



PROJECT TIME



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EXECUTIVE SUMMARY

1. The Biden family connection to Chinese investment partnership runs through Chinese Ministry of Foreign Affairs Yang Jiechi currently serving in the Politburo and as the Director of the Office of Foreign Affairs of the Communist Party of China. Yang served extensively at the Chinese embassy in Washington meeting with Senator Biden regularly. The Hunter Biden investment partnership was managed through Ministry of Foreign Affairs institutions designed to garner influence with foreign leaders during Yang's tenure as Foreign Minister. Chinese financial industry sources indicate that the partnership is believed to have a direct line to the Politburo. Background research supports this assertion.
2. The primary broker arranging the Bohai Harvest Rosemont investment partnership Michael Lin is a Taiwanese national living in Hong Kong who has worked for key Chinese state firms known to engage in illicit technology transfer as head of their international investments. During his time running Thornton, Mr. Lin worked primarily for Chinese state institutions under the Ministry of Foreign Affairs and Chinese state-owned enterprises. Separate national intelligence agencies have confirmed that Michael Lin is a person of interest for his work on behalf of China.
3. The BHR investment partnership is entirely a state managed operation. Bohai is a state owned entity and the BHR partnership is under Bank of a China a major state owned bank. The investment partnerships and clients are primarily state owned and engage in financial transactions that have little reason other than to funnel revenue and assets to the BHR partnership. The BHR investment partnership has no reason for existence other than political payoff.
4. Hunter Biden remains invested in the BHR investment partnership holding 10% through a Washington DC based holding company. His visits to China meeting with state owned companies that would become investors began prior to his father's election in 2008 and continued regularly even likely meeting the Ukrainian prime minister and his entourage during one trip to Beijing. Given the Chinese state client and state backed investment nature of the fund, it is difficult to see what Hunter Biden provides to the investment partnership.
5. Chris Heinz and his step father Secretary of State John Kerry appear to have clear ethical problems with Chinese investment. Evidence indicates that Kerry was invested in, directly or indirectly, via Kerry Heinz family trusts in the businesses of his step son Chris Heinz. During his tenure as the Secretary of State, his step son Heinz was selling assets to China in which he had a direct or indirect financial stake through family trust vehicles and investing in a Chinese state owned partnership investment firm. This seems to present clear ethical problems.
6. Based upon current state assets under management of \$6.5 billion and industry standard fees and conservative estimates for capital appreciation, the Hunter Biden stake in BHR would likely be worth at least \$50 million USD. Based upon an original investment of \$400,000 this would represent a gain of 12,400% from 2013 to 2020. Given the circumstances, this seems problematic on many levels.

1. INTRODUCTION

The People's Republic of China <PRC> has been ruled by the Communist Party of China <CPC> since 1949, when Chairman Mao Zedong led the Communists to victory over the Kuomintang Party, which subsequently fled to Taiwan. China is currently ruled by the CPC's Politburo Standing Committee, which is led by the CPC Chairman Xi Jinping (习近平) <Xi>, the China Premier Li Keqiang (李克强) , and five other top-ranking officials.

In 1979, Joseph R. Biden Jr. <Biden>, first visited China at the age of 36, as part of a United States <US> government delegation when he was the senator for Delaware (1973 – 2009).¹ He spent several days with Deng Xiaoping (邓小平) <Deng>, China's newly anointed 'paramount leader' who set the country on a path of reform and opening up.

In 1997 Biden became a ranking member of the Senate Foreign Relations Committee <SFRC>, which is a standing committee of the US Senate that leads foreign policy legislation and debate in the Senate. The SFRC oversees the funding of foreign aid programs, arm sales to national allies, international treaty negotiations, and diplomatic nominations. During this time, Biden supported free-trade legislation that helped China join to the World Trade Organization <WTO>.

In January 2001, Biden became SFRC chairman, and in the same year, China was admitted into the WTO. Discussions on the pros and cons for China's WTO admittance are beyond the scope of this research, but the SFRC chairman has global influence, and should strive to act in the US national interest. At a minimum, the SFRC chairman should be free of foreign interference.

