

Congress of the United States
Washington, DC 20510

December 18, 2025

The Honorable Pete Hegseth
Secretary of War
U.S. Department of War
The Pentagon
Washington, DC 20301

Dear Secretary Hegseth:

We write to urge you to expand the Department's list of Chinese military companies maintained pursuant to Section 1260H of the FY 2021 National Defense Authorization Act to include a set of Chinese firms that support "military-civil fusion" (MCF) and advance People's Liberation Army (PLA) capabilities across various sectors, including: biotechnology and life sciences; sensing, surveillance, and robotics; consumer smart devices; large-scale AI models; displays and imaging; semiconductors and manufacturing equipment; and power batteries and energy storage.

We applaud recent actions taken by the Department, including the addition of Tencent to the 1260H list in January 2025 as well as reports that an October 7 letter from Deputy Secretary of War Stephen Feinberg informed the Armed Services Committees that Alibaba, Baidu, and BYD should be added to the list of companies that aid the PRC's military.¹

The firms listed below represent military-civil fusion contributors central to PLA modernization, internal-security operations, and power-projection capabilities. Their designation under Section 1260H would directly support Congress' intent that U.S. taxpayer funds not underwrite PRC military-industrial and internal-security or intelligence capabilities.

¹ *Pentagon Seeks to Add Alibaba, Baidu, BYD to China Military List*, *Bloomberg News Reports*, Reuters (November 26, 2025), available at <https://www.reuters.com/world/china/pentagon-suggests-adding-alibaba-baidu-byd-list-aiding-china-military-bloomberg-2025-11-26/>.

Sincerely,



John Moolenaar
Chairman
Select Committee on China



Rick Scott
Chairman
Senate Special Committee on Aging




Eric A. "Rick" Crawford
Chairman
House Permanent Select Committee on
Intelligence



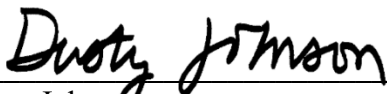
Andrew R. Garbarino
Chairman
Committee on Homeland Security



Rob Wittman
Chairman
House Armed Services Committee, Tactical
Air and Land Forces Subcommittee



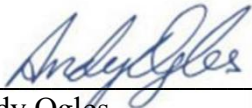
Bill Huizenga
Chairman
House Committee on Foreign Affairs,
South & Central Asia Subcommittee



Dusty Johnson
Chairman
Committee on Agriculture, Commodity
Markets, Digital Assets, and Rural
Development Subcommittee



Darin LaHood
Chairman
House Permanent Select Committee on
Intelligence, Subcommittee on NSA and Cyber



Andy Ogles
Chairman
Committee on Homeland Security,
Cybersecurity and Infrastructure Protection
Subcommittee

Biotech, Genomics, and Life Sciences Manufacturing

WuXi AppTec, WuXi Biologics, and WuXi XDC

- The Select Committee has previously advocated for the addition of WuXi AppTec and Wuxi Biologics to the 1260H List.²
- WuXi's management committee has included representatives from the PLA's Academy of Military Medical Sciences and the Fourth Military Medical University, and the company has received investment from the Aviation Industry Corporation of China Military-Civic Fusion Selected Hybrid Securities Investment Fund, a military-civil fusion fund explicitly created to support military-production enterprises.³
- WuXi also operates a genetic testing demonstration center designated by the National Development and Reform Commission (NDRC) alongside the Xinjiang Production and Construction Corps and has executives serving on national drug-development committees with PLA medical institutes, underscoring its integration into China's military-civil fusion apparatus.⁴
- WuXi Biologics CEO Chen Zhisheng delivered a joint lecture at Tsinghua University together with Major General Chen Wei of the PLA's Academy of Military Medical Sciences in 2019.⁵

GenScript Group (GenScript and affiliated CDMO entities)

- GenScript co-hosted the 2nd International Synthetic Biology Forum with Nanjing University of Science and Technology (NUST)—one of China's Seven Sons of National Defense—and employs NUST-trained PhDs in key process-engineering roles, tying its synthetic-biology and biomanufacturing capabilities into a core defense-university ecosystem.⁶
- GenScript's co-founder Frank Zhang (Zhang Fangliang) was selected for the PRC's Thousand Talents Program and holds multiple CCP-linked political and honorary posts (district People's Congress delegate, vice chair of a local Federation of Industry and

² Letter from U.S. House of Representatives, Select Committee on the Strategic Competition Between the United States and the Chinese Communist Party, to Secretary Gina Raimondo, Secretary Lloyd Austin, and Secretary Janet Yellen, Re: WuXi AppTec and WuXi Biologics (February 12, 2024), available at <https://chinaselectcommittee.house.gov/sites/evo-subsites/selectcommitteeontheccp.house.gov/files/evo-media-document/2.12.24%20WuXi%20AppTec%20Letter%20FINAL.pdf>.

