Tibet, Hong Kong, and Macau) at 19, <https://www.state.gov/reports/2017-report-on-international-religious-freedom/china-includes-tibet-hong-kong-and-macau/>. In the 2018 iteration, the State Department described the Chinese government’s escalation by targeting Muslim groups in Xinjiang for forced disappearances, torture, physical abuse, and prolonged detention without trial. U.S. DEP’T OF STATE, 2018 Report on International Religious Freedom: China (Includes Tibet, Hong Kong, and Macau) at 60, <https://www.state.gov/wp-content/uploads/2019/05/CHINA-INCLUSIVE-2018-INTERNATIONAL-RELIGIOUS-FREEDOM-REPORT.pdf>. Also in 2018, the United Nations cited a number of human rights abuses in Xinjiang, including mass surveillance, travel restrictions, and mass detentions against the Uyghurs. United Nations Comm. on the Elimination of Racial Discrimination, Concluding Observations on the Combined Fourteenth to Seventeenth Periodic Reports of China (Including Hong Kong and Macao), CERD/C/CHN/CO/14-17 (Sept. 19, 2018), https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CERD%2FC%2FCHN%2FCO%2F14-17&Lang=en.

⁸ HARVARD T.H. CHAN SCH. OF PUB. HEALTH, *Inaugural Training Course on Health Financing with NHSA*, <https://web.archive.org/web/20240209120305/https://www.hsph.harvard.edu/china-health-partnership/research/training-nhsa/> (last visited May 13, 2025); see also HARVARD T.H. CHAN SCH. OF PUB. HEALTH, *Inaugural Training Course on Health Financing with NHSA*, <https://hsph.harvard.edu/research/china-health-partnership/executive-education/inaugural-training-course-on-health-financing-with-nhsa/> (last visited May 13, 2025).

⁹ HARVARD T.H. CHAN SCH. OF PUB. HEALTH, *Inaugural Training Course on Health Financing with NHSA*, <https://web.archive.org/web/20240209120305/https://www.hsph.harvard.edu/china-health-partnership/research/training-nhsa/> (last visited May 13, 2025).

¹⁰ HARVARD T.H. CHAN SCH. OF PUB. HEALTH, *Partnership*, <https://hsph.harvard.edu/research/china-health-partnership/partnership/> (last visited May 13, 2025).

¹¹ HARVARD T.H. CHAN SCH. OF PUB. HEALTH, *Fifth Flagship Training on Health Care Financing with China’s NHSA*, <https://hsph.harvard.edu/research/china-health-partnership/executive-education/fifth-flagship-training-on-health-care-financing-with-chinas-nhsa-3/> (last visited May 13, 2025).

¹² *Id.*

¹³ NAT’L HEALTHCARE SEC. ADMIN., *The 5th International Medical Insurance Experience Learning Training Course of the National Health Security Administration Was Successfully Held* [国家医疗保障局第五期国际医保经验学习培训班成功举办], (Oct. 24, 2023),

https://web.archive.org/web/20231026053125/http://www.nhsa.gov.cn/art/2023/10/24/art_14_11432.html.

¹⁴ NAT’L HEALTHCARE SEC. ADMIN., *The 6th International Medical Security Experience Learning and Training Course of the National Health Insurance Administration Was Successfully Held in Guangxi* [国家医保局第六期国际医疗保障经验学习培训班在广西成功举办] (Nov. 1, 2024),

https://www.nhsa.gov.cn/art/2024/11/1/art_14_14487.html.

¹⁵ HARVARD T.H. CHAN SCH. OF PUB. HEALTH, *Fifth Flagship Training on Health Care Financing with China’s NHSA*, <https://hsph.harvard.edu/research/china-health-partnership/executive-education/fifth-flagship-training-on-health-care-financing-with-chinas-nhsa-3/> (last visited May 13, 2025).

¹⁶ Henryk Szadziwski & Louisa Greve, *Retraction of XPCC Study by Prominent Medical Journal Shows Editors Need to Get Serious About Research Ethics Red Flags*, UYGHUR HUM. RTS. PROJECT (Oct. 11, 2023) <https://uhrp.org/insights/retraction-of-xpcc-study-by-prominent-medical-journal-shows-editors-need-to-get-serious-about-research-ethics-red-flags/>.

¹⁷ *Id.*

¹⁸ Fatemeh Shahriyari et al., *Synthesis and Characterization of Cu-Sn Oxides Nanoparticles Via Wire Explosion Method with Surfactants, Evaluation of In-vitro Cytotoxic and Antibacterial Properties*, 31 ADV. POWDER TECH. 2337 (2020), <https://www.sciencedirect.com/science/article/abs/pii/S0921883120301205>.

