

How Republicans overhype the findings of their Hunter Biden probe



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The Fact Checker

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“The Committee has identified over 20 companies affiliated with certain Biden family members and their business associates.”

— **Majority staff of the House Oversight Committee, [Second Bank Records memorandum](#), released May 10**

“We’ve identified about 20-plus shell companies that the Bidens have created to launder the money they were receiving from foreign nationals down to their personal bank account.”

— **Rep. James Comer (R-Ky.), chairman of the House Oversight Committee, [interview on Fox Business](#), May 11**

“The Committee has now identified over \$20 million in payments from foreign sources to the Biden family and their business associates.”

— **Majority staff of the House Oversight Committee, [Third Bank Records memorandum](#), released Aug. 9**

“The Biden family received over \$20 million from our enemies around the world. What did they do to receive the money?”

— **Comer, [interview on Newsmax](#), Aug. 10**

The House Oversight Committee, led by Comer, has been investigating business dealings of President Biden’s son, Hunter, and other family members — and by extension unverified allegations that the president was involved in his son’s business as well. The committee has obtained thousands of bank records, and the Republican staff has issued three memorandums summarizing some of the findings.

The memos are written in a partisan manner — ignoring or playing down contrary information — but an interesting pattern has emerged. The memos themselves have careful language that is often hedged. Then Comer and other GOP lawmakers, including [House Speaker Kevin McCarthy](#) (Calif.), go on Twitter or speak to conservative media using hyperbolic language that goes well beyond what the memos say. Over time, the reporting on the memos in conservative media becomes untethered from the documentation in the reports.

For instance, the second staff memo never says that Hunter Biden used “shell” companies — a term often associated with shady or illegal activity, even though a shell company is a [legitimate entity](#). Comer [once described](#) such an entity as “a fake company ... they don’t make anything. They don’t produce anything. They don’t provide a good or service.” He is not wrong about many shell companies, but the memo lists real companies, with active websites and real business functions. (The third staff memo refers to just one “shell” company, which we will describe later.)

As for the \$20 million in payments, Comer and other Republicans invoke this figure often. A close reading of the memos, however, finds that only about \$7 million can be directly attributed to Biden family members, mostly Hunter, while the rest went to “associates,” according to the memos. Yet Comer and other lawmakers misleadingly suggest all of the money went to the Biden family or, as some label it, “[the Biden crime family](#).” No evidence has emerged that any of these funds can be traced to [Joe Biden](#) himself.

Let’s detail the difference between the memos and the rhetoric.

‘Shell’ companies

Comer often suggests that the Biden family used these so-called shell companies to launder money; in his telling, such companies served no legitimate function. But that claim is undercut by the list of 21 companies that appear in the second staff memo.

Virtually all of the companies (many of which now are defunct) had legitimate business interests. Others had clearly identified business investments. Digging through the records, we find only three whose business purpose remains vague; one (**Rosemont Seneca Global Risk Services, LLC**) may not even be related to Hunter Biden, according to an email found in Hunter Biden’s laptop. The memos do not list any payments that flowed through these three companies.

Companies founded by Hunter Biden

- **Seneca Global Advisors** was a boutique consulting firm that Hunter Biden founded in 2008 to help small and midsize companies expand into markets in the U.S. and other countries, according to a 2019 interview he gave to the New Yorker. [OpenSecrets.org](#) identifies it as “a lobbying firm that was hired by 9 clients in 2008, for a total amount of \$210,000.” All of the clients are identified.
- **Owasco PC** was essentially Hunter Biden’s law firm and did legal work. One memo acknowledges it is “a professional corporation.” The memo also lists an **Owasco LLC** and **Skaneateles, LLC**, two of the companies whose purpose remains vague. Hunter Biden named his personal LLCs, used to handle

payments like payroll, after towns in New York's Finger Lakes region, where his mother was born, according to a former business partner.