³ James Mulvenon, *The WuXi Group: The National Security Risks Associated with Its Government and Military Connections, Data Privacy Issues, and Corporate Reach*, SOS International LLC (April 2024), available at <https://www.jamesmulvenon.com/wp-content/uploads/2024/05/WuXi-Group.pdf>.

⁴ James Mulvenon, *Red Genes: Assessing WuXi AppTec's Ties to the Party-Army-State in China*, Jamestown Foundation (2024), available at <https://jamestown.org/red-genes-assessing-wuxi-apptecs-ties-to-the-party-army-state/>.

⁵ 陈薇、陈智胜为本科新生讲授‘生物医药与健康产业’，勉励同学们‘用全世界最好的技术发出中国声音’ [Chen Wei and Chen Zhisheng Lecture to Undergraduate Students on ‘Biomedicine and the Health Industry,’ Encouraging Them to ‘Use the World’s Best Technology to Project China’s Voice’], Tsinghua University, available at <http://m.migelab.com/api.php?s=/Art/index/aid/7667> (accessed Dec. 10, 2025).

⁶ 第二届合成生物世界论坛会议论文集 [Conference Proceedings of the 2nd Synthetic Biology World Forum], Genscript, available at https://www.genscript.com/gsfiles/conference/abstract/huikan_en.pdf (accessed 10 Dec 2025).

Commerce, etc.), situating the company's top leadership inside PRC strategic talent and political structures.⁷

- GenScript's Nanjing entity maintains an internal Party committee with named Party secretaries and deputy secretaries who also hold senior operational roles (COO, government affairs director, HR VP), indicating direct CCP organizational penetration into corporate governance consistent with PRC military-civil fusion implementation.⁸

Sensing, Surveillance, Robotics, and Embodied AI

Tiandy Technologies

- Tiandy Technologies supplies advanced video recorders, facial recognition, and analytics, including "race" or ethnicity-recognition features, to Chinese authorities in Xinjiang and to Iran's security apparatus.⁹
- An Open Society Alliance dossier describes Tiandy's operations in Iran and its marketing to security agencies.¹⁰ The EU's Implementing Regulation (EU) 2023/152 identifies Radis Vira Tejarat Co. as Tiandy's Iranian representative and documents the use of Tiandy equipment by the Islamic Revolutionary Guard Corps (IRGC), Basij, and Law Enforcement Forces to violently suppress nationwide protests.¹¹
- Additional policy analysis of Tiandy details its AI "ethnicity-tracking" systems used to identify Uyghurs and other minorities, and its export of surveillance and interrogation technologies to Chinese and Iranian security services, making it a key enabler of techno-authoritarian repression.¹²

Unitree Robotics

- During the China–Cambodia "Golden Dragon 2024" exercise, PLA forces publicly fielded a rifle-equipped robot dog developed by Unitree, with state media showing it operating alongside infantry in urban assault drills and soldiers describing it as a "new member" of urban combat units for reconnaissance and strike missions.¹³

⁷ 中国民主建国会湖北省委员会。"湖北天南星实业有限公司。" Accessed December 11, 2025.

<https://hbmj.gov.cn/a/2069.html>.

⁸ "南京市江宁区组织部, 金斯瑞生物科技有限公司党委: 党建引领科技创新的 "基因力量" [The Party Committee of GenScript Biotech: The "Genetic Power" of Party-Building Leading Scientific and Technological Innovation], 中共南京市委组织部, available at <https://archive.ph/XHfri> (accessed 10 Dec 2025).

⁹ Charles Rollet, "Tiandy's Iran Business, Sells to Revolutionary Guard and Military," IPVM, December 6, 2021. available at <https://ipvm.com/reports/tiandy-iran-business>.

¹⁰ Open Society Alliance, *Tiandy: Use of Surveillance for Identification and Suppression*, at page 6 (2024), available at <https://opensocietyalliance.org/tiandy-use-of-surveillance-for-identification-and-suppression/>.

¹¹ Council Implementing Regulation (EU) 2023/152 of 23 January 2023. *Official Journal of the European Union* L 20 (January 23, 2023). available at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023R0152>.

