

Section 117 re: UPENN Center

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COMMITTEE ON
EDUCATION AND THE WORKFORCE
U.S. HOUSE OF REPRESENTATIVES
2176 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-6100

February 24, 2023

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Dear Secretary Cardona,

We write to you regarding the recent revelations surrounding classified documents held at the Penn Biden Center for Diplomacy and Global Engagement ("Center").¹ We are concerned with the University of Pennsylvania's (UPenn) involvement in the matter and whether the institution violated section 117 of the *Higher Education Act of 1965*,² breaking the barrier between academic freedom and national security.

Coincidentally, less than a month prior to Attorney General Garland's appointment of a special counsel to investigate the matter,³ your Department of Education (Department) announced it was abandoning robust scrutiny of section 117 violations and was moving section 117 enforcement efforts from the Office of the General Counsel (OGC) to the Office of Federal Student Aid (FSA).⁴ FSA was never designed to handle such serious matters and it does not have the capability or expertise needed to do so. The relocation of the enforcement activities to FSA was done despite the fact that enforcement efforts undertaken by the OGC led to the reporting of \$6.5 billion in previously undisclosed foreign contributions, including foreign contributions made to UPenn.⁵ Indeed, following the Center's launch in 2017, UPenn saw a nearly 400 percent increase in reportable gifts and contracts.⁶ This alarming spike in foreign donations also included approximately \$22 million in anonymous donations from China.⁷

Your actions in light of these revelations are yet another example of this administration's failure to protect students, institutions, and taxpayers against threats posed by our foreign adversaries on college campuses. As the Committee responsible for oversight of your Department's inaction, we request the following information no later than two weeks after the date of this letter:

1. Any and all communications or documents associated with the decision to move the enforcement of section 117 from OGC to FSA;

¹ <https://www.nytimes.com/2023/01/11/us/politics/biden-classified-documents.html>

² See Higher Education Act of 1965 §117, 20 U.S.C. §1011f (1998).

³ <https://www.cnn.com/2023/01/12/politics/joe-biden-classified-documents-counsels-office/index.html>

⁴ <https://www.federalregister.gov/documents/2022/12/27/2022-28119/agency-information-collection-activities-comment-request-foreign-gifts-and-contracts-disclosures>

⁵ <https://content.govdelivery.com/accounts/USED/bulletins/27b7801>

⁶ <https://oversight.house.gov/wp-content/uploads/2023/01/2023-01-18-Letter-UPenn-Penn-Biden-Center.pdf>

⁷ <https://www.nlpc.org/government-integrity-project/foreign-agent-probe-of-hunter-biden-should-include-upenn-and-nonprofit-group/>

2. All documents turned over by UPenn to the Department through its section 117 enforcement efforts; and
3. Any and all communications with or about, and documents provided to, the Department by UPenn since January 20, 2021.

Thank you for your prompt attention to this matter.

Sincerely,



Virginia Foxx
Chairwoman
U.S. House Committee on
Education & the Workforce



Jim Banks
Member of Congress



James Comer
Member of Congress



Michelle Steele
Member of Congress



UNITED STATES DEPARTMENT OF EDUCATION

THE UNDER SECRETARY

April 3, 2023

The Honorable Virginia Foxx
Chairwoman
Committee on Education and the Workforce
U.S. House of Representatives
Washington, DC 20515

Dear Chairwoman Foxx:

Thank you for your letter dated February 24, 2023, to Secretary Cardona requesting information regarding the U.S. Department of Education's (the Department's) administration of Section 117 of the Higher Education Act of 1965 (HEA), as amended. Your letter was referred to me, and I am pleased to respond on behalf of Secretary Cardona. Please note that an identical response has been provided to the co-signers of your letter.

Under Section 117, institutions are required to report to the Department statutorily defined gifts, contracts, and/or restricted and conditional gifts or contracts from or with a statutorily defined foreign source.¹ This disclosure requirement is an important measure in ensuring transparency and identifying foreign influence in U.S. higher education.

The Department remains committed to the robust enforcement of Section 117. We continue to collect the disclosure reports that institutions are required to file, make certain data publicly available, and monitor institutions' compliance with disclosure requirements. Clarification of our organizational responsibilities will help us continue to fulfill our obligations to ensure transparency with respect to foreign gifts and contracts in higher education.

In February 2019, the Senate Permanent Subcommittee on Investigations held a hearing and issued a staff report on the U.S. education system and activities of the Chinese government.² The staff report recommended that the Department take action to ensure that institutions comply with the law and properly report foreign gifts and contracts as required by Section 117. Following that Subcommittee hearing and report, the Department took steps to enhance Section 117 compliance and continues its efforts to assist institutions in understanding and complying with their reporting obligations.

From 2019 to 2022, the Department's efforts relating to Section 117 were not centralized within, or coordinated through, a single office. The Department's office of Federal Student Aid (FSA) continued to handle the administration of various Section 117 matters, such as maintaining the

¹ See 20 U.S.C. § 1011f.

² U.S. Senate Permanent Subcommittee on Investigations, Staff Report, "China's Impact on the U.S. Education System," (Feb. 27, 2019), <https://www.hsgac.senate.gov/wp-content/uploads/imo/media/doc/PSI%20Report%20China's%20Impact%20on%20the%20US%20Education%20System.pdf>.

reporting portal used by institutions to file disclosure reports and providing technical support to institutions and individual users for correctly filing and amending disclosure reports. The Office of the General Counsel (OGC) assumed responsibility for some of the remaining aspects of Section 117 administration. Specifically, in 2020, political appointees in OGC led the Department's efforts to obtain approval for a new information collection request to gather more detailed data on foreign gifts and contracts and to conduct investigations and inquiries into possible noncompliance by a number of institutions.