The following report is based on research and analysis of available open-source intelligence at the time of writing. The focus is to determine the nature and extent of the Biden family's ties with the CPC and its businesses from the mid-2000s onwards.



Biden meets Yang Jiechi (second from left), Chinese Ambassador to the United States in October 7, 2004²

Yang - Yang Jiechi (杨洁篪)

Yang is currently director of the Central Foreign Affairs Commission Office (中央外事工作委员会) <CFAC> and former Chinese Foreign Minister (2007 - 2013). Yang worked in the Chinese Embassy in Washington is 1983 – 1987 and 2000 – 2004.³ Yang joined the embassy the same year that Deng Xiaoping's daughter Deng Rong (邓榕) <Rong> left the embassy. Rong set-up the embassy at the behest of her father in 1979, joined by her husband He Ping (贺平) <He> (defense attaché).⁴ He was the head of the PLA Equipment Department and founded arms-dealer Poly Group (保利集团) in 1983.⁵

¹ <https://obamawhitehouse.archives.gov/the-press-office/2011/08/21/remarks-vice-president-sichuan-university>

² <https://web.archive.org/web/20071129012728/http://gilchrest.house.gov/Photos.asp?GalleryID=1&PageID=3&PageView=>

³ https://www.chinavivae.com/biography/Yang_Jiechi/career

⁴ <http://www.caifc.org.cn/index.php?m=content&c=index&a=show&catid=25&sid=605>

⁵ <https://www.poly.com.cn/english/1686.html>; <https://www.scmp.com/article/119003/cadres-criticise-deng-rongs-us-ties>

2. BIDEN'S BUSINESS TIES WITH CHINA

The following is a detailed chronological timeline showing the relationship between Biden's political activities and the Chinese business conducted by his relatives and associates.

Circumventing campaign-finance laws (alleged)

2005

Rosemont Capital - Rosemont Capital LLC

In January 2005, associates of Hunter established Rosemont Capital. These associates were Chris Heinz <Heinz> (left), and Devon Archer <Archer> (right), who were roommates at Yale University <Yale>. The firm was named after a Heinz family farm, and the capital was from the Heinz, heir to the Heinz food processing empire, and step-son of John Kerry <Kerry>, a former Yale graduate who at the time was the senator for Massachusetts. Archer first worked in banking, before serving as the co-chair for Kerry's presidential campaign in 2004 and trustee of the Heinz family office.



2006

In 2006, Biden's son Hunter Biden <Hunter>, who trained as a lawyer at Yale, ran his own Washington lobby firm, Oldaker Biden & Belair, which he co-founded in 2002 with William Oldaker, Biden's former campaign treasurer for Congress.⁶

In mid-2006, Hunter, along with Biden's brother James Biden <James>, acquired the hedge fund Paradigm Global Advisors <Paradigm>, a few months before Biden was to become SFRC chairman again and launch a presidential bid.

According to an unnamed executive quoted in Politico, James made it clear that he viewed Paradigm as a way to take money from rich foreigners who could not legally give money to Biden's campaign account. *"We've got investors lined up in a line of 747s filled with cash ready to invest in this company,"* as well as telling Paradigm employees not to *"worry about investors. We've got people all around the world who want to invest in Joe Biden"*.⁷



James and Hunter denied to the press that James made these comments.

Our research indicates the Biden family and associates went on to execute a string of business deals with China and the CPC for nearly a decade.

⁶ <https://www.nytimes.com/2008/08/25/us/politics/25biden.html>; <https://abcnews.go.com/Blotter/story?id=5640118&page=1>

⁷ <https://www.nationalreview.com/2019/09/hunter-biden-comprehensive-timeline/>

Meeting with Communist Leaders

2007

On January 1, Biden was re-elected as the SFRC chairman, and on January 7, he announced his second bid for presidency.