¹² Craig Singleton, Foundation for Defense of Democracies, *Targeting Tiandy: The Case for Blacklisting a Chinese Tech Firm Tied to Crackdowns on Uyghurs and Iranian Protestors*, at page 3 (Dec. 1, 2022), <https://www.fdd.org/analysis/2022/12/01/targeting-tiandy/>.

¹³ Jonathan Karis, *Chinese Army's Latest Weapon: Gun-Toting Dog*, The Guardian (May 30, 2024), <https://www.theguardian.com/science/article/2024/may/30/chinese-armys-latest-weapon-gun-toting-dog>.

- Unitree is labeled one of Hangzhou's six flagship "little dragon" enterprises¹⁴ and is based in the Hangzhou High-Tech Zone, explicitly described as a "military-civil fusion" zone.¹⁵ The company receives extensive state backing, including investment from a roughly RMB 140 billion Sci-Tech Fund and support from a RMB 21 billion robotics cluster, and multiple rounds of emergency financial assistance.¹⁶

Livox

- Livox is a LiDAR company created through DJI's internal incubation mechanism and later described as a subsidiary of DJI.¹⁷ DJI, in turn, has been designated a "Chinese military company" by DOW, a classification recently upheld by a U.S. district court based on DJI's contributions to the Chinese defense industrial base.¹⁸

¹⁴ The "six little dragons of Hangzhou" refers to a group of state-backed tech companies—DeepSeek, Game Science, Unitree, Manycore Tech, Brain Co., and DEEP Robotics—designated by Hangzhou in January 2025 as priority recipients for targeted government funding and policy support, with the city allocating 15.72% of its industrial policy funds specifically to foster these types of enterprises. See 杭州“六小龙”掀起“神秘东方力量”热潮 [“Hangzhou's 'Six Little Dragons' Spark the 'Mysterious Eastern Force'"], Hangzhou Municipal Investment Promotion Bureau (Jan. 16, 2025), available at https://web.archive.org/web/20250314192706/http://tzcj.hangzhou.gov.cn/art/2025/1/16/art_1621408_58894355.html; “六小龙”走红之后：各地学什么·杭州怎么干？[*After the “Six Little Dragons” Went Viral: What Are Other Places Learning from Hangzhou and What Is Hangzhou Doing?*], Xu Yiping, The Paper (Feb. 12, 2025), available at https://web.archive.org/web/20250402191946/https://www.thepaper.cn/newsDetail_forward_30137040; Why Hangzhou Was Able to Give Birth to the “Six Little Dragons”, CHINA NEWS NETWORK (Feb. 10, 2025), available at https://web.archive.org/web/20250316235335/https://news.cnr.cn/native/gd/20250210/t20250210_527067314.shtml; “数字杭州”科技引领发展动能 [“Digital Hangzhou” Technology Leadership Drives Momentum], CCTV (Feb. 17, 2025), available at <https://web.archive.org/web/20250317024907/http://www.81.cn/zt/2025nzt/njtdgzlzfzhlpxzgsxdhxpzjj2025nqglh/lhrddc/16369966.html>.

¹⁵ 机构职责 [Organization Structure and Main Responsibilities], Hangzhou High-Tech Industry Development Zone (Binjiang) Development & Reform Bureau (last visited Mar. 16, 2025), available at <https://web.archive.org/web/20250317015401/https://www.hhtz.gov.cn/col/col1229241840/index.html>; 信息索引号 002493486/2024-21145 [Information Index No. 002493486/2024-21145], Hangzhou High-Tech Industry Development Zone (Binjiang) Development & Reform Bureau (July 2, 2024), available at https://web.archive.org/web/20250317015908/https://www.hhtz.gov.cn/art/2024/7/2/art_1229241843_171518.html.

¹⁶ Ibid.

¹⁷ “Livox And Xpeng Partner To Bring Mass Produced, Built-In Lidar To The Market,” DJI Europe / MyNewsDesk Press Release (Dec. 21, 2020), noting Livox was founded as a DJI subsidiary and provides LiDAR for autonomous driving and smart-city applications, available at <https://www.mynewsdesk.com/uk/dji/pressreleases/livox-and-xpeng-partner-to-bring-mass-produced-built-in-lidar-to-the-market-3061118>; “Livox Continues To Push Lidar Industry Forward With Two New Solutions For Long Range and Short Range Detection,” Newswire (2020), stating that Livox was established based on DJI's internal incubation mechanism, available at <https://www.newswire.ca/news-releases/livox-continues-to-push-lidar-industry-forward-with-two-new-solutions-for-long-range-and-short-range-detection-876536123.html>.