More recently, the Department has taken steps to strengthen its efforts to ensure that colleges and universities comply with Section 117, including by designating FSA as the lead office for that role. In introductory remarks during a June 2022 webinar, the Department indicated that it would return primary responsibility for the administration of Section 117 to FSA.³ The Department reiterated those organizational responsibilities in December 2022 in connection with FSA seeking approval from the Office of Management and Budget (OMB) for a new information collection request for Section 117.⁴ Staff in FSA will consult and coordinate as necessary with other offices in the Department, relying on the collective expertise of the entire Department. In particular, FSA will continue to work closely with OGC on enforcement of Section 117, with OGC attorneys continuing to work on resolving any pending investigations and advising FSA on compliance more generally. Similarly, FSA will continue to work with the Department's Office of the Under Secretary and Office of Postsecondary Education to conduct outreach to institutional and other stakeholders and engage with them on Section 117 as well as various other issues associated with research security and integrity.

FSA is well positioned to lead and coordinate the Department's efforts relating to Section 117. First and foremost, FSA has consistently been the office within the Department responsible for the systems used to collect data pursuant to Section 117.⁵ FSA is currently evaluating its ability to make improvements to its reporting portal.

Second, FSA already collects data and information from the approximately 6,000 institutions of higher education that participate in the programs of student financial aid under Title IV of the HEA. At its core, Section 117 is a reporting requirement about financial ties between institutions and foreign sources. Given that many institutions already submit financial and other data to FSA, such reporting reasonably aligns with the types of responsibilities assumed by FSA for other programs administered by the Department. For example, FSA collects and analyzes student information through the Free Application for Federal Student Aid, institutional program and operational data through the Application for Approval to Participate in the Federal Student Aid Programs, and institutional financial data through the eZ-Audit system. In contrast, collection and analysis of financial and other institutional data are not functions routinely handled by OGC.

³ U.S. Department of Education, Webinar, "Section 117 of the Higher Education Act Presentation by the U.S. Department of Education" (June 23, 2022), <https://www2.ed.gov/policy/highered/leg/section117-webinar-202206.pdf>.

⁴ Notice, Agency Information Collection Activities; Comment Request; Foreign Gifts and Contracts Disclosures, Docket No. ED-2022-SCC-0159, 87 Fed. Reg. 79,292 (Dec. 27, 2022).

⁵ See, e.g., Federal Student Aid, Electronic Announcement, "Section 117 of the Higher Education Act," (Dec. 23, 2019), <https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2019-12-23/section-117-higher-education-act>; U.S. Department of Education, Dear Colleague Letter, DCL ID GEN-04-11, "Reporting Gifts, Contracts, and Relationships by Institutions" (Oct. 4, 2004), <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2004-10-04/reporting-foreign-gifts-contracts-and-relationships-institutions>.

Third, FSA has significant audit and review expertise involving institutions of higher education. As part of its current duties, FSA routinely conducts program reviews to confirm that an institution meets requirements for institutional eligibility, financial responsibility, Clery Act compliance, and administrative capability. FSA's ability to develop a programmatic approach to oversight and compliance is more likely to lead institutions to widely adopt systematic processes for Section 117 reporting and compliance reviews.

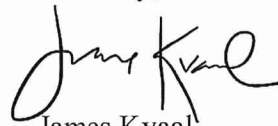
Your letter also requests information on the University of Pennsylvania and any communications with, or documents submitted to, the Department in connection with Section 117 enforcement. Section 117 is a transparency statute, and the Department's responsibilities under Section 117 are focused on ensuring compliance with reporting requirements. If there is evidence of an institution knowingly or willfully failing to meet its disclosure obligations, the Department can pursue a range of enforcement actions, including a referral to the Department of Justice to bring a civil action. Section 117 does not, however, direct the Department to police international education partnerships or to take enforcement action against an institution based on its assessment of whether duly reported foreign gifts and contracts rise to the level of undue foreign influence. Congress and the executive branch agencies with expertise in foreign intelligence are best positioned to make such an assessment.

The Department continues to collaborate with other federal agencies through various interagency initiatives relating to research security and foreign malign influence in higher education. The Department recognizes that information collected pursuant to Section 117 can serve as a valuable tool in the federal government's comprehensive efforts to respond to potential national security threats. Accordingly, the Department is exploring ways in which it can deepen its partnerships with, and broaden its support to, other federal agencies to contribute toward cross-government efforts in these areas.

In May 2020, the Department received a letter requesting that it conduct an investigation into foreign gifts and contracts received by the University of Pennsylvania and its Penn Biden Center for Diplomacy and Global Engagement. Citing transactions reported pursuant to Section 117, the letter expressed concerns similar to those raised in your letter. During the previous administration, the Department carefully reviewed the request and determined that the information was insufficient to justify further investigation into the University of Pennsylvania's compliance with Section 117's reporting requirements. Enclosed, please find copies of the May 10, 2020, letter to the Department and the Department's June 18, 2020, letter in response.

Thank you again for your letter. If you need any additional information, please contact the Department's Office of Legislation and Congressional Affairs at (202) 401-0020.