Companies in partnership with Hunter Biden

- **Rosemont Seneca Partners**, founded in 2009 by Hunter Biden, Devon Archer and Christopher Heinz. The third staff memo identifies it as “central to the Bidens’ later business ventures,” confirming that it is not a shell company. Many of the other supposed shell companies are offshoots of this firm.
- **Rosemont Seneca Advisors** in 2017 had investment projects in West Africa and a 5 percent stake in Harves Amusement Parks and ownership in Harves Sports and Entertainment, both in China. A 2011 email in Hunter Biden’s laptop suggests most of his business was done through this entity.
- **Rosemont Seneca Technology Partners (RSTP)** still exists under a different name, Pilot Growth Equity. As we have previously reported, Rosemont Seneca Partners had a stake in RSTP, which invested in emerging technology companies. In 2014, the Wall Street Journal reported that Hunter Biden had been discharged that February from the Navy Reserve after testing positive for cocaine use. Biden had not disclosed the discharge to RSTP members and so in early 2015 he was eased out of the firm, which has since rebranded itself as Pilot Growth Equity and declined to comment.
- **RSTP II Alpha** and **RSTP II Bravo** were related venture capital funds that registered with the Securities and Exchange Commission. The investments included a genetics testing company called Counsyl, according to a 2014 Forbes article.
- **Rosemont Seneca Bohai**, created in 2014 to invest in a Chinese fund generally known as BHR Partners, was a replacement vehicle for Rosemont Seneca Thornton, LLC, mentioned below.
- **RSP Holdings** is described in an SEC document as the parent company of RSP Investments, which aimed to “provide private placement services, hedge fund marketing and capital introduction services.” The memo does not mention RSP Investments but has a listing for **Rosemont Seneca Principal Investments**, presumably the same company.
- **Hudson West III** and **Hudson West IV** were involved in an energy investment deal with CEFC China Energy, a Chinese energy conglomerate. Comer has decried the deal as “a scheme to try to get China to buy liquefied natural gas,” indicating he knows these are not shell companies.

Companies with a Hunter Biden connection

- **Rosemont Realty LLC**, founded in 1991. Hunter Biden was not on the Rosemont Realty management team but was listed as part of the board of advisers of the firm, which was managed by Devon Archer. This was a substantial company; in 2013, its website showed it owned properties in 25 states, including Comer’s home state of Kentucky. Archer was recently interviewed by the Oversight Committee and he tried to explain that a wire transfer of \$3.5 million from Elena Baturina, a Russian billionaire, that interested the committee was part of a \$120 million investment with Rosemont Realty that was unrelated to Hunter Biden. “Rosemont Realty was completely out of his, kind of, portfolio,” Archer said.
- **Lion Hall Group** and **JBB SR** are associated with Joe Biden’s brother James Biden. Lion Hall is a consulting group, according to a Washington Post investigation, while JBB SR has been described in

Ben Schreckinger's 2021 book "The Bidens" as managing two businesses that sold medical and agricultural products. James Biden hung up the phone when the Fact Checker identified himself.

- **Robinson Walker LLC**, founded in 2008 by John Robinson "Rob" Walker, and **CEFC Infrastructure Investment**, once a subsidiary of a Chinese energy company, are not Biden family companies at all but are listed because they transferred funds to Biden family members. Walker, who at one point was a managing director of Rosemont Seneca Advisors, could not be reached for comment.

One named 'shell' company

Rosemont Seneca Thornton LLC is the one company specifically named in a staff memo as a shell company. As we have reported, this entity was created in 2013 to invest in BHR Partners, the Chinese fund. But almost as soon as Rosemont Seneca Thornton was created, the partners decided to dissolve it, according to a person with access to the board minutes. Thornton Group, one of the investors, was run by Jim Bulger, who brought expertise in investing in China. But the original structure had added unexpected regulatory burdens to Thornton, and so Bulger's lawyers advised that the group split up, this person said. Archer, in his interview, confirmed this to committee investigators, saying the creation of the LLC was "a mistake."

We'd previously reported that Archer kept the vehicle alive for his own real estate business, without telling Hunter Biden or Bulger, according to two people knowledgeable about Archer's activities. After a Senate report alleged that Rosemont Seneca Thornton received a \$3.5 million payment from Baturina, Archer told Bulger that he had used Rosemont Seneca Thornton to transfer funds from Baturina to purchase real estate in Brooklyn, according to a participant in the conversation.