¹⁸ Reuters, *Drone maker DJI loses lawsuit to exit Pentagon's list of firms with Chinese military ties*, Reuters (Sept. 26, 2025), available at <https://www.reuters.com/legal/litigation/drone-maker-dji-loses-lawsuit-against-pentagon-claim-chinese-military-ties-2025-09-26/>.

- Livox supplies LiDAR to FAW Jiefang's J7 L3 smart truck program.¹⁹ FAW Jiefang produced the Jiefang 'Shenghu' medium high-mobility general tactical vehicle for the PLA, and this vehicle appeared in the September 3, 2015 Tiananmen parade.²⁰

LeiShen

- LeiShen manufactures a range of high-performance LiDAR systems used in autonomous vehicles, robotics, mapping, and advanced sensing applications. One of its products—the LS-CH64W LiDAR—was publicly displayed mounted on a PLA armored vehicle during the 2025 Victory Day parade, demonstrating its integration into Chinese military platforms.²¹

RoboSense

- RoboSense, a leading Chinese LiDAR supplier, was founded by a group of PhDs from Harbin Institute of Technology (HIT)²² who had worked on LiDAR and outdoor robotics perception for many years.²³ The company has reportedly “maintained cooperation with world-class educational and research institutes including [the Massachusetts Institute of Technology], [Hong Kong University of Science and Technology], Tsinghua [University], and HIT on talent sourcing and academic exchanges.”²⁴ HIT is one of China's “Seven Sons of National Defence” universities overseen by the Ministry of Industry and Information Technology with deep, well-documented ties to the PLA and Chinese defense industry, and has itself been added to the U.S. Entity List for activities in support of the PLA.²⁵

¹⁹ Livox, Livox 携手挚途与一汽解放达成前装量产自动驾驶重卡项目合作 [*Livox Partners with Zhitu and FAW Jiefang on Mass-Produced Autonomous Heavy-Truck Pre-Installation Project*] (Sept. 10, 2020), available at <https://archive.ph/XcRKK>.

²⁰ FAW Jiefang, 一汽解放 “胜虎” 军车亮相阅兵式 [*FAW Jiefang “Shenghu” Military Vehicle Appears in Military Parade*], available at <https://archive.ph/Ct7j5>.

²¹ Foundation for Defense of Democracies. *From Parade to Battlefield: LiDAR at the Core of China's Military Modernization*. Washington, DC: Foundation for Defense of Democracies, 2025. available at <https://www.fddaction.org/policy-alerts/2025/09/23/policy-alert-urgent-u-s-response-needed-to-counter-chinas-strategic-use-of-lidar-technology/>.

²² High-Tech Corporation. “RoboSense.” PDF brochure, c. 2017. https://www.high-tech.co.jp/common/sys/gv/gv00431_05.pdf.

²³ “Shenzhen Based RoboSense Is the Next DJI for LIDAR.” *SyncedReview*, September 26, 2017. <https://syncedreview.com/2017/09/26/shenzhen-based-robosense-is-the-next-dji-for-lidar/>.

²⁴ “Robosense – Executive Bio, Top Executives, and Transitions,” Equilar ExecAtlas, describing RoboSense as founded by a group of PhDs from Harbin Institute of Technology, available at <https://people.equilar.com/bio/org/robosense/5419465>.

²⁵ Australian Strategic Policy Institute, *Harbin Institute of Technology*, University Tracker (accessed Dec. 2, 2025). available at <https://unitracker.aspi.org.au/universities/harbin-institute-of-technology>.

- RoboSense participates in R&D and demonstration projects in Shanghai's Lingang New Area,²⁶ which Shanghai authorities describe as a key platform for "military-civil fusion projects," including intelligent-vehicle and sensor pilots.²⁷

CloudMinds

- The Department of Commerce's Bureau of Industry & Security (BIS) added CloudMinds Beijing and CloudMinds Hong Kong to the Entity List in May 2020 for "the procurement of commodities and technologies for military end-use in China."²⁸
- CloudMinds researchers have collaborated on papers with the Sichuan Civil-military Integration Institute.²⁹
- CloudMinds robots have been deployed in urban public-security environments in China, including police- and city-security applications that are characteristic of state-directed military-civil fusion use rather than purely commercial deployment.³⁰