Sincerely,



James Kvaal

Enclosures



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF THE GENERAL COUNSEL

Peter Flaherty, Chairman
Paul D. Kamenar, Counsel
National Legal and Policy Center
107 Park Washington Court
Falls Church, VA 22046

via electronic mail

June 18, 2020

Dear Chairman Flaherty and Counsel Kamenar:

The U.S. Department of Education ("Department") is in receipt of your letter, dated May 20, 2020, regarding Section 117 of the Higher Education Act of 1965, 20 U.S.C. § 1011f, the University of Pennsylvania, and the Biden Center for Diplomacy and Global Engagement. *See Exhibit 1.*

The Department shares your concerns regarding the potentially adverse impact of money from certain undisclosed foreign sources on teaching, research, academic freedom, campus political climate, and national security. For example, a recent bipartisan Congressional investigation of the Chinese Communist Party's "Confucius Centers" found these foreign-funded propaganda operations on U.S. campuses were part of "China's broader, long-term strategy" to promote "complacency towards China's pervasive, long-term initiatives against both government critics at home and businesses and academic institutions abroad." *See* <https://www.hsgac.senate.gov/imo/media/doc/2019-11-18%20PSI%20Staff%20Report%20-%20China's%20Talent%20Recruitment%20Plans%20Updated2.pdf>

Since June 2019, the Department has initiated multiple Section 117 investigations of taxpayer-funded universities which have failed to make statutorily required disclosures of gifts, contracts, and/or restricted conditional gifts or contracts, from or with a statutorily defined foreign source(s). Section 117 does *not* authorize anonymized reporting of foreign source gifts and contracts. To the contrary, universities are required to identify the sources of qualifying foreign gifts and contracts. Unfortunately, the Department has discovered massive failures by universities to identify foreign sources (frequently identifying the sources as "anonymous," in violation of the statutory requirement to identify foreign sources). Our records suggest universities have anonymized the foreign sources of approximately \$8.4 billion qualifying gifts and contracts. Since 2010, for example, universities anonymized the foreign donors of gifts and contracts worth over \$1.147 billion from the People's Republic of China (\$599 million), Qatar (\$268 million), Saudi Arabia (\$205 million), and Russia (\$75 million).

400 MARYLAND AVE. S.W., WASHINGTON, DC 20202-1100
www.ed.gov

The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

The Department is committed to the enforcement of Section 117's clear statutory requirement that taxpayer-funded American universities disclose the identities of foreign donors for qualifying gifts and contracts. Whether involving qualifying foreign source gifts and contracts and the University of Pennsylvania or any other university, universities have a statutory duty to identify foreign donors pursuant to Section 117 disclosure obligations to the Department. The Department anticipates issuance of an Electronic Announcement on or about June 22, 2020, reminding universities of the ongoing foreign source disclosure obligation (disclosed on the Department's Section 117 reporting system at <https://partners.ed.gov/ForeignGifts>).

The Department believes full and timely Section 117 compliance is a matter of urgent importance to the national security and educational integrity of our universities. The national security concerns created by universities' concealment of foreign source identities for gifts to or contracts with domestic or international policy "centers" and other persons or entities that might serve as instruments of or platforms for foreign influence and/or propaganda efforts ought to be self-evident. Here especially students, parents, taxpayers, and policy makers need and deserve universities' compliance with law, transparency, and accountability.

The Department appreciates the Center's concern that universities meet their statutory disclosure obligations. However, the information you have provided to the Department is currently insufficient to justify further investigation. The Department, however, will continue to consider and evaluate information relating to disclosure failures involving the University of Pennsylvania or other American universities.

Sincerely,



Paul R. Moore
Chief Investigative Counsel
Office of the General Counsel
(202) 230-0059
Paul.Moore@ed.gov

cc: Reed D. Rubinstein
Principal Deputy General Counsel delegated
the Authority and Duties of the General Counsel

EXHIBIT 1

National Legal and Policy Center

"promoting ethics in public life"



Co-Founder
Ken Boehm 1949-2018

Board of Directors
Peter Flaherty, Chairman
Kurt Christensen, Vice-Chairman
Michael Falcone
Richard F. LaMountain
David Wilkinson

Since 1991

May 20, 2020

The Honorable Betsy DeVos
Secretary, Department of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Via Email

Paul R. Moore, Esq.
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., S.W.,
Room 6E300 Washington, D.C. 20202
Paul.Moore@ed.gov

Re: Investigation of University of Pennsylvania and the Penn Biden Center for Diplomacy and Global Engagement for Failing to Disclose Anonymous Gifts and Contracts from China in violation of Section 117 of the Higher Education Act and Referral to the Department of Justice for Enforcement Action and Payment of Investigation Costs

Dear Secretary DeVos and Mr. Moore:

The National Legal and Policy Center (NLPC) hereby requests that the Department of Education conduct a full Investigation and Records Request of all monetary gifts and contracts that have been received by the University of Pennsylvania and its Penn Biden Center for Diplomacy and Global Engagement from China sources, many of which are listed as Anonymous in their semi-annual reports, and thus is in clear violation of Section 117 of the Higher Education Act, 20 U.S.C. 1011f, that all gifts or contracts exceeding \$250,000 must disclose the foreign ownership and control of the gift or contract.

Moreover, NLPC requests that the Department obtain and inspect all copies of the monetary gifts and contracts, whether or not listed as Anonymous, in order to determine what if any conditions or restrictions were or are placed on those gifts or contracts, which is also required to be disclosed by federal law and to release them to the public as required by 20 U.S.C. 1011f(e).

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703-237-1970 • fax 703-237-2090 • www.nlpc.org

Finally, NLPC requests that the Secretary refer to the Attorney General a civil enforcement action in federal court pursuant to 20 U.S.C. 1001f(f)(1) to obtain a court order seeking payment to the U.S. Treasury of "the full costs to the United States of obtaining compliance, including all associated costs of investigation and enforcement" because the violations were clearly knowing and willful.

