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## The CCP's Investors: How American Venture Capital Fuels the PRC Military and Human Rights Abuses

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THE SELECT COMMITTEE ON THE  
STRATEGIC COMPETITION BETWEEN  
THE UNITED STATES AND  
THE CHINESE COMMUNIST PARTY

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# THE CCP'S INVESTORS: How American Venture Capital Fuels the PRC Military and Human Rights Abuses

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## Table of Contents

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<b>Background .....</b>	<b>- 4 -</b>
1. Scope and method .....	- 4 -
2. The PRC’s pursuit of technological supremacy .....	- 8 -
<b>Section I – Artificial Intelligence .....</b>	<b>- 10 -</b>
1. AI companies blacklisted by the U.S. government for supporting genocide or other human rights abuses .....	- 11 -
2. AI companies supporting the PRC’s surveillance state or materially associated with Uyghur forced labor .....	- 15 -
3. Sequoia’s billion+ dollar investment into ByteDance, which supports the PRC’s digital authoritarianism and threatens national security .....	- 18 -
4. AI companies blacklisted by the U.S. government for supporting the PLA .....	- 20 -
5. AI companies supporting the PLA or its contractors .....	- 23 -
6. Generative AI companies .....	- 28 -
<b>Section II – Semiconductors .....</b>	<b>- 30 -</b>
1. Supporting PRC government priority semiconductor companies .....	- 31 -
2. Early investments into SMIC .....	- 32 -
3. Investment into red flag listed semiconductor company SJSemi .....	- 33 -
4. PRC semiconductor companies benefit from U.S. R&D .....	- 33 -
5. Semiconductor companies that support the PLA or present other significant security concerns .....	- 35 -
6. AI semiconductor companies blacklisted by the U.S. government .....	- 37 -
<b>Section III – Intangible Support and Expertise .....</b>	<b>- 39 -</b>
1. U.S. VCs help PRC companies go global .....	- 39 -
2. U.S. VCs provide PRC companies with invaluable mentorship and management expertise .....	- 40 -
3. U.S. VCs help PRC companies find, develop, and hire talent .....	- 41 -
4. U.S. VCs give PRC companies credibility and help them find and engage with co-investors and industry partners .....	- 41 -
<b>Section IV – Analysis and Recommendations .....</b>	<b>- 43 -</b>
1. Outbound investment in critical sectors undercuts U.S. policy .....	- 43 -
2. Recommendations .....	- 44 -

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## EXECUTIVE SUMMARY

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In this investigation, the House Select Committee on the Strategic Competition between the United States and the Chinese Communist Party (Select Committee or Committee) set out to understand the relationship between U.S. venture capital firms (VCs) and the People's Republic of China's (PRC) explosive growth in two advanced technology sectors: artificial intelligence (AI) and semiconductors.

Both technologies have civilian and military applications. Both will drive the future of warfighting, and both are necessary components of the Chinese Communist Party's (CCP) Orwellian surveillance state and human rights abuses. Both technologies also provide the foundation for advancements in other cutting-edge technologies such as biotechnology and quantum computing.

The Committee examined five U.S. venture capital firms that have a sizeable footprint in PRC AI and semiconductor companies to better understand whether and how American capital and expertise have supported the PRC's technological advancement.

We found that these **five VCs alone have made investments worth at least \$3 billion into PRC technology companies that facilitate human rights abuses including genocide, contract with the Chinese military, or strengthen the PRC's semiconductor supply chains and advance China's national security ambitions.**

**We also found evidence that VCs provide intangible support, including expertise, to companies, including problematic PRC companies in the targeted sectors.**

By virtue of our small sample size, our results significantly understate the amount of U.S. investment and expertise that has flowed into companies linked to the People's Liberation Army (PLA) or the CCP's human rights abuses.

Related to artificial intelligence, the Committee found that just these firms alone have invested:

- In total, more than **\$1.9 billion** into AI companies that support the CCP's human rights abuses, surveillance state, or the People's Liberation Army (PLA).
- More than **\$130 million** into PRC artificial intelligence companies blacklisted by the U.S. government for supporting the CCP's genocide and human rights abuses.
- More than **\$20 million** into AI companies supporting the CCP's surveillance state and companies associated with forced labor.
- Over **\$1 billion** into ByteDance, which supports the PRC's digital authoritarianism and presents a threat to U.S. national security.

- More than **\$190 million** into AI companies that are now blacklisted by the U.S. government for supporting the PRC's military.
- Another **\$140+ million** into AI companies that support the PLA.

Related to semiconductors, the Committee found that these firms have invested:

- In total, more than **\$1 billion** into more than **150 semiconductor** companies.
- More than **\$50 million** into PRC semiconductor giant SMIC, beginning one year after SMIC's founding.
- More than **\$35 million** into a semiconductor company after it was blacklisted by the U.S. government for supporting the PLA.
- **Tens of millions of dollars** into semiconductor companies backed by and receiving subsidies from the PRC government.
- More than **\$180 million** into semiconductor companies that support the PLA.

U.S. investments were critical to the early growth and success of some of the PRC's largest and most notorious AI and semiconductor companies, many of which are now blacklisted by the U.S. government over national security concerns, and many of which are supported by the PRC government. Some VCs even touted the PRC's strategic priorities and PRC government support as a positive factor weighing in favor of investment in their internal memos.

The results of the Committee's investigation significantly understate the total U.S. funding that has flowed into the PRC's AI and semiconductor sectors: we looked only at venture capital funds, examined just five venture firms out of countless that invest in the PRC, and focused narrowly on companies that are publicly linked to the PLA or the CCP's human rights abuses.<sup>a</sup> We also only looked at investments related to two technologies out of many that are relevant to U.S. national security and technological competition.

**The Committee's findings suggest that there are billions of dollars beyond those captured in this report that have flowed into PRC companies that support the PRC's military, digital authoritarianism, and efforts to develop technological supremacy and undermine American technological leadership. The status quo is untenable.**

This report illustrates that outbound U.S. capital investment has advanced the PRC's strategic priorities while undercutting U.S. strategy towards the PRC. The

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<sup>a</sup> Our results understate the true scope of investment into these sectors *even with respect to these five firms*. For example, one of the smaller funds examined had invested more than \$700 million into PRC semiconductor and artificial intelligence companies since 2010, but only a fraction of that total is covered in the specific investments noted below. Another firm produced partial information that suggested investment totals in the billions of dollars into semiconductors alone.

United States has invested enormous time, resources, and government effort to prevent the transfer of sensitive U.S. technology to the PRC. But U.S. venture capital flows have undercut those efforts by funding and providing intangible support to the very same companies that export controls and other regulations are intended to isolate.

**Decades of investment—including funding, knowledge transfer, and other intangible benefits—from U.S. VCs have helped build and strengthen the PRC’s priority sectors.** This bell cannot be unrung. Simply put, robust PRC outbound investment restrictions in key strategic sectors are a national security and human rights imperative.

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## BACKGROUND

### 1. Scope and method

This report details the findings from the Select Committee’s investigation into the relationship between U.S. VCs and the PRC’s AI and semiconductor sectors, with a particular focus on the ways in which those VCs have supported companies linked to the PLA or the CCP’s human rights abuses. AI and semiconductor technologies are dual-use technologies, critical to national security, necessary components of the CCP’s Orwellian surveillance state and human rights abuses, and priority industries for the PRC government.

#### Venture Capital Funds Examined

The Committee reviewed investments—including capital and expertise—provided by five U.S.-headquartered venture capital firms to PRC artificial intelligence and semiconductor companies.

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*“Artificial intelligence and semiconductor technologies are necessary components of the CCP’s Orwellian surveillance state and human rights abuses.”*

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*GGV Capital* was founded in 2000 and is headquartered in California. *GGV* opened its first office in China in 2005 and operated an integrated global business in the decades that followed.<sup>1</sup> *GGV* spun off its China business into a separate entity in 2023, shortly after the public announcement of the Committee’s investigation.<sup>2</sup>

*GSR Ventures* was founded in 2004 and is headquartered in California. *GSR* has an office in the PRC and has invested heavily in PRC technology companies.<sup>3</sup>

*Qualcomm Ventures* is the investing arm of *Qualcomm*, a U.S. semiconductor company headquartered in California. *Qualcomm Ventures* has a PRC office.<sup>4</sup>

*Sequoia Capital* was founded in 1972 in California. *Sequoia* partnered with local leaders in 2005 to establish *Sequoia Capital China*, which had offices in the PRC.<sup>5</sup> *Sequoia* split off its China business into a separate entity in 2023, which is now known as *HongShan*.<sup>6</sup>

*Walden International* was founded in 1987 and is headquartered in California. *Walden* is a self-described “pioneer[]” in venture investing in the PRC.<sup>7</sup> Its investments have focused especially on PRC semiconductor companies.<sup>8</sup> *Walden* has offices in Beijing and Shanghai.<sup>9</sup>

All five firms have United States-based investors. These investors—or limited partners (LPs)—often include institutional entities such as university endowments, family offices, pension funds, and others, such as corporate entities and individuals.

U.S.-based VCs invest in PRC companies using both U.S. dollars (USD) and Chinese renminbi (RMB). This report examines investments from both USD and RMB funds. While different VCs may organize the corporate links between USD and RMB funds in different ways, our examination found that these funds are deeply intertwined in practice. For example, the funds have often shared general partners, professional networks, and corporate name and reputation, resulting in the transfer of expertise and intangible goodwill to companies.<sup>b</sup> In addition, some RMB funds raise money from U.S. limited partners.<sup>c</sup> RMB investments are therefore included in the findings below, alongside investments in USD.

All five firms produced information to the Committee in this investigation by identifying investments in the relevant sectors and producing specific information about a targeted subset of investments. The Committee also conducted interviews with senior executives at multiple firms. Given the limited information produced to the Committee, our results below significantly understate the true scope of the investment of capital, expertise, and intangible goodwill *even with respect to these five firms*.

Some of the VCs have divested from certain investments, and any such divestments are noted throughout. However, our investigation found that some of the VC firms have not divested their investments into PRC companies linked to the PLA or human rights abuses. In addition, even where a firm divested, the company had already benefited from the investment in the first instance.

Several of the VCs the Committee investigated stressed that their investments in the PRC were made “during an era of optimism lasting about 15 years.”<sup>10</sup> Sequoia, for example, told the Committee that its entry into the PRC “coincided with expressed government policies and public positions in the US that encouraged businesses to invest in the region.”<sup>11</sup>

### **Threats to VC Employees in the PRC**

U.S. businesses in the PRC have faced an increasingly hostile environment as PRC authorities crack down on information flowing out of the country. The PRC government has raided U.S. companies in the PRC and has also increasingly stopped executives, including foreigners, from leaving the country by imposing exit bans.<sup>12</sup> The PRC’s recently updated counter-espionage law is sweeping—the

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<sup>b</sup> See also ANTON MALKIN, CHINA’S EXPERIENCE IN BUILDING A VENTURE CAPITAL SECTOR 7 (2021) (“[F]oreign funds provided the foundation for the VC sector to grow. Therefore, while today RMB funds comprise the vast majority of total venture funds under management, the expertise and capital were originally provided by foreign VC funds . . .”). Some U.S. VCs set up RMB funds to increase investment into the PRC, specifically in areas where the PRC imposes foreign investment restrictions.

<sup>c</sup> Sequoia Capital told the Committee that Sequoia Capital China’s RMB funds did not contain U.S. limited partners.

law treats all “documents, data, materials, and items related to national security and interests” as akin to state secrets.<sup>13</sup>

Amid these pressures, multiple U.S. firms expressed apprehension to the Committee about cooperating with the Committee’s investigation because of pressure or fear of pressure from the PRC government and the CCP. One firm told the Committee that its PRC personnel were “scared to death” about providing basic fund information to the Committee because of potential repercussions in the PRC. A representative of that firm recalled that in another case, one of his clients, a general partner, had disappeared—and re-appeared in a PRC prison.

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*“One firm told the Committee that its PRC personnel were “scared to death” about providing basic fund information to the Committee because of potential repercussions in the PRC.”*

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Another U.S. firm told the Committee that the PRC government was “actively pressuring” venture capital firms not to cooperate with the Committee’s investigation. That firm also faced pressure from its investment companies and limited partners, who likewise urged the firm not to cooperate. Shortly before the Committee opened its investigation, the PRC authorities had informed another one of the firm’s senior employees, without explanation, that he or she could not travel outside the country.

In addition, multiple VCs expressed concern about providing information to the Committee because of the PRC’s vague so-called “data security” laws and associated civil or criminal penalties. For example, GSR Ventures initially refused to provide the Committee with any information about its RMB investments. After extensive negotiations, GSR Ventures told the Committee it could not disclose the exact amounts invested in a handful of companies, citing the PRC’s “data privacy rules.”<sup>d</sup> GSR Ventures is headquartered in the United States.

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*“Another U.S. firm told the Committee that the PRC government was ‘actively pressuring’ venture capital firms not to cooperate with the Committee’s investigation.”*

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### **Splitting U.S. and PRC Funds**

Two of the firms that the Committee investigated, Sequoia Capital and GGV, in 2023 announced their intentions to split their China funds into separate legal

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<sup>d</sup> GSR told the Committee it invested an aggregate of \$15 million into the five PRC companies the Committee flagged.

entities. This report examines investments made prior to the announcement of those splits.

Sequoia Capital announced in summer 2023 that it would split its China business, known as Sequoia Capital China (Sequoia China), into a new entity, called HongShan.<sup>14</sup> Before the split, Sequoia’s U.S. and PRC entities were interlinked, with Sequoia China raising money from U.S. limited partners and U.S.-based Sequoia personnel investing in Sequoia China funds.<sup>15</sup> The two shared profits, networks, and certain back-office functions.<sup>16</sup> The head of Sequoia China, Neil Shen, served as a “steward of Sequoia Capital.”<sup>17</sup> Shen was a representative to the Chinese People’s Political Consultative Congress, the CCP’s standing advisory committee.<sup>18</sup>

GGV opened its first office in China in 2005. By 2014, a GGV managing partner explained that GGV was “considered a local firm” in the PRC, with roughly half of GGV’s partners reportedly based in the PRC.<sup>19</sup> GGV’s associated RMB funds were set up in 2017 and were overseen by a GGV then-managing partner.<sup>e 20</sup> At least two additional GGV partners were dual-hatted, working in both GGV’s USD and RMB funds.

GGV told the Committee that it began evolving its approach to the PRC in 2018.<sup>21</sup> That year, a GGV managing partner stated that unlike other U.S. venture firms, GGV was “one fund” across the United States and the PRC.<sup>22</sup> In 2023, the firm announced a decision to legally split the U.S. and PRC entities.<sup>23</sup> Notably, this decision came shortly after the launch of the Committee’s investigation.

By splitting off their China businesses, it appears likely that Sequoia and GGV will reduce the flow of American technological and managerial expertise from those two U.S. VCs to PRC-based companies, which is a step in the right direction.

However, without further legislative action, it is not clear whether these splits will in fact staunch future flows of American capital to problematic PRC companies—indeed, such splits may insulate some types of capital flows from regulatory scrutiny they would

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*“Without further legislative action, it is not clear whether these splits will in fact staunch future flows of American capital to problematic PRC companies.”*

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have otherwise been subject to under a recently released Executive Order.<sup>f</sup> For example, as of 2023, U.S. investors remained the single largest source of capital for

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<sup>e</sup> GGV’s associated RMB funds are a separate legal entity, and are now known as Jiyuan Capital.

<sup>f</sup> On August 9, 2023, President Joe Biden issued an Executive Order on Addressing United States Investments in Certain National Security Technologies and Products in Countries of Concern. Exec. Order 14,105, 88 Fed. Reg. 54867 (Aug. 11, 2023).

Sequoia Capital China, and the corporate split will not prevent continued investment by U.S. institutional and other investors into HongShan.<sup>24</sup>

These splits also raise new questions about the reverse flow of emerging American technologies to venture funds like GGV Asia and HongShan, which may seek to ramp up investments in Silicon Valley startups.<sup>25</sup>

## 2. The PRC's pursuit of technological supremacy

### The CCP's Military-Civil Fusion Strategy

General Secretary Xi Jinping has made plain his intent to “resolutely win the battle of key and core technologies” and build the People’s Liberation Army into a “great wall of steel.”<sup>26</sup> The PRC is actively seeking out and using advancements in artificial intelligence and in semiconductors to facilitate the PRC’s repressive surveillance state and enhance its military capabilities.<sup>27</sup>

The PRC government uses a complex mix of state subsidies and incentives, state-owned and controlled enterprises, and start-ups to advance its technological goals. The PRC’s policy of military-civil fusion (军民融合)—which “eliminat[es] barriers between the PRC’s civilian research and commercial sectors[] and its military and defense industrial sectors”—ensures that no technology company in the PRC is truly a private company.<sup>28</sup> This is especially relevant in the venture capital space, because start-ups that begin with a civilian purpose may be leveraged for military ends or to advance the Party’s authoritarianism at home and abroad.

### U.S. VC Investments Support the PRC Government’s Technology Ambitions

The PRC government views foreign venture capital as key to becoming the world leader in science and technology by 2050.<sup>29</sup> This is not surprising: foreign venture capital has been foundational to the development of the PRC’s venture capital ecosystem and to the PRC’s

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*“Some VCs even touted actual or potential PRC government support [for a company] . . . as a factor favoring investment.”*

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advancement in high-tech sectors.<sup>30</sup> Indeed, many of the PRC companies funded by U.S. VCs also received PRC state subsidies or other support, demonstrating the alignment between U.S. investment and the PRC’s national technology priorities.

The Committee found that some VCs even touted actual or potential PRC government support as a factor favoring investment. For example, in its investment memo for a PLA-linked company, GGV noted potential PRC support due to priorities under the Made in China 2025 strategy—the PRC’s strategy to technologically surpass and dominate the United States—as a factor favoring the investment.<sup>31</sup> Similarly, in its internal memorandum for PRC semiconductor giant

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*“The PRC’s largest semiconductor foundry has therefore benefitted both from U.S. dollars—flowing through Walden funds—and from PRC state subsidies.”*

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SMIC, Walden pointed to the PRC’s Five Year Plan prioritizing the semiconductor industry, as well as PRC state policy incentivizing and supporting semiconductor companies, as an important factor favoring investment.<sup>32</sup> § SMIC has continued to receive billions of dollars in PRC state funding.<sup>33</sup> The PRC’s largest

semiconductor foundry has therefore benefitted both from U.S. dollars—flowing through Walden funds—and from PRC state subsidies.

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§ Similarly, in a 2004 investment memorandum for PRC semiconductor company Advanced Micro-Fabrication Equipment (AMEC), Walden listed “support from the Chinese government and receiving tax benefits” as a “pro” of the investment. *See* Walden International documents (on file with Select Committee).

## SECTION I – ARTIFICIAL INTELLIGENCE

*The five U.S. VCs examined by the Committee have made investments worth more than a billion dollars into PRC artificial intelligence companies that support the CCP’s human rights abuses, surveillance state, or the People’s Liberation Army.*

The PRC views artificial intelligence as critical to its goal of global technological supremacy. In General Secretary Xi Jinping’s words, “[A]ccelerating the development of a new generation of artificial intelligence is an important strategic tool for us to win the initiative in global scientific and technological competition.”<sup>34</sup> For the PRC, AI is critical to national priorities ranging from manufacturing to military modernization to “public security”—the CCP’s euphemism for its repressive surveillance state.<sup>35</sup>

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*“Some of the PRC’s most prized companies on the cutting-edge of AI development have received U.S. investment.”*

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Some of the PRC’s most prized companies that are today on the cutting-edge of AI development have received U.S. investment. For example, the PRC in 2017 formed an AI “national team,” the goal of which is to advance the PRC’s AI development more efficiently.<sup>36</sup> Many of the companies on the team received, or have since received, U.S. funding, including those below:

### PRC AI National Team

<b>Company</b>	<b>U.S. VC Supporter</b>
Megvii	GGV
MiningLamp	Sequoia Capital China
Qihoo360	Sequoia Capital China
SenseTime	Qualcomm Ventures
Yitu	Sequoia Capital China
Xiaomi	GGV
Alibaba Cloud	GGV (into Alibaba)

This section will examine U.S. venture capital investments into PRC companies through the lens of two of the PRC’s end-uses for artificial intelligence. First, the PRC uses AI for “social governance” or “public security,” a euphemism for censorship and surveillance. In Xinjiang and elsewhere in the PRC, the CCP uses facial recognition, biometric surveillance, and other AI-powered technologies to perpetrate genocide against Uyghurs and commit other human rights abuses against targeted populations.<sup>37</sup> Across China, the PRC also uses its mass

surveillance system to enforce political repression.<sup>38</sup> The Committee’s investigation found that U.S. VCs have invested in companies that are now designated on red flag lists by the U.S. government for human rights abuses, as well as companies whose activities support the PRC’s surveillance state or forced labor but are not on any U.S. blacklists.

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*“The PRC uses AI-powered technologies to perpetrate genocide against Uyghurs.”*

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Second, the PRC uses AI for military modernization. This section will examine investments in AI companies with links to the PLA. AI is central to the PRC’s concept of future warfare.<sup>39</sup> The PLA is using AI to advance its intelligence, surveillance, reconnaissance, and command and control capabilities.<sup>40</sup> This includes leveraging AI to make split-second wartime decisions and to detect U.S. ships and aircraft quickly and accurately.<sup>41</sup> The Committee’s investigation confirmed that U.S.-based venture capital firms have invested in PRC companies that contract with the PLA.

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*“U.S. venture capital firms have invested in PRC companies that supply the PLA.”*

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Finally, this section will touch on U.S. investments in generative AI companies. The PRC views generative artificial intelligence—a type of AI model that produces content when prompted by the user, such as text, video, or images—as critical to its national security.<sup>42</sup> Dozens of PRC companies are developing generative AI, including foundational models akin to ChatGPT.<sup>43</sup> U.S. venture capital firms have funded several such companies. It is critical to maintain American leadership in these technologies.

Overall, the five U.S. VCs examined by the Committee have made investments worth more than a billion dollars into PRC artificial intelligence companies that support the CCP’s human rights abuses and surveillance state, as well as PRC artificial intelligence companies that support the People’s Liberation Army. There are other investments highlighted by our investigation that may not fall neatly into one of these categories but represent a threat to American technological leadership or present other significant national security or human rights concerns. The below examples uncovered by the Committee’s investigation represent only a fraction of the broader problem of U.S. venture capital investment into companies that advance PRC human rights abuses or the PLA.

### **1. AI companies blacklisted by the U.S. government for supporting genocide or other human rights abuses**

*GGV, Qualcomm Ventures, Sequoia Capital China, and Walden International have made investments worth more than \$130 million into PRC artificial*

*intelligence companies that have been blacklisted by the U.S. government for supporting the CCP's genocide and human rights abuses.*

Company		U.S. VC	Amount
Megvii	Blacklisted over surveilling and tracking Uyghurs in Xinjiang	GGV	\$ ~18,000,000
Intellifusion	Winner of the Xinjiang Security Excellent Enterprise Award	Walden	\$ ~66,000,000
SenseTime	Develops facial recognition tech used to track Uyghurs	Qualcomm Ventures	\$ 19,000,000
DeepGlint	Partners with Xinjiang police and Huawei on facial recognition	Sequoia Capital China	\$ ~15,000,000
Yitu	Produces AI chips, increasing PRC surveillance abilities	Sequoia Capital China	\$ ~20,000,000
<b>Total</b>			<b>\$ ~138,000,000</b>

Note: Amounts are rounded to the nearest million. GGV's Megvii investment is between \$15-20 million.