Beijing Humanoid Robotics Innovation Center

- The Beijing Humanoid Robotics Innovation Center, with its Hui Si Kaiwu embodied-intelligence platform, is explicitly described as a "national-local joint embodied-intelligence robotics center."³¹
- A China Military Network article, posted on the Hunan Provincial National Defense Mobilization website, cites the Humanoid Robotics Innovation Center's embodied-AI simulation platform as training ground for robots that will operate on "unmanned battlefields of the future," explicitly framing the center's work in a national defense and military context.³²

²⁶ 上海速腾聚创科技有限公司 [Shanghai Suteng Juchuang Technology Co., Ltd.], 企查查 [Qichacha], accessed December 10, 2025, available at <https://www.qixin.com/company/320e31a5-491d-4d14-a9a0-eb1cb1f37ab2>.

²⁷ 对市政协十四届一次会议 第0872 号提案的答复 [Reply to Proposal No. 0872 of the 14th Session of the Municipal Council], 中国 (上海) 自由贸易试验区临港新片区管理委员会 [Lin-gang Special Area of China (Shanghai) Pilot Free Trade Zone], April 28, 2023, available at <https://archive.vn/O1EJQ>

²⁸ U.S. Department of Commerce, Bureau of Industry and Security, Addition of Entities to the Entity List; Revision of Certain Entries on the Entity List, Federal Register 85, no. 109 (June 5, 2020), available at <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>.

²⁹ Wang Fupan, Wu Yadong, Yang Wenchao, Yang Fan, Hou Jiaxin, Liao Jing, *Design and Research of Data Glove Based on Visual Information Fusion*, Journal of Computer Research and Development 55(12), (2018): 2764-2774, available at <https://crad.ict.ac.cn/cn/article/doi/10.7544/issn1000-1239.2018.20170891?>

³⁰ 达闼机器人. "达闼与唐山市公安局合作 · 运用巡警机器人提升城市安全保障水平 [Dahua Robotics cooperates with the Tangshan Public Security Bureau to use patrol robots to enhance urban safety and security], 达闼机器人官网 [Dahua Robotics Official Website], November 10, 2023, <https://www.dataarobotics.com/zh/blog/news-407.html>.

³¹ Beijing Humanoid Robot Innovation Center official site. "About the Innovation Center," accessed December 11, 2025, <https://www.x-humanoid.com/about.html>.

³² China Military Network, "Embodied Intelligent Robots – When AI Has a 'Body'," Hunan Provincial National Defense Mobilization Office, August 1, 2025, <https://dnmj.hunan.gov.cn/>.

Consumer Smart-Device Ecosystems

Xiaomi Corporation

- The DOD designated Xiaomi as a “Communist Chinese military company” under Section 1237 of the FY1999 NDAA on January 14, 2021.³³ In 2021, the U.S. District Court for the District of Columbia vacated DOD’s prior designation of Xiaomi, finding that the administrative record did not adequately show that Xiaomi was owned or controlled by, or affiliated with, the PLA.³⁴ The bullets below—primarily reflecting developments since that decision—document Xiaomi’s growing role in state-directed, dual-use R&D programs, defense-linked universities, and PLA medical research, providing a basis for listing under Section 1260H.
- A Xiaomi-affiliated researcher co-authored a 2021 machine-learning clinical study with teams from the PLA General Hospital, the PLA Medical School, and the PLA Joint Logistic Support Force’s 920 Hospital. The project used PLA medical datasets for model validation, demonstrating direct scientific collaboration between Xiaomi-linked personnel and core PLA medical institutions.³⁵
- In 2022 it was reported that Xiaomi is leading a national robotics R&D project and operates the official “National New-Generation AI Open Innovation Platform for Smart Home.”³⁶
- Also in 2022, Xiaomi launched a RMB 500 million “Xiaomi Young Scholars” initiative that funds young faculty at more than 20 top universities, including Beihang University and Beijing Institute of Technology. These universities are part of the “Seven Sons of National Defense,” meaning Xiaomi’s talent investments now directly support institutions with longstanding ties to the PRC defense technology ecosystem.³⁷
- Xiaomi serves as the lead undertaking entity for the “Reconfiguration Technology Project” under the 2023 National Key R&D Program *Intelligent Robots*. This places the company directly inside a central government dual-use robotics effort that supports intelligent manufacturing relevant to defense needs.³⁸

³³ “U.S. Court Blocks Trump-Era Designation of Xiaomi as a Chinese Military Company and Permits Continued Trading in its Securities,” *Morrison Foerster*, March 19, 2021, <https://www.mofo.com/resources/insights/210319-us-court-blocks-trump-era-designation>; “OFAC publishes frequently asked question regarding Xiaomi Corporation,” *Willkie Compliance*, May 27, 2021, <https://complianceconcourse.willkie.com/articles/news-alerts-2021-05-may-20210527-ofac-publishes-frequently-asked/>.