On January 18, Hunter resigned as interim CEO of Paradigm. He had been instructed by Biden to find a different line of work, according to court records, to avoid allegations of conflict of interest harming Biden's presidential bid.⁸ (Despite this, Biden's campaign still paid USD 143,000 to Hunter's lobby firm for 'legal services').⁹

Thornton - Thornton Group LLC

On September 5, associates of Hunter established Thornton, which acted as a government relations consultancy in the US and China.¹⁰ These associates were James Bulger <Bulger>, the son of long-term Massachusetts senator William Bulger <William> (and nephew of organized crime boss James Bulger), and Michael Lin, aka Lin Chun Liang (林俊良) <Lin>, a Taiwanese born investment banker who also studied at Yale, worked in Boston, New York and then China.¹¹ Thornton was founded with David Callahan and Vincent Barletta as partners to Lin and Bulger. There is scant evidence to indicate Callahan and Barletta participated in Chinese related business.¹² However, both Callahan and Barletta as public works contractors have made large amounts of political donations throughout the New England area with easy access to politicians. Mr. Barletta was involved in a small scandal about making excessive contributions to candidates through third parties.¹³



From its inception, Thornton has had a close relationship with the following US government organization:

SLLF - State Legislative Leaders Foundation

The SLLF is a US nonprofit, nonpartisan, independent NGO for the leaders of the American state legislatures (such as House Speakers, Senate Presidents, Majority Leaders, Minority Leaders, and Pro Tempores), which established the 'William M. Bulger Excellence in State Leadership Award' in 1996.¹⁴

Thornton's first meeting in China was with China's highest organ of state power:

NPC - The National People's Congress of the PRC (全国人民代表大会)

The NPC is China's national legislature, but in reality, a rubber stamp parliament for the CPC's decisions. The NPC meets in full session for only two weeks each year, while the real power rests with the Standing Committee of the NPC which meets throughout the year. Current Chairman is Li Zhanshu (栗战书), who is also a member of the Politburo Standing Committee.

⁸ <https://madisonrecord.com/stories/510565400-bidens-owe-simmonscooper-1-million-in-hedge-fund-deal>

⁹ <https://www.nationalreview.com/2019/09/hunter-biden-comprehensive-timeline/>

¹⁰ Company number: 4417684

¹¹ thorntonai.com/english/team-a-2.html

¹² https://opencorporates.com/companies/us_ma/261136683

¹³ <https://www.patriotledger.com/news/20161003/canton-businessman-to-pay-185000-for-illegal-campaign-contributions>

¹⁴ <https://www.bostonmagazine.com/2007/09/24/the-brother-bulger/>

On October 11, Thornton arranged for a SLLF to visit Chinese officials and senior businessmen in Beijing.¹⁵ There they met with the National People's Congress Vice Chairman Xu Jialu (许嘉璐) <Xu>, and Wei Xin (魏新) <“Wei”>, Chairman & CPC Secretary of Founder Group <Founder> (where Lin worked during the early 2000s as their head of international investment).

Founder – Founder Group (北大方正集团有限公司)

At the same meeting, Thornton and SLLF met with the CPC Secretary of Founder, where Lin worked during the early 2000s as their head of international investment. Founder was originally a hi-tech spin off from Peking University <PKU>, which later expanded into real estate and investment, and is allegedly backed by He Guoqiang, the former secretary of the Central Commission for Discipline Inspection and Politburo Standing Committee member (2007 – 2012).¹⁶ The Founder Group is a politically important state linked company currently leading the Chinese push for semiconductor self sufficiency.

The goal of the trip was to lay the ground for a SLLF summit in Beijing in 2008/2009. Later SLLF president Steve Lakis <Lakis> wrote about the trip and said “*it is abundantly clear we Americans need to learn more about China—its culture, politics, and most importantly, the aspirations of its people.*”¹⁷

It is unclear how Thornton, with no track record, was able to arrange meetings with such a senior Chinese politician. The one visible link being Lin -> Founder -> PKU -> NPC. Sources have indicated Lin is tied closely to senior CPC leadership indicated he is a person of concern for Chinese influence operations.