¹⁹ AUSTL. STRATEGIC POL'Y INST., *Zhejiang University*, China Defence Universities Tracker, <https://unitracker.aspi.org.au/universities/zhejiang-university/> (last visited May 13, 2025).

²⁰ Fatemeh Shahriyari et al., *Synthesis and Characterization of Cu-Sn Oxides Nanoparticles Via Wire Explosion Method with Surfactants, Evaluation of In-vitro Cytotoxic and Antibacterial Properties*, 31 ADV. POWDER TECH. 2337 (2020), <https://www.sciencedirect.com/science/article/abs/pii/S0921883120301205> (“The authors would like to express his gratitude to Iran National Science Foundation (INSF) for supporting this research under grant number 96010336 . . .”).

²¹ IRAN NAT'L SCI. FOUND., *What Is the INSF*, <https://insf.org/en/page/28/what-is-the-insf> (last visited May 13, 2025) (“The main approach of the Foundation, therefore, is to attract participation and develop the network of researchers to conduct mission and solution-oriented research in the new knowledge and disruptive technologies with the goal of assisting the Islamic Republic of Iran in achieving scientific authority.”); PBS FRONTLINE, *The Structure of Power in Iran*, <https://www.pbs.org/wgbh/pages/frontline/shows/tehran/inside/govt.html> (last visited May 13, 2025) (“Also under the control of the Supreme Leader are the foundations (called *bonyads*) that operate hundreds of companies and, according to some estimates, are allocated over half of the state budget and account for as much as 40 percent of the economy.”).

²² See e.g. Saman Firoozi et al., *A Cell-Free SDKP-Conjugated Self-Assembling Peptide Hydrogel Sufficient for Improvement of Myocardial Infarction*, 10 BIOMOLECULES 205 (2020), <https://www.mdpi.com/2218-273X/10/2/205> corrected by 14 BIOMOLECULES 751 (2024), <https://www.mdpi.com/2218-273X/14/7/751> (“This research was funded by . . . the Iran National Science Foundation grant number [96001316].”); Hamid Latifi-Navid et al., *Network Analysis and the Impact of Aflibercept on Specific Mediators of Angiogenesis in HUVEC Cells*, 25 J. CELL. MOL. MED. 8285 (2021), <https://onlinelibrary.wiley.com/doi/10.1111/jcmm.16778> (“Our gratitude thanks to INSF, Iran National Science Foundation, for Doctoral Research Support Grant to perform this study (No. 96004188).”); Shabnam Jeibouei et al., *Radiobiological Effects of Wound Fluid on Breast Cancer Cell Lines and Human-Derived Tumor Spheroids in 2D and Microfluidic Culture*, 12 SCI. REPS. 7668 (2022), <https://www.nature.com/articles/s41598-022-11023-z> (“We gratefully acknowledge the Cancer Research Center, Shahid Beheshti University of Medical Sciences, Tehran, Iran, for financial support (code No: 13087) and Iran National Science Foundation (Grant No. 98014162)”).

²³ One of these studies analyzed the effects of radiation, which involves nuclear technology. Shabnam Jeibouei et al., *Radiobiological Effects of Wound Fluid on Breast Cancer Cell Lines and Human-Derived Tumor Spheroids in 2D and Microfluidic Culture*, 12 SCI. REPS. 7668 (2022), <https://www.nature.com/articles/s41598-022-11023-z>; WORLD NUCLEAR ASS'N, *What Can Nuclear Technology Do?*, WORLD-NUCLEAR.ORG, <https://world-nuclear.org/nuclear-essentials/what-can-nuclear-technology-do> (last visited May 13, 2025). The application of radiation in certain medical settings is in important ways distinct from the development and use of radioactive isotopes in the context of nuclear weapons research, though the two do rely on a common underlying scientific basis. Iran maintains close scientific ties with the PRC, and furthering Iran's scientific capabilities feeds this adversarial alliance. *Iran to Foster Scientific Ties with China, Russia in Line with Strategic Partnership*, TEHRAN TIMES (Apr. 11, 2025), <https://www.tehrantimes.com/news/511667/Iran-to-foster-scientific-ties-with-China-Russia-in-line-with>.

²⁴ Maryam Shayan et al., *Social Interactions and Olfactory Cues Are Required for Contagious Itch in Mice*, 14 SCI. REPS. 11334 (2024), <https://www.nature.com/articles/s41598-024-61078-3> (“This study was supported by a grant from . . . the Iran National Sciences Foundation (INSF) (Grant No. 96002757).”).

