



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













May 2, 2025

The Honorable Paul Atkins
Chairman
U.S. Securities and Exchange Commission
100 F Street NE
Washington, D.C. 20549

Dear Chairman Atkins,

As Chairmen of the House Select Committee on the Strategic Competition Between the United States and the Chinese Communist Party and the Senate Committee on Aging and Members of Congress, we write to express grave concern over the continued presence of Chinese companies on U.S. stock exchanges. These entities benefit from American investor capital while advancing the strategic objectives of the Chinese Communist Party (CCP), supporting military modernization and gross human rights violations. As described below, they also pose an unacceptable risk to American investors. We urge the Securities and Exchange Commission (SEC) to use its existing authorities to protect U.S. markets, investors, and national security.














These high-risk firms operate across multiple sectors but share common characteristics: many face **U.S. government restrictions**, maintain **hidden Party control mechanisms**, secretly support **Chinese military applications**, or are linked to **slave labor**.

	COMPANY	TKR	VIE	 SANCTIONS	 GOLDEN SHARE	 MIL-CIV FUSION**	 FORCED LABOR	 PARTY BRANCH*
	Hesai	HS AI		1260H ¹		✓	✓	✓
	Qifu Technology	QFIN	✓	EL ² ; 1260H		✓	✓	✓
	Tencent Music	TME	✓	1260H	✓	✓	✓	✓
	Daqo New Energy	DQ		UFLPA ³		✓	✓	✓
	Luokung Tech	LKCO	✓			✓	✓	-
	Alibaba	BABA	✓		✓	✓	✓	✓
	Baidu	BIDU	✓		✓	✓	✓	✓

¹ Entities that are themselves, or whose parent entities are, designated as Chinese military companies by the Department of Defense pursuant to Section 1260H of the National Defense Authorization Act for Fiscal Year 2021.

² Entities that are themselves, or whose parent entities are, on the Commerce Department's Entity List.

³ Entities that are themselves, or whose parent or affiliate entities are, included on the Uyghur Forced Labor Prevention Act (UFLPA) Entity List maintained by the U.S. Department of Homeland Security.

	JD.com	JD	✓		✓	✓	✓
	CCSC Technology	CCTG			✓		-
	Pony AI	PONY			✓	✓	✓
	Zeekr	ZK			✓	✓	✓
	XPeng	XPEV	✓		✓	✓	✓
	WeRide	WRD			✓	✓	✓
	Nano Labs	NA			✓		-
	PDD	PDD	✓			✓	✓
	Weibo	WB	✓	✓			✓
	BiliBili	BILI	✓	✓		✓	✓
	Full Truck Alliance	YMM	✓	✓		✓	✓
	JinkoSolar	JKS				✓	✓
	Scienjoy	SJ	✓			✓	✓

* The company hosts a CCP Party branch, which is typical in the PRC.

** The company is involved in the military-civil fusion system by supplying to or procuring from the military or its end users.

“-” = unclear

Several also use variable interest entity (VIE) structures, which obscure true control and leave U.S. investors with no direct ownership over the Chinese operating company.

The firms listed above are merely examples. They illustrate deeper, structural problems posed by the CCP’s control over Chinese companies that make the listing of their securities on U.S. exchanges untenable.

First, in the People’s Republic of China, no company is truly private. The CCP maintains sweeping authority over all firms—whether state-owned or nominally private—through legal mandates and political control mechanisms. Under the 2017 National Intelligence Law, all organizations and individuals are obligated to “support, assist, and cooperate with state intelligence work,”¹ and the Cybersecurity Law requires companies to “provide technical support and assistance to public security organs” upon request.² In 2020, the CCP expanded its grip on the private sector, directing entrepreneurs to align with Party priorities and participate in “united front” work³—a strategy that advances CCP influence and supports intelligence collection for agencies like the Ministry of State Security.⁴ These mandates are enforced through coercive instruments such as embedded Party committees⁵ and “golden shares”—state-held equity stakes that grant outsized control despite minimal ownership.⁶

Second, the extent of CCP control over Chinese firms is systematically concealed from U.S. investors. Chinese law prohibits companies from making disclosures that “misrepresent or disparage” national policy,⁷ and the amended Counterespionage Law classifies information about military ties, state ownership, and Party influence as national secrets.⁸ As one witness testified before the Select Committee, “companies now can’t even do due diligence in advance of any sort of business transaction” in the PRC for fear of violating Chinese law.⁹

These restrictions apply not just to parent companies, but to China-based subsidiaries where Party-state control is often exercised. While U.S. disclosure requirements focus on formal control mechanisms, the CCP leverages informal structures such as internal Party committees or golden share agreements to exercise actual control—and to obscure the material risks arising from that control in public filings.

Third, many of these firms are not merely opaque—they are actively integrated into the Chinese military and surveillance apparatus. Under the CCP's Military-Civil Fusion (MCF) strategy, commercial entities are systematically mobilized to serve defense and intelligence goals. Companies listed on U.S. exchanges have participated in PLA weapons development, partnered with PLA-affiliated research institutes, and supplied technologies used in repression and surveillance of China's ethnic minorities and Han Chinese majority alike. When the CCP's demands conflict with U.S. law, Chinese companies must advance the CCP's goals, regardless of the impact on their bottom line. American investors—often unknowingly—are financing firms that support the CCP's military expansion, internal security campaigns, and authoritarian governance model.

Fourth, Chinese law creates unpredictable risk to U.S. investors that enhanced disclosures cannot mitigate. Because of PRC legal restrictions on foreign ownership of Chinese companies, many also use VIE structures to list on U.S. exchanges—a shell company arrangement that does not afford investors most shareholder rights.¹⁰ The CCP could eliminate these structures at any time, leaving U.S. investors with no recourse.¹¹

Moreover, U.S. regulators have found that audits of PRC companies—typically conducted by China-based auditors—often fail to meet U.S. standards.¹² While many state-owned enterprises delisted from U.S. exchanges in 2022 to avoid audit scrutiny, numerous private firms that remain listed are subject to the same faulty audit standards because of the secrecy requirements and prohibitions on basic diligence and transparency noted above.

Taken together, these factors ensure Chinese companies face a direct conflict between their legal obligations to American investors and the coercive control exercised by the CCP. They are compelled by Chinese law to hide relevant and material information about the CCP's control over the company from U.S. investors and regulators. Shell company structures like VIEs deny investors true ownership, and opaque auditing practices prevent meaningful due diligence. These companies cannot be transparent about their activities in the PRC. They must conduct activities that expose investors to regulatory risks in the United States and elsewhere in the world. At the Party's request, they can be integrated into the People's Liberation Army (PLA) military modernization and the CCP's human rights abuses at any time—and they must actively conceal these activities from those outside of China, including American shareholders.

This is not just a transparency issue; it is a matter of national security.

The SEC has broad authority to suspend trading and compel delisting by suspending or revoking the registration of the securities of Chinese companies that do not adequately protect American investors under the Holding Foreign Companies Accountable Act (HFCAA) and pursuant to Sections 12(j) and (k) of the Securities Exchange Act. **We urge the Commission to use these tools: no firm should remain listed if it cannot, by design, comply with U.S. law.**

* * * *

Building on the risk factors identified in the table above, we provide detailed profiles of several especially concerning firms:

1. Hesai Group ❌ 🇨🇳 🇺🇸 🇨🇵

Hesai is a Pentagon-designated Chinese military company that manufactures LiDAR sensors for autonomous vehicles and robotics.¹³ The company's sensors appear on PLA combat vehicles developed with Dongfeng Motors¹⁴ and in security robots built by UISEE, which are deployed in Xinjiang for surveillance and repression of Uyghur Muslims.¹⁵ Hesai sources components from the sanctioned China Electronics Technology Group Corporation (CETC) 13th Research Institute¹⁶ and operates in Shanghai's Military-Civil Fusion Zone.¹⁷ A CCP Party committee with over 170 members¹⁸ directs internal governance and has hosted high-level visits from senior Party and government officials¹⁹—reinforcing the firm's deep political integration.

“[Hesai’s] sensors appear on PLA combat vehicles ... and in security robots deployed in Xinjiang for repression of Uyghur Muslims.”



CCTV Broadcast of Hesai LiDAR (circled) on PLA Autonomous Fighting Vehicle (2022)

2. Qifu Technology Inc. ❌ 🏢 🇨🇳 🇺🇸

Qifu is a Chinese digital finance firm whose parent, Qihoo 360, was sanctioned by the U.S. Commerce Department in 2020 and designated by the Pentagon in 2022 as a Chinese military company.²⁰ Qihoo 360 maintains a CCP Party Committee with six subordinate branches “deeply integrated into all aspects of corporate governance and daily operations,” and regularly collaborates with public security agencies.²¹

3. Tencent Music Entertainment Group ❌ 🏢 🇨🇳 🇺🇸

Tencent is a Chinese streaming platform owned by Tencent Holdings, a Chinese military company designated by the Pentagon under Section 1260H for supporting China’s military and intelligence operations.²² Tencent runs a Party committee with over 3,000 members, has published the first Party journal in China’s internet sector, and maintains a dedicated Party WeChat account.²³ It has transmitted user data to public security bureaus in Xinjiang and partnered with local authorities to embed surveillance into public transit systems.²⁴

*Tencent is owned by a
Pentagon-designated Chinese
military company.*

4. Daqo New Energy Corp. ❌ 🏢 🇨🇳 🇺🇸

Daqo is a major Chinese polysilicon producer whose Xinjiang subsidiary is sanctioned under the Uyghur Forced Labor Prevention Act Entity List for participating in state-sponsored slave labor programs. Its entire output comes from a Xinjiang facility inside a paramilitary-run industrial zone sanctioned for executing the CCP’s ongoing genocide.²⁵ Daqo has accepted subsidies for state-arranged labor transfers and sources from suppliers linked to the same forced labor system.²⁶ CCP Party committees operate throughout Daqo’s structure, with formal partnerships across banks and government agencies and dedicated Party centers inside its facilities.²⁷

*Daqo’s Xinjiang subsidiary is sanctioned under the UFLPA for
participating in state-sponsored slave labor programs.*

5. Luokung Technology Corp.

Luokung develops geospatial big data platforms used in China’s military modernization. It was previously designated a “Communist Chinese Military Company” by the Department of Defense, a label overturned in 2021 for lack of evidence—but the company’s operations tell a different story.²⁸ Luokung is led by Dongpu Zhang, President of the company and former Vice President of Aerospace Science and Technology Holding Group—a subsidiary of the U.S.-sanctioned China Aerospace Science and Technology Corporation (CASC), one of China’s top state-owned missile contractors.²⁹ Zhang has stated that Luokung’s “spatiotemporal cloud platforms support weapons research and development” with “aerospace departments that develop cruise missiles.”³⁰ Through its China-based subsidiaries,³¹ the company provides mapping, behavioral AI, and digital twin systems to defense-linked partners including CETC, CASC, China Shipbuilding Industry Corporation, Beidou, and PIESAT.³² It also operates a variable interest entity in Horgos, Xinjiang.³³

“[Luokung’s CEO] has stated that [its] “spatiotemporal cloud platforms support weapons research and development” with “aerospace departments that develop cruise missiles.”

6. Alibaba Group Holding Limited

Alibaba is a Chinese technology conglomerate designated by the Chinese government to lead national AI development and deeply embedded in China’s military and surveillance systems. Its cloud division works with two Pentagon-designated Chinese military companies³⁴—Global Tone Communication Technology (GTCOM)³⁵ and China North Industries Group Corporation (NORINCO)³⁶—to support data translation, surveillance, and weapons development. Alibaba is reportedly tasked by PRC intelligence agencies to process data on a “daily” basis.³⁷ Moreover, Alibaba has maintained a CCP Party committee since 2008, now led by a former Chinese police officer and comprising over 2,000 members.³⁸ In 2022, CCP-linked entities acquired “golden shares” in key Alibaba subsidiaries, securing board seats and veto power over sensitive content and data operations.³⁹ In Xinjiang, Alibaba has supported policing and counterterrorism systems,

“[Alibaba’s] cloud division works with two Pentagon-designated Chinese military companies.”

developed facial recognition tools to identify Uyghurs, partnered with the sanctioned AI firm Megvii, deployed smart prison platforms, and facilitated the sale of goods tied to forced labor.⁴⁰

7. Baidu, Inc.

Baidu is a core enabler of China's surveillance system and military-civil fusion strategy. It maintains an internal CCP committee established with CEO Robin Li's support in 2011, now comprising 10 Party branches with over 2,500 Party members among its

40,000 employees.⁴¹ Li himself has served on the Chinese People's Political Consultative Conference.⁴² Baidu Maps is embedded into the Integrated Joint Operations Platform used to surveil Uyghurs in Xinjiang,⁴³ and its exclusive distributor there operates a designated

"Baidu has procured high-performance computing systems from ... a Chinese military company sanctioned for aiding [China's] nuclear weapons program."