³⁴ *Ibid.*

³⁵ Liu, Chao, Qian Yuan, Zhi Mao, Pan Hu, Rilige Wu, Xiaoli Liu, Quan Hong, Kun Chi, Xiaodong Geng, and Xuefeng Sun. *Development and Validation of a Model for the Early Prediction of the RRT Requirement in Patients with Rhabdomyolysis*. *American Journal of Emergency Medicine* 46 (August 2021): 38–44, available at <https://doi.org/10.1016/j.ajem.2021.03.006>.

³⁶ Bao Guo, Mengge Liu, Wen Zhang, Hexuan Chen, Chang Mu, Xiang Li, Jianwei Cui, Bin Wang, and Yuhang Guo, *The Xiaomi Text-to-Text Simultaneous Speech Translation System for IWSLT 2022*, Proceedings of the 19th International Conference on Spoken Language Translation (IWSLT 2022), available at 2022.iwslt-1.17.pdf.

³⁷ Ryan Fedasiuk and Emily S. Weinstein, *Universities and the Chinese Defense Technology Workforce*, Washington, DC: Center for Security and Emerging Technology (December 2020): 6–7, <https://cset.georgetown.edu/publication/universities-and-the-chinese-defense-technology-workforce/>.

³⁸ 小米牵头承担的2023年国家重点研发计划 ‘智能机器人’ 重点专项— ‘机器人自动化产线快速重构技术项目’ 启动会在北京小米科技园举办 [*The kick-off meeting for the 2023 National Key R&D Program ‘Intelligent*

- These developments are part of longstanding connections between Xiaomi and dual-use research funded by the Chinese government. For example, prior to founding Xiaomi, Lei Jun played a key role in the development of WPS 2005, which was reported as funded under China's dual-use 863 Program.³⁹

Large-Scale Artificial Intelligence Model Developers

DeepSeek

- A senior U.S. State Department official told Reuters that DeepSeek “has willingly provided and will likely continue to provide support to China’s military and intelligence operations,” citing its appearance in more than 150 procurement records for the PLA and other entities in the Chinese defense industrial base as well as its provision of technology services to PLA research institutes.⁴⁰ The official also noted that DeepSeek has maintained access to “large volumes” of advanced Nvidia GPUs despite U.S. restrictions and has sought to use shell companies in Southeast Asia to evade export controls.⁴¹
- DeepSeek is being localized and integrated into the PRC’s public security and policing systems, where it is embedded in video-surveillance platforms to analyze faces, vehicles, and crowd behavior, and piloted as a tool to integrate case data, generate incident reports, and provide decision support to officers on the ground.⁴² Public security literature frames these applications as part of intelligence-led governance, pre-emptive prevention, and “new-type public security combat power” that strengthens data-driven policing and stability maintenance under the CCP’s total national security framework.⁴³

Display and Imaging Components

BOE Technology Group Co., Ltd. (BOE)

- BOE, whose predecessor was the PLA-linked, state-owned “Plant 774”⁴⁴ (Beijing Electron Tube Factory), was founded in 1993 as Beijing Oriental Electronics Group and has since become a leading global display maker, with Chinese-language corporate and

Robotics’ Major Project — ‘Rapid Reconfiguration Technology for Robotic Automated Production Lines,’ led by Xiaomi, was held at Xiaomi Technology Park in Beijing.], AI芯天下 [AI Chip World], April 25, 2024, accessed December 10, 2025, <https://www.eet-china.com/mp/a309410.html>.

³⁹ Jordan Schneider, “Chinese Software Wars: Microsoft Office vs Kingsoft’s Word Perfect,” January 16, 2020, <https://www.chinatalk.media/p/chinese-software-wars-microsoft-office>

⁴⁰ Mason, Jeff, and Michael Martina. “U.S. Officials Warn China’s DeepSeek AI Company Is Supporting Military and Intelligence Operations.” *Reuters*, October 7, 2025. <https://www.reuters.com/world/us-officials-warn-chinas-deepseek-ai-company-is-supporting-military-intelligence-2025-10-07/>.

⁴¹ Ibid.