²⁵ See 31 C.F.R. § 560.538(a) (2023) (“This section does not apply if the parties to the transactions described in this paragraph include the Government of Iran.”).

²⁶ Exec. Order No. 13846, 83 Fed. Reg. 38939 (Aug. 6, 2018), <https://trumpwhitehouse.archives.gov/presidential-actions/executive-order-reimposing-certain-sanctions-respect-iran/>.

²⁷ Katie Bo Williams, *Iranian Proxies Killed Americans in Iraq, Pentagon Leaders Say*, DEFENSE ONE (Mar. 12, 2020), <https://www.defenseone.com/threats/2020/03/iranian-proxies-killed-americans-iraq-pentagon-leaders-say/163727/>.

²⁸ Justin R. Gagnon et al., *Relaxed Phase-Matching Constraints in Zero-Index Waveguides*, 128 PHYS. REV. LETT. 203902 (May 17, 2022), <https://arxiv.org/pdf/2102.13074> (“R.W.B. and E.M. acknowledge support from the Defense Advanced Research Projects Agency (DARPA) Defense Sciences Office (DSO) Nascent program and the US Army Research Office.”)

²⁹ Alexander Hellemans, *Zero-Index Metamaterials Open New Possibilities for Optical Chips*, IEEE SPECTRUM (Oct. 20, 2015), <https://spectrum.ieee.org/zeroindex-metamaterials-open-new-possibilities-in-optical-chips>.

- ³⁰ Todd Haugen, *AI Needs Optical Chips*, LASER FOCUS WORLD (Dec. 9, 2024), <https://www.laserfocusworld.com/optics/article/55247068/ai-needs-optical-chips>.
- ³¹ Zheqi Chen et al., *Rubber-glass Nanocomposites Fabricated Using Mixed Emulsions*, 121 PROC. NAT'L ACAD. SCI. e2322684121 (2024), <https://www.pnas.org/doi/10.1073/pnas.2322684121>.
- ³² F. Nanni et al., *Polymers as Aerospace Structural Components: How to Reach Sustainability*, Macromolecular Chemistry & Physics, 224, 2300186 (Sept. 25 2023), <https://onlinelibrary.wiley.com/doi/10.1002/macp.202300186>.
- ³³ Juanjuan Zheng et al., *Temperature-resistance Sensor Arrays for Combinatorial Study of Phase Transitions in Shape Memory Alloys and Metallic Glasses*, 168 SCRIPTA MATERIALIA 144 (2019), <https://www.sciencedirect.com/science/article/abs/pii/S1359646219302386>.
- ³⁴ See e.g. Girolamo Costanza & Maria Elisa Tata, *Shape Memory Alloys for Aerospace, Recent Developments, and New Applications: A Short Review*, 13 MATERIALS 1856 (2020), <https://www.mdpi.com/1996-1944/13/8/1856>.
- ³⁵ Melissa Albert, *Xi Jinping*, ENCYCLOPAEDIA BRITANNICA, <https://www.britannica.com/biography/Xi-Jinping> (last visited May 13, 2025).
- ³⁶ AUSTL. STRATEGIC POL'Y INST., *Tsinghua University*, China Defence Universities Tracker, <https://unitracker.aspi.org.au/universities/tsinghua-university/> (last visited May 13, 2025); Select Comm. on the CCP, *The CCP Quad: How American Taxpayers and Universities Fund the Chinese Military-Industrial Complex* (Sept. 23, 2024), <https://selectcommitteeontheccp.house.gov/media/investigations/investigation-report-ccp-quad-how-american-taxpayers-and-universities-fund>.
- ³⁷ AUSTL. STRATEGIC POL'Y INST., *Zhejiang University*, China Defence Universities Tracker, <https://unitracker.aspi.org.au/universities/zhejiang-university/> (last visited May 13, 2025).
- ³⁸ AUSTL. STRATEGIC POL'Y INST., *Huazhong University of Science and Technology*, China Defence Universities Tracker, <https://unitracker.aspi.org.au/universities/huazhong-university-of-science-and-technology/> (last visited May 13, 2025).
- ³⁹ See Basic Research Office, *About*, U.S. DEP'T OF DEF., <https://basicresearch.defense.gov/About/> (last visited May 13, 2025).
- ⁴⁰ David Vergun, *DOD Harnesses Science, Technology to Counter Adversaries*, U.S. DEP'T OF DEF. (Jan. 31, 2024), <https://www.defense.gov/News/News-Stories/Article/Article/3662268/dod-harnesses-science-technology-to-counter-adversaries/>.
- ⁴¹ The term "Dual-use" refers to items that have both commercial and military or proliferation applications. BUREAU OF INDUSTRY & SECURITY, *Dual Use Export Licenses*, U.S. DEP'T OF COMMERCE, <https://www.bis.doc.gov/index.php/all-articles/2-uncategorized/91-dual-use-export-licenses> (last visited May 13, 2025).
- ⁴² U.S. DEP'T OF DEF., *Engineering in DOD*, <https://www.defense.gov/Spotlights/Engineering-in-DOD/> (last visited May 14, 2025).
- ⁴³ Yufeng Chen et al., *Controlled Flight of a Microrobot Powered by Soft Artificial Muscles*, 575 NATURE 324 (2019) <https://doi.org/10.1038/s41586-019-1737-7>.
- ⁴⁴ See Benjamin Jenson, *Fewer Soldiers, More Drones: What Ukraine's Military Will Look Like After the War*, CENTER FOR STRATEGIC AND INTERNATIONAL STUDIES (Apr. 28, 2025), <https://www.csis.org/analysis/fewer-soldiers-more-drones-what-ukraines-military-will-look-after-war>.
- ⁴⁵ Guorui Li et al., *Bioinspired Soft Robots for Deep-Sea Exploration*, 14 NATURE COMM. 7097 (2023), <https://doi.org/10.1038/s41467-023-42882-3>.
- ⁴⁶ See, *Everything We Just Learned About The Ghost Shark Uncrewed Submarine*, WAR ZONE (Aug. 23, 2024), <https://www.twz.com/news-features/everything-we-just-learned-about-the-ghost-shark-uncrewed-submarine>.
- ⁴⁷ The Seven Sons of National Defense refers to the seven universities that have close relationships with the Chinese military and are core training and research facilities for China's defense industry. AUSTL. STRATEGIC POL'Y INST., *Beihang University*, China Defence Universities Tracker (last visited May 14, 2025), <https://unitracker.aspi.org.au/universities/beihang-university/>.
- ⁴⁸ Lucas C. Hanson et al., *Robotic Computing on FPGAs: Current Progress, Research Challenges, and Opportunities*, IEEE (2022), <https://ieeexplore.ieee.org/document/9869951>.
- ⁴⁹ *From the Battlefield to Benchtop: How FPGAs Give the Military a Critical Edge*, NEW WAVE DESIGN (Apr. 15, 2025), <https://newwavedesign.com/blog/fpga-in-critical-military-applications/>.
- ⁵⁰ Expressing Concern Regarding Persistent And Credible Reports of Systematic, State-sanctioned Organ Harvesting from Non-consenting Prisoners of Conscience in the People's Republic of China, Including from Large Numbers of