NLPC. Founded in 1991, NLPC is a non-profit public interest organization based in the Washington, D.C. area that promotes ethics in public life and government and corporate accountability through research, investigation, education, and legal action. See www.nlpc.org. In particular, NLPC's Corporate Integrity Project recently requested BlackRock's President Larry Fink to divest its portfolio of Chinese companies in response to China's coverup of the coronavirus and human rights abuses. <https://nlpc.org/2020/05/12/larry-fink-asked-to-divest-blackrock-from-chinese-companies-in-response-to-coronavirus-human-rights-abuses/>

Systematic Reporting Violations by the University of Pennsylvania of China Monetary Gifts and Contracts

Over 30 years ago, Congress enacted Section 117 of the Higher Education Act of 1965 (HEA) in light of concerns about the growing financial relationship between U.S. universities and foreign sources. Congress balanced academic freedom and national security by mandating financial transparency through required reporting of contracts with and gifts from a foreign source that, alone or combined, are valued at \$250,000 or more in a calendar year.

The law could not be any clearer: universities must disclose the source of the monetary gifts and contracts over \$250,000 in a calendar year. 20 U.S.C. 1011f provides in relevant part:

(a) Disclosure report

Whenever any institution is owned or controlled by a foreign source or receives a gift from or enters into a contract with a foreign source, the value of which is \$250,000 or more, considered alone or in combination with all other gifts from or contracts with that foreign source within a calendar year, the institution shall file a disclosure report with the Secretary on January 31 or July 31, whichever is sooner.

(b) Contents of report

Each report to the Secretary required by this section shall contain the following:

(1) For gifts received from or contracts entered into with a foreign source other than a foreign government, the aggregate dollar amount of such gifts and contracts attributable to a particular country. The country to which a gift is attributable is the country of citizenship, or if unknown, the principal residence for a foreign source who is a natural person, and the country of incorporation, or if unknown, the principal place of business, for a foreign source which is a legal entity.

(2) For gifts received from or contracts entered into with a foreign government, the aggregate amount of such gifts and contracts received from each foreign government.

(3) In the case of an institution which is owned or controlled by a foreign source, the identity of the foreign source, the date on which the foreign source assumed ownership or control, and any changes in program or structure resulting from the change in ownership or control.

(c) Additional disclosures for restricted and conditional gifts

Notwithstanding the provisions of subsection (b), whenever any institution receives a restricted or conditional gift or contract from a foreign source, the institution shall disclose the following:

(1) For such gifts received from or contracts entered into with a foreign source other than a foreign government, the amount, the date, and a description of such conditions or restrictions. The report shall also disclose the country of citizenship, or if unknown, the principal residence for a foreign source which is a natural person, and the country of incorporation, or if unknown, the principal place of business for a foreign source which is a legal entity.

(2) For gifts received from or contracts entered into with a foreign government, the amount, the date, a description of such conditions or restrictions, and the name of the foreign government.

Nevertheless, in spite of this clear statutory requirement, the University of Pennsylvania, since at least October 30, 2013 through June 30, 2019, has knowingly and willfully violated 20 U.S.C. 1011f multiple times by listing many such gifts over \$250,000 only as “Anonymous” as evidenced on the Department’s database of all foreign donations.¹

From 2013-2019, the University of Pennsylvania received more than \$67 million from China sources. More significantly, after the Penn Biden Center opened here in Washington,

¹ <https://studentaid.gov/data-center/school/foreign-gifts>. A copy of the China gifts and contracts to the University of Pennsylvania from October 30, 2013 through September 30, 2019 is attached hereto into two sets of spread sheets: the first from October 30, 2013 through September 30, 2019, and the second overlapping set from March 27, 2017 through December 31, 2019. The gifts or contracts that are labeled as Anonymous are highlighted in yellow. Note, there are several contracts listed in the second set that do not list the name of the donor nor does it list it as “Anonymous.” Instead, they are listed as 6-digit numbers in gifts in July 2019 and August 2019 and elsewhere. NLPC does not know whether those are Anonymous gifts or whether the Department has the name of the donor that matches the number. In any event, the name of the donor is required by law to be disclosed, not just a number.

D.C., in February 2018,² the China gifts poured in all the more, and continued after Biden announced his candidacy of the presidency on April 25, 2019:

2017: Total: \$7,734,790 Anonymous: \$500,000

2018: Total: \$27,104,246 Anonymous: \$15,800,000

2019: Total: \$26,947,074 Anonymous: \$6,004,975

The purpose of the disclosure requirement by Congress was to ensure that our universities are not beholden to foreign governments and entities in their educational activities and programs. The Senate Permanent Subcommittee on Investigations described foreign spending on U.S. schools as “a black hole” because colleges and universities “routinely” fail to comply with the law, and reported foreign money can come with strings attached that might compromise academic freedom.