### Megvii | GGV

Megvii is a facial recognition company that is on multiple U.S. government red flag lists over its involvement in surveilling and tracking Uyghurs in Xinjiang.<sup>h 44</sup> Starting in February 2019, GGV invested over \$15 million into Megvii.<sup>45</sup> Just a few months before GGV's investment, Megvii touted its products at a Xinjiang "security" expo, and a September 2018 article described the company's debut of its "City Sky Eye 2.0" system at the Xinjiang Police Technical Equipment and Public Security Products Expo.<sup>46</sup> And in 2017, PRC media described Megvii as an "official technical support unit" of Xinjiang's Public Security Video Laboratory.<sup>47</sup>

*"Just a few months before GGV's investment, Megvii touted its products at a Xinjiang 'security' expo."*

GGV told the Committee that around the time it made its investment, U.S. investment banks had been engaged in and working on Megvii's initial public

<sup>h</sup> Megvii builds surveillance technology and has worked with Huawei to test "Uyghur alarms," which use AI to detect members of the minority group in a crowd. *Huawei/Megvii Uyghur Alarms*, IPVM (Dec. 8, 2020, 10:44 A.M.), <https://ipvm.com/reports/huawei-megvii-uygur>. Megvii has also filed multiple patent applications that allow for facial recognition by ethnicity. One application states that the technology can "directly connect to the facial recognition that has been built by the public security organ." The patents were filed in June 2019 and in 2017. *Patenting Uyghur Tracking – Huawei, Megvii, More*, IPVM (Jan. 12, 2021, 7:33 P.M.), <https://ipvm.com/reports/patents-uyghur>.

offering (IPO).<sup>48</sup> It pointed to Megvii's publicly available IPO prospectus, which stated that its technology was intended for "civil purposes," not human rights abuses.<sup>49</sup>

The year that GGV made the investment, roughly two-thirds of Megvii's revenue came from PRC surveillance projects.<sup>50</sup> GGV's internal memorandum dated November 2018 repeatedly and favorably notes that Megvii technology is used by PRC government bodies including the CCP's Ministry of Public Security.<sup>51</sup> The memorandum states that AI public security applications are experiencing "explosion growth" in the PRC, as the PRC government invests in projects such as Safe City and Smart City Brain.<sup>52</sup> Both are tools of the PRC's digital authoritarianism that it has exported abroad.<sup>53</sup> In its memo, GGV did not note the potential (or actual) abuse of Megvii's technology as an investment risk.<sup>i</sup> <sup>54</sup> Since investing, GGV has sought to divest from Megvii but has faced difficulties in part due to limited market appetite for purchasing the shares.<sup>55</sup>

### Intellifusion | Walden International

Intellifusion develops facial recognition technology that is used in Xinjiang for "anti-terrorism solutions," according to PRC media.<sup>56</sup> "Anti-terrorism" is often used in the PRC as a euphemism for genocide against Uyghurs.<sup>57</sup> Walden International made RMB investments worth more than \$65 million into Intellifusion from 2018 to February 2020.<sup>58</sup> The Commerce Department added Intellifusion to its Entity List in June 2020 because of its involvement in human rights abuses in Xinjiang.<sup>59</sup>

A Walden International investment director reportedly first discovered Intellifusion at a road show in 2016; he was "deeply impressed" in part because the company was focused on public security applications of facial recognition.<sup>60</sup> In 2017, Intellifusion won the Xinjiang Security Excellent Enterprise Award.<sup>61</sup> The company's "DeepEye" facial recognition system can purportedly "recognize a suspect from a million people in just one second."<sup>62</sup>

Walden's internal investment memo on Intellifusion praises the company's successful work with PRC police forces.<sup>63</sup> Intellifusion's expansion into Xinjiang, the memo states, is a "pro" of the investment.<sup>64</sup> A potential con, the memo notes, is fierce competition from companies including Hikvision, SenseTime, Megvii, and Yitu, all of which are on U.S. government red flag lists over their role then the Uyghur genocide.<sup>65</sup>

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*"Walden's internal investment memo on Intellifusion praises the company's successful work with PRC police forces."*

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<sup>i</sup> GGV told the Committee it was not aware of any abuse of Megvii's technology as an investment risk at the time.

## SenseTime | Qualcomm Ventures

SenseTime is one of the largest facial recognition companies in the PRC. It is on two U.S. government red flag lists over its role in human rights abuses against Uyghurs.<sup>66</sup> Qualcomm Ventures invested \$9.5 million into SenseTime in 2017, and another \$9.5 million in 2018.<sup>67</sup> This investment occurred before Qualcomm Ventures enhanced its due diligence controls to include “reviewing the potential investment entity’s customer list to assess whether the entity’s product has military end uses.”<sup>68</sup> Qualcomm Ventures’ internal pitch deck for the investment did not include human rights concerns among the fund’s risk considerations.<sup>69</sup> The deck highlighted security surveillance as a current application of the technology, including SenseTime’s provision of face and vehicle recognition to “seven of top ten surveillance system integrators.”<sup>70</sup>

Qualcomm Ventures told the Committee that it divested from SenseTime after the company was blacklisted by the U.S. government; the divestiture was complete by November 2022.<sup>71</sup> Still, SenseTime was first blacklisted in 2019—and in November 2021, Qualcomm Ventures congratulated SenseTime on its Hong Kong IPO approval and said that the company is “creat[ing] a better #AI empowered future through #innovation.”<sup>72</sup>

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*“Qualcomm Ventures’ internal pitch deck for the investment did not include human rights concerns . . . [and instead] highlighted security surveillance as a current application of the technology.”*

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## DeepGlint | Sequoia Capital China

DeepGlint is a Beijing-based company founded in 2013 that develops image analysis and pattern recognition technologies.<sup>73</sup> Starting in April 2014, Sequoia Capital China invested almost \$15 million into DeepGlint through a fund with U.S. limited partners.<sup>74</sup>

After Sequoia Capital China’s early investment, DeepGlint built software that can detect Uyghurs and partnered repeatedly with Xinjiang police.<sup>75</sup> For example, DeepGlint co-founded a lab with the Urumqi (the capital of Xinjiang) police.<sup>76</sup> DeepGlint also partnered with Huawei to develop a facial recognition tool used in Xinjiang.<sup>77</sup> <sup>j</sup>

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<sup>j</sup> The co-developed tool is known as the “One Person One File” facial recognition solution. Eva Dou, *Documents Link Huawei to China’s Surveillance Programs*, WASH. POST (Dec. 14, 2021, 4:00 A.M.), <https://www.washingtonpost.com/world/2021/12/14/huawei-surveillance-china/>.

The Commerce Department added DeepGlint to the Entity List in 2021 because of its involvement in PRC human rights abuses in Xinjiang.<sup>78</sup> Sequoia Capital China exited the investment in the spring and summer of 2023, after DeepGlint went public in 2022.<sup>79</sup>

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*“After Sequoia Capital China’s early investment, DeepGlint built software that can detect Uyghurs, and partnered repeatedly with Xinjiang police.”*

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### **Yitu | Sequoia Capital China (now HongShan)**

Yitu Technology is an AI company whose facial recognition technology is used by the PRC police.<sup>80</sup> The company also produces its own AI chips and provides “intelligent healthcare.”<sup>81</sup> Sequoia Capital China invested roughly ¥85 million RMB and \$6 million (\$20 million total) into Yitu starting in June 2014.<sup>82</sup> <sup>k</sup>

Yitu partners with companies including China Unicom, which was designated in 2022 as a threat to national security by the Federal Communications Commission and in 2021 as a Chinese military company by the Department of Defense, and the General Hospital of the People’s Liberation Army.<sup>83</sup>

In October 2019, the Commerce Department added Yitu to the Entity List over its involvement in human rights abuses against Uyghurs.<sup>84</sup> In 2021, the Treasury Department added Yitu to an investment blacklist over those abuses.<sup>85</sup> Sequoia Capital China did not exit the USD investment.

## **2. AI companies supporting the PRC’s surveillance state or materially associated with Uyghur forced labor**

*GSR Ventures and Walden International have made investments worth more than \$20 million in PRC artificial intelligence companies whose activities support the PRC’s surveillance state or are materially associated with Uyghur forced labor.*

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<sup>k</sup> RMB investment amounts are converted to USD at the RMB-to-USD exchange rate as of the initial date of investment.

Company		U.S. VC	Amount
Bochuang	Tied to sanctioned Xinjiang paramilitary force	Walden	\$ 9,000,000
Longmao Data	Supports numerous Entity Listed companies	GSR	Unknown
Moqi	Fingerprint scanners startup that sells to Ministry of Public Security	GSR	\$ ~15,000,000
<b>Total</b>			<b>\$ ~24,000,000</b>

Note: Amounts are rounded to the nearest million. GSR's Moqi investment is between \$10-20 million.

### Beijing Bochuang Linkage Technology Co., Ltd. | Walden International

Beijing Bochuang Linkage Technology Co., Ltd. (Bochuang) is a PRC smart agriculture company that provides equipment to cotton farmers in Xinjiang.<sup>86</sup> The import of Xinjiang cotton is banned under U.S. law due to the CCP's ongoing genocide there and its use of Uyghur forced labor in the cotton industry.<sup>87</sup>

Walden International made RMB investments worth over \$9 million into the company between March 2018 and November 2020. Walden's internal investment memo for the company highlights the PRC's stated goal in its 14<sup>th</sup> Five Year Plan of "agricultural digitalization."<sup>88</sup>

Bochuang has close ties to Xinjiang. When the company launched a joint venture with another PRC company in 2017, the Deputy Director of the Science and Technology Bureau of the Eighth Division of Xinjiang Production and Construction Corps (XPCC)—a paramilitary organization that has been sanctioned because it perpetrates genocide against Uyghurs—attended the launch.<sup>89</sup> Bochuang's partner in the joint venture, meanwhile, is tied to the PLA.<sup>90</sup> One of its wholly owned subsidiaries is a PLA contractor with over 15 known bids on PLA contracts.<sup>91</sup> Another of the company's majority-

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*"When Bochuang launched a joint venture with another PRC company, the Deputy Director of a sanctioned paramilitary organization blacklisted for its participation in the Uyghur genocide attended the launch."*

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<sup>1</sup> Bochuang exhibited its smart tractors at the Xinjiang Agricultural Machinery Expo in 2022. News coverage states that, "For many years, Bochuang [ . . . ] has been actively promoting digital intelligent technologies for Xinjiang." *Xinjiang Agricultural Machinery Expo Bochuang Linked Smart Agricultural Machinery is Popular*, ORIENTAL NET (July 8, 2022, 10:30 A.M.), [https://web.archive.org/web/20231101190039/https://webcache.googleusercontent.com/search?q=cach e:4aSywmmmb1REJ:www.xhby.net/sy/kj/202207/t20220708\\_7609849.shtml&hl=en&gl=us](https://web.archive.org/web/20231101190039/https://webcache.googleusercontent.com/search?q=cach e:4aSywmmmb1REJ:www.xhby.net/sy/kj/202207/t20220708_7609849.shtml&hl=en&gl=us).

owned subsidiaries won a Strategic Support Force bid in 2021 related to drones.<sup>92</sup> The joint venture’s office appears to be in the Aviation Industry Corporation of China (AVIC) Technology Building in Beijing.<sup>93</sup> AVIC is a designated PRC military company.<sup>94</sup>

Bochuang’s founder received his undergraduate and master’s degrees at Beihang University, which is one of the PRC’s ‘Seven Sons of National Defense’ and is on the Commerce Department Entity List.<sup>95</sup> He studied under a professor known as the “honorary director” of the Beihang Robotics Research Institute.<sup>96</sup> At least one company that supports the PLA has grown out of the research at the Institute.<sup>97</sup>

### Longmao Data | GSR Ventures

GSR Ventures has invested into Longmao Data, a company that provides data services for AI platforms, helping them train their models.<sup>98</sup> GSR did not provide the amount invested for this investment. The company touts intelligent security as a core use for its data.<sup>99</sup> Longmao has a long list of problematic partners. Longmao counts Entity Listed companies Megvii, SenseTime, and iFlyTek as customers, most likely helping these companies train their AI models.<sup>100</sup> Other customers include China Mobile—which is on multiple U.S. red flag lists, YMTC—a semiconductor company on the Commerce Department’s Entity List, and the University of Electronic Science and Technology of China—a major PRC defense research institution on the Entity List.<sup>101</sup>

### Moqi | GSR Ventures

Moqi is a biometrics company that specializes in fingerprint scanners.<sup>102</sup> GSR invested between \$10 and \$20 million into Moqi starting in 2018 and holds a seat on the company’s board.<sup>103</sup> GSR touted Moqi’s ties to the PRC’s police agency, the Ministry of Public Security (MPS), in its updates to limited partners.<sup>104 m</sup>

Moqi has presented its products at PRC “security” conferences alongside companies like Intellifusion.<sup>105</sup> It won multiple awards at the China International Public Security Expo in 2021.<sup>106</sup> Moqi has an array of problematic partners including Inspur Information, which is owned by the

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*“GSR touted Moqi’s ties to the PRC’s police agency, the Ministry of Public Security (MPS), in its updates to limited partners.”*

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<sup>m</sup> For example, in a 2018 update, GSR highlighted Moqi’s strategic partnership with the Third Research Institute of the MPS. The Third Research Institute focuses on “smart police research” and network security. SOS INTERNATIONAL, BLUE HERON: SEMICONDUCTOR MANUFACTURING INTERNATIONAL CORPORATION 23 (2020), [https://www.jcapitalresearch.com/uploads/2/0/0/3/20032477/blue\\_heron\\_smic\\_footnoted.pdf](https://www.jcapitalresearch.com/uploads/2/0/0/3/20032477/blue_heron_smic_footnoted.pdf). It also reportedly appears to be co-located with a PLA unit central to cyberattacks against the United States. *Id.*

blacklisted CCP military company Inspur.<sup>107</sup> In 2022, Sugon—a blacklisted company with ties to both the PLA and Xinjiang—also listed Moqi as a “cooperation partner.”<sup>108</sup> <sup>n</sup>

**3. Sequoia’s billion+ dollar investment into ByteDance, which supports the PRC’s digital authoritarianism and threatens national security**

*Sequoia Capital and Sequoia Capital China have invested over one billion dollars into ByteDance, which supports the PRC’s digital authoritarianism and presents a threat to U.S. national security.*

Company		U.S. VC	Amount
ByteDance	Collaborates with Entity Listed companies, disseminates CCP propaganda, app hosts Xinjiang Internet Police	Sequoia Capital China	\$ 1,411,000,000
		GGV	\$ 600,000
<b>Total</b>			<b>\$ 1,411,600,000</b>

Note: Amounts are rounded to the nearest million. GGV has exited its ByteDance investment.

Sequoia Capital and Sequoia Capital China have collectively invested over \$1.4 billion dollars into ByteDance starting in March 2014, helping facilitate the company’s overseas expansion. Unfortunately, Sequoia is far from alone; other major American VC firms and other investors hold large stakes in ByteDance, and some of these investors retain board seats.<sup>109</sup> Neil Shen, who headed Sequoia China and now heads HongShan, was and is a ByteDance board member.<sup>110</sup>

*“Sequoia Capital and Sequoia Capital China have collectively invested over \$1.4 billion dollars into ByteDance starting in March 2014.”*

ByteDance, the parent company of TikTok, has collaborated with Megvii, iFLYTEK, SenseTime, and other companies implicated in the Uyghur genocide.<sup>111</sup> ByteDance also works with Xinjiang authorities and helps disseminate propaganda about the region.<sup>112</sup> In 2018, Douyin—the

PRC version of TikTok that is owned by ByteDance—actively welcomed Xinjiang Internet Police onto the app.<sup>113</sup> At the welcome ceremony, an MPS official said that

<sup>n</sup> The Commerce Department added Sugon to the Entity List in 2019. Addition of Entities to the Entity List and Revision of an Entry on the Entity List, 84 Fed. Reg. 29371 (June 24, 2019). The Treasury Department added Sugon to the NS-CMIC list in December 2021. Press Release, U.S. Dep’t of the Treasury, Treasury Identifies Eight Chinese Tech Firms as Part of the Chinese Military-Industrial Complex (Dec. 16, 2021).

Internet police will use Douyin to “enhance the Internet social governance capabilities of public security agencies.”<sup>114</sup> The next year, ByteDance signed a strategic cooperation agreement with the Ministry of Public Security’s Press and Publicity Bureau to improve PRC police departments’ “influence and credibility.”<sup>115</sup> In addition to helping the PRC spread propaganda, ByteDance has reportedly worked with CCP officials to surveil Hong Kong protestors.<sup>116</sup>

ByteDance’s U.S. application, TikTok, also poses national security risks. For example, the Secretary of ByteDance’s CCP committee, Zhang Fuping, also serves as ByteDance’s Editor-in-Chief and Vice President

and has vowed that the CCP committee would “take the lead” across “all product lines and business lines,” which include TikTok.<sup>117</sup> *Forbes* reported that TikTok’s internal platform, which houses its most sensitive information, was inspected in person by CCP cybersecurity agents in the lead-up to the CCP’s 20<sup>th</sup> National Congress.<sup>118</sup> In addition, in leaked audio from more than 80 internal TikTok meetings, China-based employees of ByteDance repeatedly accessed nonpublic data about U.S. TikTok users, including the physical locations of specific U.S. citizens.<sup>119</sup>

ByteDance also has ties to the PRC’s defense ecosystem. It is a founding member of the Beijing Academy of Artificial Science, which emerged from a PRC state plan that emphasizes the importance of military-civil fusion in AI.<sup>120</sup> ByteDance researchers have also worked with PLA-linked universities.<sup>121</sup>

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*“ByteDance signed a strategic cooperation agreement with the Ministry of Public Security’s Press and Publicity Bureau to improve PRC police departments’ ‘influence and credibility.’”*

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supported the acquisition.<sup>123</sup> GGV then invested into ByteDance in 2020.<sup>124</sup> It exited the investment in 2023.<sup>125</sup>

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*“ByteDance has collaborated with Megvii, iFlytek, SenseTime, and other companies implicated in the Uyghur genocide.”*

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Several other U.S. firms have contributed to the rise of TikTok and ByteDance. For example, GGV was an early investor in and board member of Musical.ly, co-leading two of the company’s funding rounds.<sup>122</sup> ByteDance acquired Musical.ly in 2017 and merged it into TikTok. GGV’s lead partner on the investment

#### 4. AI companies blacklisted by the U.S. government for supporting the PLA

*Sequoia Capital China and Walden International have made investments worth more than \$190 million into PRC artificial intelligence companies now blacklisted by the U.S. government for their support of the PLA.*

Company		U.S. VC	Amount
Qihoo 360	Leads Cyberspace Security Military-Civil Integration Innovation Center	Sequoia Capital China	\$ ~48,000,000
BGI	Collects genetic info globally & collaborates with PLA	Sequoia Capital China	\$ ~32,000,000
4Paradigm	Contracts with the PLA's Armored Forces Academy	Sequoia Capital China	\$ ~81,000,000
DJI	Produces drones used by the PLA	Sequoia Capital China Walden	\$ ~36,000,000 Unknown
<b>Total</b>			<b>\$ ~197,000,000</b>

Note: Amounts are rounded to the nearest million.

#### Qihoo 360 | Sequoia Capital China (now HongShan)

Established in 2005, Qihoo 360 is a military-civilian PRC enterprise focused on cybersecurity that has been blacklisted by the Commerce Department and Defense Department over its support for the PLA.<sup>126</sup> In 2006, Sequoia Capital China invested \$12 million and roughly ¥291 million (\$48 million total) into Qihoo 360. The USD fund that it used to do so had a variety of U.S. limited partners. Sequoia Capital China exited its USD investment in June 2015; it only partially exited the RMB investment.<sup>127</sup> Neil Shen remained on Qihoo's board until 2020.<sup>128</sup>

In 2017, Qihoo 360 was announced as the leader of the PRC's Cyberspace Security Military-Civil Integration Innovation Center, the goal of which is to strengthen the PRC's cyber defenses.<sup>129</sup> Qihoo 360 also signed a strategic cooperation agreement with an office of the State Administration of Science, Technology, and Industry for National Defense (SASTIND), which manages China's defense industry.<sup>130</sup> PRC media reported at the time that the agreement is intended to "export the most advanced technical

*"Qihoo 360 was announced as the leader of the PRC's Cyberspace Security Military-Civil Integration Innovation Center, the goal of which is to strengthen the PRC's cyber defenses."*

capabilities to the cyber defense industry and create a new model of military-civilian integration in cyberspace.”<sup>131</sup> ◦

Relatedly, Unisound—a 2015 Qualcomm Ventures investment—signed a strategic cooperation agreement with Qihoo 360 in May 2023 under which the two companies work together on AI advancement.<sup>132</sup> Unisound has also signed a strategic cooperation agreement with China Construction Electronics Information Technology Co., a PLA supplier.<sup>133</sup>

### BGI | Sequoia Capital China

BGI is a PRC genomics company that has partnered with the PLA on genetic research since at least 2010.<sup>134</sup> In one example, a BGI researcher collaborated with a PLA university that is on the Entity List to sequence human genomes using a PLA-built supercomputer.<sup>135</sup> BGI operates the China National GeneBank, a massive government-funded gene repository that includes genetic data from people around the world.<sup>136</sup> Sequoia Capital China invested roughly \$32 million into BGI Tech, a BGI subsidiary, starting in 2013 and exited that investment in November 2020.<sup>137</sup>

Sequoia China’s internal investment memo touted BGI’s acquisition of U.S. company Complete Genomics.<sup>138</sup> p American scientists expressed concern at the time that the acquisition would weaken U.S. sequencing companies, according to public reporting.<sup>139</sup> Others expressed privacy and national security concerns that the deal would give BGI greater access to Americans’ DNA.<sup>140</sup> Sequoia China’s investment memo is dated September 2012, the same month the acquisition was announced.<sup>141</sup>

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*“BGI [. . .] has partnered with the PLA on genetic research.”*

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The Commerce Department added BGI Tech and two other BGI subsidiaries to the Entity List in March 2023, stating that “their collection and analysis of genetic data poses a significant risk of contributing to monitoring and surveillance by the government of China.”<sup>142</sup> BGI Tech parent company BGI Genomics has been designated as a Chinese military company by the Department of Defense.<sup>143</sup>

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◦ Further, Qihoo collaborates closely with Beihang University, one of the PRC’s seven sons of national defense. The two established a “military-civilian integration big data analysis and application research center,” among other projects. See Li Qin, *360 and Beihang University Jointly Built a Laboratory, Amplifying a “Signal” They Had Long Said*, LEIPHONE (Jan. 17, 2018, 3:50 P.M), [https://web.archive.org/web/2023112173549/https://webcache.googleusercontent.com/search?q=cach e:VsquWa3JWfIJ:https://m.leiphone.com/category/gbsecurity/KU0DaxeR1kXBk4KA.html&sca\\_esv=581742246&hl=en&gl=us&strip=1&vwsr=0](https://web.archive.org/web/2023112173549/https://webcache.googleusercontent.com/search?q=cach e:VsquWa3JWfIJ:https://m.leiphone.com/category/gbsecurity/KU0DaxeR1kXBk4KA.html&sca_esv=581742246&hl=en&gl=us&strip=1&vwsr=0).

¶ The 2012 memo states, “Acquisition of CGI enables BGI’s fast expansion to whole human genome services with highest accuracy and lowest cost among competitors.”

#### 4Paradigm | Sequoia Capital China (now HongShan)

4Paradigm is a PRC AI company and PLA supplier that is on the U.S. Commerce Department’s Entity List.<sup>144</sup> Sequoia Capital China began investing in 4Paradigm in March 2015 and has invested ¥466 million (\$76 million) and roughly \$5 million using a fund with U.S. limited partners.<sup>145</sup> It did not exit those investments.<sup>146</sup>

4Paradigm has contracted with the PLA’s Armored Forces Academy to provide command decision-making software.<sup>147</sup> The company also counts PRC defense conglomerate China Electronics Technology Group Corporation (CETC) and Suzhou Nuclear Power Research Institute—which is on the Commerce Department’s Entity List—as customers.<sup>148</sup>

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*“4Paradigm has contracted with the PLA’s Armored Forces Academy to provide command decision-making software.”*

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#### DJI | Sequoia Capital China & Walden International

DJI is a PRC drone manufacturer that the U.S. government blacklisted over its ties to the PLA and involvement in human rights abuses.<sup>149</sup> Sequoia Capital China invested \$36 million into DJI starting in August 2014. In December 2021, the Treasury Department identified DJI as part of the Chinese Military-Industrial Complex for providing drones to the Xinjiang Public Security Bureau.<sup>150</sup> In October 2022, the Department of Defense designated DJI a Chinese military company.<sup>151</sup> Sequoia China exited the investment in 2019 and 2021. Walden International has also invested in DJI, and one of its partners reportedly served as DJI’s executive vice chairman of innovation.<sup>152</sup>

As early as 2017, the U.S. Army began discontinuing its use of DJI drones due to concerns related to “cyber vulnerabilities.”<sup>153</sup> In 2019, the 52<sup>nd</sup> Research Institute of China Electronics Technology Group (CETC) sold DJI drones to the PLA.<sup>154</sup> CETC is a state-owned defense conglomerate that leverages civilian technology to supply the PLA.<sup>155</sup> The 52<sup>nd</sup> Research Institute is on the Commerce Department’s Entity List due to its support of PLA modernization.<sup>156</sup>

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*“The Treasury Department identified DJI as part of the Chinese Military-Industrial Complex for providing drones to the Xinjiang Public Security Bureau.”*

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DJI has received investments from state-owned entities including China Chengtong Holdings Group, which seeks to “increase capital support for major national strategies such as the Belt and Road project and military-civilian fusion.”<sup>157</sup>

## 5. AI companies supporting the PLA or its contractors

*The five U.S. venture capital firms the Committee examined invested more than \$140 million to PRC artificial intelligence companies that support the PLA or its contractors.*

Company		U.S. VC	Amount
NJTF	Works with “domestic military units” on software contracts	GGV	\$ ~13,000,000
AirLook	Describes itself as a “military-civilian integration enterprise”	GGV	\$ ~ 8,000,000
EverSec	Contracts with the PLA on cybersecurity	Sequoia Capital China	\$ ~13,000,000
i-Space	Avowed proponent of military-civil fusion	Sequoia Capital China	\$ ~11,000,000
7Invensun	Develops eye-tracking tech with PLA	Qualcomm Ventures	\$ ~1,000,000
LandSpace	Contracts with the PLA Central Military Commission	Sequoia Capital China	\$ ~26,000,000
Hangzhou YuShu	Collaborates with state-owned ballistic missile manufacturer	Sequoia Capital China	\$ ~4,000,000
HAI Robotics	Bid on PLA contract; works with Megvii and Xinjiang government	Sequoia Capital China	\$ ~48,000,000
		Walden	Unknown
Nanjing Black Lake	Sells to blacklisted companies including NORINCO, a state-owned defense manufacturer	GSR	\$ ~15,000,000
		GGV	Unknown
SinoITS	Runs an AI lab with PLA-linked university	Qualcomm Ventures	\$ ~3,000,000
Aplux	Collaborates with PRC defense university on AI lab	Qualcomm Ventures	\$ 4,000,000
ObjectEye	Incubated from PRC AI hub that developed PLA wargaming system	GSR	Unknown
Alibaba	Provides cloud services to PLA contractors	GGV	\$ ~8,000,000
<b>Total</b>			<b>\$ ~154,000,000</b>

Note: Amounts are rounded to the nearest million. GGV's NJTF investment is between \$10-15 million. GGV's AirLook investment is between \$5-10 million. GSR's Nanjing Black Lake investment is between \$10-20 million. GGV's Alibaba investment is between \$5-10 million.