CCP "party-building workstation."⁴⁴

Baidu has procured high-performance computing systems from Sugon,⁴⁵ a Chinese military company sanctioned by the United States for aiding China's nuclear weapons program.⁴⁶ In 2017, China's National Development and Reform Commission selected Baidu to lead

a national AI laboratory focused on deep learning, biometrics, and human-computer interaction, in partnership with Beihang University, Tsinghua University, and the Chinese Academy of Sciences.⁴⁷ Furthermore, Baidu co-founded the OpenAtom Foundation to develop open-source platforms used in China's artificial intelligence, cloud, and military systems,⁴⁸ and operates a quantum research center with military-linked institutions including the Beijing Academy of Quantum Information Sciences.⁴⁹

8. JD.com

JD.com is one of China's largest e-commerce platforms, specializing in direct retail sales with an extensive logistics network that has revolutionized delivery services across the country. The company established its Party committee in 2011.⁵⁰ JD.com is deeply integrated into China's military infrastructure through JD Logistics, which signed a formal cooperation agreement with the PLA Air Force Logistics Department in 2017 to provide transportation, storage management, and supply services as part of China's military-civil fusion strategy.⁵¹ The company operates a "Military Online Procurement Mall" that handles over 60% of PLA orders and serves more than 1,200 military units across China.⁵²



JD Logistics CEO Wang Zhenhui shakes hands with PLA Air Force logistics chief Zheng Xuexiang at the October 2017 signing ceremony for a civil-military logistics partnership.⁵³



JD unveiled its JDY800 drone prototype, a small model with a maximum takeoff weight of less than one ton, despite its billing as a “heavy” transport aircraft.⁵⁴

Additionally, JD.com is listed as a “co-construction unit” of LuoJia Laboratory, jointly building geospatial data infrastructure alongside blacklisted firms like iFLYTEK, FiberHome, and China Aerospace Science and Industry Corporation.⁵⁵ In China, JD.com operates major logistics hubs in Urumqi and Jiashi County through Guangdong’s Xinjiang Aid programs, a core component of the CCP’s forced assimilation campaign against Uyghurs, embedding the company in the infrastructure of genocide.⁵⁶

JD.com operates major logistics hubs through Xinjiang Aid, a core component of the CCP’s genocide against Uyghurs.

9. CCSC Technology International Holdings

CCSC is a China-based electronics firm that produces interconnect components—connectors, cables, and harnesses—for military, aerospace, and surveillance applications. The company markets its products for “mobility in the military and defense sectors,” including ruggedized wiring and sensors for high-shock combat environments.⁵⁷ Its board includes longtime defense advisor Dr. Pak Keung Chan, who has specialized in aerospace and weapons memory systems.⁵⁸ CCSC’s core PRC subsidiary has held *Specialized and Advanced SME* status since 2016 and was elevated in July 2023 to *Little Giant*—a designation granted by Beijing to firms supporting China’s industrial and defense goals under *Made in China 2025*.⁵⁹ CCSC is leveraging U.S. capital markets while serving strategic sectors aligned with the CCP’s military and techno-industrial ambitions.

“[CCSC] markets its products for ‘mobility in [China’s] military and defense sectors.’”

10. Pony AI Inc.

Zeekr vehicles have direct satellite links that tie everyday EV functions to space infrastructure long controlled by the Chinese military.

Pony AI develops autonomous driving technology while maintaining partnerships with Chinese military-linked entities. State-owned GAC Group, which has documented ties to corruption,⁶⁰ military procurement,⁶¹ and forced labor in Xinjiang,⁶² holds an ownership stake with veto power over Pony’s key decisions.⁶³ Pony formed two specific joint ventures: one with

SANY Heavy Industry,⁶⁴ a defense contractor developing military unmanned equipment,⁶⁵ and another with Sinotrans,⁶⁶ a state-owned military logistics provider.⁶⁷ These ventures are postured to support PRC military logistics in a potential conflict with the United States. The Pentagon designated Pony’s LiDAR supplier, Hesai, as a Chinese military company in 2023.⁶⁸

Pony also partners with Robosense in a military-civil fusion project with blacklisted Beihang University to develop unmanned systems for military logistics networks.⁶⁹ Pony has an embedded CCP branch and is prominently featured in CCP publications as a model enterprise advancing “new productive forces,” with its Guangzhou operations highlighted by Party-state media as aligned with national priorities in autonomous driving and industrial innovation.⁷⁰

Pony formed a joint venture with a Chinese defense contractor developing unmanned military equipment.

11. ZEEKR Intelligent Holding Ltd.

Zeekr is Geely’s consolidated premium EV brand,⁷¹ and is embedded in China’s military-civil fusion system through its use of Geespace’s “Future Mobility Constellation,” a satellite network developed and built by Geely to support real-time tracking, remote sensing, and secure communications for smart vehicles.⁷² Geely now equips Zeekr vehicles with direct satellite links that operate without ground networks, tying everyday EV functions to space infrastructure long controlled by the Chinese military.⁷³ Geely has also supplied over 1,000 Borui sedans to the PLA, calling it the model’s official “military career” and promoting its “military-grade quality” as suited for harsh conditions—part of its decades-long commitment to support military-civil fusion through equipment, training, and recruitment programs.⁷⁴ Zeekr has an official CCP branch embedded in its operations,⁷⁵ with its smart factory serving as a CCP training and propaganda base for ideological education, career grooming, and university-enterprise integration; it is also a national model for “new productive forces,” highlighting automation, AI, and 5G, and is a focus of Party-led efforts to overcome chokepoint technologies in advanced manufacturing.⁷⁶ Furthermore, Zeekr is directly tied to forced labor risk through its partial ownership of Times Geely Power, a battery maker co-owned with CATL,⁷⁷ which is listed under the Uyghur Forced Labor Prevention Act Entity List and designated as a military end-user for its ties to China’s defense sector and forced labor-linked supply chains in Xinjiang.

12. XPeng

XPeng, initially backed by Alibaba and Xiaomi, develops advanced autonomous and flying vehicle technologies. Its AeroHT subsidiary is building a flying car factory in Guangdong—directly aligning with China’s “low-altitude economy” initiative, which recently received military backing from the PLA Southern Theater Command specifically for that province.⁷⁸ XPeng has an embedded CCP branch and regularly conducts Party-building activities through affiliated foundations and joint events.⁷⁹ Its chairman, He Xiaopeng, speaking on the National People’s Congress “representative channel,” emphasized XPeng’s role in exporting high-tech vehicles globally and advancing national tech self-reliance—framing the company as a model for the CCP’s “new productive forces” agenda.⁸⁰ XPeng sources critical LiDAR technology from Livox, a unit of the blacklisted Chinese military drone company DJI, despite being branded as independent from DJI.⁸¹ It also uses batteries from CALB, a company founded by the China Airborne Missile Academy and still partially state-owned, with defense origins and known supply to military-linked automakers like Dongfeng.⁸² Furthermore, the company’s supply chain raises human rights concerns through its connections to labor transfer programs in Xinjiang.⁸³ XPeng was fined by Chinese regulators in 2021 for illegally collecting facial data from 430,000 individuals without consent in its Shanghai stores.⁸⁴

“XPeng’s supply chain raises human rights concerns through its connections to labor transfer programs in Xinjiang.”

13. WeRide, Inc.

WeRide, a Chinese autonomous driving firm operating in 25 cities across China, Europe, and the Middle East, is commercially entangled with core nodes of the Chinese military-industrial complex and state-run forced labor apparatus. WeRide has a CCP branch that participates in “Red Alliance Co-construction” with Guangzhou officials, embedding political oversight and alignment with Party priorities into its autonomous vehicle operations.⁸⁵ WeRide’s primary manufacturing partner, Yutong Bus,⁸⁶ maintains extensive reciprocal ties with Yutong Heavy Industries⁸⁷—a military contractor that identifies the PLA as its “primary customer” and has received multiple awards from PLA weapons and logistics departments.⁸⁸ In addition to this indirect exposure, WeRide purchased over RMB 75 million in goods directly from Yutong Heavy Industries in 2022.⁸⁹ Yutong Bus sources from HIT Welding,⁹⁰ a vendor to major U.S. blacklisted Chinese defense contractors like NORINCO and AVIC,⁹¹ and from companies implicated in the CCP’s ongoing genocide in Xinjiang, including Shanghai Huayi Group⁹² and Camel Group⁹³—the latter added to the UFLPA Entity List in 2023.⁹⁴ These ties embed WeRide in commercial networks that support China’s military buildup and coercive labor programs.

14. Nano Labs Ltd.

Nano Labs is a fabless AI chip design firm. Its chips are fabricated by foundries including blacklisted SMIC, and packaged by ASE Group.⁹⁵ In January 2025, Nano Labs acquired a 5% stake in Weiheng Technology, an AI chip startup working with DeepSeek, and by February had directly deployed DeepSeek’s 671B model on its YangTuo workstation—cementing its role in China’s large-model ecosystem.⁹⁶ Its founder Jack Kong’s dual position on Hong Kong Cyberport Management’s board,⁹⁷ where he helped facilitate Integrity Technology Group’s establishment of its international headquarters in January 2024.⁹⁸ This relationship creates a direct channel between Chinese military interests and Western markets, as Integrity serves as a vendor to China’s PLA⁹⁹ and the Ministry of Public Security¹⁰⁰ with classified weapons research permits¹⁰¹ and recently secured contracts to develop military cyberattack simulation systems¹⁰² that appear to leverage Nano Labs’ advanced computing capabilities.

A Nano Labs partnership creates a direct channel between Chinese military interests and Western markets.

15. Pinduoduo Inc.

Pinduoduo, through its U.S.-facing platform Temu, has rapidly gained market share by shipping low-cost goods directly from China to American consumers while exploiting customs loopholes and likely relying on forced labor. A Select Committee report found Temu was “doing next to nothing” to ensure its supply chains are free of Uyghur forced labor and had no system in place to comply with the UFLPA,¹⁰³ effectively guaranteeing products made with forced labor in Xinjiang are entering American homes via its platform.¹⁰⁴ Furthermore, Temu circumvents tariffs and inspections by exploiting the *de*

minimis rule—shipping nearly all packages valued under \$800—allowing Pinduoduo to unfairly undercut American retailers.¹⁰⁵ Furthermore, Pinduoduo has an embedded CCP branch, including a dedicated “poverty alleviation” Party unit that integrates political objectives into product development and corporate strategy.¹⁰⁶ Serious cybersecurity concerns emerged when Google suspended the Pinduoduo app in 2023 after discovering malware,¹⁰⁷ with researchers finding code that exploited Android vulnerabilities to gain unauthorized access to user data,¹⁰⁸ posing significant espionage and privacy risks to U.S. consumers.

16. Weibo Corporation 🇨🇳🇺🇸🇨🇵

Weibo, China’s dominant microblogging platform, plays a central role in the CCP’s digital censorship regime, suppressing dissent and amplifying Chinese state narratives. In 2020, the China Internet Investment Fund, via Wangtou Tongda (Beijing) Technology, acquired a 1% “golden share” in Weibo’s domestic subsidiary, Beijing Weimeng Technology, gaining board appointment rights and embedding Party oversight into content governance.¹⁰⁹ The subsidiary hosts active CCP Party branches that lead joint Party-building efforts,¹¹⁰ reinforcing the CCP’s ideological control within the company.

17. Bilibili Inc. 🇨🇳🇺🇸🇨🇵

Bilibili, China’s premier video platform for youth culture featuring anime, gaming, and interactive “bullet chat” content, has reportedly been negotiating a “golden share” arrangement with Shanghai state entities as of 2023,¹¹¹ which would formalize government oversight of its massive Gen-Z user data and content policies. Bilibili established an independent CCP Party branch in 2017 under the leadership of its Chief Operating Officer, dedicating an entire floor as a “Party-building service station” to systematically embed ideological work into both daily operations and youth-facing content.¹¹² Bilibili is directly tied to the CCP’s Xinjiang Aid system through its membership in the Shanghai–Kashgar E-Commerce Cooperation Alliance, embedding the company in state-run efforts to industrialize Xinjiang under a program widely linked to the CCP’s ongoing genocide against Uyghur Muslims.¹¹³

18. Full Truck Alliance Co., Ltd. 🇨🇳🇺🇸🇨🇵

Full Truck Alliance, China’s dominant digital freight platform connecting millions of truck drivers with shipping companies through its Yunmanman and Huochebang apps, became subject to direct state control when the China Internet Investment Fund acquired a 1% “golden share” in 2021, securing board representation rights and government oversight of its vast logistics data operations.¹¹⁴ The company’s main Chinese entities, Guangxi Yunmanman Network Technology and Truck Alliance (Beijing) Technology, operate extensive CCP Party branches, including one designated as a model unit, that systematically enforce Party leadership throughout the organization.¹¹⁵ Full Truck Alliance is embedded in Xinjiang’s industrialization push through Jiangsu’s Aid Xinjiang programs, supporting labor-intensive logistics and freight infrastructure in a region at the center of the CCP’s forced labor system.¹¹⁶

19. JinkoSolar Holding Co., Ltd.

JinkoSolar, one of the world’s largest solar panel makers, has well-documented ties to forced labor in Xinjiang. It operates a major facility in the region, accepted state-subsidized labor transfers in 2020, and built its plant inside an industrial park that also houses a high-security prison and an internment camp.¹¹⁷ Jinko is a top customer of Xinjiang Daqo, whose entire polysilicon output is linked to forced labor. These facts—government labor subsidies, proximity to detention, and reliance on tainted supply—place Jinko deep inside China’s forced labor system. Additionally, JinkoSolar maintains formal CCP structures across its operations, including a CCP Party committee with multiple branches at its Sichuan subsidiary and a temporary Party branch at its Chuxiong project site—examples that reflect broader, likely widespread Party-led governance throughout the company.¹¹⁸

20. Scienjoy Holding

Scienjoy is a Chinese live-streaming platform that operates mobile entertainment apps monetized through virtual gifting and influencer-driven commerce. In 2021, it partnered with Pingtan Marine Enterprise Ltd., later sanctioned by the U.S. for forced labor and illegal fishing, to “start live broadcast marketing of [Pingtan Marine Enterprise’s] pelagic aquatic products [on] TikTok, SnackVideo, Tmall, Taobao, JD, and WeChat Video Account,”¹¹⁹ making Pingtan “the first fishery company in China to engage in [...] live broadcast e-commerce for pelagic aquatic products.”¹²⁰ ScienJoy’s subsidiaries, Kashgar Sixiang Times Internet Technology and Kashgar Sixiang Lehong Information Technology, are based in the Kashgar Economic Development Zone—an industrial park that hosts a Xinjiang prison camp and functions as a hub for state-run “poverty alleviation” programs tied to the CCP’s ongoing genocide against Uyghur Muslims.¹²¹ Scienjoy maintains CCP presence through functional Party organizations at its Hangzhou headquarters.¹²²

* * * *

This list is not exhaustive. It reflects only a subset of PRC-based firms accessing U.S. capital while serving a genocidal dictatorship and our foremost geostrategic rival. Under Beijing’s model of military-civil fusion, data, capital, hardware, and research—no matter how commercial on the surface—are ultimately harnessed for nefarious state purposes. Those purposes include surveillance, repression, and, in the event of a military conflict, operations aimed at defeating the American military and killing our service members. The SEC can—and must—act.