The University of Pennsylvania and the Penn Biden Center are particularly vulnerable to China government influences due to the large amounts of China donations and contracts. For example, at the height of the Chinese coverup of the pandemic, Penn Global³ sponsored the **2020 Penn China Research Symposium** on January 31, 2020, that included opening remarks by Ambassador Huang Ping, Consul-General of the People’s Republic of China in New York. At least one of the panelists at the symposium was from the Penn Biden Center.⁴ Moreover, the University of Pennsylvania since 2015 has established a Penn China Research and Engagement Fund where university funds are awarded for research projects about China.⁵

While the Penn Biden Center has yet to criticize China for its pandemic coverup for the coronavirus, it has publicly attacked both Hungary and Poland, U.S. NATO Allies, for the efforts those countries have taken to control the spread of the virus as being undemocratic even though United States governors have exercised similar emergency powers and issued stay-at-home orders.⁶

² Philadelphia Tribune, *Penn opens Biden Center for Diplomacy in Washington D.C.* (Feb. 14, 2018) https://www.phillytrib.com/penn-opens-biden-center-for-diplomacy-in-washington-d-c/article_bf91aac7-35c4-551d-a063-d99cb4126963.html

³ *Penn Global is comprised of the following seven divisions: the Office of the Vice Provost for Global Initiatives, **Penn Biden Center for Diplomacy and Global Engagement**, Perry World House, Penn Abroad, International Student and Scholar Services (ISSS), Global Support Services, and Penn Global Finance and Administration.*

⁴ <https://global.upenn.edu/global-initiatives/event/2020-penn-china-research-symposium>

⁵ <https://global.upenn.edu/global-initiatives/penn-china-research-and-engagement-fund>

⁶ <https://twitter.com/PennBiden/status/1256273201958653953>

Joe Biden's affiliation with the Penn Biden Center further raises concerns of foreign influence not unlike those raised when the Clinton Foundation received millions of dollars in donations while Hillary Clinton was running for president.⁷

Particularly troubling is that the Chairman of the Board of Trustees of the University of Pennsylvania, David L. Cohen, a political lobbyist and Democratic fundraiser, was a major fundraiser for Barack Obama and now for Joe Biden. As publicly reported:

2009: Cohen becomes chairman of the University of Pennsylvania Board of Trustees.

June 30, 2011: Hosts a fundraiser catered by Stephen Starr for President Barack Obama and the Democratic National Committee, with tickets ranging from \$10,000 to \$38,500.

2012: Cohen raises more than \$500,000 for Obama's reelection.

April 25, 2019: On his first day as a declared presidential candidate, Joe Biden visits Cohen's home for a fundraiser with 150 guests.

John Duchneskie, Philadelphia Inquirer, *Lawyer, corporate mover, political power broker: A look at David L. Cohen's career* (updated Dec. 5, 2019)⁸

CONCLUSION

For the foregoing reasons, NLPC requests that the Department of Education immediately begin its investigation of the numerous reporting violations of the University of Pennsylvania and its Penn Biden Center, refer the matter to the Department of Justice for civil enforcement in federal court, and seek recoupment of all costs to the U.S. government for investigating and enforcing the reporting and disclosure laws of China monetary gifts and contracts.

Sincerely yours,

/s/ Peter Flaherty

Peter Flaherty

Chair of NLPC

/s/ Paul D. Kamenar

Paul D. Kamenar

Counsel to NLPC

1629 K Street, NW

Washington, DC 20006

paul.kamenar@gmail.com

(301) 257-9435

⁷ <https://www.nytimes.com/2016/08/21/us/politics/hillary-clinton-presidential-campaign-charity.html>

⁸ <https://www.inquirer.com/news/david-cohen-career-penn-philadelphia-comcast-20191205.html>

10/30/2013	\$300,000.00	Monetary Gift	CHINA	Arrail Group
09/27/2013	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
09/27/2013	\$2,000,000.00	Monetary Gift	CHINA	Anonymous
09/27/2013	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
04/18/2014	\$511,232.00	Monetary Gift	CHINA	China Minsheng Banking Co., Ltd.
04/14/2014	\$821,500.00	Monetary Gift	CHINA	E-House (China) Holdings Limited
04/23/2014	\$252,400.00	Contract	CHINA	Chifeng city rong Jitang Pharmaceut
04/19/2014	\$890,000.00	Monetary Gift	CHINA	Beijing Longfor Properties Co., Ltd
08/11/2014	\$725,999.00	Monetary Gift	CHINA	Shanghai Noah Investment Management
10/27/2014	\$661,000.00	Monetary Gift	CHINA	State Administration Foreign Expert
07/06/2015	\$260,000.00	Monetary Gift	CHINA	KWG Property Holding Limited Guangz
09/01/2015	\$818,593.00	Monetary Gift	CHINA	Industrial Bank Co. Ltd. (China Ind
09/07/2015	\$275,000.00	Monetary Gift	CHINA	China Zheshang Bank Co., Ltd.
09/17/2015	\$250,680.00	Monetary Gift	CHINA	Guanghua School of Management (Peki
09/24/2015	\$1,445,495.00	Monetary Gift	CHINA	E-House (China) Holdings Limited
10/12/2015	\$579,450.00	Monetary Gift	CHINA	State Administration Foreign Expert
11/12/2015	\$532,745.00	Monetary Gift	CHINA	Ping An Bank Co., Ltd.
11/16/2015	\$531,000.00	Monetary Gift	CHINA	China Minsheng Banking Co., Ltd.