## NJTF | GGV (now Jiyuan Capital)

GGV, through its associated RMB funds, has made RMB investments worth between \$10 and \$15 million into NJTF, a software firm focused on industries including shipbuilding and aerospace.<sup>158</sup> ¶ ZTE—which the U.S. has designated as a national security threat, and which has sold restricted U.S.-made equipment to foreign adversaries like Iran and North Korea—is also an investor.<sup>159</sup>

NJTF has worked with an array of PLA universities and entities; it has also bid on at least one PLA project.<sup>160</sup> Descriptions of the company tout its work with “domestic military units.”<sup>161</sup>

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*“NJTF has worked with an array of PLA research institutes and entities.”*

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As for aerospace applications, NJTF states on its website that it has collaborated with PLA entities including: Beihang University, Northwestern Polytechnical University, Nanjing University of Aeronautics and Astronautics, Harbin Institute of Technology, China Aerospace Science and Technology Corporation, and Aviation Industry Corporation of China, among others.<sup>162</sup> In the maritime domain, NJTF lists the China State Shipbuilding Corporation’s (CSSC) 702<sup>nd</sup> Shanghai Branch as a partner.<sup>163</sup> CSSC’s 702<sup>nd</sup> Research Institute and others are on the Commerce Department Entity List “for acquiring and attempting to acquire U.S.-origin items in support of programs for the People’s Liberation Army.”<sup>164</sup>

## AirLook | GGV

GGV has made RMB investments worth between \$5 and \$10 million into AirLook, a drone company that is self-avowedly a “military-civilian integration enterprise.”<sup>165</sup> The company’s CEO has stated that AirLook has “created a path for civilian use of military technology” and “enjoyed the benefits of the country’s policies that encourage military-civilian integration.”<sup>166</sup> Its core team is “composed of two people, one is from the military drone team of the aerospace group, and the other is from the Internet company.”<sup>167</sup>

AirLook has a strategic cooperation agreement with China Aerospace Science and Industry Corporation’s (CASIC) Space Data Service Center, which provides satellite data services and drone aerial photography to the PRC government and others.<sup>168</sup> The two parties agreed among other things to “collect, analyze, and process a range of data sources to support government departments and research institutes.”<sup>169</sup> CASIC is a major PLA contractor that is blacklisted by the U.S. government.<sup>170</sup>

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¶ GGV’s associated RMB funds were overseen by a GGV then-managing partner. At least two additional GGV partners were dual-hatted, working in GGV’s USD and RMB funds.

## EverSec | Sequoia Capital China (now HongShan)

EverSec is a PRC cybersecurity company and PLA supplier.<sup>171</sup> Sequoia Capital China began investing in EverSec in April 2016. It has invested around ¥87 million (\$13 million) into the company.

EverSec serves as a “Cybersecurity Emergency Service Support Unit” for the PRC government and has contracted with the PLA to develop an AI-enabled “cyber threat intelligent sensing and early warning platform.”<sup>172</sup> In addition, EverSec won a bid in 2019 for a malware-related cyber project from the PLA’s Strategic Support Force.<sup>173</sup> It also won a data platform software-related bid for the PLA Air Force in 2020.<sup>174</sup>

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*“EverSec has contracted to develop an AI-enabled ‘cyber threat intelligent sensing and early warning platform’ for the PLA.”*

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## i-Space | Sequoia Capital China (now HongShan)

i-Space is a “commercial” space company whose president, Peng Xiaobo, is an enthusiastic proponent of military-civil fusion.<sup>175</sup> Sequoia Capital China began investing in i-Space in August 2020 and has invested roughly ¥73 million (\$11 million).

i-Space also participated in conferences promoting military-civil fusion. Coverage of the company’s attendance at one conference states:

As a useful complement to China’s aerospace industry and an important participant in the national military-civilian fusion development strategy, Interstellar Glory is committed to . . . the implementation of the national military-civilian fusion development strategy.<sup>176</sup>

In 2018, i-Space was selected as a top ten commercial aerospace company on the “2018 Military Industry Ranking.”<sup>177</sup>

## 7Invensun | Qualcomm Ventures

7Invensun is a PRC company that develops eye-tracking and facial identification technologies. Qualcomm Ventures invested \$1.2 million into 7Invensun in 2013 and divested by March 2022.<sup>178</sup>

The company has worked with a variety of PLA entities. In 2018, 7Invensun co-authored two pieces with a subsidiary of the blacklisted PRC military company China Aerospace Science and Industry Corporation.<sup>179</sup> 7Invensun’s website touted its work with the PLA’s Air Force Aviation University on technology that tracks pilot eye movements.<sup>180</sup> The website also featured 7Invensun’s work with China

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*“Qualcomm Ventures’ internal investment memo notes that the company’s CEO is an expert in fighter jet simulation systems.”*

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Academy of Launch Vehicle Technology (CALT), a CCP military company whose research institutes have been on the Commerce Department’s Entity List since 2001.<sup>181</sup> Qualcomm Ventures’ internal investment memo notes that 7Invensun’s CEO is an expert in fighter jet simulation

systems and a former faculty member at Shenyang Aerospace University.<sup>182</sup> Shenyang Aerospace University builds PLA aircraft.<sup>183</sup>

### **LandSpace | Sequoia Capital China (now HongShan)**

LandSpace is a PRC aerospace company that contracted with the PLA Central Military Commission in fall of 2020.<sup>184</sup> Sequoia Capital China began investing in LandSpace in August 2020 and has invested around ¥163 million (\$26 million). In a 2018 post on its website, a LandSpace investor said the company “promotes the active and effective transformation of high-end military technologies in civilian aerospace and other fields.”<sup>185</sup>

### **HangZhou YuShu Technology | Sequoia Capital China (now HongShan)**

HangZhou YuShu is a robot developer that has contracted with China Aerospace Science and Technology Corporation, a state-owned enterprise that produces ballistic missiles and space launch vehicles.<sup>186</sup> China Aerospace entities are on Commerce and Treasury Department blacklists.<sup>187</sup> In 2020, HangZhou YuShu won a bid to provide China Aerospace with robot technology.<sup>188</sup> The company received roughly ¥27 million (\$4 million) from Sequoia Capital China, with its first investment coming in December 2019.

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*“HangZhou YuShu contracted with a state-owned enterprise that produces ballistic missiles and space launch vehicles.”*

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### **HAI Robotics | Sequoia Capital China (now HongShan) & Walden International**

HAI Robotics is a warehouse robotics company that sought to contract with state-owned defense conglomerate China Aerospace Science and Technology Corporation in 2021.<sup>189</sup> Sequoia Capital China invested ¥307 million (\$48 million) into the company starting in May 2021. Walden International also invested in HAI Robotics. The company’s chief consultant is the “Godfather of DJI,” according to its website, referring to the PRC drone company on multiple U.S. government red flag lists.<sup>190</sup> In addition, HAI has ties to entities implicated in forced labor. The company’s technology appears to power a Xinjiang government-owned “smart warehouse.”<sup>191</sup> HAI has also signed a strategic cooperation agreement with Megvii, which the U.S. has designated for involvement in human rights abuses.<sup>192</sup>

## Nanjing Black Lake Network Technologies | GSR & GGV

Black Lake is a software company that has collaborated with several PLA suppliers. GSR invested between \$10 and \$20 million into the company from 2018 and 2021 and holds a seat on the company's board. GGV has also led a funding round into the company.<sup>193</sup> Black Lake, which

develops "intelligent manufacturing" software for factories, counts blacklisted PRC state-owned defense company NORINCO as a customer.<sup>194</sup> Huawei Cloud is one of Black Lake's close partners.<sup>195</sup> The company also reportedly works with China Mobile, China Unicom, Huawei, and other companies that are blacklisted by the United States.<sup>196</sup>

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*"Black Lake counts blacklisted PRC state-owned defense company NORINCO as a customer."*

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## SinoITS | Qualcomm Ventures

SinoITS, an AI startup focused on vehicle and pedestrian recognition, received \$2.8 million from Qualcomm Ventures starting in April 2021. SinoITS has a joint artificial intelligence laboratory with the Beijing University of Posts and Telecommunications, a university that is on the Commerce Department's Entity List.<sup>197</sup>

The university is a member of numerous military-civil fusion alliances, maintains top-secret security credentials, and conducts cyber research for the PLA.<sup>198</sup> The stated research focuses of the lab include pedestrian recognition research, surveillance video analysis, and big data analysis for public security.<sup>199</sup>

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*"SinoITS has a joint artificial intelligence laboratory with a university that is a member of numerous military-civil fusion alliances and conducts cyber research for the PLA."*

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## Aplux | Qualcomm Ventures

Aplux, a PRC company focused on intelligent Internet of Things technologies, received a \$4 million investment from Qualcomm Ventures in December 2022.<sup>200</sup> Aplux has created a joint artificial intelligence laboratory with the University of Electronic Science and Technology of China (UESTC).<sup>201</sup> The lab will "conduct cutting-edge exploration" on internet of things technology.<sup>202</sup> UESTC is on the Commerce Department's Entity List and is a major PRC defense industry university.<sup>203</sup>

## ObjectEye | GSR Ventures

GSR Ventures invested an unknown total in RMB in ObjectEye, an artificial intelligence company purportedly focused on intelligent transportation and smart textiles. The company was "incubated from the National Key Laboratory of Pattern Recognition of the Institute of Automation, Chinese Academy of Sciences."<sup>204</sup> The Chinese Academy of Sciences' Institute of Automation (CASIA)

is a leading PRC state-owned artificial intelligence research and development hub. Companies like Huawei, Alibaba, and Baidu collaborate with CASIA, as do state security applications, which “utilize CASIA’s intelligent video surveillance and face recognition technologies.”<sup>205</sup> The founder of ObjectEye, Jinqiao Wang, is an artificial intelligence researcher at CASIA.<sup>206</sup> CASIA has developed an AI system used in PLA wargaming.<sup>207</sup>

### Alibaba | GGV Capital

Alibaba is one of the PRC’s leading AI companies and an e-commerce provider. GGV invested between \$5 and \$10 million into Alibaba starting in 2003, a few years after its founding, and exited the investment in 2012. In November 2017, the PRC Ministry of Science and Technology selected Alibaba’s cloud arm as part of its “national team” to lead the PRC’s AI development.<sup>208</sup> That year, Alibaba’s cloud arm also secured a military-civil fusion cooperation agreement with NORINCO, a critical state-owned PLA contractor, and an agreement with the PRC’s National University of Defense Technology.<sup>209</sup>

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*“According to one report, PRC intelligence agencies task major PRC tech companies like Alibaba to process valuable data for them, with such coordination occurring ‘daily.’”*

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Alibaba’s cloud arm has been investigated by the U.S. government for national security risks, including how it stores personal information and intellectual property.<sup>210</sup> Belgium’s intelligence service has also reportedly been monitoring Alibaba for potential espionage activities.<sup>211</sup> According to one report, PRC intelligence agencies task major PRC tech companies including Alibaba to process valuable data for them, with such coordination occurring “daily.”<sup>212</sup>

## 6. Generative AI companies

*U.S. VCs firms have made meaningful investments into generative artificial intelligence companies, a technology critical to national security.*

Company		U.S. VC	Amount
Moonshot AI	Develops AI foundation models	Sequoia Capital China	\$ 30,000,000
Surreal	Focuses on deepfake generation	Sequoia Capital China	\$ 2,000,000
<b>Total</b>			<b>\$ 32,000,000</b>

Note: Amounts are rounded to the nearest million.

## **Moonshot AI | Sequoia Capital China (now HongShan)**

The PRC government views generative artificial intelligence—a type of AI model that produces content when prompted by the user, such as text, video, or images—as critical to its national security.<sup>213</sup> Starting in March 2023, Sequoia China invested \$30 million into Beijing Dark Side of the Moon Technology Co., known as Moonshot AI. Founded in 2023, Moonshot AI develops large-scale AI foundation models.<sup>214</sup> Shortly after its founding, Moonshot launched Kimi Chat, which a PRC newspaper described as “the first smart assistant product that supports the input of 200,000 Chinese characters, which is the longest context input length supported by the large model service that can be used in the global market.”<sup>215</sup> According to a news report, “[T]he core members of its founding team participated in the research and development of Google Gemini, Google Bard, Pangu NLP, Wudao and other large models, and a number of core technologies . . . adopted by mainstream products such as Google PaLM, Meta LLaMa, and Stable Diffusion.”<sup>216</sup>

## **Surreal | Sequoia Capital China (now HongShan)**

In addition to foundation models, PRC companies are developing generative artificial intelligence tools that produce deepfakes. Deepfakes are videos that are generated or altered using artificial intelligence to make people appear to say or do things they did not in fact do or say. Deepfakes pose a national security threat because they can be used to spread false information or propaganda, to manipulate users to reveal confidential information through fake texts or videos, and for other malicious purposes.<sup>217</sup>

Despite these national security concerns, starting in 2020 Sequoia China invested \$2.2 million in Surreal, a start-up focused on the generation of deepfakes.<sup>218</sup> At the time, Surreal was based in the PRC.<sup>219</sup> Surreal has since “tak[en] measures to distance itself from its Chinese origins.”<sup>220</sup> It is now based in Los Angeles, and has twice renamed itself, first as Movio and now as HeyGen.<sup>221</sup>

HeyGen’s main product is personalized deepfake videos. Sequoia China’s investment in Surreal/HeyGen raises concerns about whether a PRC entity (HongShan) has influence over a U.S.-based company developing technology with significant national security implications. The PRC has a history of censoring content on platforms that have ties to the PRC, such as content about the Uyghur genocide or criticism of the CCP.<sup>222</sup>

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<sup>†</sup> The first federal statute in the United States regarding deepfakes required the Intelligence Community to assess how the PRC may use them for, among other ends, “intelligence or influence operations directed against the United States.” 50 U.S.C. § 3369(a).

## SECTION II – SEMICONDUCTORS

*The five U.S. VCs examined by the Committee have made investments worth more than \$1 billion into more than 150 PRC semiconductor companies.*

Semiconductors are the paradigmatic “dual use” technology: they are a critical component in everything from cars to weapons. The PRC has made it a top priority to edge out U.S. firms and dominate the semiconductor space globally by 2030.<sup>223</sup> Over the last decade, the PRC government has been racing to produce domestic capability across the semiconductor supply chain, including parts where it is dependent on the United States and other nations. U.S. venture capital firms have been helping the PRC accomplish its goal.

In 2014, the PRC introduced state industrial policies to boost semiconductor production domestically.<sup>224</sup> The government offers PRC-based semiconductor companies large subsidies, tax preferences, and other incentives.<sup>225</sup>

But the PRC’s semiconductor expansion strategy is multi-faceted: it also includes acquiring foreign semiconductor firms, establishing joint ventures with foreign semiconductor firms, leveraging open-source technology to develop chips, stealing intellectual property, and seeking to attract talent to the PRC to boost semiconductor production.<sup>226</sup> And, of course, the PRC has also encouraged foreign investment into its many state-funded semiconductor startups.<sup>227</sup> Many U.S. VCs have been more than happy to help, investing alongside state funds such as China’s Integrated Circuit Industry Investment Fund.<sup>228</sup>

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*“U.S. VC investments into PRC semiconductor companies align with the PRC’s stated goal of “establishing a world-leading semiconductor industry” across the semiconductor supply chain.”*

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U.S. VC investments into PRC semiconductor companies align with the PRC’s stated goal of “establishing a world-leading semiconductor industry” across the semiconductor supply chain.<sup>229</sup> The PRC has had mixed success, but U.S. capital has played a role in the success it has experienced. From 2011 to 2020, the number of registered PRC chip companies grew 17-fold—from 1,300 to 22,800.<sup>230</sup> U.S. VC investments run the gamut from electronic design automation or chip design firms to etching equipment companies. U.S. venture capital dollars have also flowed to PRC semiconductor companies who in turn fund additional semiconductor startups.<sup>231</sup>

The U.S. government has sought to implement a range of controls on the PRC’s semiconductor sector. This includes prohibitions on allowing the PRC access to advanced chips.<sup>232</sup> VC investments in PRC semiconductor firms undercut these restrictions because these investments help the PRC increase its semiconductor production capacity and expertise, thereby bringing the country closer to being

able to produce advanced chips on its own. For example, U.S. dollar investment has supported the growth of PRC firm Advanced Micro-Fabrication Equipment (AMEC)—which now is rapidly working to lessen the blow of U.S. export controls by replacing imported equipment with domestic alternatives.<sup>233</sup>

The VCs that the Committee examined have invested in more than 150 semiconductor companies. The semiconductor sector is unique in that any investment into *any* PRC semiconductor company helps the PRC in certain key respects vis-à-vis the United States.<sup>234</sup> However, certain investments have proven more problematic than others because they have helped grow the PRC’s national giants in the semiconductor space. In addition, some investments have fueled companies that end up as PLA suppliers.

**1. Supporting PRC government priority semiconductor companies**

*Walden International has partnered with PRC state-owned enterprises and provincial governments to advance China’s semiconductor industry.*

**Walden PRC Semiconductor Investment Range**

	<b>Low</b>	<b>Medium</b>	<b>High</b>
	\$ ~833,000,000	\$ ~1,539,000,000	\$ ~2,246,000,000

Note: Based on ~140 unique investments by Walden. Most investments were reported as ranges: “low” assumes the lower range for all investments, “high” assumes the higher range for all investments, and “medium” splits the difference.

Walden partnered with PRC government entities in 2011 to create what PRC media described as “the first fund focusing on the semiconductor industry in China.”<sup>235</sup> Walden also signed a strategic cooperation agreement in 2022 with Guangzhou Industrial Investment Group to establish the Guangdong Province Semiconductor and Integrated Circuit Venture Sub-Fund.<sup>236</sup>

Similarly, Walden set up a \$500 million fund with PRC state-owned enterprise China Everbright in 2017 to fund the semiconductor industry.<sup>237</sup> China Everbright Limited is a state-owned asset manager whose investments are oriented toward advancing PRC strategies and plans, including military-civil fusion and the One Belt, One Road initiative.<sup>238</sup>

*“Walden appears to have set up a fund with China Electronics Corporation, a critical state-owned PLA supplier, with the stated goal of enlarging the PRC’s domestic semiconductor sector.”*

In addition, Walden appears to have set up a fund in 2018 with China Electronics Corporation (CEC), a critical state-owned PLA supplier, with the stated goal of enlarging the PRC’s domestic semiconductor sector.<sup>239</sup> The U.S.

government has designated CEC a Chinese military company and prohibited U.S. investors from buying or selling its publicly traded securities.<sup>240</sup>

## 2. Early investments into SMIC

*U.S. venture investments were critical sources of funds and expertise for SMIC, China's largest semiconductor foundry, in the company's early days.*

Company		U.S. VC	Amount
SMIC	Provides chips for PLA research, equipment, and weapons	Walden	\$ ~52,000,000
SJSemi	Entity Listed affiliate of SMIC	Walden	\$ 35,000,000
GalaxyCore	SMIC's "most trusted foundry partner"	Walden	\$ ~38,000,000
<b>Total</b>			<b>\$ ~125,000,000</b>

Note: Amounts are rounded to the nearest million. Walden's GalaxyCore investment is between \$25-50 million.

U.S. dollars and expertise helped the PRC build Semiconductor Manufacturing International Corporation (SMIC), a company critical to the PRC's semiconductor advancement and to the PLA. Walden International invested over \$50 million into SMIC, with its first investment coming in 2001, about a year after SMIC was established.<sup>241</sup> One of the funds that Walden used to invest in SMIC has received funding from U.S. limited partners.

In addition to funding, Walden has provided SMIC with hands-on expertise. Walden founder Lip-Bu Tan, who also served as CEO of U.S. semiconductor firm Cadence Design Systems, served on SMIC's board from 2001 to 2018.<sup>242</sup> Tan was compensated hundreds of thousands of dollars in salary and stock options for his tenure as a board member during those years.<sup>243</sup>

*“Walden International has invested over \$50 million into SMIC, with its first investment coming in 2001, about a year after SMIC was established.”*

Today, SMIC is a U.S. government-designated Chinese military company on multiple U.S. blacklists.<sup>244</sup> SMIC products have been used in military research since at least 2004.<sup>245</sup>

In addition to SMIC, Walden has invested into an ecosystem of SMIC affiliates such as SJSemi, described below. Multiple U.S. firms, including Walden, have also invested in GalaxyCore, a fabless image sensor company and early partner of SMIC's. GalaxyCore became SMIC's "largest local customer" in 2008, according to

PRC media.<sup>246</sup> Several years later, GalaxyCore's CEO described SMIC as the company's "most trusted foundry partner."<sup>247</sup> As a fabless company, GalaxyCore reportedly tested its products on SMIC's platform early on, while SMIC poured R&D funds into GalaxyCore.<sup>248</sup> PRC media in 2021 described Walden as GalaxyCore's largest institutional shareholder.<sup>249</sup>

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*One of the key funds that Walden used to invest in SMIC has received funding from U.S. limited partners.*

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Walden funds exited from SMIC in June 2013 and in January 2021.<sup>250</sup>

### **3. Investment into red flag listed semiconductor company SJSemi**

*Walden invested \$35 million into SJSemi a year after SJSemi was added to the Entity List.*

Walden International invested more than \$35 million into SJSemi in October 2021, about a year after SJSemi was added to the Commerce Department Entity List alongside SMIC over its PLA ties.<sup>251</sup> Walden has not exited that investment.<sup>252</sup> SJSemi began as a joint venture between SMIC and Jiangsu Changjiang Electronics Technology (JCET).<sup>253</sup> JCET has supplied PRC companies that the U.S. government has designated on red flag lists over support to the PLA, such as Ningbo Semiconductor International Corporation (a SMIC affiliate) and Hunan Goke Microelectronics.<sup>254</sup> In April 2021, SMIC transferred all of its shares of SJSemi to other PRC entities, some of which are state-owned.<sup>255</sup>

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*"Walden International invested over \$35 million into SJSemi in 2021, after SJSemi was added to the Commerce Department Entity List alongside SMIC over its PLA ties."*

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Qualcomm Ventures personnel also supported an investment into SJSemi in 2015.<sup>s</sup> The firm's internal investment slides highlight that the investment will support the PRC government's "aspiration to build local advanced [semiconductor] production."<sup>256</sup>

### **4. PRC semiconductor companies benefit from U.S. R&D**

*U.S. VC firms have invested in PRC semiconductor companies that tout their status as beneficiaries of U.S. research and development.*

U.S. venture capital funds have specifically targeted and invested in PRC companies whose executives tout expertise gained in American institutions and

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<sup>s</sup> Qualcomm Ventures told the Committee that, "Qualcomm Ventures personnel were involved in supporting an investment in SJ Semiconductor in 2015, although this investment was not sourced by Qualcomm Ventures." After SJ Semiconductor was added to the Entity List, Qualcomm ceased export activity with the company.

benefited from U.S.-funded research and development. For example, Walden and Qualcomm Ventures invested tens of millions of dollars into PRC semiconductor company Advanced Micro-Fabrication Equipment (AMEC),<sup>†</sup> whose founder Dr. Gerald Yin spent much of his career at American semiconductor firms Applied Materials and Lam Research, which specialize in the same area of etching technology as AMEC.<sup>257</sup> <sup>‡</sup> (AMEC has been sued by U.S. semiconductor companies alleging misappropriation of trade secrets and patent infringement.)<sup>258</sup> Walden International made investments worth roughly \$38 million in both USD and RMB from 2005 to 2019; Qualcomm Ventures invested \$7.1 million into AMEC starting in 2006. Another PRC company with U.S. VC backing, AmLogic, states on its website that its core team is composed of “many senior integrated circuit design talents who have returned from the United States.”<sup>259</sup> <sup>¶</sup> AmLogic’s customers include ZTE, China Telecom, China Unicom, and Russia Telecom.<sup>260</sup> In addition, in an early investment memo for SMIC, Walden described the return of overseas talent to the PRC as an attractive reason for its investment.<sup>261</sup> In the memo, Walden said that while the PRC has a lack of experienced management personnel and a weak design force more broadly, it anticipated China “will eventually overcome [these] obstacles” because “overseas Chinese talents are returning to China.”<sup>262</sup>

U.S. venture funds have also worked with and supported companies that participate in the PRC’s talent recruitment plans, the goal of which is to incentivize experts to come to the PRC and transfer knowledge and technology.<sup>263</sup> GGV, GSR, Walden, and Sequoia Capital China personnel have participated in a start-up competition run by the venture capital arm of the Thousand Talents Plan.<sup>264</sup> Walden also invested \$8 million in a PRC talent program recipient, semiconductor company Anyka.<sup>265</sup> Anyka is a participant in the “Help Our Motherland through Elite Intellectual Resources from Overseas” (HOME) Program, which seeks to “to build a platform for overseas talents to return to work in and serve the country.”<sup>266</sup>

These findings are not only notable but highlight the importance of ensuring America is a welcoming destination for the talented workers who facilitate technological innovation.