We urge the Commission to begin delisting companies that are inseparable from China’s military-industrial system or fundamentally incompatible with U.S. disclosure laws. The full list of Chinese firms currently listed on major U.S. exchanges totals 286 as of March 7, 2025.¹²³

Thank you for your attention to this urgent matter. We ask that you respond with your plan for addressing the concerns raised in this letter. We stand ready to support you,

Chairman Atkins

May 2, 2025

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including on legislation as appropriate, to ensure U.S. financial markets are not exploited by the CCP to fuel its rise and imperil our national security.

Sincerely,



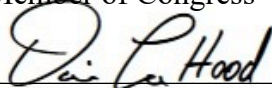
John Moolenaar
Chairman
House Select Committee on the CCP



Rob Wittman
Member of Congress



Andy Barr
Member of Congress



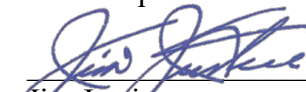
Darin LaHood
Member of Congress



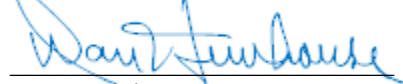
Gus Bilirakis
Member of Congress



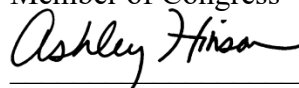
Rick Scott
Chairman
Senate Special Committee on Aging



Jim Justice
United States Senator



Dan Newhouse
Member of Congress



Ashley Hinson
United States Senator



Nathaniel Moran
Member of Congress

¹ *National Intelligence Law of the People's Republic of China* (promulgated by the Standing Comm. of the Nat'l People's Cong., June 27, 2017, effective June 28, 2017), art. 7, http://www.npc.gov.cn/zgrdw/npc/xinwen/2017-06/27/content_2024529.htm.

² *Cybersecurity Law of the People's Republic of China* (promulgated by the Standing Comm. of the Nat'l People's Cong., Nov. 7, 2016, effective June 1, 2017), art. 28, https://www.gov.cn/xinwen/2016-11/07/content_5129723.htm.

³ *Opinion on Strengthening the United Front Work of the Private Economy in the New Era*, Gen. Office of the Cent. Comm. of the Chinese Communist Party (Sept. 15, 2020),

https://web.archive.org/web/20250414032029/https://www.gov.cn/zhengce/2020-09/15/content_5543685.htm.

⁴ H. Select Comm. on Strategic Competition Between the U.S. & the CCP, *Memorandum: United Front 101*, 118th Cong. (Nov. 27, 2023), <https://selectcommitteeontheccp.house.gov/sites/evo-subsites/selectcommitteeontheccp.house.gov/files/evo-media-document/uf-101-memo-final-pdf-version.pdf>.

⁵ “Party committees” are CCP structures established within firms through a hierarchical organization system. A Party cell (党支部) must be formed when an organization has at least three CCP members, while a Grassroots Party Committee (党的基层委员会) is established in organizations with over 100 Party members. These committees perform specific corporate governance functions including oversight, discipline, compliance monitoring, and participation in key decisions, with Party committees being accountable to higher-level Party committees in the CCP hierarchy. While SOEs must document these committees in their articles of association, private firms face no such requirement, creating less transparency for foreign investors despite their prevalence. Over 92% of China’s top 500 private enterprises have party committees, according to official surveys. See *Charter of the Communist Party of China* (Oct. 24, 2017), <https://perma.cc/GKD4-6DBS>; *Company Law of the People’s Republic of China* (promulgated by the Standing Comm. of the Nat’l People’s Cong., Dec. 29, 1993, effective July 1, 1994, as amended), art. 19; *An Analysis Report About the Status of Building Party Organizations in Civilian-Run Enterprises*, All-China Fed’n of Indus. & Com. (May 23, 2019), <https://archive.ph/H4mys>; *2020 Top-500 Chinese Civilian-Run Enterprises: Research & Analysis Report*, All-China Fed’n of Indus. & Com., State Council of the People’s Republic of China (Sept. 10, 2020), <https://archive.ph/UhzCq>.

⁶ A golden share, also known as “Jingu” (金股) or “special management shares” (特殊管理股), is a minimal equity stake—typically less than 1% of company shares—that grants Chinese government agencies disproportionate control rights including board representation and veto power over certain corporate decisions, as demonstrated by its implementation in U.S.-listed Chinese tech firms incorporated in the Cayman Islands such as Alibaba subsidiaries, Bilibili subsidiaries, and Full Truck Alliance. See Lingling Wei, *China’s New Way to Control Its Biggest Companies: Golden Shares*, Wall Street Journal (Mar. 8, 2023), <https://www.wsj.com/articles/xi-jinpings-subtle-strategy-to-control-chinas-biggest-companies-ad001a63>; *Authorities Are Tightening Their Grip in the Private Sector*, The Economist (Nov. 18, 2021), <https://www.economist.com/business/chinas-communist-authorities-reinvent-state-capitalism/21806311>; Oscar Almén & Hanna Carlsson, *The Chinese Communist Party’s Influence Over Businesses*, Swedish Defence Research Agency (Feb. 2025), https://www.ui.se/globalassets/ui.se-eng/publications/other-publications/particeller_nkk_report_2025.pdf.

⁷ *Trial Measures for the Administration of Domestic Enterprises’ Overseas Issuance of Securities and Listing* (promulgated by the Cyberspace Admin. of China, effective Mar. 31, 2023), art. 12, <https://web.archive.org/web/20241202181320/http://www.csrc.gov.cn/csrc/c101954/c7124478/7124478/files/%E9%99%84%E4%BB%B61%E5%BC%9A%E5%A2%83%E5%86%85%E4%BC%81%E4%B8%9A%E5%A2%83%E5%A4%96%E5%8F%91%E8%A1%8C%E8%AF%81%E5%88%B8%E5%92%8C%E4%B8%8A%E5%B8%82%E7%AE%A1%E7%90%86%E8%AF%95%E8%A1%8C%E5%8A%9E%E6%B3%95.pdf>.

⁸ *Counter-espionage Law of the People’s Republic of China*, Xinhua (Apr. 26, 2023), https://web.archive.org/web/20241202182002/https://www.spp.gov.cn/spp/fl/202304/t20230426_612649.shtml; Wu Yuliang, Chairman, Nat’l People’s Cong. Supervisory & Judicial Comm., *Explanation on the Draft Revision of the Counter-espionage Law of the People’s Republic of China*, presented at the 36th Meeting of the Standing Comm. of the 13th Nat’l People’s Cong. (Aug. 30, 2022), https://web.archive.org/web/20241202181728/http://www.npc.gov.cn/npc/c2/c30834/202304/t20230426_429049.html.

⁹ *Risky Business: Growing Peril for American Companies in China: Hearing Before the H. Select Comm. on Strategic Competition Between the U.S. & the CCP*, 118th Cong. (2023) (testimony of Piper Lounsbury), https://selectcommitteeontheccp.house.gov/sites/evo-subsites/selectcommitteeontheccp.house.gov/files/evo-media-document/lounsbury-testimony_0.pdf.

¹⁰ H. Select Comm. on Strategic Competition Between the U.S. & the CCP, *Reset, Prevent, Build: A Strategy to Win America's Economic Competition with the Chinese Communist Party*, 118th Cong. 16–17 (Dec. 12, 2023), <https://selectcommitteeontheccp.house.gov/sites/evo-subsites/selectcommitteeontheccp.house.gov/files/evo-media-document/reset-prevent-build-scc-report.pdf>.

¹¹ Michael Sutherland & Karen Sutter, *U.S. Capital Markets and China: Issues for Congress*, Congressional Research Service (Sept. 2, 2021), <https://www.congress.gov/crs-product/IF11803>.

¹² Julia Horowitz, *Audits of Chinese Companies by KPMG and PwC Full of Holes, US Watchdog Finds*, CNN (May 10, 2023), <https://www.cnn.com/2023/05/10/business/us-china-audit-companies-report/index.html#:~:text=Deficiencies%20were%20found%20in%20100,fix%20them%2C%E2%80%9D%20Williams%20said>.

¹³ Hesai was first designated in January 2024, challenged the designation in court, and was temporarily removed in August 2024. The Department of Defense re-listed the company in October 2024 based on new information, as published in 89 FR 86230. See Edward White, *China's Hesai to Sue Pentagon After Being Reinstated to Blacklist*, Financial Times (Oct. 24, 2024), <https://www.ft.com/content/eefaad6e-dae6-4297-9cd1-87dfb6deea2f>; Demetri Sevastopulo & Edward White, *Chinese EV Laser Maker Fights Back Against Pentagon Blacklisting*, Financial Times (July 14, 2024), <https://www.ft.com/content/f0fd46dc-62b9-4d60-8367-dc4ae860076d>; U.S. DEP'T OF DEF., *Notice of Designation of Chinese Military Company*, 89 Fed. Reg. 84547 (Oct. 23, 2024), <https://www.federalregister.gov/documents/2024/10/23/2024-24723/notice-of-designation-of-chinese-military-company>; *Hesai Group Statement on the U.S. Department of Defense "Chinese Military Companies" List*, Hesai (Jan. 31, 2024), <https://web.archive.org/web/20241129151443/https://investor.hesaitech.com/news-releases/news-release-details/hesai-group-statement-us-department-defense-chinese-military>.

¹⁴ James Mulvenon, *Hesai Technology and its "Chinese Eye"* (June 2024), <https://www.jamesmulvenon.com/wp-content/uploads/2024/06/Hesai-Technology-Final.pdf>.

¹⁵ *How Does UISEE Become the "AI Driver" of the World?*, Hesai (June 29, 2023), <https://web.archive.org/web/20250414043544/https://www.hesaitech.com/how-does-uissee-become-the-ai-driver-of-the-world/>.

¹⁶ *U.S.-China Competition in Emerging Technologies: LiDAR*, Congressional Research Service (Aug. 14, 2023), <https://crsreports.congress.gov/product/pdf/IF/IF12473>; Huatai United Sec. Co., Ltd., *Initial Public Offering Prospectus (Draft) for Hesai Technology Co., Ltd.*, Hesai Tech. Co., Ltd., 1–197 (Oct. 7, 2021), https://web.archive.org/web/20241129183409/https://pdf.dfcfw.com/pdf/H2_AN202101071448531255_1.pdf.

¹⁷ *Ibid.*

¹⁸ For example, see *Party Building Strengthens the Foundation on the "Chain": Jiading's Smart Sensor and Industrial Internet Cluster Accelerates with "Jia" Speed* [“链”上党建强根基，嘉定区智能传感器及工业互联网产业集群驶出“嘉”速度！], WECHAT: SHANGHAI JIADING INDUSTRIAL ZONE [上海嘉定工业区] (Apr. 11, 2023),

<https://web.archive.org/web/20250416120351/https://mp.weixin.qq.com/s?src=11×tamp=1744804899&ver=5934&signature=1Mzxv6MuBmMgkV%2AqE0Uu0fg08mJfF-9zB3jk01lWVRUjWjW1cRZFMxZiTSF5oowVjbQ1uyxb5uH97-nbwgAiz7U94y%2A1rvjUl9qBzOq96eZPazM2pcH0wcnl4O2PNc&new=1>.

¹⁹ For example, see *Shanghai Party Standing Committee Member and Vice Mayor Zhang Wei Investigates Hesai Technology* [上海市委常委、副市长张为调研禾赛科技], WECHAT: HESAI [禾赛] (Aug. 4, 2022), <https://web.archive.org/web/20250416120606/https://mp.weixin.qq.com/s?src=11×tamp=1744805059&ver=5934&signature=OzKaCiOq8XZrR5bu%2AUXymh%2A16HfOaUMLpoCFPMgLcL5mhHafI4KA-gPE0KKfeqC%2AKiKkpKt-bglMOtoHQp8RmNunXsRZJPWRiS1CYwqX5lqxiz5YdmNNIRsK4Msv3eokM&new=1>.