12/18/2015	\$270,000.00	Monetary Gift	CHINA	Shanghai Institute of International
04/10/2016	\$252,200.00	Monetary Gift	CHINA	Bank of Communications
03/23/2016	\$500,000.00	Monetary Gift	CHINA	Anonymous
05/15/2016	\$1,573,972.00	Monetary Gift	CHINA	Ping An Bank Co., Ltd.
06/27/2016	\$413,992.00	Monetary Gift	CHINA	China Zheshang Bank Co., Ltd.
06/29/2016	\$300,000.00	Monetary Gift	CHINA	Anonymous
08/14/2016	\$831,170.00	Monetary Gift	CHINA	Shanghai Real Estate Education & Te
07/31/2016	\$426,311.00	Monetary Gift	CHINA	China Minsheng Banking Co., Ltd.
08/29/2016	\$532,500.00	Monetary Gift	CHINA	Hainan Airlines Co., Ltd.
09/09/2016	\$926,802.00	Monetary Gift	CHINA	E-House (China) Holdings Limited
09/04/2016	\$500,322.00	Monetary Gift	CHINA	Shanghai Automotive Industry Corpor
10/17/2016	\$598,850.00	Monetary Gift	CHINA	State Administration Foreign Expert
03/27/2017	\$536,340.00	Monetary Gift	CHINA	Shanghai Real Estate Education & Te
06/12/2017	\$634,996.00	Monetary Gift	CHINA	China Construction Bank Corporation
07/12/2017	\$579,200.00	Monetary Gift	CHINA	Nanjing Sample Technology Co., Ltd.
07/14/2017	\$500,000.00	Monetary Gift	CHINA	Anonymous
08/07/2017	\$512,063.00	Monetary Gift	CHINA	Hainan Airlines Co., Ltd.

08/21/2017	\$617,000.00	Monetary Gift	CHINA	Guangzhou Pearl River Enterprises G
09/17/2017	\$491,840.00	Monetary Gift	CHINA	Shanghai Automotive Industry Corpor
09/17/2017	\$324,800.00	Monetary Gift	CHINA	China Everbright Group
08/29/2017	\$538,500.00	Monetary Gift	CHINA	China Minsheng Banking Co., Ltd.
10/16/2017	\$633,550.00	Monetary Gift	CHINA	Bank of Communications
10/16/2017	\$502,750.00	Monetary Gift	CHINA	State Administration Foreign Expert
11/18/2017	\$1,863,751.00	Monetary Gift	CHINA	E-House (China) Holdings Limited
04/01/2018	\$535,000.00	Monetary Gift	CHINA	China Minsheng Banking Co., Ltd.
03/20/2018	\$300,000.00	Monetary Gift	CHINA	Anonymous
03/15/2018	\$250,000.00	Monetary Gift	CHINA	Anonymous
03/15/2018	\$500,000.00	Monetary Gift	CHINA	Anonymous
03/15/2018	\$250,000.00	Monetary Gift	CHINA	Anonymous
04/18/2018	\$1,228,885.00	Monetary Gift	CHINA	E-House (China) Holdings Limited
04/18/2018	\$416,150.00	Monetary Gift	CHINA	Shanghai Real Estate Education & Te
04/18/2018	\$718,650.00	Monetary Gift	CHINA	Guangzhou R&F Properties
04/19/2018	\$950,000.00	Monetary Gift	CHINA	China Merchants Bank
04/18/2018	\$304,504.00	Monetary Gift	CHINA	KWG Property Holding Limited Guangz
05/29/2018	\$14,500,000.00	Monetary Gift	CHINA	Anonymous

07/25/2018	\$378,891.00	Contract	CHINA	SHANGHAI REAL ESTATE EDUCATION TECH
07/16/2018	\$2,937,158.00	Contract	CHINA	CHINA MERCHANTS BANK
08/08/2018	\$393,343.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FINA
08/21/2018	\$330,000.00	Contract	CHINA	GUANGZHOU R&F PROPERTIES CO., LTD.
10/09/2018	\$390,250.00	Contract	CHINA	SAIC MOTOR HK INVESTMENT LIMITED
10/01/2018	\$1,032,745.00	Contract	CHINA	GUANGDONG PEARL RIVER INVESTMENT HO
10/01/2018	\$622,120.00	Contract	CHINA	CHINA MINSHENG BANK CO. LTD.
10/12/2018	\$332,250.00	Contract	CHINA	CHINA EVERBRIGHT GROUP
12/10/2018	\$734,300.00	Contract	CHINA	MARY KAY (CHINA) CO., LTD.
01/01/2019	\$167,500.00	Contract	CHINA	MOELIS &COMPANY
01/01/2019	\$258,000.00	Contract	CHINA	GUANGZHOU TIMES PROPERTY HOLDING L
01/09/2019	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
01/09/2019	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
01/24/2019	\$107,100.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN

02/05/2019	\$1,100,000.00	Contract	CHINA	Guangzhou R&F Properties Co., Ltd.
02/12/2019	\$83,750.00	Contract	CHINA	MOELIS & COMPANY
02/13/2019	\$163,461.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
02/27/2019	\$60,320.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
03/23/2019	\$274,670.00	Contract	CHINA	SAIC MOTOR HK INVESTMENT LIMITED
04/01/2019	\$123,282.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
04/01/2019	\$250,000.00	Monetary Gift	CHINA	Hua Medicine
04/05/2019	\$150,000.00	Contract	CHINA	ZHEJIANG UNIVERSITY
04/15/2019	\$258,000.00	Contract	CHINA	GUANGZHOU TIMES PROPERTY HOLDING L
04/15/2019	\$258,000.00	Contract	CHINA	TIMES PROPERTY HOLDINGS LIMITED
04/19/2019	\$447,042.00	Contract	CHINA	Guangzhou R&F Properties Co., Ltd.
05/28/2019	\$150,000.00	Contract	CHINA	ZHEJIANG UNIVERSITY
06/03/2019	\$4,975.00	Monetary Gift	CHINA	Anonymous
06/03/2019	\$400,000.00	Monetary Gift	CHINA	Anonymous
06/03/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
06/11/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
06/13/2019	\$328,500.00	Contract	CHINA	Vipshop (China) Co. Ltd.