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<sup>†</sup> Walden founder Lip-Bu Tan and Hing Wong, a Walden managing director, both previously held AMEC board seats. Qualcomm Ventures stated that it and others “provided financial support for the stable development of AMEC in its early years.” *Congratulations to AMEC Who Made Its IPO Debut on the Shanghai Stock Exchange, STAR Market!*, QUALCOMM VENTURES (Aug. 1, 2019), <https://www.qualcommventures.com/insights/blog/shanghai-stock-exchange-star-market/>.

<sup>‡</sup> AMEC was designated as a Chinese Communist military company in January 2024. Press Release, U.S. Dep’t of Defense, DOD Releases List of People’s Republic of China (PRC) Military Companies in Accordance With Section 1260H of the National Defense Authorization Act for Fiscal Year 2021 (Jan. 31, 2024).

<sup>¶</sup> Walden has made RMB investments worth \$23.5 million into AmLogic.

## 5. Semiconductor companies that support the PLA or present other significant security concerns

*U.S. venture capital firms have made investments worth roughly \$180 million into PRC semiconductor companies that directly or indirectly support the People's Liberation Army.*

Company		U.S. VC	Amount
SMIC	Provides chips for PLA research, equipment, and weapons	Walden	\$ ~52,000,000
SJSemi	Partners and is affiliated with SMIC	Walden	\$ 35,000,000
AMEC	Designated CCP military company that sells to other blacklisted PRC companies	Walden	\$ ~38,000,000
		Qualcomm Ventures	\$ 7,000,000
Siptory	Founded based on collaboration between PRC government and PLA entities	Walden	\$ 13,000,000
Fujian	Transforms products from "civilian to military use"	Sequoia Capital China	\$ ~13,000,000
Dapu	Contracted with PLA in 2021	Walden	\$ ~18,000,000
RT-Thread	Works with PLA-affiliated AI and chip companies	GGV	\$ ~8,000,000
Semishare	Repeat bidder on PLA projects	Walden	\$ ~5,000,000
<b>Total</b>			<b>\$ ~189,000,000</b>

Note: Amounts are rounded to the nearest million. Walden's Dapu investment is between \$10-25 million. GGV's RT-Thread investment is between \$5-10 million and GGV is seeking to exit this investment. Walden's Semishare investment is less than \$10 million.

U.S. VCs have invested in PRC semiconductor companies with ties to the PLA. In addition to SMIC and SJSemi, starting in 2020 Walden International made RMB investments worth \$13 million into packaging firm Siptory, which states on its website that it was founded based on strategic cooperation with the Chinese Academy of Sciences and the Aviation Industry Corporation of China, a designated Chinese military company.<sup>267</sup> Specifically, Siptory grew out of collaboration between Chinese Academy of Science's Institute of Microelectronics

*"Walden invested in AMEC, which is a vendor to several blacklisted semiconductor companies, including SMIC."*

and the PRC company Shennan Circuits, which is majority owned by AVIC.<sup>268</sup> Shennan Circuits has been heavily involved in defense procurement with entities including AVIC's Lei Hua Institute of Electronic Technology and the China Aerospace Science and Technology Corporation.<sup>269</sup> Both AVIC and China Aerospace are "national leaders in developing intelligent AI-enabled unmanned vehicles."<sup>270</sup> A Walden partner also sits on Siptory's board of directors.<sup>271</sup>

Walden has also invested in AMEC, described above, which is a vendor to several blacklisted semiconductor companies, including SMIC. AMEC works with the Shanghai Integrated Circuit Research and Development Center, which the United States added to its Entity List over its efforts to acquire U.S.-origin items to support the PLA's modernization.<sup>272</sup> YMTC, which is likewise on the Entity List and supplies the PRC military company Huawei, is also an AMEC customer.<sup>273</sup>

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*"PRC semiconductor companies that bid on PLA projects have received U.S. VC funding."*

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Another PRC recipient of U.S. investment, Fujian Deer Technology, is involved in chemicals used in semiconductor production. The company is self-avowedly transforming its products "from civilian to military use."<sup>274</sup> Sequoia China invested in Fujian Deer Technology

in 2021. PRC semiconductor companies that bid on PLA projects have also received U.S. VC funding. For example, Walden investment Semishare has been a repeat bidder on PLA projects.<sup>275</sup> Similarly, Dapu received an investment from Walden International worth between \$10 and \$25 million; the company is a PLA contractor with a successful bid as recently as 2021.<sup>276</sup>

U.S. VCs have also invested in PRC companies that, in turn, partner with problematic PRC semiconductor companies. For example, GGV has invested between \$5 and \$10 million in RT-Thread, which works closely with a range of PLA-linked semiconductor and artificial intelligence

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*"Phytium's technology has helped power PLA research on hypersonic testing."*

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companies. The company touts Phytium as a "chip partner," among other major PRC semiconductor companies.<sup>277</sup> Phytium's technology has helped power PLA research on hypersonic testing.<sup>278</sup> Phytium is on the U.S. Entity List, which cites the fact that "supercomputing capabilities are vital for the development of many – perhaps almost all – modern weapons and national security systems, such as nuclear weapons and hypersonic weapons."<sup>279</sup>

Another of RT-Thread's partners, Loongson, is also on a U.S. red flag list over its efforts to acquire U.S.-origin items in support of PLA modernization.<sup>280</sup> Loongson has contracted with China Aerospace Science and Industry Corporation, a key PLA missile contractor.<sup>281</sup> RT-Thread also works with state-owned PLA contractor CETC and state-owned rail company CRRC, both of which

have been designated by the Department of Defense as Chinese military companies.<sup>282</sup>

In addition to PLA-linked entities, RT-Thread's other customers include Hikvision and iFlyTek, two companies on U.S. government red flag lists over their complicity in human rights abuses against Uyghurs.<sup>283</sup> U.S. VC funding has supported other companies in the semiconductor supply chain tied to forced labor. For example, GGV invested over \$20 million into Daqo New Energy in 2009.<sup>284</sup> Daqo, which produces polysilicon—a material critical to making semiconductors—is the majority owner of Xinjiang Daqo New Energy, which the Commerce Department placed on its Entity List in 2021 for accepting or using Uyghur forced labor.<sup>285</sup> GGV exited the investment in 2014.

## 6. AI semiconductor companies blacklisted by the U.S. government

*U.S. venture capital firms funded the growth of PRC artificial intelligence semiconductor companies that were placed on the Entity List in October 2023.*

U.S. venture capital firms have invested into PRC artificial intelligence chip companies that seek to do exactly what U.S. export controls are meant to stop: advance China's AI chip industry. In a sign that U.S. VCs are investing in particularly sensitive PRC companies, the United States added Biren Technology and Moore Threads—recipients of funding from Walden and GGV (now Jiyuan Capital), respectively—to the Commerce Department's Entity List in October 2023, making it more difficult for U.S. companies to ship to them.<sup>286</sup>

AI chips are specialized computer chips that are needed to efficiently train advanced AI algorithms.<sup>287</sup> These chips are critical to the PRC's ability to develop advanced AI capabilities—which can be applied in the military and surveillance

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*“U.S. venture capital firms have invested into PRC artificial intelligence chip companies that seek to do exactly what U.S. export controls are meant to stop: advance China's AI chip industry.”*

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sectors—because cutting-edge AI chips make developing AI algorithms faster and cheaper.<sup>288</sup> PRC companies are dependent on Western firms for AI chip fabrication and AI chip design technology.<sup>289</sup> The United States has accordingly barred the export of advanced AI chips to the PRC and controlled the export of certain U.S. chip design software to the PRC.<sup>290</sup>

Meanwhile, venture capital firms have invested both U.S. dollars and renminbi into PRC AI chip producers including Biren Technology, Moore Threads, SemiDrive, NebulaMatrix, ThinkForce, and Intellifusion.<sup>291</sup> Horizon Robotics, which has received funding from GSR and Sequoia China, has been described as the PRC rival to U.S. firm Nvidia.<sup>292</sup> Horizon Robotics focuses especially on autonomous driving chips and facial recognition technology such as smart cameras.<sup>293</sup> Its chip business is led by Zhou Feng, who PRC media described

as “the former main chip architect of Huawei[] HiSilicon.”<sup>294</sup> The founder of Horizon Robotics was named a member of the PRC Ministry of Science and Technology’s “Next Generation Artificial Intelligence Strategic Advisory Committee,” which advises the PRC government on AI.<sup>295</sup> Other members include representatives from Beihang University—a PLA research institution, the PLA’s Central Military Commission, and the National University of Defense Technology.<sup>296</sup> Horizon Robotics has also helped lead the Chinese Association for Artificial Intelligence alongside members of the PLA General Staff Department and ZTE.<sup>297</sup> In addition, Horizon Robotics—along with Sequoia Capital—were listed as sponsors for a 2018 event launching a “military-civilian integration system testing area” related to autonomous driving.<sup>298</sup>

## SECTION III – INTANGIBLE SUPPORT AND EXPERTISE

*U.S. VCs offer a blend of funding, expertise, and intangible goodwill that is uniquely valuable to PRC-based companies.*

While the value of U.S. funding is obvious, the intangible benefits provided by U.S. venture firms are equally as important but less understood. This section will provide a high-level overview of these intangible benefits, examples of which are also provided throughout the previous sections of this report.

Venture firms have an incentive to ensure that the companies they fund succeed and bring returns to the fund’s partners, and they are well-placed to provide companies with the expertise needed to achieve this success. Start-ups have a narrow focus—for example, on a certain type of chip or a certain kind of artificial intelligence application. But a venture firm covers a variety of industries in its portfolio and can pull insights from analogous fields and competitors. In the words of a leading PRC venture capital firm, “No matter how successful an entrepreneur is, his influence is always limited to one enterprise. But a VC is different because its influence can cover various fields and even the whole economy.”<sup>299</sup>

As Walden described in one of its submissions to the Committee: “[P]ortfolio companies are often pre-revenue and have not yet reached scale. During these early stages, it is often expected that investors can provide, in addition to capital, advice on growth opportunities. This is in contrast to late-stage investment funds who seek to identify targets based primarily on historical financial performance.”<sup>300</sup>

Therefore, in many cases, venture firms act almost as consultants for target companies. Based on our investigation, U.S. VCs help PRC companies in at least four critical ways, detailed below.

### **1. U.S. VCs help PRC companies go global**

U.S. venture firms help PRC companies go global, particularly when spreading to U.S. and European markets. U.S. VCs are adept at dealing in non-PRC markets because of their connections to U.S. and other capital markets. They are therefore well-positioned to help PRC companies venture into the international market. This includes helping PRC companies expand operations overseas, diversify their supply chains, IPO overseas, and combat potential headwinds from the U.S. government related to these efforts.

For example, when inaugurating a Sequoia Capital China-backed “genomics incubator” in the PRC, Neil Shen stated that Sequoia is committed to “enabling innovators to access global resources.”<sup>301</sup> Similarly, a GGV managing partner highlighted the firm’s global resources as a key selling point in a 2021 interview, stating that “[c]ompared with most Chinese investment institutions, we have a

more global team and can effectively give the company global value. For example, we can call our partners in other regions at any time to connect with overseas resources and help.”<sup>302</sup> A few years earlier, GGV noted as a major achievement of 2014 that it “makes intros for China internet giants looking to the US.”<sup>303</sup> GGV clients also recognize the value-add: one of GGV’s investment companies said that GGV’s U.S. partners bring PRC start-ups to Silicon Valley and connect them “with many American resources.”<sup>304</sup>

U.S. venture capital firms are also well-positioned to help PRC companies that face headwinds doing business in the United States. Sequoia’s investment in ByteDance, the parent company of TikTok, is a prime example. Sequoia has invested over \$1 billion into ByteDance. After the federal government launched an investigation into the national security risks of TikTok in 2020, Sequoia partner Doug Leone reportedly advocated for TikTok by pressing government officials “to craft a solution that would enable TikTok to keep operating in the U.S.”<sup>305</sup>

## **2. U.S. VCs provide PRC companies with invaluable mentorship and management expertise**

U.S. venture capital firms provide mentorship to PRC start-ups new to the business world, including business management, media, and other advice. Venture capitalists are often former founders of successful companies and sit on boards of successful companies. They have a larger breadth of knowledge and are better connected than PRC start-up founders, who are often technical specialists in narrow fields.

VCs help their PRC companies gain business management skills. For example, GGV launched a training program alongside Tsinghua University for companies in GGV’s ecosystem focused on financial training.<sup>306</sup> VCs also provide their companies with substantive expertise. For example, the founder and chairman of Walden International, Lip-Bu Tan—whose venture firm invests heavily in semiconductor companies—was a long-time board member and former CEO of U.S. chip company Cadence Design Systems.<sup>307</sup> Cadence specializes in electronic design automation, a part of the semiconductor supply chain dominated by Western companies.<sup>308</sup> <sup>w</sup>

Tan and other partners at Walden sat on the board of Walden’s semiconductor companies, including SMIC and AMEC, positioning them to provide business and subject-matter expertise. AMEC and SMIC undertook an initial public offering

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<sup>w</sup> Many PRC companies reportedly use Cadence software—including Phytium, a PRC semiconductor company that works closely with the PLA, and Brite Semiconductor, which has close ties to the PRC’s Semiconductor Manufacturing International Corporation (SMIC). See Ellen Nakashima & Gerry Shih, *China Builds Advanced Weapons Systems Using American Chip Technology*, WASH. POST (Apr. 9, 2021, 6:52 P.M.), [https://www.washingtonpost.com/national-security/china-hypersonic-missiles-american-technology/2021/04/07/37a6b9be-96fd-11eb-b28d-bfa7bb5cb2a5\\_story.html](https://www.washingtonpost.com/national-security/china-hypersonic-missiles-american-technology/2021/04/07/37a6b9be-96fd-11eb-b28d-bfa7bb5cb2a5_story.html).

while Tan was a board member. Tan has said that he provided advice to AMEC about strategic planning, business planning, and team building, has introduced new shareholders and partners, and has helped develop customers and markets.<sup>309</sup> Descriptions of Walden’s activities in Chinese also state that it “assists in technology transfer.”<sup>310</sup>

Even in cases where VCs may not hold board seats, VC firms contribute significant value to companies in the PRC. In a submission to the Committee, Walden noted that its “years of experience and industry knowledge within the investment community . . . [make it] well-positioned to provide general strategic advice.”<sup>311</sup> In an interview with the Committee, a GGV partner, speaking in general terms about the role of VCs, described himself as “a part time therapist” to founders, who counsels them through difficult corporate decisions such as layoffs.

### **3. U.S. VCs help PRC companies find, develop, and hire talent**

U.S. VCs help PRC companies find and hire talent. VCs can provide PRC companies with invaluable connections. For example, Walden told the Committee that it “often assists its portfolio companies with identifying talent, suggesting or connecting with other investors, and corporate strategy matters.”<sup>312</sup> An early Walden internal investment memo flags that SMIC’s challenges would be to “create a working environment for [the] team” and “train the . . . team.”<sup>313</sup> Another disclosure for AMEC noted that the company’s CEO was a first-time CEO.<sup>314</sup> U.S. venture capitalists have a global network of potential talent that state-led funders and advisers may not. Indeed, Lip-Bu Tan was ranked #1 most well-connected executive in the technology industry.<sup>315</sup>

Disclosures from other VCs painted a similar picture. GGV noted that its platform team provides support “in areas such as recruiting, business development, and marketing” to companies.<sup>316</sup>

### **4. U.S. VCs give PRC companies credibility and help them find and engage with co-investors and industry partners**

U.S. VCs help PRC companies with finding and engaging with other co-investors. Most U.S. VCs operating in the PRC boast mature, well-funded, and experienced investors—so foreign VC backing of a PRC start-up sends a positive signal to the market and other potential co-investors. In fact, research shows that “portfolio firms that receive investment from a foreign VC are more likely to list on foreign markets and be affiliated with prestigious law firms, bankers, and accountants.”<sup>317</sup>

Relatedly, venture capital firms play an important role in introducing funded companies to industry associations and other multilateral organizations that provide them with benefits. Access to these organizations is especially important

for companies that are seeking to go global. The more globally connected a company, the more able it is to bring in new outside directors and partners.

## SECTION IV – ANALYSIS AND RECOMMENDATIONS

### 1. Outbound investment in critical sectors undercuts U.S. policy

U.S. VC investment in the PRC grew in the mid-2000's and exploded the following decade as the U.S. government encouraged investment into the PRC, believing that greater economic ties would encourage economic liberalization.<sup>318</sup>

Unfortunately, we have seen the opposite. As U.S. capital flows into PRC advanced technology companies grew, the PRC channeled technological advances to facilitate the regime's authoritarian surveillance state and human rights abuses and propel the PRC's military modernization.

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*“Outbound U.S. capital investment has advanced the PRC's strategic priorities while undercutting U.S. strategy towards the PRC.”*

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This report illustrates that outbound U.S. capital investment in critical sectors has advanced the PRC's strategic priorities while undercutting U.S. strategy towards the PRC. The United States has invested enormous time, resources, and government effort

to regulating U.S. technology transfers to the PRC to prevent American technology from fueling the PLA's modernization, supporting the PRC's human rights abuses, and giving China the technological edge in critical foundational and emerging technologies. The United States has used export controls, human rights and military blacklists, and other regulatory restrictions to pursue these goals.

At the exact same time, U.S. capital has flooded into the very PRC companies that are designed to provide the PRC with those same technologies. While the U.S. has barred certain PRC companies from operating on government devices or in federal infrastructure, savings of American retirees and other investors flow to these companies or their customers.<sup>319</sup> For instance, after allowing U.S. capital and expertise to flow to SMIC for decades, U.S. policy has belatedly recognized the national security risks it poses, and now prohibits Americans from buying SMIC's publicly traded securities.<sup>320</sup>

The United States bars the export of sensitive technology to companies like SMIC—but it does not bar U.S. investors from funding the next SMIC, just as U.S. dollars and expertise proved foundational to SMIC itself over more than two

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*“[T]he PRC channeled technological advances to [its] authoritarian surveillance state, human rights abuses, and . . . military modernization.”*

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decades. Likewise, the United States has designated companies like Megvii, SenseTime, and others on red flag lists for their involvement in genocide—but allows U.S. investment and expertise to power the next Megvii or SenseTime. The recent executive order on outbound investment will begin to remedy these

incongruities, but congressional action is still needed to build upon this foundation.<sup>321</sup>

In short, U.S. capital and expertise have flowed directly into the hands of our nation’s foremost strategic competitor. Simply put, robust PRC outbound investment restrictions in key strategic sectors are a national security and human rights imperative.

## 2. Recommendations

The PRC routinely leverages civilian technology to advance the PLA or to support its human rights abuses and surveillance state. The former frequently occurs under a doctrine known as military-civil fusion, where civilian resources—from technology to research and talent—are leveraged for national military power.<sup>322</sup> This means that civilian universities, state-owned enterprises, start-ups, government funds, government agencies, and more, are used to achieve both military modernization and economic advancement.<sup>323</sup> The PRC also leverages domestic companies to perpetuate its attempts to erase the Uyghur culture and ethnicity—using surveillance cameras, drones, and facial recognition technology developed by purportedly private, civilian PRC companies.<sup>324</sup>

### **Outbound Capital Investment to Listed PRC Entities:**

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**Recommendation 1:** Restrict U.S. investment in entities tied, directly or indirectly, to the PLA, or forced labor and genocide.

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Specifically, Congress should pass legislation to generally prohibit investment in PRC companies included on key U.S. government sanctions and red flag lists, including the Uyghur Forced Labor Prevention Act (UFLPA) Entity List, the Non-SDN Chinese Military-Industrial Complex Companies (NS-CMIC) List, the list established by Section 889 of the John S. McCain National Defense Authorization Act for Fiscal Year 2019, the list established by Section 1260H of the William M. “Mac” Thornberry National Defense Authorization Act for FY 2021, the Military End User List, the list established by Section 5949 of the James M. Inhofe National Defense Authorization Act for FY 2023, the Federal Communications Commission’s “Covered List,” the Entity List, and the Withhold Release Orders and Findings List related to forced labor. Legislation should include subsidiaries and parent or holding companies of these listed entities. The 1260H list should also be updated to include companies identified as supporting the PLA, including those unlisted companies identified above.

## Outbound Capital Investment in Strategic Sectors and Technologies:

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**Recommendation 2:** Implement sectoral outbound investment restrictions in areas related to the PRC's critical and emerging technologies, military capabilities, and human rights abuses.

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VC investments occur early in a company's existence, and it is possible that some PRC companies do not set out to supply the PLA or participate in human rights abuses from the start—but grow into doing so as they gain funding and notoriety. Because of the extent of government control over the PRC's private sector, it is necessary to implement sectoral investment controls to prevent U.S. capital from flowing to entities that support the PLA or the PRC's domestic repression or genocide.

The Biden Administration's executive order is an important first step to implementing sector-based restrictions on outbound investments.<sup>325</sup> Congress should codify restrictions on U.S. investment in areas related to the PRC's critical and emerging technologies, military capabilities, and human rights abuses. Outbound rules should restrict investment on a sectoral basis, including many of the technology sectors identified as critical by the Office of Science and Technology Policy and many of those the CCP has openly declared its intent to dominate in the 14<sup>th</sup> Five Year Plan.