²⁰ This surveillance relationship is evidenced by Qihoo 360's formal business association with the Ministry of Public Security Third Research Institute, and Qihoo 360's participation in a July 9, 2021, bid for a Safety Protection Construction Project conducted by the Aksu District Public Security Bureau in Xinjiang. See *Third Research Institute of the Ministry of Public Security Signs Agreement with 360 Group to Jointly Build a Cybersecurity Brain* [公安部第三研究所和 360 集团签署共建网络安全大脑合作协议], Qihoo 360 (Sept. 2, 2019), <https://web.archive.org/web/20250429181209/https://bbs.360.cn/thread-15783436-1-1.html>. For BIS and DoD sanctions, see *Addition of Entities to the Entity List; Revision of Certain Entries on the Entity List*, 85 FED. REG. 34,495 (June 5, 2020), <https://www.federalregister.gov/documents/2020/06/05/2020-10869/addition-of-entities-to-the-entity-list-revision-of-certain-entries-on-the-entity-list>; 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, 2022), <https://web.archive.org/web/20221005182828/https://www.defense.gov/News/Releases/Release/Article/3180636/dod-releases-list-of-peoples-republic-of-china-prc-military-companies-in-accord/>.

²¹ For example, see *Vice Mayor Li Zhibin Meets with Qihoo 360 Representatives to Discuss Cybersecurity* [李志斌副市长与北京奇虎 360 科技有限公司企业代表就网络安全等问题座谈], WECHAT: PING'AN QINGCHENG [平安青城] (Apr. 5, 2016), [https://web.archive.org/web/20250416152024/https://mp.weixin.qq.com/s?src=11×tamp=1744816708&ver=5934&signature=TlstdkXvPYzAOH5ictjgJxGhbo9DA6zZPJLx%2A-TVjzYm9jy1II284c9emXipEK1evm%2Ah%2A6Kccn5jc7DWPbFZJJNd8wBZ4PU6ELlqBHiZzIwZVEM3Fbmo7W4JdK75YmA&new=1](https://web.archive.org/web/20250416151955/https://mp.weixin.qq.com/s?src=3×tamp=1744816688&ver=1&signature=XDxo1folcbE-Fra9h2C-PXd7Lb6aV3W9C4qGoXuNLPFKzdU4wa7Zav-V%2AvpUsMXvtE7jtKROvyqgS7dDcKlsY-0RJHXarptaspkRQOMoKohwGgm4fqBMFEeiRf3SbwnkhpV6UX0arSvGUDGir1fRMA==; Roundup: Internet Companies That Have Established Party Organizations [盘点：那些成立党组织的互联网公司们], WECHAT: PARTY BUILDING IN NON-PUBLIC ENTERPRISES [非公有制企业党建] (July 3, 2017), <a href=).

²² Office of the Secretary, U.S. DEP'T OF DEF., *Notice of Availability of Designation of Chinese Military Companies*, 90 Fed. Reg. 1,105 (Jan. 7, 2025), <https://www.federalregister.gov/documents/2025/01/07/2025-00070/notice-of-availability-of-designation-of-chinese-military-companies>.

²³ *Ibid.*

²⁴ Tencent, Australian Strategic Policy Institute, <https://chinatechmap.aspi.org.au/#/company/tencent>.

²⁵ Laura T. Murphy & Nyrola Elimä, *In Broad Daylight: Uyghur Forced Labour and Global Solar Supply Chains*, Sheffield Hallam University (2021), <https://www.shu.ac.uk/-/media/home/research/helena-kennedy-centre/projects/pdfs/evidence-base/in-broad-daylight.pdf>;
Ann Swanson & Chris Buckley, *Chinese Solar Companies Tied to Use of Forced Labor*, *New York Times* (Jan. 28, 2021), <https://www.nytimes.com/2021/01/08/business/economy/china-solar-companies-forced-labor-xinjiang.html>.

²⁶ *Ibid.*

²⁷ This includes, for example, signing formal “Party Building Co-Construction Agreements” with banks like Nanjing Bank, for example, to deepen business relationships through Party channels. For example, see *Party Building Drives Development: Banks and Enterprises Forge New Chapter Together* [党建引领促发展 银企结对共建谱新篇], Daqo (Sept. 11, 2024), https://web.archive.org/web/20250429192826/https://www.daqo.com/News/news_detail/id/7669.html;
Party Congress Convened by the Party Branch of Nanjing Daqo Electric Research Institute [南京大全电气研究院党支部召开党员大会], Daqo (June 20, 2022), https://www.daqo.com/News/news_detail/id/6532.html (<https://archive.vn/gHwnY>); *Jiangning Development Zone Emergency Management Bureau Party Branch and Daqo Group (Nanjing Park) Party Committee Jointly Hold Themed Party Day Activity* [江宁开发区应急管理局党支部与大全集团（南京园区）党总支共同开展主题党日活动], Daqo (May 6, 2023), https://web.archive.org/web/20250429193944/https://www.daqo.com/News/news_detail/id/7125.html.

²⁸ *LUOKUNG TECH. CORP. V. DEP’T OF DEF.*, No. 1:21-cv-00583, Memorandum Opinion Granting Plaintiffs’ Motion for Preliminary Injunction (D.D.C. May 5, 2021), https://files.lbr.cloud/public/2021-05/D.D.C.%2021-cv-00583%20dckt%20000033_000%20filed%202021-05-05.pdf?EPULNsL6pAtitKHUKj6zZ3Q89t_Y6_2T.

²⁹ China Aerospace Science and Industry Co., Ltd. [航天科技控股集团股份有限公司], *2012 Annual Report* [2012 年度报告] (Mar. 2013), https://web.archive.org/web/20250414183205/https://file.finance.sina.com.cn/211.154.219.97%3A9494/MRGG/CNSESZ_STOCK/2013/2013-3/2013-03-14/1056876.PDF.

³⁰ Zhang Dongpu, *Leveraging Spatiotemporal Context for Government–Enterprise Big Data Transformation* [张东普: “时空背景下政企业务大数据化转型”的抓手], Taibo Network [泰伯网] (June 14, 2017), <https://web.archive.org/web/20250414183353/https://www.taibo.cn/p/46142>.

³¹ Luokung Technology Corp., Annual Report (Form 20-F) (filed with the SEC Dec. 31, 2023), <https://app.quotemedia.com/data/downloadFiling?webmasterId=90423&ref=318657540&type=PDF&symbol=LKCO&cdn=c3539b7ad4b760c35169d2812b7fb5d0&companyName=Luokung+Technology+Corp&formType=20-F&formDescription=Annual+and+transition+report+of+foreign+private+issuers+%5BSections+13+or+15%28d%29%5D&dateFiled=2024-10-22>.

³² Luokung Technology Corp. [箩筐技术公司], Clients and Partners [客户及合作伙伴], <https://web.archive.org/web/20240908091256/https://m.luokung.com/>; Luokung Technology Corp. Announces it to Provide PaaS Service for the China’s First Remote Sensing Big Data Cloud “SIWEI Earth,” *Earth Imaging Journal* (Sept. 20, 2019), <https://web.archive.org/web/20250429210936/https://eijournal.com/news/business-2/luokung-technology-corp-announces-its-to-provide-paas-service-for-the-chinas-first-remote-sensing-big-data-cloud-siwei-earth>; Luokung Technology Corp. and China Position Form Strategic Partnership to Build Smart Mobility

Spatiotemporal Data Platform [箩筐技术公司携中国位置共建智慧出行全时空大数据融合管理平台], Taibo Net [泰伯网] (Jan. 31, 2019), <https://web.archive.org/web/20250416164956/https://www.taibo.cn/p/55009>.

³³ Luokong’s SEC filings refer to this entity as “Huoerguosi Luokuang Information and Technology Limited”, “Huoerguosi Luokuang”, and “霍尔果斯箩筐信息科技有限公司.” See *Securities Purchase Agreement Between Luokung Technology Corp. and Honbridge Holdings Ltd.*, Ex. 4.26, Form 20-F (Jan. 2019), https://www.sec.gov/Archives/edgar/data/1498171/000121390019007752/f20f2018ex4-26_luokungtech.htm.

³⁴ 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)* (Jan. 7, 2025), <https://media.defense.gov/2025/Jan/07/2003625471/-1/-1/1/ENTITIES-IDENTIFIED-AS-CHINESE-MILITARY-COMPANIES-OPERATING-IN-THE-UNITED-STATES.PDF>.

³⁵ Alibaba, Australian Strategic Policy Institute, <https://chinatechmap.aspi.org.au/#/company/alibab>; Samantha Hoffman, *Engineering Global Consent*, Australian Strategic Policy Institute (2022), <https://s3-ap-southeast-2.amazonaws.com/ad-aspi/2019-10/Engineering%20global%20consent%20V2.pdf>.

³⁶ U.S.-China Economic and Security Review Commission, *2021 Annual Report to Congress 251–52* (2021), https://www.uscc.gov/sites/default/files/2021-11/2021_Annual_Report_to_Congress.pdf.

³⁷ Zach Dorfman, *Tech Giants Are Giving China a Vital Edge in Espionage*, Foreign Policy (Dec. 23, 2020), <https://foreignpolicy.com/2020/12/23/china-tech-giants-process-stolen-data-spy-agencies/>.

³⁸ *Ibid.*

³⁹ *China Acquires ‘Golden Shares’ in Two Alibaba Units*, Reuters (Jan. 13, 2023), <https://www.reuters.com/technology/china-moving-take-golden-shares-alibaba-tencent-units-ft-2023-01-13/#:~:text=Alibaba%20has%20been%20one%20of,rights%20for%20key%20business%20decisions>.

⁴⁰ *Ibid.*

⁴¹ *Ibid.*

⁴² The CPPCC is China’s top United Front advisory body, used to co-opt elites and align private industry with Party goals. See People’s Daily [人民日报], *List of Members of the 12th National Committee of the Chinese People’s Political Consultative Conference* [中国人民政治协商会议第十二届全国委员会委员名单] (Feb. 27, 2014), <https://web.archive.org/web/20250429212826/http://www.cppcc.gov.cn/zxww/2014/02/27/ARTI1393487184783942.shtml>.

⁴³ Human Rights Watch (2019) found that the Integrated Joint Operations Platform (IJOP), used by police in Xinjiang, relies on Baidu Maps functionality for route planning. See Human Rights Watch, *China’s Algorithms of Repression: Reverse Engineering a Xinjiang Police Mass Surveillance App* (May 1, 2019), <https://www.hrw.org/report/2019/05/01/chinas-algorithms-repression/reverse-engineering-xinjiang-police-mass-surveillance>.

⁴⁴ Xinjiang Bai Jiang Tu Network Services Co., Ltd. [新疆百疆图网络服务有限公司], Corporate Culture [企业文化], http://www.baidu-xj.cn/inarticle/index_1.html (<https://archive.is/CDsPF>).

⁴⁵ Sugon Information Industry Co., Ltd. [曙光信息产业股份有限公司], *Prospectus for Public Offering of A-Share Convertible Corporate Bonds* [公开发行 A 股可转换公司债券募集说明书] 1 (Aug. 2, 2018), <https://web.archive.org/web/20250429213425/https://zhengxin-pub.cdn.bcebos.com/static/3b494d92efcebf72859d4546f0f24b8.pdf>.

⁴⁶ Sugon (Dawning) is sanctioned under EO 13959 and the BIS Entity List for providing supercomputing infrastructure to the PLA and surveillance systems in Xinjiang. See U.S. Dep’t of the Treasury, *Non-SDN Chinese Military-Industrial Complex Companies (NS-CMIC) List Updates; Administrative Updates to the SDN, Consolidated, NS-CMIC, and SSI Lists* (Dec. 16, 2021), <http://home.treasury.gov/policy-issues/financial-sanctions/recent-actions/20211216>; U.S. Dep’t of the Treasury, *Treasury Identifies Eight Chinese Tech Firms as Part of the Chinese Military-Industrial Complex* (Dec. 16, 2021), <http://home.treasury.gov/news/press-releases/jy0538>.

⁴⁷ Of note, Beihang University is a “Seven Sons of National Defense” university, meaning it is directly subordinate to the Ministry of Industry and Information Technology. Beihang specializes in the development of military aeronautical and astronautic technologies, including research focused on UAV swarming and manned-unmanned teaming. Additionally, Tsinghua University is co-supervised by the PRC’s State Administration of Science, Technology and Industry for National Defense, an arm of the Chinese government whose stated purposes include “strengthen[ing] military forces with additional personnel and more advanced equipment” and which seeks to leverage these universities for defense purposes. See State Council of the People’s Republic of China, *State Administration for Science, Technology and Industry for National Defense* (Oct. 6, 2014), https://web.archive.org/web/20241005175357/http://english.www.gov.cn/state_council/2014/10/06/content_281474992893468.htm; Alex Joske, *The China Defense Universities Tracker*, Australian Strategic Policy Institute (Nov. 25, 2019), <https://www.aspi.org.au/report/china-defence-universitiestracker>. For details on the initiative, see Meng Jing, *China’s First ‘Deep Learning Lab’ Intensifies Challenge to US in Artificial Intelligence Race*, South China Morning Post (Feb. 21, 2017), <https://www.scmp.com/tech/china-tech/article/2072692/chinas-first-deep-learning-lab-intensifies-challenge-us-artificial>.

⁴⁸ Sunny Cheung, Open-Source Technology and PRC National Strategy: Part I, *China Brief*, Vol. 24, No. 10 (May 10, 2024), <https://jamestown.org/program/open-source-technology-and-prc-national-strategy-part-i/>.

⁴⁹ *Baidu Discloses Quantum Computing Plans* [百度披露量子计算布局], Pingwest [品玩] (Oct. 26, 2020), <https://web.archive.org/web/20250429233232/https://finance.sina.com.cn/tech/2020-10-26/doc-iiznezxr8100866.shtml>; *Baidu Announces Upgraded Quantum Strategy at QIP 2022* [百度连续四年亮相全球量子信息处理顶会 QIP 宣布量子战略规划升级], Baidu AI [百度 AI] (Mar. 11, 2022), <https://web.archive.org/web/20250429233335/https://ai.baidu.com/support/news?action=detail&id=2801>; *Partners* [合作伙伴], Beijing Academy of Quantum Information Sciences [北京量子信息科学研究院] (Dec. 24, 2017), <https://web.archive.org/web/20250429233445/https://www.baqis.ac.cn/collaboration/>.