⁴² James Dewey, “DeepSeek’s Use in PRC Military and Public Security Systems,” *China Brief* 25, no. 18 (October 4, 2025), <https://jamestown.org/program/deepseek-use-in-prc-military-and-public-security-systems/>.

⁴³ Ibid.

⁴⁴ 福州京东方光电科技有限公司 [Fuzhou BOE Optoelectronics Technology Co., Ltd.], 公司简介 [company profile], n.p. (May 19, 2022), available at <https://51uns.bysjy.com.cn/Company/Details/68241?schoolCode=12827>.

industry histories describing its origins as a military electronics enterprise and key display supplier.⁴⁵

- BOE is integrated as at least a subprime contractor for the PLA, and many of its customers are known PLA suppliers, such as HiSense.⁴⁶
- BOE operates out of a designated military-civil fusion (MCF) enterprise zone in the PRC, specifically the Chengdu Hi-Tech Industrial Development Zone in Sichuan Province, which hosts BOE's US \$8.8 billion OLED production line.

Tianma Microelectronics and its major display subsidiaries.

- Tianma is a major supplier of military-grade display panels—including LCD and AMOLED modules—used in avionics, cockpit systems, and secure communications equipment.⁴⁷ Tianma is identified by the U.S. Department of State as a subsidiary of the Aviation Industry Corporation of China (AVIC), the principal producer of advanced fighter aircraft for the PLA.⁴⁸ AVIC itself is listed on both the 1260H List⁴⁹ and Treasury's NS-CMIC List,⁵⁰ with multiple additional AVIC affiliates designated across those lists and the Commerce Department's Entity List.⁵¹

⁴⁵ 36Kr article, 跟三星扳手腕的国产屏幕巨头 · 出现了... [The domestic screen giant going head-to-head with Samsung has appeared...] 36Kr, July 14, 2023, available at <https://36kr.com/p/2342698082719234>.

⁴⁶ Artem Alekseenko, *UDE Shanghai Highlights Hisense Dual Cell TV U9E*, DisplayDaily (July 16, 2019), available at <https://displaydaily.com/ude-shanghai-highlights-hisense-dual-cell-tv-u9e/>; Margarita Konaev et al., U.S. and Chinese Military AI Purchases: An Assessment of Military Procurement Data between April and November 2020, Center for Security and Emerging Technology, August 2023, available at <https://cset.georgetown.edu/wp-content/uploads/CSETU.S.-and-Chinese-Military-AI-Purchases-1.pdf>.

⁴⁷ Omdia, *Chinese panel makers lead global military-like displays with 53% share in 2024 reports*, Omdia (October 15, 2024), available at <https://omdia.tech.informa.com/pr/2024/oct/chinese-panel-makers-lead-global-military-like-displays-with-53percent-share-in-2024-reports-omdia>.

⁴⁸ U.S. Department of State, Bureau of East Asian and Pacific Affairs, *Communist Chinese Military Companies Listed Under E.O. 13959 Have More Than 1,100 Subsidiaries*, Fact Sheet, n.p. (Jan. 14, 2021), available at <https://2017-2021.state.gov/communist-chinese-military-companies-listed-under-e-o-13959-have-more-than-1100-subsidiaries/>.

⁴⁹ U.S. Department of War, "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)," (January 7, 2025), available at <https://media.defense.gov/2025/Jan/07/2003625471/-1/-1/1/ENTITIES-IDENTIFIED-AS-CHINESE-MILITARY-COMPANIES-OPERATING-IN-THE-UNITED-STATES.PDF>.

⁵⁰ U.S. Department of Treasury, Office of Foreign Assets Control, *"Non-SDN Chinese Military-Industrial Complex Companies List*," December 16, 2021, available at <https://www.treasury.gov/ofac/downloads/ccmc/nscmiclist.pdf>.

⁵¹ 15 C.F.R. § 744(Supp. No. 4)

Semiconductors, Advanced Materials, and Manufacturing Equipment

Hua Hong Semiconductor

- Hua Hong Semiconductor is state-backed, with China's "Big Fund II" investing directly in the company.⁵² Its current business centers on 65 nm / 40 nm "legacy" chips.⁵³ Those legacy nodes are widely used in industrial, automotive, aerospace and defense systems, meaning Hua Hong's production is directly relevant to military-relevant supply chains.⁵⁴
- Hua Hong also has substantial ownership links to MCF investment entities and existing 1260H-listed companies.⁵⁵