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## ENDNOTES

- <sup>1</sup> Tom Dotan, *The Information's 411—WeChat Because WeCare*, THE INFO. (Feb. 9, 2018, 2:54 P.M.), <https://www.theinformation.com/articles/the-informations-411-wechat-because-wecare?rc=ihjan0>; *Focus on Technology Investment for 21 Years, GGV's Changes and Changes*, EBRUN (Oct. 19, 2021, 9:15 A.M.) [https://webcache.googleusercontent.com/search?q=cache:YVky1z3DN8J:https://m.ebrun.com/456846.html&sca\\_esv=585165273&hl=en&gl=us&strip=1&vwsrc=0](https://webcache.googleusercontent.com/search?q=cache:YVky1z3DN8J:https://m.ebrun.com/456846.html&sca_esv=585165273&hl=en&gl=us&strip=1&vwsrc=0).
- <sup>2</sup> Kane Wu & Roxanne Liu, *US Venture Firm GGV Capital to Separate China Business*, REUTERS (Sept. 22, 2023, 2:41 A.M.), <https://www.reuters.com/markets/us/us-venture-firm-ggv-capital-separate-china-business-amid-geopolitical-tension-2023-09-21/>.
- <sup>3</sup> *Transforming Healthcare, One Company at a Time*, GSR VENTURES, <https://gsrventuresglobal.com/about> (last visited Jan. 2, 2024).
- <sup>4</sup> *Our Offices*, QUALCOMM VENTURES, <https://www.qualcommventures.com/offices/> (last visited Jan. 4, 2024).
- <sup>5</sup> Sequoia Capital (@sequoia), TWITTER (June 6, 2023, 6:31 A.M.), <https://twitter.com/sequoia/status/1666029996455112704>.
- <sup>6</sup> Ryotaro Yamada, *Sequoia Capital's Split-Off of China Business Spurred by Sino-U.S. Rift*, NIKKEIASIA (June 8, 2023, 3:09 A.M.), <https://asia.nikkei.com/Business/Finance/Sequoia-Capital-s-split-off-of-China-business-spurred-by-Sino-U.S.-rift>; Eleanor Olcott et al., *Neil Shen Plots Global Expansion for Sequoia's China Spin-Off*, FIN. TIMES (Oct. 12, 2023), <https://www.ft.com/content/6e3b6905-0b0f-4215-80a4-4082cb899966>.
- <sup>7</sup> *Walden International: China*, WALDEN INT'L, <https://web.archive.org/web/20210516003553/http://waldenintl.com/china/index.aspx> (last visited Jan. 4, 2024).
- <sup>8</sup> Richenda Evans-Freke, *Walden International Appoints Impressive New MD in China*, FINANCEASIA (June 11, 2002), <https://www.financeasia.com/article/walden-international-appoints-impressive-new-md-in-china/28509>. Mao Daolin, former General Secretary Hu Jintao's son-in-law, appears to have been a member of Walden's team in the 1980's and 1990's. See Kathy Chen, *Chinese Wedding Pulls Back Veil of Secrecy on Money-Power Unions*, WALL ST. J. (Oct. 31, 2003, 12:01 A.M.), <https://www.wsj.com/articles/SB106754823050625000>.
- <sup>9</sup> *Walden International*, *supra* note 7.
- <sup>10</sup> GGV documents (on file with Select Committee).
- <sup>11</sup> Sequoia documents (on file with Select Committee).
- <sup>12</sup> James Pomfret & Angel Woo, *China's Exit Bans Multiply as Political Control Tightens Under Xi*, REUTERS (May 1, 2023, 8:50 P.M.), <https://www.reuters.com/world/china/chinas-exit-bans-multiply-political-control-tightens-under-xi-2023-05-02/>; Lingling Wei, *China Ratchets Up Pressure on Foreign Companies*, WALL ST. J. (Apr. 28, 2023, 1:49 P.M.), <https://www.wsj.com/articles/china-ratchets-up-pressure-on-foreign-companies-524b958e>.
- <sup>13</sup> See Christian Shepherd, *China Raids Another Global Business Consultancy, Cites Spying Concerns*, WASH. POST (May 9, 2023, 6:07 A.M.), <https://www.washingtonpost.com/world/2023/05/09/china-raid-capvision-bain-business/>.
- <sup>14</sup> Kate Clark et al., *Sequoia Capital's U.S. Partners May Reap China Gains Even After Split*, THE INFO. (June 6, 2023, 2:09 P.M.), <https://www.theinformation.com/articles/sequoia-capitals-u-s-partners-may-reap-china-gains-even-after-split?rc=ihjan0>.

<sup>15</sup> Clark et al., *supra* note 14; Juro Osawa, *Sequoia Capital's China Arm Raises \$9 Billion, Exceeding Target*, THE INFO. (July 4, 2022, 10:26 P.M.), <https://www.theinformation.com/articles/sequoia-capitals-china-arm-raises-9-billion-exceeding-target?rc=ihjan0>.

<sup>16</sup> Clark et al., *supra* note 15.

<sup>17</sup> *Rare Interview: Neil Shen in Talks with Stephen Schwarzman*, YouTube (July 5, 2020), [https://www.youtube.com/watch?v=nZ\\_oSFGqoVw](https://www.youtube.com/watch?v=nZ_oSFGqoVw).

<sup>18</sup> Shai Oster & Juro Osawa, *Sequoia Capital China Chief Leaves Peijing's Top Political Advisory Body*, THE INFO. (Jan. 20, 2023, 4:06 A.M.), <https://www.theinformation.com/articles/sequoia-china-chief-leaves-beijings-top-political-advisory-body?rc=ihjan0>; *see also Chinese People's Political Consultative Conference (CPPCC)*, THE CTR. FOR STRATEGIC TRANSLATION, <https://www.strategictranslation.org/glossary/cppcc> (last visited Jan. 4, 2024).

<sup>19</sup> Eric Newcomer, *In Venture Race to China, IPOs Lag*, THE INFO. (Jan. 22, 2014, 5:41 P.M.), <https://www.theinformation.com/articles/in-venture-race-to-china-ipos-lag?rc=ihjan0>.

<sup>20</sup> GGV documents (on file with Select Committee); Interview with Select Committee; Zhao Na, *Diversion of GGV Capital: Conflict and Reinvention of Dual-Currency Funds*, SOHU (Feb. 18, 2017, 6:16 A.M.), [https://web.archive.org/web/20231214163211/https://www.sohu.com/a/126577364\\_115443](https://web.archive.org/web/20231214163211/https://www.sohu.com/a/126577364_115443).

<sup>21</sup> GGV documents (on file with Select Committee).

<sup>22</sup> Dotan, *supra* note 1.

<sup>23</sup> GGV documents (on file with Select Committee).

<sup>24</sup> Source material (on file with Select Committee); *see also* Kate O'Keeffe et al., *Sequoia Made a Fortune Investing in the U.S. and China. Then It Had to Pick One*, WALL ST. J. (June 27, 2023, 12:01 A.M.), <https://www.wsj.com/articles/sequoia-made-a-fortune-investing-in-the-u-s-and-china-then-it-had-to-pick-one-f13e7b91>.

<sup>25</sup> Juro Osawa, *American AI Startups Quietly Raise Money from Top Chinese VC Firms, Including Sequoia Capital China*, THE INFO. (Nov. 7, 2023, 10:25 A.M.), [https://www.theinformation.com/articles/american-ai-startups-raise-money-from-top-chinese-vc-firms-including-sequoia-capital-china?utm\\_content=article\\_push&utm\\_medium=organic&utm\\_campaign=AB\\_post&utm\\_term=AB\\_post](https://www.theinformation.com/articles/american-ai-startups-raise-money-from-top-chinese-vc-firms-including-sequoia-capital-china?utm_content=article_push&utm_medium=organic&utm_campaign=AB_post&utm_term=AB_post).

<sup>26</sup> Alison Snyder, *Xi Pushes to Accelerate China's Scientific "Self-Reliance"*, AXIOS (Oct. 20, 2022), <https://www.axios.com/2022/10/20/xi-jinping-speech-science-innovation>; Nectar Gan, *Xi Jinping Vows to Make China's Military a 'Great Wall of Steel' in First Speech of New Presidential Term*, CNN (Mar. 13, 2023, 2:35 A.M.), <https://www.cnn.com/2023/03/13/china/china-xi-jinping-first-speech-third-term-intl-hnk/index.html>.

<sup>27</sup> *See* U.S. Dep't of Def., *Military and Security Developments Involving the People's Republic of China: Annual Report to Congress 31, 168* (2023), <https://media.defense.gov/2023/Oct/19/2003323409/1/-1/1/2023-MILITARY-AND-SECURITY-DEVELOPMENTS-INVOLVING-THE-PEOPLES-REPUBLIC-OF-CHINA.PDF>; Ryan Fedasiuk & Emily Weinstein, *AI in the Chinese Military, in CHINESE POWER AND ARTIFICIAL INTELLIGENCE: PERSPECTIVES AND CHALLENGES 175, 176* (William C. Hannas & Huey-Meei Chang eds., 2022).

<sup>28</sup> U.S. Dep't of State, *Military-Civil Fusion and the People's Republic of China*, <https://www.state.gov/wp-content/uploads/2020/05/What-is-MCF-One-Pager.pdf>; *see also* ALEX STONE & PETER WOOD, *CHINA'S MILITARY-CIVIL FUSION STRATEGY*, CHINA AEROSPACE STUDIES INSTITUTE 79 (2020), [https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Other-Topics/2020-06-15%20CASI\\_China\\_Military\\_Civil\\_Fusion\\_Strategy.pdf](https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Other-Topics/2020-06-15%20CASI_China_Military_Civil_Fusion_Strategy.pdf).

<sup>29</sup> U.S.-CHINA ECON. & SEC. REV. COMM'N, ANNUAL REPORT TO CONGRESS 251-52 (2021), [https://www.uscc.gov/sites/default/files/2021-11/Chapter\\_2\\_Section\\_4--U.S-China\\_Financial\\_Connectivity\\_and\\_Risks\\_to\\_U.S.\\_National\\_Security.pdf](https://www.uscc.gov/sites/default/files/2021-11/Chapter_2_Section_4--U.S-China_Financial_Connectivity_and_Risks_to_U.S._National_Security.pdf) (“[A] 2017 *State Council Notice on the Publication of the Program to Build a National Technology Transfer System* called for Chinese enterprises to seek foreign VC investment as part of a multifaceted technology transfer strategy . . . . [T]he Chinese government’s 14th Five-Year Plan notes the government will continue to attract and utilize foreign capital in developing emerging technologies, advanced manufacturing, and telecommunications.”); NATHAN PICARSIC & EMILY DE LA BRUYÈRE, *THE WEAPONIZATION OF CAPITAL* 13 (2022) (“The director of the Chinese National Development and Reform Commission’s Department of Finance [said] in a 2019 speech at Tsinghua University: Use venture capital to support the development and growth of high-end, innovative manufacturing and strategic emerging industries. Give full play to the national, policy, strategic, and basic role of venture capital in making up for shortcomings and establishing a strong positioning — with priority to supporting the development of strategic national security technology.”).

<sup>30</sup> *See, e.g.*, U.S.-CHINA ECON. & SEC. REV. COMM'N, *supra* note 29, at 251-52; *see also* ANTON MALKIN, *CHINA’S EXPERIENCE IN BUILDING A VENTURE CAPITAL SECTOR* 7 (2021), [https://www.cigionline.org/static/documents/documents/no.248\\_0.pdf](https://www.cigionline.org/static/documents/documents/no.248_0.pdf) (“[U]ntil VC funding took off in 2014, foreign funds provided the foundation for the [PRC] VC sector to grow.”); Jesse Fried and Matthew Schoenfeld, *The Risky Business of Investing in Chinese Tech Firms*, HARV. L. S. FORUM ON CORP. GOV. (Feb. 4, 2019), <https://corpgov.law.harvard.edu/2019/02/04/the-risky-business-of-investing-in-chinese-tech-firms/> (“[O]ff to New York went Baidu, JD.com, Alibaba, and dozens of other Chinese unicorns and near-unicorns thirsty for growth capital. There, they found Americans eager for exposure to China and its explosive growth.”).

<sup>31</sup> GGV documents (on file with Select Committee).

<sup>32</sup> Walden International documents (on file with Select Committee).

<sup>33</sup> *See* MICHAELA D. PLATZER ET AL., CONG. RSCH. SERV., R46581, *SEMICONDUCTORS: U.S. INDUSTRY, GLOBAL COMPETITION, AND FEDERAL POLICY* 28 (2020), <https://www.crs.gov/Reports/R46581#fn119>.

<sup>34</sup> *Xi Jinping: Promote the Healthy Development of My Country’s New Generation of Artificial Intelligence*, XINHUA (Oct. 31, 2018), [https://web.archive.org/web/20240105152508/http://www.xinhuanet.com/politics/2018-10/31/c\\_1123643321.htm](https://web.archive.org/web/20240105152508/http://www.xinhuanet.com/politics/2018-10/31/c_1123643321.htm).

<sup>35</sup> *See* Graham Webster et al., *Full Translation: China’s ‘New Generation Artificial Intelligence Development Plan’* (2017), DIGICHINA (Aug. 1, 2017), <https://digichina.stanford.edu/work/full-translation-chinas-new-generation-artificial-intelligence-development-plan-2017/>.

<sup>36</sup> Karen M. Sutter & Zachary Arnold, *China’s AI Companies*, in *CHINESE POWER AND ARTIFICIAL INTELLIGENCE: PERSPECTIVES AND CHALLENGES* 19, 24 (William C. Hannas & Huey-Meei Chang eds., 2022).

<sup>37</sup> *See, e.g.*, Danielle Cave et al., *Mapping More of China’s Tech Giants: AI and Surveillance*, AUSTL. STRATEGIC POL’Y INST. (Nov. 28, 2019), <https://www.aspi.org.au/report/mapping-more-chinas-tech-giants>.

<sup>38</sup> *See, e.g.*, Charles Rollet, *Hikvision Wins PRC Police Project to Predict Protesters Entering Capital*, IPVM (June 25, 2022, 9:34 P.M.), <https://ipvm.com/reports/hikvision-capital-platform>.

<sup>39</sup> Fedasiuk & Weinstein, *supra* note 27, at 176.

<sup>40</sup> *Id.*

<sup>41</sup> U.S. Dep’t of Defense, *Military and Security Developments*, *supra* note 27, at 50; Fedasiuk & Weinstein, *supra* note 27, at 176.

<sup>42</sup> Ngor Luong & Ryan Fedasiuk, *State Plans, Research, and Funding, in CHINESE POWER AND ARTIFICIAL INTELLIGENCE: PERSPECTIVES AND CHALLENGES* 3, 7 (William C. Hannas & Huey-Meei Chang eds., 2022).

<sup>43</sup> Josh Ye, *China's Tencent Debuts Large Language AI Model, Says Open for Enterprise Use*, REUTERS (Sept. 7, 2023, 7:40 P.M.), <https://www.reuters.com/technology/chinas-tencent-says-large-language-ai-model-hunyuan-available-enterprise-use-2023-09-07/> (“By July, there are more than 130 large language models in China,” Jiang Jie, Tencent’s vice president, said, “A war of a hundred models has begun.”).

<sup>44</sup> Press Release, U.S. Dep’t of Defense, DOD Releases List of People’s Republic of China (PRC) Military Companies in Accordance With Section 1260H of the National Defense Authorization Act for Fiscal Year 2021 (Jan. 31, 2024); Press Release, U.S. Dep’t of the Treasury, Treasury Identifies Eight Chinese Tech Firms as Part of the Chinese Military-Industrial Complex (Dec. 16, 2021); Addition of Certain Entities to the Entity List, 84 Fed. Reg. 54002 (Oct. 9, 2019).

<sup>45</sup> GGV documents (on file with Select Committee).

<sup>46</sup> *Megvii City Sky Eye 2.0 System Debuts for the First Time, End-to-End Intelligent Security Once Again Attracts the Attention of the Audience*, (Sept. 3, 2018), [https://web.archive.org/web/20231108161208/https://webcache.googleusercontent.com/search?q=cach e:8EmHeB8KsNYJ:www.ccw.com.cn/ai/2018-09-03/3728.html&sca\\_esv=580120143&hl=en&gl=us&strip=1&vwsr=0](https://web.archive.org/web/20231108161208/https://webcache.googleusercontent.com/search?q=cach e:8EmHeB8KsNYJ:www.ccw.com.cn/ai/2018-09-03/3728.html&sca_esv=580120143&hl=en&gl=us&strip=1&vwsr=0); *The 15th Xinjiang Police Anti-Terrorism Technology and Equipment Expo 2019* (Oct. 23, 2018), <https://web.archive.org/web/20231107175225/https://webcache.googleusercontent.com/search?q=cach e:XlJ4HUvvH-oJ:www.zgjzb.com/exhibit/show-92.html&hl=en&gl=us> (“The Asia-Europe Security Expo, formerly known as the Xinjiang Police Technical Equipment and Public Security Products Expo, has been successfully held for 14 consecutive years.”).

<sup>47</sup> Jeffrey Ding, *Companies Involved in Expanding China’s Public Security Apparatus in Xinjiang*, CHINAI (May 21, 2018), <https://chinai.substack.com/p/chinai-newsletter-11-companies-involved-in-expanding-chinas-public-security-apparatus-in-xinjiang>.

<sup>48</sup> GGV documents (on file with Select Committee).

<sup>49</sup> *Id.*

<sup>50</sup> Charles Rollet, *Megvii Financials and Growth Examined*, IPVM (Aug. 30, 2019, 7:14 A.M.), <https://ipvm.com/reports/megvii-ipo>.

<sup>51</sup> GGV documents (on file with Select Committee).

<sup>52</sup> *Id.*

<sup>53</sup> See, e.g., Matt Schrader, *Huawei’s Smart Cities and CCP Influence, At Home and Abroad*, THE JAMESTOWN FOUND. (June 19, 2018, 3:53 P.M.), <https://jamestown.org/program/huaweis-smart-cities-and-ccp-influence-at-home-and-abroad/>.

<sup>54</sup> GGV documents (on file with Select Committee).

<sup>55</sup> *Id.*

<sup>56</sup> *Police-Grade Dynamic Portrait Recognition Solutions Have Attracted Much Attention*, E110119.COM (Aug. 21, 2017), <https://web.archive.org/web/20231101171038/https://webcache.googleusercontent.com/search?q=cach e:3C0n-6Udj8cj:www.e110119.com/news/show-4022.html&hl=en&gl=us>.

<sup>57</sup> See U.S. Dep’t of State, Off. of Int’l Religious Freedom, *Xinjiang 2022 International Religious Freedom Report* (2022).

<sup>58</sup> Walden International documents (on file with Select Committee).

<sup>59</sup> Addition of Certain Entities to the Entity List; Revision of Existing Entries on the Entity List, 85 Fed. Reg. 34503 (June 5, 2020).

<sup>60</sup> *Yuntian Lifei Will Bring the “Deep Eye” Dynamic Portrait Recognition Solution to the Asia-Europe Security Expo*, PR NEWSWIRE ASIA (Aug. 7, 2017, 5:00 P.M.), [https://web.archive.org/web/20231121154411/https://webcache.googleusercontent.com/search?q=cach e:iejvhuRvTm8J:https://m.21jingji.com/article/20201124/2fb447f1d518abcfce025b0b4e235e77.html&sc a\\_esv=584304970&hl=en&gl=us&strip=1&vwsrsc=0](https://web.archive.org/web/20231121154411/https://webcache.googleusercontent.com/search?q=cach e:iejvhuRvTm8J:https://m.21jingji.com/article/20201124/2fb447f1d518abcfce025b0b4e235e77.html&sc a_esv=584304970&hl=en&gl=us&strip=1&vwsrsc=0).

<sup>61</sup> *Yuntian Lifei won the 2017 Xinjiang Security Excellent Enterprise Award, and its police-level dynamic portrait recognition solution has attracted much attention*, (Aug. 21, 2017) <https://web.archive.org/web/20240105224322/http://www.e110119.com/news/show-4022.html>.

<sup>62</sup> YUJIA HE, HOW CHINA IS PREPARING FOR AN AI-POWERED FUTURE 10 (2017), [https://www.wilsoncenter.org/sites/default/files/media/documents/publication/how\\_china\\_is\\_prepari ng\\_for\\_ai\\_powered\\_future.pdf](https://www.wilsoncenter.org/sites/default/files/media/documents/publication/how_china_is_prepari ng_for_ai_powered_future.pdf).

<sup>63</sup> Walden International documents (on file with Select Committee).

<sup>64</sup> *Id.*

<sup>65</sup> *Id.*

<sup>66</sup> In 2019, SenseTime was added to the Commerce Department’s Entity List because of its role in human rights abuses against Uyghurs. Addition of Certain Entities to the Entity List, 84 Fed. Reg. 54002 (Oct. 9, 2019). Then, in December 2021, the Treasury Department identified SenseTime as a Non-SDN Chinese Military-Industrial Complex Company for developing facial recognition technology that specifically targets Uyghurs. Press Release, U.S. Dep’t of the Treasury, Treasury Sanctions Perpetrators of Serious Human Rights Abuse on International Human Rights Day (Dec. 10, 2021).

<sup>67</sup> Qualcomm Ventures documents (on file with Select Committee).

<sup>68</sup> *Id.*

<sup>69</sup> *Id.*

<sup>70</sup> *Id.*

<sup>71</sup> *Id.*

<sup>72</sup> Qualcomm Ventures (@QualcommVenture), TWITTER (Nov. 22, 2021, 8:00 P.M.), <https://twitter.com/QualcommVenture/status/1462949231971508226>.

<sup>73</sup> Charles Rollet, *DeepGlint: Uyghur Detection, Race Analytics, PRC Police Deals*, IPV.M (Apr. 7, 2022, 8:06 A.M.), <https://ipvm.com/reports/deepglint-human-rights>.

<sup>74</sup> Sequoia documents (on file with Select Committee).

<sup>75</sup> Rollet, *supra* note 73.

<sup>76</sup> Celia Chen, *DeepGlint: The Chinese AI Firm That Helped Police Catch a Criminal Who Had Been on the Run for 20 Years*, S. CHINA MORNING POST (May 7, 2019, 6:00 A.M.), <https://www.scmp.com/tech/start-ups/article/3008998/deepglint-chinese-ai-firm-helped-police-catch-criminal-who-had-been>.

<sup>77</sup> Eva Dou, *Documents Link Huawei to China’s Surveillance Programs*, WASH. POST (Dec. 14, 2021, 4:00 A.M.), <https://www.washingtonpost.com/world/2021/12/14/huawei-surveillance-china/>; *see Geling Shentong Joins Hands with Huawei to Promote the Joint Innovation of Large Models*, DEEPGLINT (July 10, 2023, 10:14 A.M.), <https://web.archive.org/web/20231212190650/https://www.deepglint.com/press-detail?id=34> (evidencing further collaboration with Huawei).

<sup>78</sup> Addition of Certain Entities to the Entity List; Revision of Existing Entry on the Entity List; Removal of Entity from the Unverified List; and Addition of Entity to the Military End-Use (MEU) List, 86 Fed. Reg. 36496 (July 12, 2021).

<sup>79</sup> Sequoia documents (on file with Select Committee); *AI Firm DeepGlint Debuts on Shanghai Stock Exchange*, PANDAILY (Mar. 17, 2022, 12:51 P.M.), <https://pandaily.com/ai-firm-deepglint-debuts-on-shanghai-stock-exchange/>.

<sup>80</sup> See Paul Mozur, *One Month, 500,000 Face Scans: How China is Using A.I. to Profile a Minority*, N.Y. TIMES (Apr. 14, 2019), <https://www.nytimes.com/2019/04/14/technology/china-surveillance-artificial-intelligence-racial-profiling.html>.

<sup>81</sup> Isabella Cheng, *Yitu, China AI Provider, IPO & Financials Examined*, IPVM (Dec. 3, 2020, 12:39 P.M.), <https://ipvm.com/reports/yitu-ipo>.

<sup>82</sup> Sequoia documents (on file with Select Committee).

<sup>83</sup> YITU TECH., <https://web.archive.org/web/20231026041431/https://www.yitutech.com/cn> (last visited Jan. 8, 2024). *Chinese People's Liberation Army General Hospital*, BEIJING MUN. ADMIN. OF TRADITIONAL CHINESE MED. (Aug. 22, 2017), [https://zyj.beijing.gov.cn/ylfw/zhyy/201912/t20191219\\_1314651.html](https://zyj.beijing.gov.cn/ylfw/zhyy/201912/t20191219_1314651.html); U.S. Dep't of Def., *Entities Identified as Chinese Military Companies Operating in the United States in Accordance with Section 1260H of the William M. ("Mac") Thornberry National Defense Authorization Act for Fiscal Year 2021 (PUBLIC LAW 116-283)* (June 3, 2021), <https://media.defense.gov/2021/Jun/03/2002734519/-1/-1/0/ENTITIES-IDENTIFIED-AS-CHINESE-MILITARY-COMPANIES-OPERATING-IN-THE-US.PDF>; Press Release, Fed. Comm'ns Comm'n, *FCC Revokes China Unicom Americas' Authority to Provide Telecom Services in America* (Jan. 27, 2022).

<sup>84</sup> Addition of Certain Entities to the Entity List, 84 Fed. Reg. 54002 (Oct. 9, 2019).

<sup>85</sup> U.S. Dep't of the Treasury, *supra* note 44.

<sup>86</sup> *Bochuang Has Jointly Developed 37 Million Acres of Cotton Fields in Xinjiang to Fully Promote Rural Revitalization*, SOHU (June 9, 2021, 10:14 A.M.), [https://web.archive.org/web/20230925220127/https://www.sohu.com/a/471201075\\_100301361](https://web.archive.org/web/20230925220127/https://www.sohu.com/a/471201075_100301361); *When Xinjiang Cotton Fields Meet the "Black Technology" of Bochuang Linkage with Digital Intelligence*, GEEKPARK (Jan. 19, 2022), <https://web.archive.org/web/20230925220151/https://www.geekpark.net/news/297315>.

<sup>87</sup> See *UFLPA Frequently Asked Questions*, U.S. DEP'T OF HOMELAND SEC. (Jan. 10, 2024), <https://www.dhs.gov/uflpa-frequently-asked-questions>.