Falun Gong Practitioners and Members of Other Religious and Ethnic Minority Groups, H.R. Res. 343, 114th Cong. (2016), <https://www.congress.gov/bill/114th-congress/house-resolution/343/text>.

⁵¹ Independent Tribunal into Forced Organ Harvesting of Prisoners of Conscience in China, *China Tribunal* (June 17, 2019), https://chinatribunal.com/wp-content/uploads/2019/07/ChinaTribunal_-_SummaryJudgment_17June2019.pdf.

⁵² Congressional-Executive Comm’n on China, *Stopping the Crime of Organ Harvesting*, 118th Cong. (Mar. 20, 2024) (statement of Ethan Gutmann, China Studies Research Fellow, Victims of Communism Memorial Foundation), <https://www.cecc.gov/sites/evo-subsites/cecc.house.gov/files/documents/Gutmann%20Testimony%20-%20March%2020%202024.pdf>.

⁵³ See e.g. Tamsin Lee-Smith & Jelena Cosic, *At the U.N., China Is Deploying a Growing Army of Puppet Organizations to Monitor and Intimidate Human Rights Activists*, INTERNATIONAL CONSORTIUM OF INVESTIGATIVE JOURNALISTS (Apr. 28, 2025), <https://www.icij.org/investigations/china-targets/united-nations-ngo-gongo-intimidate-human-rights/>.

⁵⁴ ASS’N OF AM. UNIVS., *Tax-Exempt Status of Universities and Colleges* (Oct. 2, 2022), <https://www.aau.edu/key-issues/tax-exempt-status-universities-and-colleges>.

⁵⁵ All documents should be produced in the unredacted native form with all metadata intact and unaltered.

⁵⁶ H. Res. 5, § 4(a), 119th Cong. (2025).

⁵⁷ RULES OF THE HOUSE OF REPRESENTATIVES, 119th Cong. at 9 (Jan. 16, 2025), <https://rules.house.gov/sites/evo-subsites/rules.house.gov/files/documents/houserules119thupdated.pdf>.