⁵⁰ *Ibid.*

⁵¹ Zhang Tao, *Chinese Air Force Signs Commercial Agreement with Logistics Companies*, Xinhua (Oct. 27, 2017), https://web.archive.org/web/20171029171711/http://eng.mod.gov.cn/news/2017-10/26/content_4795863.htm.

⁵² He Hongyuan [贺泓源], *Jingdong, Fengshun, and the PLA Air Force Logistics Department Reach Strategic Cooperation to Arrange Civil-Military Fusion* [京东、顺丰与空军后勤部达成战略合作 布局军民融合], Observer Net Comprehensive [经济观察网] (Oct. 25, 2017), <https://web.archive.org/web/20240730160708/www.eeo.com.cn/2017/1025/315365.shtml>; *China's Largest All-Freighter Airline Sees Fleet Expand to 50*, Xinhua (Dec. 22, 2018), https://web.archive.org/web/20250114104443/www.xinhuanet.com/english/2018-12/22/c_137691624.htm; Amanda Lee, *Chinese Online Retailer JD.com Explores Move into Aviation to Improve Logistics*, South China Morning Post (Dec. 11, 2017), <https://www.scmp.com/tech/e-commerce/article/2123871/online-retailer-jdcom-feels-addition-cargoaircraft-will-give-wing>.

⁵³ JD Logistics [京东物流], *JD Logistics Reaches Strategic Cooperation Agreement with PLA Air Force Logistics Department, Self-Built Logistics Model Recognized* [京东物流与空军后勤部达成战略合作 自建物流模式获认可] (Oct. 26, 2017), https://web.archive.org/web/20250417140141/https://m.sohu.com/a/200451584_99967243/?pvid=000115_3w_a.

⁵⁴ *JD's Ultra-Heavy UAV Project: Marketing Hype Without the Capability to Lead Real Logistics Breakthroughs* [京东立项超重型无人机：商业噱头，没能力引领真正的物流体系突破], WECHAT: HOU ZHIJIAN [候知健] (June 25, 2018), <https://web.archive.org/web/20250417141015/https://mp.weixin.qq.com/s?src=11×tamp=1744898823&ver=5936&signature=3%2AhWjSNY%2A%2Amhu-fveKzkT%2Avh9Llj%2ATrGm3ED0TV9qsaHui9EDM2fAU38IgxM3iPIovXW10WH8Tqsb6BXMWqApO3azdF2aoU9FZKJoLmmBuZpeZLYG4q-Qj8Yach1ORQz&new=1>.

⁵⁵ Luojia Laboratory [珞珈实验室], <https://web.archive.org/web/20250416173835/https://luojia.whu.edu.cn/>.

⁵⁶ Yuchuan Wang, *JD Brings Smart Logistics Park to Xinjiang*, JD Logistics (Sept. 30, 2021), <https://web.archive.org/web/20250416172924/https://jdcorporateblog.com/jd-brings-smart-logistics-park-to-xinjiang/>; *JD Logistics Launches Smart Supply Chain Center in Kashgar, Xinjiang* [京东物流新疆产地智能供应链中心在喀什开仓运营], China Net Food [中国网食品] (Aug. 8, 2022), https://web.archive.org/web/20250416174656/http://food.china.com.cn/2022-08/08/content_78362218.htm.

⁵⁷ CCSC Technology Intl. Holdings Ltd., Free Writing Prospectus (Form FWP) 11 (Dec. 6, 2023), <http://pdf.secdatabase.com/43/0001213900-23-093734.pdf>; CCSC Technology Intl. Holdings Ltd., Prospectus (Form 424B4) (Jan. 17, 2024), https://www.sec.gov/Archives/edgar/data/1931717/000121390024004911/f424b40124_ccsctech.htm.

⁵⁸ CCSC Technology Intl. Holdings Ltd., *Board of Directors*, <https://web.archive.org/web/20250415184738/https://ir.ccsc-interconnect.com/overview.html?type=board>.

⁵⁹ *Ibid.*; CCSC Technology Intl. Holdings Ltd., *Company Introduction*, <https://web.archive.org/web/20250415185049/https://ir.ccsc-interconnect.com/overview.html>.

⁶⁰ GAC Group has a documented history of corrupt dealings with PRC government officials, including arranging a no-show position for Liu Tienan's son that paid 1.21 million yuan in salary over six years while Liu, as Vice Chairman of the National Development and Reform Commission, helped approve GAC Toyota's vehicle and engine projects. See Du Fang [杜放], Cheng Shihua [程士华] & Tao Ye [陶冶], *Exposing "Shadow Employees" Who Collect Salaries Without Working* [揭秘那些不上班只拿钱的“影子

员工”], Xinhua via China Military Online [新华社] (Sept. 26, 2014), https://web.archive.org/web/20241127192514/http://www.81.cn/gnxw/2014-09/26/content_6156259.htm.

⁶¹ GAC Group partnered with U.S.-blacklisted iFlytek in 2024 to build its G-OS smart car system, drawing on iFlytek’s military and surveillance tech. The PLA’s use of GAC’s Trumpchi sedans further shows GAC’s role as a military supplier. *See* Guosen Securities [国信证券], *GAC Group (601238.SH): Expanding Pure EV Market, Hybrid Tech Gaining Momentum* [广汽集团（601238.SH）：埃安开拓纯电市场，混动技术蓄势待发], at 42 (July 22, 2022), https://web.archive.org/web/20250430111258/https://pdf.dfcfw.com/pdf/H3_AP202207251576532082_1.pdf; Matthew S. Axelrod, *Remarks as Prepared for Delivery on the Academic Outreach Initiative*, Bureau of Industry and Security (Oct. 26, 2022), <https://www.bis.doc.gov/index.php/documents/about-bis/newsroom/3180-academic-outreach-initiative-portland-speech/file>; Liu Xinglong [刘兴龙], *iFlytek Obtains Weapons Equipment Production License, Expands into Defense Sector* [科大讯飞获武器装备生产许可 开拓军工领域], *China Securities Journal* [中国证券报] (Apr. 11, 2014), <https://web.archive.org/web/20241127202240/http://finance.sina.com.cn/stock/s/20140411/010318764049.shtml>; Rose Yu, *With the Military's Blessing, One Chinese Luxury Car Tries to Make a Comeback*, *Wall St. J.* (May 20, 2014), <https://web.archive.org/web/20241127192857/https://www.wsj.com/articles/BL-CJB-22277>.

⁶² As of 2024, GAC Group is actively engaged in state-led industrial expansion in Xinjiang, including lithium and battery production. Its ties to forced labor are underscored by its supply chain links to Xinjiang Joinworld Co., Ltd., added to the UFLPA Entity List for involvement in forced labor and repression of Uyghurs and other persecuted groups. *See* Tianshan Net – Xinjiang Daily [天山网–新疆日报], *Major Investment Drives Industrial Clusters as Paired Assistance Spurs Strategic Sectors in Xinjiang* [大招商培育大产业 受援地优势产业链式发展] (Mar. 22, 2024), https://web.archive.org/web/20241127190637/https://www.ts.cn/xwzx/jjxw/202403/t20240321_19919779.shtml; Notice Regarding the Uyghur Forced Labor Prevention Act Entity List, 89 Fed. Reg. 92,953 (Nov. 25, 2024), <https://www.federalregister.gov/documents/2024/11/25/2024-27337/notice-regarding-the-uyghur-forced-labor-prevention-act-entity-list>.

⁶³ According to SEC filings, GAC holds veto rights over operational decisions while sharing technological resources and accessing government testing programs. *See* Pony AI Inc., *Registration Statement* (Form F-1) 1, 102, 130, 138, 154, F-34, F-75 (SEC filed Oct. 17, 2024), https://www.sec.gov/Archives/edgar/data/1969302/000110465924109475/tm2310344-12_fl.htm.

⁶⁴ Pony’s joint venture with SANY is Yiji Zhika in Changsha (where Pony holds 40% ownership), *see* Changsha Yiji Zhika Technology Co., Ltd. [长沙一骥智卡科技有限公司], Qichacha [企查查], <https://m.qcc.com/firm/b71d0685ee06962c838962220e3b1e89.html> (<https://archive.md/RjXzd>); Pony AI Inc., *Registration Statement* (Form F-1) 144, 152 (SEC filed Oct. 17, 2024), https://www.sec.gov/Archives/edgar/data/1969302/000110465924109475/tm2310344-12_fl.htm; SANY Group Co., Ltd. [三一集团有限公司], *Strategic Alliance: SANY, Sinotrans, and Pony.ai Build a “Golden Triangle” for Smart Logistics* [战略联盟 | 三一集团、中国外运、小马智行打造智慧物流“黄金三角”] (Nov. 1, 2022), <https://web.archive.org/web/20241127165841/https://m.sanygroup.com/activity/11495.html>.

⁶⁵ SANY Heavy Industry Co., Ltd. [三一重工股份有限公司], *Announcement on Signing of Strategic Cooperation Agreement on Joint Research of “Unmanned Equipment” with National University of Defense Technology of the PLA* [关于三一重工股份有限公司与中国人民解放军国防科技大学签订〈联合研制“无人装备”战略合作协议〉的公告], Announcement No. 2015-031 (Sept. 13, 2015),

https://web.archive.org/web/20250414161800/http://pdf.dfcfw.com/pdf/H2_AN201509110010774607_1.pdf.

⁶⁶ Pony's joint venture with Sinotrans is Qingzhui Logistics (Cyantron) in Guangzhou (where Pony holds 51% controlling stake), *see* Qingzhu Logistics Technology Co., Ltd. [青雅物流科技有限公司], Qichacha [企查查],

<https://web.archive.org/web/20241127164421/https://m.qcc.com/firm/1d9da30b5eff761d293f302d8029c8be.html>; Pony AI Inc., *Registration Statement* (Form F-1) 144, 152 (SEC filed Oct. 17, 2024), https://www.sec.gov/Archives/edgar/data/1969302/000110465924109475/tm2310344-12_fl.htm.

⁶⁷ Sinotrans, now under China Merchants Group, is directly tied to PLA logistics. Its subsidiaries carry out military transport missions, support naval operations, and have been praised by PLA departments for meeting national defense standards. *See* Conor M. Kennedy, *China Maritime Report No. 4: Civil Transport in PLA Power Projection*, China Maritime Studies Institute, U.S. Naval War College 9, 13–14 (Dec. 2019), <https://digital-commons.usnwc.edu/cgi/viewcontent.cgi?article=1003&context=cmsi-maritime-reports>.

⁶⁸ *Ibid.*; Hesai Technology Co., Ltd. [禾赛科技有限公司], *New Journey Begins: Hesai Columbus South China Operations Center Officially Opens* [开启新征程，禾赛哥伦布华南运营中心正式开业] (Oct. 10, 2024), <https://web.archive.org/web/20241128173452/https://www.hesaitech.com/cn/newsdetails/143>.

⁶⁹ At the 2018 Global Smart Logistics Summit, Robosense partnered with Beihang University on the “Camel Summit Plan,” providing LiDAR for autonomous vehicles and drones in a military-civil fusion project. State media described it as a case of “accelerating the two-way transformation of military and civilian achievements.” *See* Financial News – China Financial News Network [金融时报—中国金融新闻网], *Faster Military-to-Civil and Civil-to-Military Integration Steps Release New Momentum for Military-Civil Fusion Development* [“军转民”“民参军”步伐加快 军民融合发展持续释放新动能] (Aug. 2, 2018), https://web.archive.org/web/20241127151051/https://jrj.wuhan.gov.cn/ynzx_57/xwzx/202011/t20201119_1511379.shtml. For further information on the partnership between Pony and Robosense, *see* RoboSense Technology Co., Ltd., *RoboSense Reaches Strategic Partnership with Pony.ai on Full-Business Chain* (Oct. 12, 2022), <https://web.archive.org/web/20250430104543/https://www.robosense.ai/en/news-show-1646>; Pony AI Inc., *Registration Statement* (Form F-1) at 154 (SEC filed Oct. 17, 2024), https://www.sec.gov/Archives/edgar/data/1969302/000110465924109475/tm2310344-12_fl.htm; RoboSense Technology Co., Ltd. [速腾聚创科技有限公司], *2024 Interim Report* [2024 中期報告] 7 (2024), https://web.archive.org/web/20250430105116/https://www1.hkexnews.hk/listedco/listconews/sehk/2024/0920/2024092000660_c.pdf; RoboSense Technology Co., Ltd. [速腾聚创科技有限公司], *RoboSense and Pony.ai Launch Comprehensive Strategic Cooperation* [速腾聚创与小马智行展开全面战略合作] (Oct. 12, 2022), <https://web.archive.org/web/20241127155751/https://www.robosense.ai/news-show-1646>.

⁷⁰ Guangzhou Municipal Cyberspace Administration [中共广州市委网络安全和信息化委员会办公室], *Selected Experiences in Party Building in Guangdong's Internet Industry* [广东省互联网行业党建工作经验选编] (Jan. 21, 2022), <https://web.archive.org/web/20250416204959/https://igz.gzwx.gov.cn/context/contextId/205347>.

⁷¹ ZEEKR Intelligent Technology Holding Ltd., *Zeekr Announces Strategic Integration Transactions with Geely*, PR Newswire (Nov. 14, 2024), <https://web.archive.org/web/20250414125842/https://ir.zeekrgroup.com/2024-11-14-ZEEKR-Announces-Strategic-Integration-Transactions-with-Geely>.