<sup>88</sup> Walden International documents on file with Committee.

<sup>89</sup> *Bochuang Linkage and Listed Company Hi-Tech Established a Joint Venture Gimpo New Finance*, TAIBO (Aug. 11, 2017, 10:46 A.M.), [https://web.archive.org/web/20231101193944/https://www.leiphone.com/category/transportation/zo96UXm1hT6BW1oD.html](https://web.archive.org/web/20231101191736/https://webcache.googleusercontent.com/search?q=cach e:Pwils5ai08AJ:https://www.taibo.cn/p/47009&sca_esv=578562426&hl=en&gl=us&strip=1&vwsrc=0; Zhang Wei, Agriculture Should Also Be Made Artificial Intelligence, LEIPHONE (Aug. 9, 2017, 12:24 P.M.), <a href=); Press Release, U.S. Dep't of the Treasury, *Treasury Sanctions Chinese Entity and Officials Pursuant to Global Magnitsky Human Rights Executive Order* (July 31, 2020).

<sup>90</sup> Proprietary third-party software (information sourced from PRC government contracting records). The partner company is Guangzhou Zhonghaida Satellite Navigation Technology Co. (广州中海达卫星导航技术股份有限公司).

<sup>91</sup> Proprietary third-party software (information sourced from PRC government contracting records). The company is Hi-Target Surveying Instrument Co. (广州市中海达测绘仪器有限公司).

<sup>92</sup> Proprietary third-party software (information sourced from PRC government contracting records). The company is Wuhan Hi-Target DigitalCloud Technology (武汉海达数云技术有限公司).

<sup>93</sup> *Some Companies Staying in AVIC Technology Building*, FANGYUANXINXIANG,

[https://web.archive.org/web/20231101194136/https://webcache.googleusercontent.com/search?q=cach e:J6pXfVkefQoJ:www.fangyuanxinxiang.com/show-office-739.html&sca\\_esv=578579690&hl=en&gl=us&strip=1&vwsrsc=0](https://web.archive.org/web/20231101194136/https://webcache.googleusercontent.com/search?q=cach e:J6pXfVkefQoJ:www.fangyuanxinxiang.com/show-office-739.html&sca_esv=578579690&hl=en&gl=us&strip=1&vwsrsc=0) (last visited Oct. 15, 2023). The joint venture is known as Beijing Zhongchuang Boyuan Intelligent Technology Co., Ltd.

<sup>94</sup> Press Release, U.S. Dep't of Def., DOD Releases List of People's Republic of China (PRC) Military Companies in Accordance with Section 1260H of the National Defense Authorization Act for Fiscal Year 2021 (Oct. 5, 2021).

<sup>95</sup> *Having Been Deeply Involved in the Agricultural Machinery Market for 15 Years, He Has Equipped His Tractor Fleet with Autonomous Driving and Has Annual Revenue of Over 100 Million*, JIQI ZHIXIN (Oct. 18, 2019),

[https://web.archive.org/web/20231101195058/https://webcache.googleusercontent.com/search?q=cach e:z6IqK3kSjmgJ:https://www.jiqizhixin.com/articles/2019-10-18-10&sca\\_esv=578579690&hl=en&gl=us&strip=1&vwsrsc=0](https://web.archive.org/web/20231101195058/https://webcache.googleusercontent.com/search?q=cach e:z6IqK3kSjmgJ:https://www.jiqizhixin.com/articles/2019-10-18-10&sca_esv=578579690&hl=en&gl=us&strip=1&vwsrsc=0); Additions and Revisions of Entities to the Entity List, 88 Fed. Reg. 13673 (Mar. 6, 2023).

<sup>96</sup> *Id.*

<sup>97</sup> Transcript of Testimony of Elsa B. Kania before the U.S.-China Economic and Security Review Commission Hearing on Trade, Technology, and Military-Civil Fusion (June 7, 2019), [https://www.uscc.gov/sites/default/files/June%207%20Hearing\\_Panel%201\\_Elsa%20Kania\\_Chinese%20Military%20Innovation%20in%20Artificial%20Intelligence.pdf](https://www.uscc.gov/sites/default/files/June%207%20Hearing_Panel%201_Elsa%20Kania_Chinese%20Military%20Innovation%20in%20Artificial%20Intelligence.pdf).

<sup>98</sup> *Longmao Data*, GSR VENTURES GLOBAL,

<https://webcache.googleusercontent.com/search?q=cach e:UIKqt4ApnTIJ:https://gsrventuresglobal.com/details/longmao-data&hl=en&gl=us> (last visited Jan. 8, 2024).

<sup>99</sup> *Our Customers*, LONGMAO DATA, <https://www.longmaosoft.com/> (last visited Jan. 8, 2024).

<sup>100</sup> *Id.*

<sup>101</sup> *Id.*; *Supplement No. 4 to Part 744 – Entity List*, NAT'L ARCHIVES (Jan. 1, 2024),

<https://www.ecfr.gov/current/title-15/subtitle-B/chapter-VII/subchapter-C/part-744/appendix-Supplement%20No.%204%20to%20Part%20744>; Press Release, Fed. Comm'ns Comm'n, FCC Expands List of Communications Equipment and Services That Pose a Threat to National Security (Mar. 25, 2022); Additions and Revisions to the Entity List and Conforming Removal from the Unverified List, 87 Fed. Reg. 77505 (Dec. 19, 2022); *University of Electronic Science and Technology of China*, CHINA DEFENCE UNIVS. TRACKER (Nov. 19, 2019), <https://unitracker.aspi.org.au/universities/university-of-electronic-science-and-technology-of-china/>.

<sup>102</sup> *Moqi Contactless Fingerprint Scanner*, MOQI, <https://moqi.com.cn/en/> (last visited Jan. 8, 2024).

<sup>103</sup> GSR documents (on file with Select Committee).

<sup>104</sup> *Id.*

<sup>105</sup> Yu Kuai, *Shenzhen Security Expo: What to See?*, LEIPHONE (Dec. 27, 2021, 10:25 A.M.),

[https://web.archive.org/web/20231107154513/https://webcache.googleusercontent.com/search?q=cach e:nrjNN\\_FX1\\_gJ:https://www.leiphone.com/banner/homepageUrl/id/3090&sca\\_esv=580163193&hl=en&gl=us&strip=1&vwsrsc=0](https://web.archive.org/web/20231107154513/https://webcache.googleusercontent.com/search?q=cach e:nrjNN_FX1_gJ:https://www.leiphone.com/banner/homepageUrl/id/3090&sca_esv=580163193&hl=en&gl=us&strip=1&vwsrsc=0).

<sup>106</sup> *Moqi Technology Appeared at the CPSE and Won Two Industry Awards*, SOHU (Dec. 28, 2021, 5:00 P.M.), [https://web.archive.org/web/20231107155203/https://webcache.googleusercontent.com/search?q=cache:3YQCpetqvcYJ:https://www.sohu.com/a/512419592\\_120587124&hl=en&gl=us](https://web.archive.org/web/20231107155203/https://webcache.googleusercontent.com/search?q=cache:3YQCpetqvcYJ:https://www.sohu.com/a/512419592_120587124&hl=en&gl=us).

<sup>107</sup> *Moqi Technology Has Joined Hands with Inspur Information to Build the Yuan Nao Ecosystem and Accelerate the Industrial Application of AI*, INSPUR (Apr. 2, 2022), <https://web.archive.org/web/20231107151420/https://moqi.com.cn/news/inspur/>; *Our History*, INSPUR, <https://www.inspurusainc.com/inspur-history> (last visited Jan. 9, 2024); Alexandra Alper & David Shepardson, *US Adds Units of China's BGI, Inspur to Trade Blacklist*, Reuters (Mar. 16, 2023), <https://www.reuters.com/markets/us/us-adds-chinese-genetics-company-units-trade-blacklist-2023-03-02/>; Notice of Designation of Chinese Military Companies Under the William M. (Mac) Thornberry NDAA for FY21, 86 Fed. Reg. 33994 (June 28, 2021).

<sup>108</sup> Proprietary third-party software; see also U.S. Dep't of the Treasury, *supra* note 44.

<sup>109</sup> Juro Osawa, *The TikTok Investors with the Most to Lose from a U.S. Ban*, THE INFO. (Mar. 20, 2023, 2:29 P.M.), <https://www.theinformation.com/articles/the-tiktok-investors-with-the-most-to-lose-from-a-u-s-ban>.

<sup>110</sup> Zhou Xin & Coco Feng, *Exclusive: TikTok's Owner ByteDance to Add Four Directors to Expand Its Board to Nine Amid Growing US Scrutiny Over the App's Beijing Link*, S. CHINA MORNING POST (Sept. 28, 2022, 12:00 P.M.), <https://www.scmp.com/tech/big-tech/article/3194006/tiktoks-owner-bytedance-add-four-directors-expand-its-board-nine-amid>; Ananya Bhattacharya, *Sequoia Was Rattled by Geopolitics. Chinese Firms Know What That's Like.*, QUARTZ (June 7, 2023), <https://qz.com/sequoia-was-rattled-by-geopolitics-chinese-firms-know-1850513521>.

<sup>111</sup> AUSTL. SENATE SELECT COMM. ON FOREIGN INTERFERENCE THROUGH SOC. MEDIA, TIKTOK, BYTEDANCE, AND THEIR TIES TO THE CHINESE COMMUNIST PARTY 64-65 (2023).

<sup>112</sup> Cave et al., *supra* note 37.

<sup>113</sup> *Internet Police Units Across the Country Are Stationed in Douyin to Create a New Model of Public Security Internet Governance*, YAXIN (Sept. 14, 2018, 4:34 P.M.), <https://web.archive.org/web/20191126030138/http://www.iyaxin.com/wap/content/201809/14/c267308.html>.

<sup>114</sup> *Id.*

<sup>115</sup> Cave et al., *supra* note 37.

<sup>116</sup> Chad de Guzman, *Former ByteDance Executive Alleges Chinese Government Used 'God Credential' to Access User Data and Track Hong Kong Activists*, TIME MAG. (June 7, 2023, 4:00 A.M.), <https://time.com/6285368/bytedance-tiktok-china-hong-kong-activists/>.

<sup>117</sup> Matt Pottinger et al., *Xi Jinping in His Own Words*, FOREIGN AFFS. (Nov. 30, 2022), <https://www.foreignaffairs.com/china/xi-jinping-his-own-words>.

<sup>118</sup> Emily Baker-White, *Congress Wants Answers About the FBI and DOJ's TikTok Investigation*, FORBES (Dec. 7, 2023, 2:00 P.M.), <https://www.forbes.com/sites/emilybaker-white/2023/12/07/congress-wants-answers-about-fbi-doj-tiktok-investigation/?sh=11dbf64f78df>.

<sup>119</sup> See Emily Baker-White, *Leaked Audio from 80 Internal TikTok Meetings Shows That US User Data Has Been Repeatedly Accessed from China*, BUZZFEED NEWS (June 17, 2022, 12:31 P.M.), <https://www.buzzfeednews.com/article/emilybakerwhite/tiktok-tapes-us-user-data-china-bytedance-access>; Emily Baker-White, *EXCLUSIVE: TikTok Spied On Forbes Journalists*, FORBES (Dec. 22, 2022), <https://www.forbes.com/sites/emilybaker-white/2022/12/22/tiktok-tracks-forbes-journalists-bytedance/?sh=68c05b5d7da5>.

<sup>120</sup> AUSTL. SENATE SELECT COMM., *supra* note 111, at 63.

<sup>121</sup> *Id.* at 64.

<sup>122</sup> GGV documents (on file with Select Committee); additional documents on file with the Select Committee.

<sup>123</sup> *ByteDance's Liu Zhen on Its Global Vision and Leading Uber China*, THE NEXT BILLION (Apr. 13, 2020), <https://web.archive.org/web/20230531154654/https://nextbn.ggvc.com/podcast/s1-ep-4-liu-zhen-on-bytedances-global-vision-and-leading-uber-china/> (“One of the reasons why musical.ly decided to merge with ByteDance, [one] of the reasons why I was in favor of it, is that there’s very unique capability can boost almost any company you work with.”).

<sup>124</sup> GGV documents (on file with Select Committee).

<sup>125</sup> *Id.*

<sup>126</sup> Addition of Entities to the Entity List, Revision of Certain Entries on the Entity List, 85 Fed. Reg. 34495 (June 5, 2020); U.S. Dep’t of Defense, *supra* note 94.

<sup>127</sup> Sequoia documents on file with Committee.

<sup>128</sup> Sarah Dai, *Sequoia Capital China's Neil Shen and Softbank Vision Fund Partner Quit Board Roles at Qihoo 360*, SCMP (June 2, 2020, 6:13 P.M.), <https://www.scmp.com/tech/start-ups/article/3087203/sequoia-capital-chinas-neil-shen-and-softbank-vision-fund-partner>.

<sup>129</sup> Elsa Kania, *China's Quest for Political Control and Military Supremacy in the Cyber Domain*, AUSTL. STRATEGIC POL’Y INST. (Mar. 16, 2018), <https://www.aspistrategist.org.au/chinas-quest-political-control-military-supremacy-cyber-domain/>.

<sup>130</sup> *The Information Center of the State Administration of Science, Technology, and Industry for National Defense Signed a Strategic Cooperation Agreement with 360 Enterprise Security Globe.com*, HUANQIU (Apr. 19, 2018, 3:59 A.M.), <https://web.archive.org/web/20231212191139/https://m.huanqiu.com/article/9CaKrnK7SyV>.

<sup>131</sup> *Id.*

<sup>132</sup> Proprietary third-party software; *Yunzhisheng and 360 Reached a Strategic Cooperation*, UNISOUND (May 25, 2023), <https://web.archive.org/web/20231108193456/https://www.unisound.com/news/91.html>; *see also* 360 Has Reached a Strategic Cooperation with Yunzhisheng to Jointly Meet the Inflection Point of General Artificial Intelligence, 163.COM (May 25, 2023, 11:17 A.M.), <https://web.archive.org/web/20231108161520/https://www.163.com/dy/article/I5J2VAD105199FB7.html>.

<sup>133</sup> *Yunzhisheng and China Construction Electronics Reached a Strategic Cooperation*, UNISOUND (May 25, 2023), <https://web.archive.org/web/20231212191019/https://www.unisound.com/news/89.html>.

<sup>134</sup> Kirsty Needham & Clare Baldwin, *China's Gene Giant Harvests Data from Millions of Women*, REUTERS (July 7, 2021), <https://www.reuters.com/investigates/special-report/health-china-bgi-dna/>; *see also* Yvonne Lau, *China's Extensive Use of Genetic Information Sounds a Warning*, AUSTL. STRATEGIC POL’Y INST. (Sept. 30, 2022), <https://www.aspistrategist.org.au/chinas-extensive-use-of-genetic-information-sounds-a-warning/>.

<sup>135</sup> *Id.*

<sup>136</sup> *Id.*; Kirsty Needham, *Special Report: COVID Opens New Doors for China's Gene Giant*, REUTERS (Aug. 5, 2020, 6:36 A.M.), <https://www.reuters.com/article/idUSKCN2511CD/>.

<sup>137</sup> Sequoia documents (on file with Select Committee).

<sup>138</sup> Richard Daverman, *Dream Driven: Exclusive Interview with Dr. Jun Wang, Executive Director of BGI*, CHINABIO TODAY (Mar. 19, 2013), <http://www.chinabiotoday.com/articles/20130320>; Andrew Pollack, *U.S. Clears DNA Firm's Acquisition by Chinese*, N.Y. TIMES (Dec. 30, 2012),

<https://www.nytimes.com/2012/12/31/health/chinese-firm-is-cleared-to-buy-american-dna-sequencing-company.html>.

<sup>139</sup> Pollack, *supra* note 138.

<sup>140</sup> *Id.*

<sup>141</sup> Sequoia documents (on file with Select Committee); *Complete Genomics, BGI Agree to \$117.6M Merger*, GENOME WEB (Sept. 17, 2021), <https://www.genomeweb.com/clinical-sequencing/complete-genomics-bgi-agree-1176m-merger>.

<sup>142</sup> Additions and Revisions of Entities to the Entity List, 88 Fed. Reg. 13673 (Mar. 6, 2023). Two other subsidiaries were blacklisted in 2020 for “conducting genetic analyses used to further the repression of Uighurs and other Muslim minorities.” David Shepardson, *Chinese Genetics Company BGI Denies U.S. Human Rights Accusations*, REUTERS (July 22, 2020, 2:55 A.M.), <https://www.reuters.com/article/idUSKCN24N0P2/>.

<sup>143</sup> U.S. Dep’t of Defense, *supra* note 83.

<sup>144</sup> Additions and Revisions of Entities to the Entity List, 88 Fed. Reg. 13673 (Mar. 6, 2023).

<sup>145</sup> Sequoia documents (on file with Select Committee).

<sup>146</sup> *Id.*

<sup>147</sup> Ellen Nakashima & Jeanne Whalen, *Biden Administration Concerned About U.S. Investments in Chinese Tech Companies with Military or Surveillance Ties*, WASH. POST (Dec. 16, 2021, 6:00 A.M.), [https://www.washingtonpost.com/national-security/us-investments-china-biden/2021/12/15/835876a0-5772-11ec-a808-3197a22b19fa\\_story.html](https://www.washingtonpost.com/national-security/us-investments-china-biden/2021/12/15/835876a0-5772-11ec-a808-3197a22b19fa_story.html).

<sup>148</sup> Proprietary third-party software; Addition of Certain Entities to the Entity List, Revision of Entries on the Entity List, and Removal of Entities from the Entity List, 84 Fed. Reg. 40237 (Aug. 14, 2019).

<sup>149</sup> U.S. Dep’t of the Treasury, *supra* note 44; U.S. Dep’t of Defense, *supra* note 126; Addition of Entities to the Entity List, Revision of Entry on the Entity List, and Removal of Entities from the Entity List, 85 Fed. Reg. 83416 (Dec. 22, 2020).

<sup>150</sup> U.S. Dep’t of the Treasury, *supra* note 44.

<sup>151</sup> U.S. Dep’t of Defense, *supra* note 126.

<sup>152</sup> Julie Zhu, *China Everbright, VC Firm Walden Launch \$500 Million Semiconductor Fund*, REUTERS (Oct. 26, 2017, 7:56 A.M.), <https://www.reuters.com/article/idUSKBN1CV1RC/>; see Dr. Robert Yung: *Partner of Walden International*, EVERBRIGHT LTD., <https://www.everbright.com/en/team/dr-robert-yung> (last visited Jan. 16, 2024); Luo Xin, *Walden International Joined Hands with China Electronics to Set Up a Fund to Increase Investment in China’s Semiconductor Industry*, ELEC FANS (Oct. 1, 2018), [https://web.archive.org/web/20240113164502/https://webcache.googleusercontent.com/search?q=cache:HFzELmXsKvMJ:https://www.elecfans.c’m/d/791010.html&sca\\_esv=598179004&hl=en&gl=us&strip=1&vwsr=0](https://web.archive.org/web/20240113164502/https://webcache.googleusercontent.com/search?q=cache:HFzELmXsKvMJ:https://www.elecfans.c’m/d/791010.html&sca_esv=598179004&hl=en&gl=us&strip=1&vwsr=0).

<sup>153</sup> Grace Lisa Scott, *The Obvious Reason the Military Just Banned the Most Popular Drone*, INVERSE (Aug. 5, 2017), <https://www.inverse.com/article/35129-u-s-military-just-banned-the-use-of-dji-drones>.

<sup>154</sup> *Announcement of Winning Bid for the UAV Procurement Project of Unit 95861 of the Chinese People’s Liberation Army*, GSEI (Jan. 2, 2019), <https://web.archive.org/web/20220329023643/http://www.gsei.com.cn/html/1337/2019-01-02/content-223762.html>.

<sup>155</sup> Matthew Luce, *A Model Company: CETC Celebrates 10 Years in Civil-Military Integration*, THE JAMESTOWN FOUND. (Feb. 21, 2012, 8:17 P.M.), <https://jamestown.org/program/a-model-company-cetc-celebrates-10-years-of-civil-military-integration/>.

<sup>156</sup> Addition of Certain Entities to the Entity List and Revision of an Entry on the Entity List, 86 Fed. Reg. 71557 (Dec. 17, 2021).

<sup>157</sup> Cate Cadell, *Drone Company DJI Obscured Ties to Chinese State Funding, Documents Show*, WASH. POST (Feb. 1, 2022, 10:00 A.M.), <https://www.washingtonpost.com/national-security/2022/02/01/china-funding-drones-dji-us-regulators/>; see also Charles Rollet, *DJI Lied about PRC Government Investments, Adheres to Xi Jinping Thought*, IPVM (Feb. 1, 2022, 10:15 A.M.), <https://ipvm.com/reports/dji-prc>.

<sup>158</sup> GGV documents on file with Committee; *Solutions for the Aerospace Industry*, NJTF, <https://web.archive.org/web/20231107161055/https://www.njtf.cn/software-2.html> (last visited Jan. 4, 2024).

<sup>159</sup> Source documents (on file with Select Committee); Karen Freifeld & Jiang Sijia, *China's ZTE Pleads Guilty, Settles U.S. Sanctions Case for Nearly \$900 Million*, REUTERS (Feb. 26, 2020), <https://www.reuters.com/article/us-usa-china-zte-idUSKBN16E1X1>; Diane Bartz & Alexandra Alper, *U.S. Bans New Huawei, ZTE Equipment Sales, Citing National Security Risk*, REUTERS (Nov. 30, 2022, 11:13 P.M.), <https://www.reuters.com/business/media-telecom/us-fcc-bans-equipment-sales-imports-zte-huawei-over-national-security-risk-2022-11-25/>.

<sup>160</sup> *Solutions for the Aerospace Industry*, *supra* note 158; Proprietary third-party software, information sourced from PRC government contracting records.

<sup>161</sup> *Tianhuan Software Technology R&D Position 2022 Autumn School Recruitment Notice*, PEKING UNIV. (Oct. 6, 2022), [https://web.archive.org/web/20231107160819/https://scc.pku.edu.cn/employment\\_22e90345837d28bc0183ac6393d0151b\\_0.html](https://web.archive.org/web/20231107160819/https://scc.pku.edu.cn/employment_22e90345837d28bc0183ac6393d0151b_0.html).

<sup>162</sup> *Solutions for the Aerospace Industry*, *supra* note 158.

<sup>163</sup> *Ship and Maritime Industry Solutions*, NJTF, <https://web.archive.org/web/20231107163706/https://www.njtf.cn/software-3.html> (last visited Jan. 9, 2024); see also *Company Profile*, SHANGHAI STUDENT EMP. & ENTREPRENEURSHIP SERV. NETWORK, <https://web.archive.org/web/20240109172357/https://webcache.googleusercontent.com/search?q=cach e:TiEGMC61TRQJ:www.firstjob.sh.ec.edu.cn/folder76/folder364/folder366/2016-10-18/2987.html&hl=en&gl=us> (last visited Jan. 9, 2024).

<sup>164</sup> Addition of Entities to the Entity List, Revision of Entry on the Entity List, and Removal of Entities from the Entity List, 85 Fed. Reg. 83416 (Dec. 22, 2020).

<sup>165</sup> *Beijin Fengtai Has Established a Military-Civilian Integration Scientific and Technological Innovation System*, SASTIND (May 16, 2018), [https://web.archive.org/web/20231107170553/https://webcache.googleusercontent.com/search?q=cach e:hA0WQj\\_CK2EJ:https://www.sastind.gov.cn/n10086200/n10086344/c10179429/content.html&sca\\_es v=580163193&hl=en&gl=us&strip=1&vwsr=0](https://web.archive.org/web/20231107170553/https://webcache.googleusercontent.com/search?q=cach e:hA0WQj_CK2EJ:https://www.sastind.gov.cn/n10086200/n10086344/c10179429/content.html&sca_es v=580163193&hl=en&gl=us&strip=1&vwsr=0).

<sup>166</sup> *Id.*

<sup>167</sup> *Id.*

<sup>168</sup> *China Aerospace Science and Industry Space Data Service Center and Elok Aviation Jointly Build a Strategic System for Spatial Data Integration*, IFENG (Dec. 11, 2017, 4:53 P.M.), [https://web.archive.org/web/20231107171627/https://webcache.googleusercontent.com/search?q=cach e:qlXen4mIyPcJ:ifinance.ifeng.com/15859376/news.shtml&sca\\_esv=580163193&hl=en&gl=us&strip=1 &vwsr=0](https://web.archive.org/web/20231107171627/https://webcache.googleusercontent.com/search?q=cach e:qlXen4mIyPcJ:ifinance.ifeng.com/15859376/news.shtml&sca_esv=580163193&hl=en&gl=us&strip=1 &vwsr=0).