06/18/2019	\$1,762,561.00	Contract	CHINA	E-House (China) Holdings Unlimited
06/18/2019	\$651,200.00	Contract	CHINA	E-House (China) Holdings Unlimited
06/25/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
06/26/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
06/26/2019	\$400,000.00	Monetary Gift	CHINA	Anonymous
06/25/2019	\$200,000.00	Monetary Gift	CHINA	AKO FOUNDATION
06/25/2019	\$200,000.00	Monetary Gift	CHINA	Anonymous
06/26/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
06/30/2019	\$500,000.00	Monetary Gift	CHINA	Anonymous
06/30/2019	\$383,279.00	Monetary Gift	CHINA	Anonymous
06/30/2019	\$483,667.00	Monetary Gift	CHINA	Anonymous
06/30/2019	\$416,721.00	Monetary Gift	CHINA	Anonymous
06/30/2019	\$383,054.00	Monetary Gift	CHINA	Anonymous
06/30/2019	\$333,279.00	Monetary Gift	CHINA	Anonymous

99 donations from China between 2013-2019

Sum: \$67,618,610

Largest: \$14.5 million on 5/29/2018

2013: \$4.3 million

2014: \$3.8 million

2015: \$4.9 million

2016: \$6.8 million

2017: \$7.7 million

2018: \$27.3 million

2019: \$12.7 million

Foreign Schools Gift and Contracts Report with Date Range 01/01/2014 to 12/31/2019

Grouped by: OPEID, State, Foreign Gift Received Date

Data Source: Postsecondary Education Participation System 3/30/2020

OPEID	Institution Name	City	State	Foreign Gift Received Date	Foreign Gift Amount	Gift Type	Country of Giftor	Giftor Name
22546	University of Pennsylvania	Philadelphia	PA	03/27/2017	\$536,340.00	Monetary Gift	CHINA	Shanghai Real Estate Education & le
22546	University of Pennsylvania	Philadelphia	PA	06/17/2017	\$634,996.00	Monetary Gift	CHINA	China Construction Bank Corporation
22546	University of Pennsylvania	Philadelphia	PA	07/13/2017	\$579,200.00	Monetary Gift	CHINA	Nanjing Simple Technology Co., Ltd.
22546	University of Pennsylvania	Philadelphia	PA	07/14/2017	\$500,000.00	Monetary Gift	CHINA	Anonymous
22546	University of Pennsylvania	Philadelphia	PA	08/07/2017	\$512,063.00	Monetary Gift	CHINA	Huainan Airlines Co., Ltd.
22546	University of Pennsylvania	Philadelphia	PA	08/21/2017	\$617,000.00	Monetary Gift	CHINA	Guangzhou Pearl River Enterprises G
22546	University of Pennsylvania	Philadelphia	PA	08/23/2017	\$538,500.00	Monetary Gift	CHINA	China Everbright Group
22546	University of Pennsylvania	Philadelphia	PA	09/17/2017	\$324,800.00	Monetary Gift	CHINA	China Minsheng Banking Co., Ltd.
22546	University of Pennsylvania	Philadelphia	PA	09/17/2017	\$491,840.00	Monetary Gift	CHINA	Shanghai Automotive Industry Corpor
22546	University of Pennsylvania	Philadelphia	PA	10/16/2017	\$502,750.00	Monetary Gift	CHINA	State Administration Foreign Expert
22546	University of Pennsylvania	Philadelphia	PA	10/16/2017	\$633,550.00	Monetary Gift	CHINA	Bank of Communications
22546	University of Pennsylvania	Philadelphia	PA	11/13/2017	\$1,463,751.00	Monetary Gift	CHINA	E-House (China) Holdings Limited
					\$7,734,790.00			

Foreign Schools Gift and Contracts Report with Date Range 01/01/2014 to 12/31/2019									
Grouped by: OPED, State, Foreign Gift Received Date									
Data Source: Postsecondary Education Participation System 3/02/2020									
ID	OPED ID	Institution Name	City	State	Foreign Gift Received Date	Foreign Gift Amount	Gift Type	Country of Gift	Giftor Name
22541	0033700	University of Pennsylvania	Philadelphia	PA	07/24/2017	\$500,000.00	Monetary Gift	CHINA	Anonymous

Foreign Schools Gift and Contracts Report with Date Range 01/01/2014 to 12/31/2019
 Grouped by: OPEID, State, Foreign Gift Received Date
 Data Source: Postsecondary Education Participation System 3/20/2020