Shennan Circuit Company Limited

- Shennan Circuits is described in its own corporate materials as a "leading enterprise in China's printed circuit board industry" and a pioneer in high-end packaging substrates for communications and other high-reliability applications.⁵⁶ Reuters reporting notes that Shennan's A-share listing was spun out of AVIC International Holdings, tying the company directly into the AVIC corporate family that anchors much of the PLA's aerospace and defense-electronics ecosystem.⁵⁷
- Shennan Circuits is majority-owned by AVIC, a core state-owned defense conglomerate responsible for supplying advanced aerospace and weapons systems to the PLA.⁵⁸

Kingsemi Company Limited

- Kingsemi's track systems are marketed for 28 nm and below, filling another critical segment of the PRC's indigenous lithography stack.⁵⁹
- Kingsemi is a tier 1 supplier to the University of Electronic Science and Technology of China (UESTC), formerly known as the Chengdu Institute of Radio Engineering, one of China's first defense industry universities, and is jointly supervised by the Ministry of Education and the State Administration of Science, Technology and Industry for National Defense.⁶⁰

⁵² Reuters. *Chipmaker Hua Hong Says China's State-Owned Fund to Invest \$414.2 Million*, Reuters (June 28, 2023), available at <https://www.reuters.com/technology/chipmaker-hua-hong-says-chinas-state-owned-fund-invest-4142-million-2023-06-28/>.

⁵³ Peter Brown, "China's Hua Hong Expands Legacy Chip Capacity," *Electronics360*, August 19, 2025, <https://electronics360.globalspec.com/article/22694/china-s-hua-hong-expands-legacy-chip-capacity>.

⁵⁴ Rühl, Tim. *China's Legacy Chip Buildout: A New EU Strategic Dependency That Needs De-Risking?* Stockholm: Swedish Institute of International Affairs, 2025. <https://www.ui.se/globalassets/ui.se-eng/publications/ui-publications/2025/ui-brief-no.-2-2025-china-legacy-chips.pdf>.

⁵⁵ WireScreen dataset. Accessed: 12/10/2025.

⁵⁶ Shennan Circuits Co., Ltd. *Who Is SCC?* Shennan Circuits Co., Ltd. Accessed December 11, 2025. <https://www.scc.com.cn/scc/en/gysn/index.html>.

⁵⁷ Reuters, *Avic International Says Shennan Circuits Obtained CSRC's Approval for Proposed A-Share Listing*, Reuters (October 24, 2017), available at <https://www.reuters.com/article/technology/avic-international-says-shennan-circuits-obtained-csres-approval-for-proposed-a-idUSFWN1MZ0R3/>.

⁵⁸ WireScreen dataset. Accessed December 10, 2025.

⁵⁹ Kingsemi Co., Ltd. [GSM 1500 Photoresist Coating and Developing Track – Product Introduction.] Accessed Dec. 2, 2025, available at <https://www.kingsemi.com/product/7.html>.

⁶⁰ WireScreen dataset. Accessed: 12/10/2025.

Power Batteries & Energy Storage

Gotion High-Tech

- In 2016, Gotion High-Tech announced that its wholly-owned subsidiary, Hefei Gotion High-Tech Power Energy Co., Ltd., signed a strategic cooperation framework agreement with China Aerospace Wanyuan International (Group) Co., Ltd. and the People's Government of Lubei District, Tangshan, to invest in a power-battery project in Tangshan and establish a joint venture with Hefei Gotion holding 51% and Aerospace Wanyuan 49%, focused on power-battery R&D and manufacturing as well as graphene R&D and energy-storage applications in both military and civilian fields.⁶¹ Gotion's leadership has included senior figures with strong ties to the PLA. For example, Fang Jianhua, Gotion's board-level manager from 2010 to 2016, is a former PLA General Staff officer and PLA academy graduate.⁶²

⁶¹ 国轩高科股份有限公司 [Guoxuan High-Tech Co., Ltd.], 关于全资子公司签订战略合作框架协议的公告 [Announcement on Wholly-Owned Subsidiary Signing Strategic Cooperation Framework Agreement,] n.p. (Feb. 3, 2016). available at http://pdf.dfcfw.com/pdf/H2_AN201602040013397601_01.pdf.

⁶² 福建纳川管材科技股份有限公司 [Fujian Nacoo Pipe Technology Co., Ltd.], 第四届董事会第一次会 [Announcement of Resolutions of the First Meeting of the Fourth Board of Directors], company filing, attachment 董事简历 [Biographies of Directors], 4 (January 26, 2018). available at <https://static.cninfo.com.cn/finalpage/2018-01-26/1204369947.PDF>