<sup>169</sup> *Id.*

<sup>170</sup> U.S. Dep't of Defense, *supra* note 126.

<sup>171</sup> RYAN FEDASIUK ET AL., *HARNESSED LIGHTNING: HOW THE CHINESE MILITARY IS ADOPTING ARTIFICIAL INTELLIGENCE*, GEO. UNIV. CTR. FOR SEC. & EMERGING TECH. 22 (2021), <https://cset.georgetown.edu/publication/harnessed-lightning/>.

<sup>172</sup> *Id.*

<sup>173</sup> Proprietary third-party software (information sourced from PRC government contracting records).

<sup>174</sup> *Id.*

<sup>175</sup> Peng Xiaobo, *President of Interstellar Glory: The Government and the Military Strongly Encourage Civil-Military Integration*, SINA FINANCE (Jan. 14, 2019, 5:23 P.M.), [https://web.archive.org/web/20231108184514/https://webcache.googleusercontent.com/search?q=cach e:ve5craDBC9IJ.doc.sina.cn/?id%3Dcomos:hqfskcn7054196&sca\\_esv=580562456&hl=en&gl=us&strip= 1&vwsrsc=0; Interstellar Glory Zero-Heavy Space Jointly Launches Multiple Satellites with One Stone, Beijing Yizhuang Private Enterprises Launch Commercial Satellites](https://web.archive.org/web/20231108184514/https://webcache.googleusercontent.com/search?q=cach e:ve5craDBC9IJ.doc.sina.cn/?id%3Dcomos:hqfskcn7054196&sca_esv=580562456&hl=en&gl=us&strip= 1&vwsrsc=0; Interstellar Glory Zero-Heavy Space Jointly Launches Multiple Satellites with One Stone, Beijing Yizhuang Private Enterprises Launch Commercial Satellites), BEIJING BUS. DAILY (Aug. 6, 2018), [https://web.archive.org/web/20231108185503/https://webcache.googleusercontent.com/search?q=cach e:joXD6pqiwm0J.kfqgw.beijing.gov.cn/zwgkfq/mtjkkfq/202103/t20210330\\_2333191.html&sca\\_esv=58 0562456&hl=en&gl=us&strip=1&vwsrsc=0](https://web.archive.org/web/20231108185503/https://webcache.googleusercontent.com/search?q=cach e:joXD6pqiwm0J.kfqgw.beijing.gov.cn/zwgkfq/mtjkkfq/202103/t20210330_2333191.html&sca_esv=58 0562456&hl=en&gl=us&strip=1&vwsrsc=0).

<sup>176</sup> *Interstellar Glory Debuted at the Military-Civilian Integration Exhibition, and Military-Civilian Integration Drove onto the Highway of Development*, ZHIHU (Oct. 15, 2018, 10:33 P.M.), [https://web.archive.org/web/20231108185724/https://webcache.googleusercontent.com/search?q=cach e:TIXo\\_8tA3AJ:https://zhuanlan.zhihu.com/p/46845598&sca\\_esv=580562456&hl=en&gl=us&strip=1& vwsrsc=0](https://web.archive.org/web/20231108185724/https://webcache.googleusercontent.com/search?q=cach e:TIXo_8tA3AJ:https://zhuanlan.zhihu.com/p/46845598&sca_esv=580562456&hl=en&gl=us&strip=1& vwsrsc=0).

<sup>177</sup> *Interstellar Glory Was Selected as One of the Top Ten Commercial Aerospace Companies in the 2018 Military Industry List*, ZHIHU (Dec. 21, 2018, 8:18 A.M.), <https://zhuanlan.zhihu.com/p/52983930>.

<sup>178</sup> Qualcomm Ventures documents (on file with Select Committee).

<sup>179</sup> EMILY S. WEINSTEIN & NGOR LUONG, *U.S. OUTBOUND INVESTMENT INTO CHINESE AI COMPANIES 32* (2023), <https://cset.georgetown.edu/publication/u-s-outbound-investment-into-chinese-ai-companies/>; U.S. Dep't of Def., *supra* note 94.

<sup>180</sup> WEINSTEIN, *supra* note 179.

<sup>181</sup> *Id.*; Press Release, U.S. Dep't of Defense, DOD Releases List of Additional Companies, in Accordance with Section 1237 of FY99 NDAA (Aug. 28, 2020); Entity List: Revisions and Additions, 66 Fed Reg. 24264 (May 14, 2001).

<sup>182</sup> Qualcomm Ventures documents (on file with Select Committee).

<sup>183</sup> *Shenyang Aerospace University*, CHINA DEFENCE UNIVS. TRACKER, <https://unitracker.aspi.org.au/universities/shenyang-aerospace-university/> (last visited Jan. 11, 2024).

<sup>184</sup> According to proprietary third-party software, Beijing Land Space Science and Technology (蓝箭航天空间科技股份有限公司) has contracted with the CCP's Central Military Commission.

<sup>185</sup> *Blue Arrow Aerospace Completed Series B Financing of RMB 200 Million*, LANDSPACE (May 7, 2018), <https://web.archive.org/web/20231207190752/https://www.landspace.com/news-detail.html?itemid=1>.

<sup>186</sup> Proprietary third-party software, information sourced from PRC government contracting records; MARK A STOKES & DEAN CHENG, *CHINA'S EVOLVING SPACE CAPABILITIES: IMPLICATIONS FOR U.S. INTERESTS 17* (2012), [https://www.uscc.gov/sites/default/files/Research/USCC\\_China-Space-Program-Report\\_April-2012.pdf](https://www.uscc.gov/sites/default/files/Research/USCC_China-Space-Program-Report_April-2012.pdf).

<sup>187</sup> *Supplement No. 4 to Part 744—Entity List*, *supra* note 100; OFF. OF FOREIGN ASSETS CONTROL, *NON-SDN CHINESE MILITARY-INDUSTRIAL COMPLEX COMPANIES LIST 4* (2021),

<https://www.treasury.gov/ofac/downloads/ccmc/nscmiclist.pdf>; Additions of Entities to the Entity List, 87 Fed. Reg. 51876 (Aug. 24, 2022).

<sup>188</sup> Proprietary third-party software, information sourced from PRC government contracting records.

<sup>189</sup> Proprietary third-party software.

<sup>190</sup> *About Us*, HAI ROBOTICS,

<https://web.archive.org/web/20240109205607/https://www.hairobotics.cn/company> (last visited Jan. 11, 2024); Addition of Entities to the Entity List, Revision of Entry on the Entity List,

and Removal of Entities From the Entity List, 85 Fed. Reg. 83416 (Dec. 22, 2020); U.S. Dep't of the Treasury, *supra* note 44; U.S. Dep't of Defense, *supra* note 94.

<sup>191</sup> *Xinjiang's First Unmanned Smart Warehouse for Power Materials, with a Storage Capacity Increased by 4.8 Times*, 163.COM (Nov. 18, 2020, 9:51 A.M.),

<https://web.archive.org/web/20240123051423/https://www.163.com/dy/article/FRN55L530531NGS6.html>.

<sup>192</sup> *Megvii and HAI Robotics Have Reached a Strategic Cooperation Agreement*, MEGVII,

[https://web.archive.org/web/20240125220024/https://www.megvii.com/news\\_detail/id/102](https://web.archive.org/web/20240125220024/https://www.megvii.com/news_detail/id/102) (last visited Jan. 29, 2024).

<sup>193</sup> *GGV Leads US\$1.4M Investment Round in SaaS Company Black Lake*, YAHOO! NEWS (July 18, 2017),

<https://sg.news.yahoo.com/ggv-leads-us-1-4m-investment-round-saas-051443870.html>.

<sup>194</sup> *Liu Xiaoyue, China Resources Group, L'Oreal, China North Industries...Black Lack Intelligence Manufacturing Is Deeply Engaged in the Exploration of Digital Factories*, 163.COM (Aug. 5, 2020),

<https://web.archive.org/web/20230925170224/https://36kr.com/p/824832439491714>.

<sup>195</sup> *Huawei Cloud Innovation Center & Black Lake Technology: Carry Out Smart Intelligent Manufacturing to the End*, 163.COM (Sept. 14, 2023, 10:58

P.M.), <https://web.archive.org/web/20231117195913/https://www.163.com/dy/article/IEKNI5H9055312FV.html>.

<sup>196</sup> *See Lu Jingwen, "Black Lake Intelligent Manufacturing" Completed Nearly 500 Million Yuan in Series C Financing, and Also Launched a Low-Code Task Management Applet to Empower Small Manufacturing Companies*, 36KR (Feb. 22, 2021, 8:00 A.M.),

[https://webcache.googleusercontent.com/search?q=cache:22wkeonEX9kJ:https://m.36kr.com/p/1107638318082306&sca\\_esv=583420096&hl=en&gl=us&strip=1&vwsrc=0](https://webcache.googleusercontent.com/search?q=cache:22wkeonEX9kJ:https://m.36kr.com/p/1107638318082306&sca_esv=583420096&hl=en&gl=us&strip=1&vwsrc=0).

<sup>197</sup> *Beijing Zhuoshi Zhitong Technology Co., Ltd. Joint Laboratory of Artificial Intelligence Innovation and Application*, BEIJING UNIV. OF POSTS AND TELECOMMS. (Mar. 21, 2022),

<https://web.archive.org/web/20231115185741/https://ai.bupt.edu.cn/info/1172/2162.htm>; *Supplement No. 4 to Part 744—Entity List*, *supra* note 101.

<sup>198</sup> *Beijing University of Posts and Telecommunications*, CHINA DEFENCE UNIVS. TRACKER (May 4, 2021),

<https://unitracker.aspi.org.au/universities/beijing-university-of-posts-and-telecommunications/>.

<sup>199</sup> *Beijing Zhuoshi Zhitong Technology Co.*, *supra* note 197.

<sup>200</sup> Qualcomm Ventures documents (on file with Select Committee).

<sup>201</sup> *Chengdu Ajiayi Intelligent Technology Co., Ltd*, CDTU (June 30, 2022),

[https://web.archive.org/web/20240111180454/https://webcache.googleusercontent.com/search?q=cache:CTsD\\_uj2Xr0J:https://bdai.cdtu.edu.cn/info/1102/4254.htm&hl=en&gl=us](https://web.archive.org/web/20240111180454/https://webcache.googleusercontent.com/search?q=cache:CTsD_uj2Xr0J:https://bdai.cdtu.edu.cn/info/1102/4254.htm&hl=en&gl=us).

<sup>202</sup> *Xu Yang, How to Deeply Integrate Industry, Academia and Resesarch, Chengdu Tianfu Software Park is Exploring with Practice*, CHINA INTERNET NEWS CTR. (Jan. 11, 2022, 7:32 P.M.),

<https://web.archive.org/web/20240110213826/https://webcache.googleusercontent.com/search?q=cach e:7UCsr3pe1yUJ:sc.china.com.cn/2022/difang/1325/0111/433962.html&hl=en&gl=us>.

<sup>203</sup> *Supplement No. 4 to Part 744—Entity List*, *supra* note 101; *Univ. of Elec. Sci. & Tech. of China*, CHINA DEFENCE UNIVS. TRACKER (Nov. 19, 2019), <https://unitracker.aspi.org.au/universities/university-of-electronic-science-and-technology-of-china/>.

<sup>204</sup> Documentation (on file with Select Committee).

<sup>205</sup> Sutter & Arnold, *supra* note 36, at 24; Huey-Meei Chang & William C. Hannas, *Future paths and challenges*, in CHINESE POWER AND ARTIFICIAL INTELLIGENCE: PERSPECTIVES AND CHALLENGES 225, 230 (William C. Hannas & Huey-Meei Chang eds., 2022).

<sup>206</sup> *Vision Technology Wang Jinqiao's team won the 2018 Global AI Challenge Championship*, I CLOUD NEWS (Dec. 24, 2018, 5:36 P.M.), <https://web.archive.org/web/20240130013344/https://www.icloudnews.net/a/15350.html>.

<sup>207</sup> Elsa B. Kania, *Minds at War: China's Pursuit of Military Advantage through Cognitive Science and Biotechnology*, 8 PRISM 83, 96 (2020); Elsa B. Kania, *Learning Without Fighting: New Developments in PLA Artificial Intelligence War-Gaming*, THE JAMESTOWN FOUND. (Apr. 9, 2019, 3:01 P.M.), <https://jamestown.org/program/learning-without-fighting-new-developments-in-pla-artificial-intelligence-war-gaming/>.

<sup>208</sup> U.S.-CHINA ECON. & SEC. REV. COMM'N, *supra* note 29, at 217-18.

<sup>209</sup> See Letter from Bill Hagerty, U.S. Senator, to Janet Yellen, U.S. Secretary of the Treasury, Gina Raimondo, U.S. Secretary of Commerce, and Antony Blinken, U.S. Secretary of State (Apr. 25, 2023), <https://www.hagerty.senate.gov/wp-content/uploads/2023/04/20230425-FINAL-Hagerty-Led-Senate-Letter-to-SECTREAS-SECCOMMERCE-SECSTATE-on-PRC-Cloud.pdf>.

<sup>210</sup> Alexandra Alper, *Exclusive: U.S. Examining Alibaba's Cloud Unit for National Security Risks - Sources*, REUTERS (Jan. 19, 2022, 2:58 P.M.), <https://www.reuters.com/technology/exclusive-us-examining-alibabas-cloud-unit-national-security-risks-sources-2022-01-18/>.

<sup>211</sup> Jyoti Narayan & Nilutpal Timsina, *Belgian Intelligence Service Scrutinising Alibaba's Presence at Liege Airport*, REUTERS (Oct. 5, 2023, 11:47 P.M.), <https://www.reuters.com/technology/belgiums-intelligence-service-monitors-alibaba-hub-over-espionage-concerns-ft-2023-10-05/>.

<sup>212</sup> Zach Dorfman, *Tech Giants Are Giving China a Vital Edge in Espionage*, FOREIGN POL'Y (Dec. 23, 2020, 6:00 A.M.), <https://foreignpolicy.com/2020/12/23/china-tech-giants-process-stolen-data-spy-agencies/#>.

<sup>213</sup> Luong & Fedasiuk, *supra* note 42, at 7. *Translation: Outline of the People's Republic of China 14th Five-Year Plan for National Economic and Social Development and Long-Range Objectives for 2035*, CTR. FOR SEC. & EMERGING TECH. (translation date: May 12, 2021),

<https://cset.georgetown.edu/publication/china-14th-five-year-plan/> (“In basic and core fields related to national security and overall development, we will formulate and implement strategic scientific plans and scientific projects . . . We will make breakthroughs in cutting-edge basic theories, develop dedicated chips, and construct open-source algorithm platforms such as deep learning frameworks. We will make innovations in learning inference and decision-making, images and graphics, voice and video, natural language recognition and processing, and other fields.”)

<sup>214</sup> *About*, MOONSHOT, <https://www.moonshotai.org/about> (last visited Jan. 5, 2024).

<sup>215</sup> *Sequoia, Today Capital and Others Invested in Moonshot AI's Large-Scale Model “Long Text” Journey*, LAI TIMES (Oct. 14, 2023), [https://web.archive.org/web/20240129153845/https://www.laitimes.com/article/63rgu\\_6k4b5.html](https://web.archive.org/web/20240129153845/https://www.laitimes.com/article/63rgu_6k4b5.html).

<sup>216</sup> *Id.*

<sup>217</sup> See KELLEY M. SAYLER & LAURIE A. HARRIS, CONG. RSCH. SERV., IF11333, DEEP FAKES AND NATIONAL SECURITY 1 (2023).

<sup>218</sup> Sequoia documents (on file with Select Committee).

<sup>219</sup> See Rita Liao, *How China's Synthetic Media Startup Surreal Nabs Funding in 3 Months*, TECHCRUNCH (Mar. 1, 2021), [https://techcrunch.com/2021/03/01/surreal-profile/?guccounter=1&guce\\_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce\\_referrer\\_sig=AQAAAD5zp2N0eNRqn3fxYbaND24M7iM7TqqRh5Oq0swFXpMqpun1wfnMjow3W1NUmfoYwzjoOEDdd7ES1oUc6pMhvUdrvXpZ5cwebThmCwsUEE2vMi0Vb7YxIEIu4q6txrieHW8WGudUXZiF6WK55RyNi8WplznPNkjRexam9lxKQW6](https://techcrunch.com/2021/03/01/surreal-profile/?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAAD5zp2N0eNRqn3fxYbaND24M7iM7TqqRh5Oq0swFXpMqpun1wfnMjow3W1NUmfoYwzjoOEDdd7ES1oUc6pMhvUdrvXpZ5cwebThmCwsUEE2vMi0Vb7YxIEIu4q6txrieHW8WGudUXZiF6WK55RyNi8WplznPNkjRexam9lxKQW6).

<sup>220</sup> Kenrick Cai, *AI Video Startup HeyGen Launches Near-Instant Avatar Generator, Adds \$5.6 Million in Funding*, FORBES (Nov. 29, 2023, 6:30 A.M.), <https://www.forbes.com/sites/kenrickcai/2023/11/29/ai-video-startup-heygen-launches-near-instant-avatar-generator-adds-56-million-in-funding/?sh=55d0230d6782>.

<sup>221</sup> Rita Liao, *Movio Wants to Make Your Marketing Videos with Generative AI*, TECHCRUNCH (Nov. 8, 2022, 12:30 P.M.), <https://techcrunch.com/2022/11/08/movio-marketing-videos-generative-ai/>.

<sup>222</sup> See U.S. Dep't of State, Glob. Engagement Ctr., *How the People's Republic of China Seeks to Reshape the Global Information Environment* 15 (2023).

<sup>223</sup> KAREN M. SUTTER, CONG. RSCH. SERV., R46767, *CHINA'S NEW SEMICONDUCTOR POLICIES: ISSUES FOR CONGRESS 3* (2021), <https://crsreports.congress.gov/product/pdf/R/R46767>.

<sup>224</sup> James Andrew Lewis, *China's Pursuit of Semiconductor Independence*, CTR. FOR STRATEGIC & INT'L STUD. (Feb. 27, 2019), <https://www.csis.org/analysis/chinas-pursuit-semiconductor-independence#:~:text=In%202014%2C%20China's%20State%20Council,has%20hampered%20China's%20previous%20efforts; Translation: State Council Notice on the Publication of Certain Policies to Promote the High-Quality Development of the Integrated Circuit Industry and the Software Industry in the New Period>, CTR. FOR SEC. & EMERGING TECH. (translation date: Sept. 2, 2020), [https://cset.georgetown.edu/wp-content/uploads/t0195\\_IC\\_software\\_policy\\_EN.pdf](https://cset.georgetown.edu/wp-content/uploads/t0195_IC_software_policy_EN.pdf).

<sup>225</sup> SUTTER, *supra* note 223, at 4.

<sup>226</sup> *Id.* at 6–7.

<sup>227</sup> *Id.* at 12.

<sup>228</sup> For example, Qualcomm Ventures documents from 2015 discuss an investment into a PRC semiconductor company alongside a PRC government semiconductor fund. The documents state that Qualcomm Ventures is “seeking other collaboration opportunit[ies]” with the PRC fund. Qualcomm Ventures documents (on file with Select Committee).

<sup>229</sup> SUTTER, *supra* note 223.

<sup>230</sup> Nigel Inkster et al., *Ask the Experts: Is China's Semiconductor Strategy Working?* LONDON SCH. OF ECON. & POL. SCI. (Sept. 1, 2022), <https://blogs.lse.ac.uk/cff/2022/09/01/is-chinas-semiconductor-strategy-working/>.

<sup>231</sup> For example, Walden International invested in GigaDevice, which is also a corporate investor into other PRC semiconductor companies. See Walden International documents (on file with Select Committee).

<sup>232</sup> Press Release, U.S. Dep't of Com. Bureau of Indus. & Sec., *Commerce Implements New Export Controls on Advanced Computing and Semiconductor Manufacturing Items to the People's Republic of China (PRC)* (Oct. 7, 2022).

<sup>233</sup> See Francisco Pires, *China Chipmaker Says It Is Replaying Sanctioned Tools Rapidly*, TOM'S HARDWARE (Aug. 31, 2023), <https://www.tomshardware.com/news/china-semiconductor-manufacturing-ceo-says-sanctions-barely-hurt>.

<sup>234</sup> In part, this is because start-up semiconductor companies not only help the PRC advance technologically across the semiconductor supply chain, but also help the PRC expand its capacity to make more chips. This undercuts America's domestic competitors. The PRC can also implement its advancements for military purposes. See ANDREW DAVID ET AL., FOUNDATIONAL FABs: CHINA'S USE OF NON-MARKET POLICIES TO EXPAND ITS ROLE IN THE SEMICONDUCTOR SUPPLY CHAIN 6 (2023), <https://cdn.sanity.io/files/0wfc71x/production/4061d4fb69f1253928ed51f752c558e0d02fe8c.pdf>.

<sup>235</sup> Luo Xue, *Focusing on China's Semiconductor Investment, Shanghai Huaxin Venture Capital Was Established*, CHINA ELEC. NEWS July 12, 2011, 10:45 A.M.), [https://web.archive.org/web/20231207201955/https://webcache.googleusercontent.com/search?q=cach e:1mvvmZAGYIEJ:m.cena.com.cn/semi/20110712/9215.html&sca\\_esv=578909417&hl=en&gl=us&strip =1&vwsr=0](https://web.archive.org/web/20231207201955/https://webcache.googleusercontent.com/search?q=cach e:1mvvmZAGYIEJ:m.cena.com.cn/semi/20110712/9215.html&sca_esv=578909417&hl=en&gl=us&strip =1&vwsr=0).

<sup>236</sup> See Viki, *Guangzhou Industrial Investment Group Has Joined Hands with Walden International and Other Institutions to Accelerate the Investment Layout of the Semiconductor Industry*, DRAMEXCHANGE (Jan. 1, 2019, 2:24 P.M.), <https://web.archive.org/web/20231114144026/https://webcache.googleusercontent.com/search?q=cach e:rMa4vie4g0gj:https://www.dramx.com/News/IC/20220118-30593.html&hl=en&gl=us>; Li Gang Ye Lizhu, *Guangzhou Joins Hands with Professional Institutions to Accelerate Semiconductor Industry Layout*, PEOPLE'S DAILY CLIENT GUANGDONG CHANNEL (Jan. 14, 2022, 5:23 P.M.), <https://web.archive.org/web/20231127205708/https://wap.peopleapp.com/article/6464988/6349061>.

<sup>237</sup> Julie Zhu, *China Everbright, VC Firm Walden Launch \$500 Million Semiconductor Fund*, REUTERS (Oct. 26, 2017, 7:56 A.M.), <https://www.reuters.com/article/idUSKBN1CV1RC/>; *China Everbright Limited and Walden International Group Launch Special Private Equity Fund for Semiconductor, IT Industries*, EVERBRIGHT LTD. (Oct. 26, 2017), <https://www.everbright.com/en/content/china-everbright-limited-and-walden-international-group-launch-special-private-equity-fund>.

<sup>238</sup> *Everbright "Belt & Road" Green Fund is Officially Established, with Capital Raised in the First Phase Set at RMB 10 Billion; Fundraising from Everbright Cornerstone LPs Completed*, EVERBRIGHT LTD. (Apr. 21, 2020), <https://www.everbright.com/en/news/everbright-%E2%80%9Cbelt-road%E2%80%9D-green-fund-officially-established-capital-raised-first-phase-set-rmb-10>; *Everbright Overseas Infrastructure Investment Fund, L.P. Completes Its First Closing*, EVERBRIGHT LTD. (July 18, 2017), <https://web.archive.org/web/20231219163005/https://www.everbright.com/en/content/everbright-overseas-infrastructure-investment-fund-lp-completes-its-first-closing>; *CEL Hunan FOF*, EVERBRIGHT LTD., <https://web.archive.org/web/20231219162903/https://webcache.googleusercontent.com/search?q=cache :L3-FlwBYN98J:https://www.everbright.com/zh-hans/business/fof-fund/cel-hunan-fof&hl=en&gl=us> (last visited Dec. 6, 2023).