⁷² AutoHome [网通社], *One Rocket, Nine Satellites: Geely's "Future Mobility Constellation" Lays Out a Tech Ecosystem* [“一箭九星入轨 吉利”未来出行星座“布局科技生态”] (June 2, 2022), <https://web.archive.org/web/20250414125135/https://chejiahao.autohome.com.cn/info/10644753>.

⁷³ Dou Hanyang [窦瀚洋] & Pan Yongxiang [潘永翔], *This Factory Builds a Satellite in 28 Days* [这个工厂，二十八天造一颗卫星], *People's Daily* [人民日报] (Apr. 8, 2025), <https://web.archive.org/web/20250430103415/http://www.xinhuanet.com/tech/20250408/3222bfb9d8e84c2b969f8928f7081ed4/c.html>; Spacety DaoYu [时空道宇], *Understanding the In-Vehicle Satellite Communication Behind the Zeekr 001 FR* [一文读懂极氪 001 FR 背后的车载卫星通信技术], WeChat (Oct. 29, 2023), https://web.archive.org/web/20240313035005/https://mp.weixin.qq.com/s/3rhZ4bmGhRxXnD_LiSeo9A.

⁷⁴ *People's Political Consultative Daily* [人民政协报], *Private Enterprises "Join the Military": More Opportunities, Faster Progress* [民企“参军”：多给机会快成才] (Apr. 15, 2016), https://web.archive.org/web/20250414135504/http://www.xinhuanet.com/politics/2016-04/15/c_128896358.htm; Sina Auto [新浪汽车], *First Batch of 1,000 Geely Borui Military Vehicles Delivered in Beijing* [吉利博瑞千辆军车首批交车仪式在北京举行] (Jan. 14, 2020), <https://web.archive.org/web/20250430103732/https://auto.sina.cn/news/hy/2020-01-14/detail-iihnzakh4046318.d.html>.

⁷⁵ For example, see *Party Branch for Auto Sales Services Established in Bao'an's Hangcheng Subdistrict* [就在航城！宝安首个汽车销售服务党支部揭牌成立], *Shenzhen News Network* [深圳新闻网] (June 7, 2024), https://web.archive.org/web/20250416194105/https://ibaoan.sznews.com/content/2024-06/07/content_31000808.htm.

⁷⁶ For example, see *Securely Planting the Party Flag on the Front Line of Scientific and Technological Breakthroughs! This Sheshan Enterprise Transforms Party-Building Strength into Innovation Power* [把党旗牢牢地插在科技攻关第一线！余山这家企业将党建优势转化为创新发展实力], WECHAT: TODAY SHESHAN [今日余山] (Aug. 11, 2023), [https://web.archive.org/web/20250416190834/https://mp.weixin.qq.com/s?src=11×tamp=1744830255&ver=5934&signature=wx1aC3jCco7Uy9R2dlEDM8ur59Jb%2AQ7%2AQGvorUiAOYeK9h9sKCA7lD4v1GqaJHA4hq%2Ao5C9e6CHGNuW8-dN6F8pHYUy%2AcxOSTLzXgzGvicLDQP8i5C0CrZgEBSS8ABt&new=1&poc_token=HCKAAGijUDRfJyi3FJntmr4sZ6Sbe0XSUSa19Oib](https://web.archive.org/web/20250416190834/https://mp.weixin.qq.com/s?src=11×tamp=1744830255&ver=5934&signature=wx1aC3jCco7Uy9R2dlEDM8ur59Jb%2AQ7%2AQGvorUiAOYeK9h9sKCA7lD4v1GqaJHA4hq%2Ao5C9e6CHGNuW8-dN6F8pHYUy%2AcxOSTLzXgzGvicLDQP8i5C0CrZgEBSS8ABt&new=1&poc_token=HCKAAGijUDRfJyi3FJntmr4sZ6Sbe0XSUSa19Oib; Qingming Tribute to Heroes, Monuments Inspire Progress: Tongsang Holding Group Party Branch Holds Thematic Party Day Event); *Qingming Tribute to Heroes, Monuments Inspire Progress: Tongsang Holding Group Party Branch Holds Thematic Party Day Event* [清明祭英烈 丰碑励前行 | 通商控股集团本级党总支开展清明主题党日活动], WECHAT: NINGBO TONGSANG HOLDING GROUP [宁波通商控股集团] (Apr. 3, 2024), [https://web.archive.org/web/20250416192253/https://mp.weixin.qq.com/s?src=11×tamp=1744830255&ver=5934&signature=m%2AuR8GbrPAWufg6xKJMySOrdeiS6ByYfKHOYcAQPSAKMU3SdLg6Q8uEbxw0Jzwc0UuH0Jip1eHWtow1hPzEIL2YGOfbhH2F2q6sCgyrhoEYVvDfOQ9e4HLOAMeeLYtE&new=1](https://web.archive.org/web/20250416192253/https://mp.weixin.qq.com/s?src=11×tamp=1744830255&ver=5934&signature=m%2AuR8GbrPAWufg6xKJMySOrdeiS6ByYfKHOYcAQPSAKMU3SdLg6Q8uEbxw0Jzwc0UuH0Jip1eHWtow1hPzEIL2YGOfbhH2F2q6sCgyrhoEYVvDfOQ9e4HLOAMeeLYtE&new=1; Zeekr Factory Shows Strength in Flexible Manufacturing, Cixi Ancient Town Embraces Integrity: Advanced Manufacturing First Party Branch Holds); *Zeekr Factory Shows Strength in Flexible Manufacturing, Cixi Ancient Town Embraces Integrity: Advanced Manufacturing First Party Branch Holds "Party Building Promotes Scientific Research" Tech Exchange and Integrity Education Activity* [极氪工厂撼柔性制造 慈溪古城沐廉洁清风——先进制造第一党支部开展“党建促科研”科技交流及廉政教育活动], WECHAT: CAISI YONGDONG [材思甬动] (Dec. 19, 2023), [https://web.archive.org/web/20250416192633/https://mp.weixin.qq.com/s?src=11×tamp=1744830659&ver=5934&signature=Se5Fyc07lcMIKNKqGGY-%2A%2AlzfNiyxZbn-GL6%2AORFXPvr9jTEauKhTlG0QQJtT8ubZZbP9OOZ5N94mJPcXYuZyWfk2lEgoMkWpIuRQLxTeljpn4ZLjWAlbMbMDdrlsZ5M&new=1](https://web.archive.org/web/20250416192633/https://mp.weixin.qq.com/s?src=11×tamp=1744830659&ver=5934&signature=Se5Fyc07lcMIKNKqGGY-%2A%2AlzfNiyxZbn-GL6%2AORFXPvr9jTEauKhTlG0QQJtT8ubZZbP9OOZ5N94mJPcXYuZyWfk2lEgoMkWpIuRQLxTeljpn4ZLjWAlbMbMDdrlsZ5M&new=1; Panoramic); *Panoramic "Go to the Countryside" Campaign: Geely, VREMT,*

Zeekr... This Team Extended Their Practice Base Here [全景“三下乡” | 吉利、威睿、极氪.....这支团队把实践地拓展到了这里], WeCHAT: YOUTH MEDIA CENTER & DONGLIN YOUTH LEAGUE COMMITTEE [青年媒体中心 & 东林团委] (Aug. 20, 2022), [https://web.archive.org/web/20250416193123/https://mp.weixin.qq.com/s?src=11×tamp=1744831566&ver=5934&signature=GDMXPskOfSE45ot7T5jCQzy0Bz1F5aYLMMatQE34ybu4r2Sad97AoQ10yWXYR832CFi833N0SK5PzTQYwUjdxCBWo5zrjW5-Rq9Q7iZXtyzn3-McFD2BxLmJXmB4nFMX&new=1;Firmly Grasp the Primary Task, Fight to Win the 14th Five-Year Plan](https://web.archive.org/web/20250416193123/https://mp.weixin.qq.com/s?src=11×tamp=1744831566&ver=5934&signature=GDMXPskOfSE45ot7T5jCQzy0Bz1F5aYLMMatQE34ybu4r2Sad97AoQ10yWXYR832CFi833N0SK5PzTQYwUjdxCBWo5zrjW5-Rq9Q7iZXtyzn3-McFD2BxLmJXmB4nFMX&new=1;Firmly%20Grasp%20the%20Primary%20Task%2C%20Fight%20to%20Win%20the%2014th%20Five-Year%20Plan) [牢牢把握首要任务 决战决胜“十四五”], WeCHAT: NEW SILK ROAD ENTERPRISE DEVELOPMENT PROMOTION ASSOCIATION [新丝路企业发展促进会] (Apr. 5, 2025), <https://web.archive.org/web/20250416193449/https://mp.weixin.qq.com/s?src=11×tamp=1744831566&ver=5934&signature=vF-%2AvS-TbYQhs75YKJSU6adIQJC2V-rOLWqffAmpZ8lSbz2wrizsS6HRz4CRjRMS7GI1v6NYbVWzffJe5lgA2wYhrG9haQe17Sdd-LERuZkyMupyTpvwY%2AQui2yQyUgj&new=1>.

⁷⁷ Geely Automobile Holdings Ltd. [吉利汽车控股有限公司], *Interim Report 19* (Jan. 2020), <https://web.archive.org/web/20250430014012/http://www.geelyauto.com.hk/core/files/financial/en/2020-01.pdf>.

⁷⁸ The “low-altitude economy” is considered by the CCP to be a strategic emerging industry. See XPeng AeroHT, *Milestones*, <https://web.archive.org/web/20250415121424/https://www.aeroht.com/about#history>; Li Fusheng, *Commercial Flying Cars Gearing Up for Liftoff*, China Daily (Apr. 11, 2025), [https://web.archive.org/web/20250415120423/https://www.chinadailyasia.com/hk/article/609302;Peace Ajirotutu, PLA Unveils New Unmanned Weapons Aimed at Taiwan at the Zhuhai Airshow](https://web.archive.org/web/20250415120423/https://www.chinadailyasia.com/hk/article/609302;Peace%20Ajirotutu%2C%20PLA%20Unveils%20New%20Unmanned%20Weapons%20Aimed%20at%20Taiwan%20at%20the%20Zhuhai%20Airshow), Jamestown Foundation (Dec. 20, 2024), <https://jamestown.org/program/pla-unveils-new-unmanned-weapons-aimed-at-taiwan-at-the-zhuhai-airshow/>; Fang Zuwang & Kelly Wang, *China’s Low-Altitude Economy Receives ‘Rare’ Show of Support From Military*, Caixin (July 8, 2024), <https://web.archive.org/web/20250415120927/https://www.caixinglobal.com/2024-07-08/chinas-low-altitude-economy-receives-rare-show-of-support-from-military-102214077.html>.

⁷⁹ Guangzhou Xiaopeng Public Welfare Foundation [广州市小鹏公益基金会], *Party Building at the Institution* [机构党建], https://web.archive.org/web/20250416195642/https://www.xpengfoundation.com/home/Info/index/cate_id/5.html; Guangdong University of Technology [广东工业大学管理学院], *Experiencing Technology-Driven Development: Innovative Party Branch Activity* [感悟科技驱动发展 创新党支部活动] (Dec. 3, 2018), <https://web.archive.org/web/20250416195945/https://glxy.gdut.edu.cn/info/1092/12262.htm>.

⁸⁰ Zuohan Di [左翰嫡], *Grasping the Lifeline of Technology with Our Own Hands* [把科技命脉牢牢掌握在自己手中], Central Commission for Discipline Inspection & National Supervisory Commission Website [中央纪委国家监委网站] (Mar. 8, 2025), https://web.archive.org/web/20250416200514/https://www.ccdi.gov.cn/yaowenn/202503/t20250308_409800_m.html.

⁸¹ Rita Liao, *China’s XPeng in the race to automate EVs with lidar*, Tech Crunch (April 13, 2021), <https://techcrunch.com/2021/04/13/xpeng-lidar-adas/>; Rita Liao, *Tesla’s China rival XPeng to use lidar sensors from DJI affiliate Livox*, Tech Crunch (Jan. 4, 2021), <https://techcrunch.com/2021/01/04/tesla-rival-xpeng-lidar-dji/>.

⁸² CATL is the world’s largest EV battery maker, but can the company hold onto its leading position?, KrASIA (Mar 6, 2022), <https://kr-asia.com/catl-is-the-worlds-largest-ev-battery-maker-but-can-the->

company-hold-onto-its-leading-position; CK Tan, *State-backed battery maker gives competitive jolt to China's CATL*, Nikkei Asia (May 25, 2022), <https://asia.nikkei.com/Spotlight/Electric-cars-in-China/State-backed-battery-maker-gives-competitive-jolt-to-China-s-CATL>.