OPEID	Gift Name	City	State	Foreign Gift Received Date	Monetary Gift Amount	Gift Type	Currency of Gift	Gift Name
27609	University of Pennsylvania	Philadelphia	PA	03/15/2018	\$500,000.00	Monetary Gift	CHINA	Anonymous
27610	University of Pennsylvania	Philadelphia	PA	03/15/2018	\$250,000.00	Monetary Gift	CHINA	Anonymous
27611	University of Pennsylvania	Philadelphia	PA	03/15/2018	\$250,000.00	Monetary Gift	CHINA	Anonymous
27612	University of Pennsylvania	Philadelphia	PA	03/20/2018	\$300,000.00	Monetary Gift	CHINA	Anonymous
27613	University of Pennsylvania	Philadelphia	PA	04/01/2018	\$535,000.00	Monetary Gift	CHINA	China Minsheng Banking Co., Ltd.
27614	University of Pennsylvania	Philadelphia	PA	04/18/2018	\$300,504.00	Monetary Gift	CHINA	WMC Property Holding Limited Guarant
27615	University of Pennsylvania	Philadelphia	PA	04/18/2018	\$416,150.00	Monetary Gift	CHINA	Shanghai Real Estate Education & In
27616	University of Pennsylvania	Philadelphia	PA	04/18/2018	\$1,728,885.00	Monetary Gift	CHINA	E-House (China) Holdings Limited
27617	University of Pennsylvania	Philadelphia	PA	04/18/2018	\$718,650.00	Monetary Gift	CHINA	Guangzhou R&P Properties
27618	University of Pennsylvania	Philadelphia	PA	04/19/2018	\$950,000.00	Monetary Gift	CHINA	China Merchants Bank
27619	University of Pennsylvania	Philadelphia	PA	05/29/2018	\$14,500,000.00	Monetary Gift	CHINA	Anonymous
27620	University of Pennsylvania	Philadelphia	PA	07/16/2018	\$2,937,158.00	Contract	CHINA	CHINA MERCHANTS BANK
27621	University of Pennsylvania	Philadelphia	PA	07/25/2018	\$378,891.00	Contract	CHINA	SHANGHAI REAL ESTATE EDUCATION TECH
27622	University of Pennsylvania	Philadelphia	PA	08/08/2018	\$393,343.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FINA
27623	University of Pennsylvania	Philadelphia	PA	08/27/2018	\$330,000.00	Contract	CHINA	GUANGZHOU R&P PROPERTIES CO., LTD
27624	University of Pennsylvania	Philadelphia	PA	10/01/2018	\$1,032,745.00	Contract	CHINA	GUANGDONG PEACE RIVER INVESTMENT HO
27625	University of Pennsylvania	Philadelphia	PA	10/01/2018	\$622,120.00	Contract	CHINA	CHINA MINSHENG BANK CO., LTD.
27626	University of Pennsylvania	Philadelphia	PA	10/09/2018	\$390,250.00	Contract	CHINA	SINOMOTOR PE INVESTMENT LIMITED
27627	University of Pennsylvania	Philadelphia	PA	10/12/2018	\$332,250.00	Contract	CHINA	CHINA EVERBRIGHT GROUP
27628	University of Pennsylvania	Philadelphia	PA	12/10/2018	\$744,300.00	Contract	CHINA	WANT KAT CHINA CO., LTD.
27629	University of Pennsylvania	Philadelphia	PA		\$77,104,346.00			

Foreign Schools Gift and Contracts Report with Date Range 01/01/2014 to 12/31/2019										
Grouped by: OPEID, State, Foreign Gift Received Date										
Data Source: Postsecondary Education Participation System 3/04/2020										
ID	OPEID	Institution Name	City	State	Foreign Gift Received Date	Foreign Gift Amount	Gift Type	Country of Gift	Gift Name	
22609	00337800	University of Pennsylvania	Philadelphia	PA	03/15/2018	\$500,000.00	Monetary Gift	CHINA	Anonymous	
22610	00337800	University of Pennsylvania	Philadelphia	PA	03/15/2018	\$250,000.00	Monetary Gift	CHINA	Anonymous	
22611	00337800	University of Pennsylvania	Philadelphia	PA	03/15/2018	\$250,000.00	Monetary Gift	CHINA	Anonymous	
22612	00337800	University of Pennsylvania	Philadelphia	PA	03/20/2018	\$300,000.00	Monetary Gift	CHINA	Anonymous	
22616	00337800	University of Pennsylvania	Philadelphia	PA	05/29/2018	\$14,500,000.00	Monetary Gift	CHINA	Anonymous	
						\$15,800,000.00				

ID	CRPID	Institution Name	City	State	Foreign Gift Received Date	USD	Gift Type	Country of Origin	Gift Name
23001	00337800	University of Pennsylvania	Philadelphia	PA	11/23/2019	\$329,980.00	Contract	CHINA	AC IMMUNE
23005	00337800	University of Pennsylvania	Philadelphia	PA	11/25/2019	\$110,000.00	Contract	CHINA	CITY UNIVERSITY OF HONG KONG
23008	00337800	University of Pennsylvania	Philadelphia	PA	11/27/2019	\$29,990.00	Monetary Gift	CHINA	1643212
23009	00337800	University of Pennsylvania	Philadelphia	PA	11/27/2019	\$600,000.00	Monetary Gift	CHINA	1643212
23011	00337800	University of Pennsylvania	Philadelphia	PA	11/29/2019	\$46,433.00	Contract	CHINA	SHENZHEN GUOSHENG YUAN TRADING CO.
23021	00337800	University of Pennsylvania	Philadelphia	PA	12/11/2019	\$534,377.00	Contract	CHINA	GUANGZHOU PEARL RIVER ENTERPRISES
23027	00337800	University of Pennsylvania	Philadelphia	PA	12/18/2019	\$1,292,360.00	Contract	CHINA	CHINA MERCHANTS BANK
23032	00337800	University of Pennsylvania	Philadelphia	PA	12/24/2019	\$250,000.00	Monetary Gift	CHINA	1471450
23033	00337800	University of Pennsylvania	Philadelphia	PA	12/24/2019	\$250,000.00	Monetary Gift	CHINA	1471450
23034	00337800	University of Pennsylvania	Philadelphia	PA	12/27/2019	\$191,769.00	Contract	CHINA	MARY KAY(CHINA) CO.,LTD
23037	00337800	University of Pennsylvania	Philadelphia	PA	12/31/2019	\$46,553.00	Contract	CHINA	SHENZHEN GUOSHENG YUAN TRADING CO.
						\$26,947,074.00			