<sup>239</sup> See Luo Xin, *Walden International Joins Hands with China Electronics to Establish Fund to Increase Investment in China's Semiconductor Industry*, ELECFANS (Oct. 1, 2018), [https://web.archive.org/web/20240113164502/https://webcache.googleusercontent.com/search?q=cach e:HFzELmXsKvMJ:https://www.elecfans.com/d/791010.html&sca\\_esv=598179004&hl=en&gl=us&stri p=1&vwsr=0](https://web.archive.org/web/20240113164502/https://webcache.googleusercontent.com/search?q=cach e:HFzELmXsKvMJ:https://www.elecfans.com/d/791010.html&sca_esv=598179004&hl=en&gl=us&stri p=1&vwsr=0); *Having Been Deeply Involved in China's Semiconductor Industry for 20 Years, What Investment Opportunities Are Walden International Optimistic About?*, FASTONE (Jan. 11, 2023), <https://web.archive.org/web/20231106174451/https://webcache.googleusercontent.com/search?q=cach e:JGUplP-QCcj:https://fastonetechnology.com/newsblog/post/30653.html&hl=en&gl=us>; *Wang Zhen Met with the Management Team of China Electronics Walden Fund*, SOHU (Dec. 12, 2017, 9:00 A.M.), [https://web.archive.org/web/20231106173802/https://www.sohu.com/a/207957078\\_349529](https://web.archive.org/web/20231106173802/https://www.sohu.com/a/207957078_349529); EMILY DE LA BRUYÈRE & NATHAN PICARSIC, *DEFUSING MILITARY-CIVIL FUSION: THE NEED TO IDENTIFY AND RESPOND TO CHINESE MILITARY COMPANIES 10* (2021), <https://www.fdd.org/wp-content/uploads/2021/05/fdd-monograph-defusing-military-civil-fusion.pdf>; Xin, *supra* note 152.

<sup>240</sup> Chinese Military-Industrial Complex Sanctions Regulations, 87 Fed. Reg. 8735 (Feb. 16, 2022).

<sup>241</sup> Walden International documents (on file with Select Committee).

<sup>242</sup> See U.S. SEC. & EXCH. COMM'N, FORM 6-K: REPORT OF FOREIGN PRIVATE ISSUER PURSUANT TO RULE 13A-16 OR 15D-16 UNDER THE SECURITIES EXCHANGE ACT OF 1934 31, 78 (2015), [https://www.sec.gov/Archives/edgar/data/1267482/000110465915039776/a15-10412\\_16k.htm](https://www.sec.gov/Archives/edgar/data/1267482/000110465915039776/a15-10412_16k.htm).

<sup>243</sup> *Id.* at 49, 148.

<sup>244</sup> See Dep't of Def., *supra* note 83; Press Release, U.S. Dep't of Com., Commerce Adds China's SMIC to the Entity List, Restricting Access to Key Enabling U.S. Technologies (Dec. 18, 2020), OFF. OF FOREIGN ASSETS CONTROL, *supra* note 187.

<sup>245</sup> SOS INTERNATIONAL, BLUE HERON: SEMICONDUCTOR MANUFACTURING INTERNATIONAL CORPORATION 20 (2020), [https://www.jcapitalresearch.com/uploads/2/0/0/3/20032477/blue\\_heron\\_smic\\_footnoted.pdf](https://www.jcapitalresearch.com/uploads/2/0/0/3/20032477/blue_heron_smic_footnoted.pdf).

<sup>246</sup> Liu Mingjun, *Gekewei Zhao Lixin: The Persistence Behind SMIC's Largest Customer*, CYZONE, [https://webcache.googleusercontent.com/search?q=cache:j2\\_DsnHcTLMJ:https://magazine.cyzone.cn/article/197774.html&hl=en&gl=us](https://webcache.googleusercontent.com/search?q=cache:j2_DsnHcTLMJ:https://magazine.cyzone.cn/article/197774.html&hl=en&gl=us) (last visited Jan. 5, 2024).

<sup>247</sup> *SMIC Earns "2010 Excellent Supplier Award" from GalaxyCore*, PR NEWswire (May 24, 2011, 4:30 A.M.), <https://www.prnewswire.com/news-releases/smic-earns-2010-excellent-supplier-award-from-galaxycore-122491023.html>; Mingjun, *supra* note 246.

<sup>248</sup> *Zhao Lixin, GEO of Geke Microelectronics: Sharpen Your Sword in Ten Years, and Do Disruptive Innovation if You Want to Do It*, MOORE ELITE (Aug. 16, 2018), <https://web.archive.org/web/20230925204837/https://www.mooreelite.com/%E6%A0%BC%E7%A7%91%E5%BE%AE%E7%94%B5%E5%AD%90ceo%E8%B5%B5%E7%AB%8B%E6%96%B0%EF%BC%9A%E5%8D%81%E5%B9%B4%E7%A3%A8%E4%B8%80%E5%89%91%EF%BC%8C%E8%A6%81%E5%81%9A%E5%B0%B1%E5%81%9A%E9%A2%A0%E8%A6%86-2/>.

<sup>249</sup> *Walden International Invested in Another 100 Billion IPO*, INV. WORLD (Aug. 18, 2021, 4:16 P.M.), [https://web.archive.org/web/20240111212029/https://webcache.googleusercontent.com/search?q=cach e:RAOa7Xrn4mAJ:https://m.36kr.com/p/13598484521985&sca\\_esv=582023809&hl=en&gl=us&strip= 1&vwsr=0](https://web.archive.org/web/20240111212029/https://webcache.googleusercontent.com/search?q=cach e:RAOa7Xrn4mAJ:https://m.36kr.com/p/13598484521985&sca_esv=582023809&hl=en&gl=us&strip= 1&vwsr=0).

<sup>250</sup> Walden International documents (on file with Select Committee).

<sup>251</sup> *Supplement No. 4 to Part 744 – Entity List*, *supra* note 101.

<sup>252</sup> Walden International documents (on file with Select Committee).

<sup>253</sup> Press Release, SMIC, SJSemi and Qualcomm Jointly Announce Mass Production of 14nm Wafer Bumping Technology (July 28, 2016), [https://web.archive.org/web/20200216172017/http://www.smics.com:80/en/site/news\\_read/4556](https://web.archive.org/web/20200216172017/http://www.smics.com:80/en/site/news_read/4556).

<sup>254</sup> Proprietary third-party software; Addition of Entities to the Entity List, Revision of Entry on the Entity List, and Removal of Entities from the Entity List, 85 Fed. Reg. 83416 (Dec. 22, 2020); Addition of Entities and Revision of Entries on the Entity List; and Addition of Entity to the Military End-User (MEU) List, 86 Fed. Reg. 67317 (Nov. 26 2021).

<sup>255</sup> 2021 INTERIM REPORT, SMIC 22 (2021), [https://www.smics.com/uploads/6138756a/SMIC%202021%20Interim%20Report\\_en.pdf](https://www.smics.com/uploads/6138756a/SMIC%202021%20Interim%20Report_en.pdf); Thomas Zhang, *SMIC Spinoff SJSemi Becomes China's Latest Chip Highflyer with New Fundraising*, BAMBOO WORKS (Oct. 21, 2021), <https://thebambooworks.com/smic-spinoff-sjsemi-becomes-chinas-latest-chip-highflyer-with-new-fundraising/>.

<sup>256</sup> Qualcomm Ventures documents (on file with Select Committee).

<sup>257</sup> Peter Landers, *Chinese-American Semiconductor Industry Legend Caught Between U.S. and China Chip War*, WALL ST. J. (Nov. 10, 2022, 2:15 P.M.), <https://cn.wsj.com/articles/%E7%BE%8E%E7%B1%8D%E5%8D%8E%E8%A3%94%E5%8D%8A%E5%>

AF%BC%E4%BD%93%E8%A1%8C%E4%B8%9A%E4%BC%A0%E5%A5%87%E4%BA%BA%E7%89%A9%E5%9C%A8%E7%BE%8E%E4%B8%AD%E8%8A%AF%E7%89%87%E6%88%98%E4%B8%AD%E5%B7%A6%E5%8F%B3%E4%B8%BA%E9%9A%BE-11668059106.

<sup>258</sup> Mark Cohen, *Semiconductor Patent Litigation Part 2: Nationalism, Transparency and Rule of Law*, CHINA IPR (July 4, 2018), <https://chinaipr.com/2018/07/04/semiconductor-patent-litigation-part-2-nationalism-transparency-and-rule-of-law/>.

<sup>259</sup> *Company Profile*, AMLOGIC, <https://web.archive.org/web/20231114185138/https://campus.amlogic.com/about/show.php?lang=cn&id=19> (last visited Jan. 5, 2024).

<sup>260</sup> *Id.*

<sup>261</sup> Walden International documents (on file with Select Committee).

<sup>262</sup> *Id.*

<sup>263</sup> Jeffrey Stoff, *China's Talent Programs*, in CHINA'S QUEST FOR FOREIGN TECHNOLOGY: BEYOND ESPIONAGE 38 (William C. Hannas & Didi Kirsten Tatlow eds., 2020).

<sup>264</sup> *Jury*, RECRUITMENT PROGRAM OF GLOB. EXPERTS (Apr. 30, 2012), <https://web.archive.org/web/20120430193009/http://contest.1000plan.org/html/pswy.html>; *Jury*, RECRUITMENT PROGRAM OF GLOB. EXPERTS (Mar. 18, 2013), <https://web.archive.org/web/20130318171317/http://contest.1000plan.org/html/pswy.html>; THOUSAND TALENTS PLAN VENTURE CAP. CTR. FELLOWSHIP, THE FIRST "THOUSAND TALENTS" ENTREPRENEURSHIP COMPETITION 4 (2012).

<sup>265</sup> Walden International documents (on file with Select Committee).

<sup>266</sup> RYAN FEDASIUK & EMILY WEINSTEIN, OVERSEAS PROFESSIONALS AND TECHNOLOGY TRANSFER TO CHINA 9 (2020), <https://cset.georgetown.edu/wp-content/uploads/CSET-Overseas-Professionals-and-Technology-Transfer-to-China.pdf>; *About Ankai*, ANKAI, <https://web.archive.org/web/20240113162840/http://www.anyka.com/about.aspx> (last visited Jan. 13, 2024).

<sup>267</sup> *Company Profile*, SIPTORY, <https://web.archive.org/web/20231031134409/http://www.siptory.com/en.php/Info/aboutus> (last visited Jan. 5, 2024); U.S. Dep't of Def., *supra* note 94.

<sup>268</sup> Walden International documents (on file with Select Committee).

<sup>269</sup> Proprietary third-party software, information sourced from PRC government contracting records.

<sup>270</sup> Fedasiuk & Weinstein, *supra* note 27, at 182.

<sup>271</sup> Walden International documents (on file with Select Committee).

<sup>272</sup> Proprietary third-party software; Additions and Revisions to the Entity List and Conforming Removal from the Unverified List, 87 Fed. Reg. 77505 (Dec. 19, 2022).

<sup>273</sup> *Id.*

<sup>274</sup> *The Groundbreaking Ceremony of the Jiandel Technology Fluorine-Containing New Materials Joint Research Center Was Officially Held*, FUJIAN DEER TECH. CORP. (Jan. 9, 2019), [https://web.archive.org/web/20231019011848/https://www.fjdeertech.com/show\\_60.html](https://web.archive.org/web/20231019011848/https://www.fjdeertech.com/show_60.html).

<sup>275</sup> Proprietary third-party software, information sourced from PRC government contracting records.

<sup>276</sup> *Id.*

<sup>277</sup> *Product Description*, RT THREAD, <https://web.archive.org/web/20231207210219/https://www.rt-thread.com/> (last visited Jan. 5, 2024).

<sup>278</sup> Ellen Nakashima & Gerry Shih, *China Builds Advanced Weapons Systems Using American Chip Technology*, WASH. POST (Apr. 9, 2021, 6:52 P.M.), [https://www.washingtonpost.com/national-security/china-hypersonic-missiles-american-technology/2021/04/07/37a6b9be-96fd-11eb-b28d-bfa7bb5cb2a5\\_story.html](https://www.washingtonpost.com/national-security/china-hypersonic-missiles-american-technology/2021/04/07/37a6b9be-96fd-11eb-b28d-bfa7bb5cb2a5_story.html).

<sup>279</sup> Press Release, U.S. Dep't of Com., Commerce Adds Seven Chinese Supercomputing Entities to Entity List for Their Support to China's Military Modernization, and Other Destabilizing Efforts (Apr. 8, 2021); see Nakashima & Shih, *supra* note 278.

<sup>280</sup> Additions and Revisions of Entities to the Entity List, 88 Fed Reg. 13673 (Mar. 6, 2023).

<sup>281</sup> Proprietary third-party software; *China Aerospace Science and Industry Corporation*, CHINA DEFENCE UNIVS. TRACKER, <https://unitracker.aspi.org.au/universities/china-aerospace-science-and-industry-corporation/> (last visited Jan. 16, 2024).

<sup>282</sup> Dep't of Defense, *supra* note 94.

<sup>283</sup> *Product Description*, *supra* note 277.

<sup>284</sup> GGV documents (on file with Select Committee).

<sup>285</sup> Press Release, U.S. Dep't of Com., Commerce Department Adds Five Chinese Entities to the Entity List for Participating in China's Campaign of Forced Labor Against Muslims in Xinjiang (June 24, 2021).

<sup>286</sup> Entity List Additions, 88 Fed. Reg. 71991 (Oct. 19, 2023).

<sup>287</sup> SAIF M. KHAN & ALEXANDER MANN, *AI CHIPS: WHAT THEY ARE AND WHY THEY MATTER 6* (2020), <https://cset.georgetown.edu/publication/ai-chips-what-they-are-and-why-they-matter/>.

<sup>288</sup> *Id.*

<sup>289</sup> *Id.* at 6-7, 27.

<sup>290</sup> *Information on November 6, 2023 Public Briefing*, BUREAU OF INDUS. & SEC., U.S. DEP'T OF COM., <https://www.bis.doc.gov/index.php/about-bis/newsroom/2082> (last visited Jan. 16, 2024); Press Release, Bureau of Indus. & Sec., Commerce Implements New Multilateral Controls on Advanced Semiconductor and Gas Turbine Engine Technologies (Aug. 12, 2022).

<sup>291</sup> On file with Committee. See also Ina Chu, *Who's Who is China's AI Chip Industry*, KITEROCKET (Jan. 31, 2023), <https://www.kiterocket.com/whos-who-in-chinas-ai-chip-industry/>.

<sup>292</sup> Rita Liao, *Horizon Robotics, a Chinese Rival to Nvidia, Seeks to Raise Over \$700M*, TECHCRUNCH (Dec. 22, 2020, 1:09 A.M.), <https://techcrunch.com/2020/12/21/horizon-robotics-700-million-funding/>.

<sup>293</sup> Annie Huang & Peng Chen, *Nvidia, Horizon Robotics Account for 80% of Self-Driving Chips Enabling NOA in China*, DIGITIMES ASIA (Sept. 6, 2023), <https://www.digitimes.com/news/a20230906PD205/china-horizon-robotics-adas-automotive-ic.html>; Lulu Chang, *Horizon Robotics' Smart Security Camera Uses A.I. for Serious Facial Recognition*, DIGITALTRENDS (Apr. 11, 2018), <https://www.digitaltrends.com/home/horizon-ai-smart-camera/>.

<sup>294</sup> *Horizon Robotics' Control of the Artificial Intelligence Stack*, KK NEWS (Apr. 24, 2018), <https://kknews.cc/zh-cn/tech/ep4j2yn.html>.

<sup>295</sup> *Translation: Profiles of Members of China's New Generation Artificial Intelligence Strategic Advisory Committee*, CTR. FOR SEC. & EMERGING TECH. (translation date: on Aug. 22, 2022), <https://cset.georgetown.edu/publication/profiles-of-members-of-chinas-new-generation-artificial-intelligence-strategic-advisory-committee/>.

<sup>296</sup> *Id.*

<sup>297</sup> JONATHAN RAY ET AL., CHINA'S INDUSTRIAL AND MILITARY ROBOTICS DEVELOPMENT 81 (2016), [HTTPS://WWW.USCC.GOV/SITES/DEFAULT/FILES/RESEARCH/DGI\\_CHINA%27S%20INDUSTRIAL%20AND%20MILITARY%20ROBOTICS%20DEVELOPMENT.PDF](https://www.uscc.gov/sites/default/files/research/dgi_china%27s%20industrial%20and%20military%20robotics%20development.pdf).

<sup>298</sup> *The Intelligent System Test Area with the Most Scenarios in the Country is About to Open in Xiangjiang New District, Hunan*, GASGOO June 9, 2018, 9:31 A.M.), <https://web.archive.org/web/20231115181204/https://auto.gasgoo.com/News/2018/06/09093140314070044858C601.shtml>.

<sup>299</sup> Huiyao Wang et al., *Returnee Entrepreneurs: Impact on China's Globalization Process*, 20 J. OF CONTEMP. CHINA 413, 419 (2011).

<sup>300</sup> Walden International documents (on file with Select Committee).

<sup>301</sup> *Illumina and Sequoia Capital China Partner to Launch Genomics Incubator in China*, ILLUMINA (Jan. 31, 2021), <https://investor.illumina.com/news/press-release-details/2021/Illumina-and-Sequoia-Capital-China-Partner-to-Launch-Genomics-Incubator-in-China/default.aspx>.

<sup>302</sup> *Focus on Technology Investment for 21 Years, GGV's Changes and Unchanges*, EBRUN (Oct. 19, 2021, 9:15 A.M.), [https://web.archive.org/web/20231125031657/https://webcache.googleusercontent.com/search?q=cache:YVky1z3DN8J:https://m.ebrun.com/456846.html&sca\\_esv=585165273&hl=en&gl=us&strip=1&vwsr=0](https://web.archive.org/web/20231125031657/https://webcache.googleusercontent.com/search?q=cache:YVky1z3DN8J:https://m.ebrun.com/456846.html&sca_esv=585165273&hl=en&gl=us&strip=1&vwsr=0).

<sup>303</sup> *GGV Capital Year in Review 2014*, SLIDESHARE (Jan. 16, 2015), <https://www.slideshare.net/GGVCapital/ggv-capital-year-in-review-2014public>.

<sup>304</sup> Liu Xiaojing, *GGV Capital: The Chinese Adventure of an American VC*, CAIXIN WKLY. (Jan. 22, 2016, 9:48 A.M.), [https://web.archive.org/web/20231125014223/https://webcache.googleusercontent.com/search?q=cache:yKDyHWyef4kJ:https://weekly.caixin.com/m/2016-01-22/100902483\\_all.html&sca\\_esv=585160009&hl=en&gl=us&strip=1&vwsr=0](https://web.archive.org/web/20231125014223/https://webcache.googleusercontent.com/search?q=cache:yKDyHWyef4kJ:https://weekly.caixin.com/m/2016-01-22/100902483_all.html&sca_esv=585160009&hl=en&gl=us&strip=1&vwsr=0).

<sup>305</sup> Georgia Wells et al., *Tech, Financial Firms Eye Ways to Save TikTok's U.S. Operations from Ban*, WALL ST. J. (Aug. 9, 2020, 7:12 P.M.), [https://www.wsj.com/articles/tech-financial-firms-discussing-ways-to-save-tiktoks-u-s-operations-from-trump-ban-11597014729?mod=hp\\_lead\\_pos1](https://www.wsj.com/articles/tech-financial-firms-discussing-ways-to-save-tiktoks-u-s-operations-from-trump-ban-11597014729?mod=hp_lead_pos1); Ellen Nakashima et al., *TikTok's Fate Was Shaped by a 'Knockdown, Drag-Out' Oval Office Brawl*, WASH. POST (Aug. 10, 2020, 12:48 P.M.), <https://www.washingtonpost.com/technology/2020/08/08/trump-tiktok-mnuchin-navarro/>.

<sup>306</sup> *Facing the Sea, the Second Phase of the Jiyuan Venture Capital Seminar is Coming on the Waves!*, TSINGHUA UNIV. (Aug. 25, 2022), [https://web.archive.org/web/20231125034137/https://webcache.googleusercontent.com/search?q=cache:RIzWNoWMKKIJ:https://ee.pbcfsf.tsinghua.edu.cn/info/1003/1430.htm&sca\\_esv=585174118&hl=en&gl=us&strip=1&vwsr=0](https://web.archive.org/web/20231125034137/https://webcache.googleusercontent.com/search?q=cache:RIzWNoWMKKIJ:https://ee.pbcfsf.tsinghua.edu.cn/info/1003/1430.htm&sca_esv=585174118&hl=en&gl=us&strip=1&vwsr=0); *Let the Dream Be Within Reach: GGV Venture Capital Seminar Successfully Set Sail*, TSINGHUA UNIV. (Sept. 26, 2021), [https://web.archive.org/web/20231125034335/https://webcache.googleusercontent.com/search?q=cache:xvn\\_hsyjbOYJ:https://mpage.ee.pbcfsf.tsinghua.edu.cn/web/news\\_info.php?id%3D375&sca\\_esv=585174118&hl=en&gl=us&strip=1&vwsr=0](https://web.archive.org/web/20231125034335/https://webcache.googleusercontent.com/search?q=cache:xvn_hsyjbOYJ:https://mpage.ee.pbcfsf.tsinghua.edu.cn/web/news_info.php?id%3D375&sca_esv=585174118&hl=en&gl=us&strip=1&vwsr=0).

<sup>307</sup> *Lip-Bu Tan*, INTEL, <https://www.intel.com/content/www/us/en/newsroom/biographies/lip-bu-tan.html> (last visited Jan 3., 2023).

<sup>308</sup> Zeyi Yang, *Inside the Software That Will Become the Next Battle Front in US-China Chip War*, MIT TECH. REV. (Aug. 18, 2022), <https://www.technologyreview.com/2022/08/18/1058116/eda-software-us-china-chip-war/>.

<sup>309</sup> *Walking with My Son to Open Up the Mountains and Forests - Chen Liwu, Chairman of Walden International, Wrote on the Occasion of the Listing of China Micro Science and Technology Innovation Board*, WALDEN INT'L (July 21, 2019), [https://web.archive.org/web/20231127204241/https://webcache.googleusercontent.com/search?q=cach e:saLMuDr4CwMJ:https://laoyaoba.com/n/722928&sca\\_esv=585714901&hl=en&gl=us&strip=0&vwsr c=0](https://web.archive.org/web/20231127204241/https://webcache.googleusercontent.com/search?q=cach e:saLMuDr4CwMJ:https://laoyaoba.com/n/722928&sca_esv=585714901&hl=en&gl=us&strip=0&vwsr c=0).

<sup>310</sup> *Walden International: Brand Introduction*, WALDEN INT'L, [https://webcache.googleusercontent.com/search?q=cache:boZx0rAufgsJ:mp.ppsj.com.cn/brand/Walde n.html&sca\\_esv=582023809&hl=en&gl=us&strip=1&vwsr c=0](https://webcache.googleusercontent.com/search?q=cache:boZx0rAufgsJ:mp.ppsj.com.cn/brand/Walde n.html&sca_esv=582023809&hl=en&gl=us&strip=1&vwsr c=0) (last visited Dec. 4, 2023).

<sup>311</sup> Walden International documents (on file with Select Committee).

<sup>312</sup> *Id.*

<sup>313</sup> *Id.*

<sup>314</sup> *Id.*

<sup>315</sup> Ryan Vlastelica, *These Are the Most Well-Connected People in the Tech Industry*, MARKETWATCH (June 1, 2017, 2:04 P.M.), <https://www.marketwatch.com/story/these-are-the-most-well-connected-people- in-the-tech-industry-2017-06-01>.

<sup>316</sup> GGV documents (on file with Select Committee).

<sup>317</sup> Xiao Huang et al., *Responding to Uncertainty: Syndication Partner Choice by Foreign Venture Capital Firms in China* 8 (Berkeley Roundtable on the Int'l Econ., Working Paper 2015-3).

<sup>318</sup> *See also History of the U.S. and China*, U.S. EMBASSY & CONSULATES IN CHINA (June 15, 2018), <https://china.usembassy-china.org.cn/history-of-the-u-s-and-china/>.

<sup>319</sup> *See, e.g., List of Hardware, Software, and Services Banned by US Government*, CMMC INFO. INST. (Jan. 20, 2021), <https://cmmcinfo.org/list-of-hardware-software-and-services-banned-by-us-government/>.

<sup>319</sup> *U.S. Extends Ban on Securities Investments in Companies Linked to China Military*, REUTERS (Nov. 9, 2021, 2:10 P.M.), <https://www.reuters.com/business/us-extends-ban-securities-investments- companies-linked-china-military-2021-11-09/>.

<sup>320</sup> *U.S. Extends Ban on Securities Investments in Companies Linked to China Military*, REUTERS (Nov. 9, 2021, 2:10 P.M.), <https://www.reuters.com/business/us-extends-ban-securities-investments- companies-linked-china-military-2021-11-09/>.

<sup>321</sup> Exec. Order No. 14,105, 88 Fed. Reg. 54,867 (Aug. 11, 2023).

<sup>322</sup> U.S. Dep't of State, *supra* note 28.

<sup>323</sup> *See generally* STONE & WOOD, *supra* note 28.

<sup>324</sup> *See, e.g.,* Mozur, *supra* note 80.

<sup>325</sup> Exec. Order No. 14,105, *supra* note 321.