⁸³ XPeng's supply chain exposure to forced labor in Xinjiang stems from suppliers like Sichuan Jingweida, which has employed over 300 Uyghur workers transferred from Awati County under state-organized programs involving police escorts. Separately, XPeng investor Xiaomi has been linked to Jiangxi Yahua Electronic Materials, a company cited in government reports for participating in Xinjiang labor transfer programs. See Jiangxi Yahua Electronic Materials Co., Ltd. [江西省亚华电子材料有限公司], *Recruitment Brochure* [招聘简章], Nanchang Vocational University [南昌职业大学] (June 22, 2021), <https://web.archive.org/web/20250415111818/https://jyb.nvu.edu.cn/mobile/show.php?contentid=5076>; Xinjiang Department of Human Resources and Social Security [新疆维吾尔自治区人力资源和社会保障厅], *Deputy Director Liu Junchang Leads Delegation to Jiujiang to Coordinate Rural Surplus Labor Transfer and Employment* [副厅长刘俊昌一行赴赣来浔对接农村富余劳动力转移就业工作], Jiujiang Human Resources and Social Security Information [九江人社信息] (Mar. 13, 2019), https://web.archive.org/web/20250415112200/https://www.sohu.com/a/301017817_819263#google_vignette; JWD Technology Co., Ltd. [经纬达科技有限公司], *Partners* [合作伙伴] (Jan. 27, 2023), <https://web.archive.org/web/20230127164752/https://www.myjwd.com/hezuohuoban.html>; Xinjiang Net [新疆网], *Working Away from Home Both Fills Pockets and Enriches Minds: Awat County's Organized Labor Export Program Achieves Good Poverty Alleviation Results Through Systematic Transfer of Employment* [外出务工既鼓口袋又富脑袋 阿瓦提县组织劳务输出整建制转移就业扶贫效果好] (Aug. 22, 2018), https://web.archive.org/web/20210224103211/https://www.sohu.com/a/249353626_118570; Yan Ruozhi [闫若之], *Focusing on Strengthening the Sense of Community of the Chinese Nation, We Will Work Together to Draw a "Concentric Circle" of National Unity and Progress* [以铸牢中华民族共同体意识为主线 携手共绘民族团结进步“同心圆”], Sohu (July 14, 2022), https://web.archive.org/web/20250415113733/https://www.sohu.com/a/567476799_121106854.

⁸⁴ *Xpeng apologizes for illegal collection of facial images after penalty*, Global Times (Dec. 14, 2021), <https://web.archive.org/web/20250415135208/https://www.globaltimes.cn/page/202112/1241489.shtml>.

⁸⁵ Guangzhou Municipal Bureau of Industry and Information Technology [广州市工业和信息化局], *Deputy Director Zhang Hong Leads Delegation to Guangzhou Digital Security Operations Center and Wenzhixing Technology for Party-Building Exchange* [市工信局副局长张宏伟带队赴广州数字安全运营中心、广州文远知行科技有限公司调研并开展党支部共建活动] (Jan. 24, 2024), https://web.archive.org/web/20250416202442/https://gxj.gz.gov.cn/zt/bwexljsmztjy/xxqk/content/mpost_9458400.html; *Pushing "Red Alliance Co-Building" to Empower Industrial Development with Red Chains* [推动“红联共建”，红链赋能跑出产业发展“加速度”], China Daily [中国日报网] (Dec. 19, 2022), <https://web.archive.org/web/20250416202901/https://gd.chinadaily.com.cn/a/202212/19/WS63a02096a3102ada8b22756e.html>.

⁸⁶ According to WeRide's SEC filings, it “work[s] with Yutong [...] to manufacture our robobus” with deployments in 25 cities across China, Singapore, France, the UAE, Saudi Arabia, and Qatar. See WeRide Inc., Registration Statement (Form F-1) (SEC filed July 26, 2024), <https://www.sec.gov/Archives/edgar/data/1867729/000119312524186293/d343706dfl.htm>. For additional information, see Yutong Heavy Industries Co., Ltd. [宇通重工股份有限公司], *2023 Annual Report* [2023 年年度报告] (Apr. 2, 2024), https://web.archive.org/web/20250430100153/https://www.sse.com.cn/disclosure/listedinfo/announcement/c/new/2024-04-02/600817_20240402_RFN8.pdf; Yutong Heavy Industries Co., Ltd. [宇通重工股份有限公司], *2024 Semiannual Report* [2024 年半年度报告] (Aug. 27, 2024),

<https://web.archive.org/web/20250430093101/https://file.finance.sina.com.cn/211.154.219.97:9494/MRGG/CNSESHTOCK/2024/2024-8/2024-08-27/10415196.PDF>; Yutong Bus Co., Ltd. [宇通客车股份有限公司], *2021 Annual Report* [2021 年年度报告] (Mar. 29, 2022), https://web.archive.org/web/20250430093447/http://static.sse.com.cn/disclosure/listedinfo/announcement/c/new/2022-03-29/600066_20220329_2_IdMvsLhx.pdf.

⁸⁸ *Ibid.*; Zhengzhou Dehong MacroTech Dev. Co., Ltd. [郑州德恒宏盛科技发展股份有限公司], *Response to Inquiry from the Shanghai Stock Exchange on Major Asset Restructuring Disclosure* [《关于对郑州德恒宏盛科技发展股份有限公司重大资产重组预案信息披露的问询函》之回复] (Apr. 10, 2020), Zhengzhou Deheng Hongsheng Technology Development Co., Ltd. [郑州德恒宏盛科技发展股份有限公司], Reply from Zhengzhou Deheng Hongsheng Technology Development Co., Ltd. to the Shanghai Stock Exchange Regarding the Inquiry Letter on Disclosure of Major Asset Restructuring Plan [郑州德恒宏盛科技发展股份有限公司关于上海证券交易所《关于对郑州德恒宏盛科技发展股份有限公司重大资产重组预案信息披露的问询函》之回复], <https://web.archive.org/web/20250501142631/https://q.stock.sohu.com/cn,gg,600817,5958342071.shtml>.

⁸⁹ *Ibid.*

⁹⁰ *Ibid.*

⁹¹ According to the 2023 annual report for HIT Welding, its “products are cost-effective and have won the trust of many industries and well-known manufacturers at home and abroad. [...] Leading companies in various industries that have cooperated include” NORINCO and AVIC. See Harbin Welding Inst. HuaTong (Changzhou) Welding Co., Ltd. [哈焊所华通（常州）焊业股份有限公司], *2023 Annual Report* [2023 年年度报告] (Apr. 26, 2024), <https://web.archive.org/web/20250430093718/https://disc.static.szse.cn/disc/disk03/finalpage/2024-04-26/a041511e-b021-4144-a31b-30551f5b7070.PDF>.

⁹² Yutong Bus sources from Double Coin Tire Group Co., Ltd., which lists Zhengzhou Yutong among its supported manufacturers. Double Coin is wholly owned by Shanghai Huayi Group Corporation Limited, which received RMB 58,000 in “Southern Xinjiang Labor Subsidy” payments in 2021 to employ transferred Uyghur labor—linking Yutong’s supply chain, and by extension WeRide’s, to state-sponsored forced labor programs. See Double Coin Tire Group Co., Ltd. [双钱轮胎集团有限公司], *Company Overview* [公司介绍], <https://web.archive.org/web/20230209093027/https://www.doublecoinholdings.com/index.php?m=content&c=index&a=lists&catid=29>; Shanghai Huayi Group Co., Ltd. [上海华谊集团股份有限公司], *2021 Semi-Annual Report* [2021 年半年度报告] (Aug. 20, 2021), <https://web.archive.org/web/20250501132048/http://file.finance.sina.com.cn/211.154.219.97:9494/MRGG/CNSESHTOCK/2021/2021-8/2021-08-24/7465214.PDF>.

⁹³ Yutong Bus sources 24V lithium batteries from Camel Group Co., Ltd., which identified Yutong as a commercial vehicle project partner in its 2022 annual report. Camel Group was added to the U.S. Uyghur Forced Labor Prevention Act Entity List in August 2023 for “participation in business practices that target members of persecuted groups, including Uyghur minorities”—linking WeRide to a U.S.-sanctioned forced labor supplier through its manufacturing partner. See Camel Group Co., Ltd. [骆驼集团股份有限公司], *2022 Annual Report* [2022 年年度报告] (Apr. 21, 2023), https://web.archive.org/web/20250430095707/http://static.sse.com.cn/disclosure/listedinfo/announcement/c/new/2023-04-21/601311_20230421_OY66.pdf.

⁹⁴ U.S. Dep’t of Homeland Sec., *DHS Announces Two Additional PRC-Based Companies as a Result of Forced Labor Enforcement* (Aug. 1, 2023), <https://www.dhs.gov/archive/news/2023/08/01/dhs-announces-two-additional-prc-based-companies-result-forced-labor-enforcement>.

⁹⁵ *Regarding Howay Technology and Pineapple* [关于豪微科技及菠萝的那点事], WECHAT: MINING KING 1 [挖矿王者 1] (Sept. 9, 2021), [https://web.archive.org/web/20250417025757/https://m.163.com/dy/article/HCAANS4G0552TYNC.html?spss=adap_pc](https://web.archive.org/web/20250417025024/https://mp.weixin.qq.com/s?src=11×tamp=1744857987&ver=5935&signature=o41CihqGgva0WqM9MfKq14TVL-617t8mjMqqkuod2X7-94OMgPTNCYrasdrFHRtgoh1Xj8Mrbovlc7jiDLt2%2ABsTwRWFACMpCfXhIP5wy4JMG-aW7zslwhuD2wQUUd7b&new=1;36Kr Exclusive: Metaverse “Chip” Breakthrough—Low-Profile Howay Overtakes on the Curve Toward IPO [36 氪独家 | 元宇宙「芯」突破，低调豪微弯道超车 IPO], [36Kr Zhejiang (36 氪浙江)] (July 15, 2022), <a href=).

⁹⁶ *Nano Labs Invests in AI ASIC Chip Startup, Collaborating with DeepSeek to Drive the Future of AI Technology*, Nano Labs (Jan. 28, 2025), <https://web.archive.org/web/20250417030848/https://ir.nano.cn/news-releases/news-release-details/nano-labs-invests-ai-asic-chip-startup-collaborating-deepseek>; *Nano Labs’ YangTuo LLM Workstation Successfully Completes DeepSeek Edge Deployment*, PRNewswire (Feb. 11, 2025), <https://web.archive.org/web/20250430151126/https://www.prnewswire.com/news-releases/nano-labs-yangtuo-llm-workstation-successfully-completes-deepseek-edge-deployment-302373349.html>.

⁹⁷ *Cyberport, Board of Directors*, https://web.archive.org/web/20250430151122/https://www.cyberport.hk/en/about_us/board_of_directors/ (accessed on Apr. 30, 2025); Nano Labs Ltd, Report of Foreign Private Issuer (Form 6-K) (SEC filed Sept. 2024), https://web.archive.org/web/20250430152258/https://www.cyberport.hk/wp-content/uploads/23-24_full_report.pdf.

⁹⁸ Kelly Le, *Byte-sized Bandits: AI Is Levelling-Up Scammers but Also Helping Hongkongers Fight Back*, South China Morning Post (Aug. 10, 2024), <https://web.archive.org/web/20250430152646/https://www.scmp.com/tech/policy/article/3273935/byte-sized-bandits-ai-levelling-scammers-also-helping-hongkongers-fight-back>; Cyberport, *Cyberport Signs MoU with Leading Mainland Cybersecurity Enterprise Integrity Technology* (Jan. 23, 2024), <https://web.archive.org/web/20250430152545/https://www.cyberport.hk/files/65b0160d00592870404945/Cyberport%20Signs%20MoU%20with%20Leading%20Mainland%20Cybersecurity%20Enterprise%20Integrity%20Tech.pdf>.

⁹⁹ IN-Trust Technology Co., Ltd. [永信至诚科技集团股份有限公司], *2023 Annual Report* [2023 年年度报告] (Apr. 29, 2024), https://web.archive.org/web/20250430152845/https://static.sse.com.cn/disclosure/listedinfo/announcement/c/new/2024-04-29/688244_20240429_3RO3.pdf.

¹⁰⁰ Beijing Integrity Technology Co., Ltd. [北京永信至诚科技股份有限公司], *Prospectus* [招股说明书] (Feb. 17, 2022), https://web.archive.org/web/20250501143049/https://pdf.dfcfw.com/pdf/H2_AN202203041550583197_1.pdf.

¹⁰¹ Guosen Sec. Co., Ltd. [国信证券股份有限公司], Beijing Yongxin Zhicheng Technology Co., Ltd. Response to Review Inquiries Regarding Initial Public Offering and STAR Market Listing Application [北京永信至诚科技股份有限公司首次公开发行股票并在科创板上市申请文件审核问询函的回复] (Dec. 27, 2021), https://web.archive.org/web/20250429231901/http://file.finance.sina.com.cn/211.154.219.97:9494/MRGG/CNSES_H_STOCK/2021/2021-12/2021-12-27/7747234.PDF; Beijing Integrity Technology Co., Ltd. [北京永信至诚科技股份有限公司], Preliminary Prospectus for Initial Public Offering and Listing on the STAR Market [首次公开发行股票并在科创板上市招股意向书] (Sep. 23, 2022), https://web.archive.org/web/20250501133621/http://www.sse.com.cn/disclosure/listedinfo/announcement/c/new/2022-09-23/688244_20220923_3_KrVaThPU.pdf.

¹⁰² 2023 China Unicom Software Research Institute Offensive-Defense Simulation System Procurement Project (Security Competition System) – Bid Winner Announcement [2023 年中国联通软研院信息安全运营域实战攻防演练系统购置项目（安全竞赛系统）– 中标候选人公示], BidLink [必联网] (Dec. 21, 2023), <https://web.archive.org/web/20250430153434/https://www.ebnew.com/businessShow/691307025.html>.

¹⁰³ H. Select Comm. on Strategic Competition Between the U.S. & the CCP, *Fast Fashion and the Uyghur Genocide: Interim Findings*, 118th Cong. (Jun. 23, 2023), <https://selectcommitteeontheccp.house.gov/sites/evo-subsites/selectcommitteeontheccp.house.gov/files/evo-media-document/fast-fashion-and-the-uyghur-genocide-interim-findings.pdf>.