In his congressional interview, Archer said: "I don't know what the specifics of the wire were, but it was — quite frankly, it was not supposed to go there, but that's where it went." The committee staff allege that some of the \$3.5 million went to fund the replacement vehicle for the Chinese investment. Archer, in his interview, said he did not know if that was the case, but he insisted that Baturina was a Rosemont Realty client not connected to Hunter Biden. The staff memo, released after the Archer interview, ignores that comment.

\$20 million from foreign sources

Now let's look at the money flow. The House Oversight Committee memos are written in a way that makes it difficult to follow the exact path, keeping the focus on the top-line numbers. We sought comment from Comer's staff to see if our calculations were correct, but did not get a response.

With those caveats in mind, here's how the payments appear to break down.

\$10 million in Chinese payments (at least \$3.6 million to Bidens, mostly Hunter). The staff memos are a bit vague but discuss in particular two transactions.

The memos report a \$3 million transfer in 2017 from a Shanghai-based company (State Energy HK Limited) to Robinson Walker LLC, the firm mentioned above as associated with Rob Walker, a former Clinton administration official and business associate of Hunter Biden's. Then, over the next three months, about \$1 million was transferred from Robinson Walker to "Biden family members," including Hunter's uncle James and widowed sister-in-law Hallie, and another \$1 million to James Gilliar, another Hunter Biden business partner. (Hallie Biden could not be reached for comment.)

The memos also discuss \$3 million in transfers in 2015 and 2016 from State Energy HK to the Center for International Relations and Sustainable Development, a public policy think tank associated with Vuk Jeremic, a former Serbian politician and United Nations official. Jeremic had a business relationship with Hunter Biden.

Separately (and not mentioned in the staff memos), Hunter Biden said in federal court last month that he had received a total of about \$2.6 million in 2017 and 2018 for the business transactions between Hudson West and CEFC, the Chinese energy company. So we will add those amounts to the total in the interest of being complete.

\$6.5 million from Ukrainian energy firm Burisma (\$2.6 million to Hunter Biden). The staff memo relies on Internal Revenue Service whistleblower testimony that "Burisma paid to everyone involved" \$6.5 million, of which \$2.6 million went to Hunter Biden and the balance to Archer.

\$3.5 million from Russian billionaire (none to Biden). The staff memo suggests that \$2.75 million of Baturina's transfer went to a firm that transferred funds to Hunter Biden, but our reporting and Archer's testimony suggests it is incorrect to assume Hunter ended up with this money. Under our accounting, this all would be considered money to an associate — Archer — since he says Baturina's transfer was intended for a real estate transaction unconnected to Hunter.

\$3 million in Romanian payments (about \$1 million to Hunter Biden and at least \$10,000 to Hallie Biden). The second staff memo says Romanian businessman Gabriel Popoviciu, later convicted on bribery-related charges, sent \$3 million to the firm controlled by Rob Walker. The firm then gave \$1.038 million to "Biden family accounts" after that transfer, most of which went to Hunter Biden. The memo indicates that Gilliar was the recipient of the rest of the Popoviciu money

\$142,300 from a Kazakh businessman (to Hunter Biden to pay for a Porsche sports car).

That works out to be about \$23 million in total payments from foreign sources. Of that, nearly \$7.5 million can be fairly attributed as going to "Bidens," but virtually all of it went to Hunter Biden. No money has been traced to Joe Biden.

The Pinocchio Test

Hunter Biden’s decision to pursue business deals that at the time overlapped with his father’s policy brief as vice president was ill-advised and has caused political headaches for his father. Republicans are pursuing the case with vigor, but Comer undercuts the findings of his investigation by hyping what has been found. He claims there were more than 20 “shell companies,” but upon inspection most of the companies named had legitimate business transactions or investments. He claims the Bidens received more than \$20 million from foreign sources, leaving off the caveat in the staff reports that two-thirds of the payments went to Hunter Biden’s business partners.

Comer would have more credibility if he stuck to documented facts — such as saying precisely that Hunter Biden received \$7 million from foreign sources. He earns Three Pinocchios.

Three Pinocchios

(About our rating scale)

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