¹⁰⁴ *Ibid.*

¹⁰⁵ *Ibid.*

¹⁰⁶ Changning District Party Committee Organization Dept. [长宁区委组织部], *Changning District: Continuing to Elevate Its Position and Build a New High Ground for Internet Party-Building* [长宁区：持续探索提升能级 打造互联网党建新高地], Shanghai Grassroots Party-Building Net [上海基层党建网] (Nov. 26, 2020), <https://web.archive.org/web/20250416203753/https://www.shjcdj.cn/djWeb/djweb/web/djweb/newestindex/newinfo.action?articleid=ff8080817574d9dd0175fec7fd1e0879>.

¹⁰⁷ *Google Suspends China's Pinduoduo App on Security Concerns*, Reuters (Mar. 21, 2023), <https://www.reuters.com/technology/google-suspends-chinas-pinduoduo-app-due-malware-issues-2023-03-21/#:~:text=March%2021%20%28Reuters%29%20,company%20spokesperson%20said%20on%20Tuesday.>

¹⁰⁸ Lilly Newman, *Security News This Week: Popular Chinese Shopping App Pinduoduo Is Laced With Malware*, Wired (Apr. 8, 2023), <https://www.wired.com/story/pinduoduo-malware-security-roundup/#:~:text=Researchers%20who%20analyzed%20the%20company%27s,take%20control%20of%20users%27;> Sheila Chiang, *Temu Accused of Data Risks After Sister App was Suspended for Malware*, CNBC (May 16, 2023), <https://www.cnbc.com/2023/05/17/temu-accused-of-data-risks-amid-tiktok-pinduoduo-fears.html#:~:text=Temu%20accused%20of%20data%20risks,Google%27s%20app%20store%20over%20malware>

¹⁰⁹ *China Internet Investment Fund Takes 1% Stakes in ByteDance and Sina Weibo* [中网投入股字节跳动和新浪微博, 持股比例均为 1%], Qichacha News [企查查] (Aug. 18, 2021), <https://web.archive.org/web/20250416022842/https://xnews.jin10.com/details/80259>.

¹¹⁰ For example, see *Conviction as Guidance: Joint Party-Building Activity for Beijing Internet Culture Enterprises Successfully Held* [信念引航——北京市网络文化企业联合党建活动顺利开展], WECHAT: BEIJING NETWORK CULTURE ASSOCIATION [北京网络文化协会] (June 5, 2019), <https://web.archive.org/web/20250416110858/https://mp.weixin.qq.com/s?src=11×tamp=1744801426&ver=5934&signature=KkxDnxt3zfObTeSW8Ta1H295UCfE8FlxVA2SZMGCMRGgZnVmhuJiXt8dpk6eu6oMbdxOWUDEP%2AzBtYTsGP5WxS7fWs4X4uuROJRRjV%2AwvB8DoDdVFK2WC9v0BhrfeQP&new=1>.

¹¹¹ Mark Sweney, *China to take 'golden shares' in tech firms Alibaba and Tencent*, The Guardian (Jan. 13, 2023), <https://www.theguardian.com/world/2023/jan/13/china-to-take-golden-shares-in-tech-firms-alibaba-and-tencent>.

¹¹² For example, see *Gathering New Momentum: Online Figures Reflect on the 10th Anniversary of the Shanghai Free Trade Zone* [网聚新动能•网络人士看上海自贸试验区十周年成果], WECHAT: PUJIANG TONGZHOU [浦江同舟] (Sept. 29, 2023), <https://web.archive.org/web/20250416112057/https://mp.weixin.qq.com/s?src=11×tamp=1744801980&ver=5934&signature=fo1ift2T-NtkgZyQ17QP-5bW8Yt5gIl2mu3yrJXkz6uPxmNz9k9O1SuN%2AH-qLTUepK449Ti3jsCeXh2Ws%2AtcG96qNYFr90HymDxi9eb1EcjKOyKFup2Z7yfRXXwmgv0&new=1>; Wang Haiyan [王海燕], *[Ting's View] Party Lecturer Becomes a Bilibili Influencer, Red Bullet Comments Fill the Screen* [【汀视线】党课老师 B 站开课成了网红, 哔哩哔哩红色弹幕满屏飞], WECHAT: BANGGONGTING [伴公汀] (July 1, 2018), <https://web.archive.org/web/20250416112513/https://mp.weixin.qq.com/s?src=11×tamp=1744801980&ver=5934&signature=v4dGIvFgwSzE5mqaoUA4pGbOXtSYH0MNm1C91aZbQaGAYQZHL2s9zdE8FT3tKXKaGJty26-2JV7mLgTmlU7yKHV4oHRT9nwtqija15abXXcfxmGTTtd1n7DMeMHR91&new=1>; *Bilibili CEO Chen Rui: Building a Comprehensive Cultural Platform for Youth in the New Era* [哔哩哔哩网站 CEO 陈睿——打造新时代青年文化综合体], WECHAT: JOURNALISM FRONTLINE [新闻战线] (Nov. 11, 2018), <https://web.archive.org/web/20250416112531/https://mp.weixin.qq.com/s?src=11×tamp=1744801980&ver=5934&signature=yRKxpOPfTKYotD1-9MSMKgANA%2AahHkJN%2A58aGqNAm09y58uqoqLHmR4auOn923zQNEQocMu59uo4f%2Aau525-Li8n%2AMt28rrOVkTVc0QUwNwXua4ojTYQzWIC1Q8vcI7D&new=1>; *[Focus] Strengthen Confidence and Forge Ahead—Shanghai Cadres and Citizens Enthusiastically Watch the 20th Party Congress Opening Ceremony Live* [【聚焦】坚定信心奋勇前进, 谱写事业发展新篇章! 上海干部群众踊跃收听收看二十大开幕直播], WECHAT: SHANGHAI GRASSROOTS PARTY-BUILDING NET [上海基层党建网] (Oct. 16, 2022), <https://web.archive.org/web/20250416112651/https://mp.weixin.qq.com/s?src=11×tamp=1744801980&ver=5934&signature=rDRpgDF9fTV9MgzktbiG64f5LTZSKktQT50V67WQUigT7plk8U6iMyt5guWSH1jLF2mGJlqtr5TpO66SagWUjak1NRfCnnKZhtOCdBvCbbpPuSWfmahZioBvS3fC5aF1&new=1>.

¹¹³ *Shanghai-Kashgar E-commerce Cooperation Alliance Established to Build Production-Marketing Docking Platform* [沪喀电商合作联盟成立, 将搭建产销对接平台], The Paper [澎湃新闻], (May 16, 2024), https://web.archive.org/web/20250416181550/https://www.thepaper.cn/newsDetail_forward_27401262; *“Revitalize Bachu, Share the Future” 2024 Shanghai Promotion Event Successfully Held* [“焕新巴楚 共享未来”2024 上海推介会成功举办], People's Daily [人民] (Nov. 22, 2024),

<https://web.archive.org/web/20250122040333/https://sh.people.com.cn/n2/2024/1122/c134952-41051421.html>.

¹¹⁴ Yingzhi Yang, Cheng Leng & Julie Zhu, *Exclusive: Fretting About Data Security, China's Government Expands Its Use of 'Golden Shares'*, Reuters (Dec. 16, 2021), <https://www.reuters.com/markets/deals/exclusive-fretting-about-data-security-chinas-government-expands-its-use-golden-2021-12-15/>.

¹¹⁵ For example, see *One for Yuqing! Guizhou Province Releases List of Standardized and Model Party Branch Construction Sites* [余庆 1 个! 贵州省党支部标准化规范化建设示范点公示名单], WECHAT: TODAY YUQING [今日余庆] (Aug. 10, 2020), <https://web.archive.org/web/20250416113844/https://mp.weixin.qq.com/s?src=11×tamp=1744803420&ver=5934&signature=9Wmt0TUdIcu4KmO3-4hyPI1235xXJPoZ4%2AhkcWKgG5uL1lR2vq%2AyxPF0MGtuzA7VeKiSgAeikdbaQKzTQBu9IIquOG4sPqMimwFUV0SL4JjWNkcP3kh7-eP6LCYFVCJX&new=1>; *Municipal Transportation Party Committee Guides Manbang Group's Mobile Truck Driver Party Branch in Offline Themed Party Day Activity* [市交通运输行业党委指导满帮集团货车司机流动党员党支部线下主题党日活动], WECHAT: GUIYANG MUNICIPAL TRANSPORTATION COMMITTEE [贵阳市交通委员会] (Oct. 10, 2023), <https://web.archive.org/web/20250416114200/https://mp.weixin.qq.com/s?src=11×tamp=1744803376&ver=5934&signature=KR-5Xn-A7gpHlyPxf4Umm4YFMpY-6V-5xJBfMYcKUto1EeaB9Sv2bZACGeklvIngGvCOIT49Ru8jsDrcKYkEGbjqMqliwcoizJKaPSDE8WrdQQqwcv3VM-%2A42A7YHn2T&new=1>.

¹¹⁶ Full Truck Alliance is expanding digital freight infrastructure under the Belt and Road Initiative, embedded within Jiangsu's Aid Xinjiang efforts alongside Xuzhou's logistics-driven support for Aksu. See *Jiangsu Cadres and Citizens Say: "Big Province, Big Responsibility"—Taking the Lead in Implementing National Strategies* [江苏广大干部群众表示, 块头大责任大, 落实重大战略“走在前”], Xinhua [新华] (Aug. 18, 2023), <https://web.archive.org/web/20250430170121/https://finance.sina.com.cn/jjxw/2025-03-17/doc-inexpywh0544256.shtml?froms=ggmp>.

¹¹⁷ *Ibid.*

¹¹⁸ For example, see *Full Party Member Assembly of the CCP Committee at Sichuan Jinko Solar Co., Ltd. Successfully Convened* [中共四川晶科能源有限公司委员会全体党员大会顺利召开], WECHAT: JINKO SOLAR INGOT BUSINESS UNIT [晶科能源拉晶事业部] (Apr. 8, 2022), <https://web.archive.org/web/20250416220301/https://mp.weixin.qq.com/s?src=11×tamp=1744840691&ver=5935&signature=ZFufuyKVuuDLICDWwmHc546ZVv01XdzMBz8z0IUqNUEXA813j39DEToHibj7ZmeY0hBf8rT2ZbUTyEENpPjO7mrwoOMpvBfg9b8nU5xMnptQOCwIKeP3Z8kuSgybJqAq&new=1>; *Temporary Party Branch Established for the Jinko Solar High-Efficiency Cell Project Command in Chuxiong City* [楚雄市晶科能源高效电池片项目指挥部成立临时党支部], WECHAT: WEICHU VANGUARD [威楚先锋] (Nov. 6, 2020), <https://web.archive.org/web/20250416220612/https://mp.weixin.qq.com/s?src=11×tamp=1744841007&ver=5935&signature=pDd6CoM9yX7PDtfyvI8J9PFMKx7s9FITYNiicXJTWoVfmbAv-Ds%2ARuf5WKnN2H7rvvuG78hVTMFyf-LpRPKYwD4c-UGjnMNSAdjzmHcNmRxo1qqnYhe8%2AxeqKV1Mt18a&new=1>; *Jinko Solar Ingot Business Unit [晶科能源拉晶事业部], CCP Sichuan Jinko Solar Co., Ltd. Committee Party Member Assembly Successfully Convened* [中共四川晶科能源有限公司委员会党员大会顺利召开], WECHAT: SICHUAN JINKO [四川晶科] (June 30, 2020), <https://web.archive.org/web/20250416220801/https://mp.weixin.qq.com/s?src=11×tamp=174484106>

7&ver=5935&signature=ZFufuyKVuuDLICDWwmHc546ZVv01XdzMBz8z0IUqNUGeUeEiCDRSfmb5PSybeUa8mTMdxbkAFudkoyEnb9UNf6BqTtquZqkrFZ9akYS5AsIUDSZSR4hD2PCnMglup-i4&new=1.

¹¹⁹ *Pingtang Marine Enterprise to Establish Satellite Live Broadcasting Network for Pelagic Fishing*, PRNewswire (Feb. 2, 2021), <https://web.archive.org/web/20220324222854/https://www.ptmarine.com/news/detail/525/pingtang-marine-enterprise-to-establish-satellite-live>.

¹²⁰ *Ibid.*

¹²¹ Scienjoy Holding Corp., *Prospectus* (Form 424B3) (SEC filed May 10, 2021), https://www.sec.gov/Archives/edgar/data/1753673/000121390021025316/ea140559-424b3_scienvoy.htm.

¹²² Zhejiang Performing Arts Association [浙江省演出业协会], *Leading with Digital Technology: Drawing a New Blueprint for the Live Streaming Industry — Scienjoy Holding Corporation* [以数字技术引领，绘制直播产业新蓝图——思享无限控股有限公司] (Oct. 16, 2024), <https://web.archive.org/web/20250416221633/http://www.zjsycyhx.com/?c=index&a=show&id=401>; Hangzhou Daily [杭州日报], *Changning District: Continue to Explore and Improve the Energy Level to Create a New Highland for Internet Party Building* [长宁区：持续探索提升能级 打造互联网党建新高地] (Apr. 4, 2023), https://web.archive.org/web/20250416222000/https://www.hangzhou.gov.cn/art/2023/4/4/art_812264_59077626.html.

¹²³ U.S.-China Economic & Security Review Commission, *Chinese Companies Listed on Major U.S. Stock Exchanges* (Mar. 7, 2025), https://www.uscc.gov/sites/default/files/2025-03/Chinese_Companies_Listed_on_US_Stock_Exchanges_03_2025.pdf.