Partnering with China's Foreign Influence Organizations

2008

Rosemont Solebury Capital

On March 14, Rosemont Solebury Capital was incorporated.¹⁸

Thornton Beijing - Thornton Beijing - Solebury Thornton (Beijing) Consulting Co Ltd

On July 9, Thornton's Bulger and Lin founded Solebury Thornton (Beijing) Consulting Co Ltd.¹⁹

On August 23, Biden was chosen to be the vice-presidential running mate of Democrat presidential nominee Barack Obama <Obama>.

Seneca Global Advisors

On September 12, Hunter officially ended his lobbying work for all clients. In the same month, he founded Seneca Global Advisors, ‘a boutique consulting firm’ that ‘helps small and mid-sized companies expand into markets in the U.S. and other countries.’

In 2008, Thornton continued its liaison with Chinese government, meeting with the following central government organization:

FAC - Foreign Affairs Committee (外事委员会)

The FAC is responsible for (amongst other things) reviewing NPC foreign affairs related legislation, communicating with foreign affairs committees from other countries, and publicly

¹⁵ www.thorntonasia.com/english/news3-3.html

¹⁶ <https://www.nytimes.com/2017/04/15/world/asia/china-billionaire-guo-wengui-xi-mar-a-lago.html>

¹⁷ www.thorntonasia.com/english/news3-5.html

¹⁸ <https://newyork-company.com/co/rosemont-solebury-capital-management-llc>

¹⁹ 索尔博瑞桑顿 (北京) 咨询有限责任公司

expressing opinions on major issues related to China. When the NPC is not in session, the FAC is administered by the Standing Committee.

On October 21, Lin and Lakis visited HNA Group in Beijing, this time with Archer, acting as COO of Rosemont Solebury Capital.²⁰ HNA Chairman Chen Feng hosted a welcome dinner for the US delegation that evening. HNA was originally an airline carrier that expanded rapidly into a major Chinese conglomerate, with alleged ties to current China Vice-President Wang Qishan (王岐山) <Wang>, then former vice premier (2008 – 2013).²¹ To this day, it remains unclear who is the controlling owner in the HNA Group.²² On the same day, the Thornton delegation also met with officials from PKU.²³

On October 22, a Thornton/Rosemont Solebury/SLLF delegation, including Lin, Archer, and Lakis, met with Peng Fang, Director General of the FAC.²⁴ The meeting was held in the Great Hall of the People, China's most prestigious state building used to host legislative and ceremonial activities. In other words, the Thornton delegation met with a senior Chinese foreign affairs official at China's most famous state building, in a meeting which would have been approved by or informed to China's top leaders. This was clearly not a business meeting, but (at least in the eyes of the Chinese contingent), a nation to nation, state to state meeting.

On November 4, Obama was elected president and Biden was elected vice president.

2009

On January 6, Kerry replaced Biden as SFRC chairman.

On January 20, Biden became the 47th US Vice President.

Rosemont Seneca - Rosemont Seneca Partners

On June 25, Biden co-founded Rosemont Seneca with Archer and Heinz.²⁵ The company's offices in Georgetown, were located two miles from both Biden's office in the White House and his residence at the Naval Observatory, and one mile from Kerry's Georgetown mansion.²⁶

In 2009, Hunter also joined **Rosemont Realty**, which was founded by Heinz and Archer, and employed another Yale graduate, Daniel Burrell <Burrell>.²⁷

S&ED - U.S.–China Strategic and Economic Dialogue (中美战略与经济对话)

From July 27 to July 28, the first S&ED, which was held in Washington. The S&ED is a high-level dialogue to discuss global strategic and economic issues between the two countries.²⁸

On July 29, Rosemont Seneca Advisors LLC was incorporated in Delaware. The reason business owners may choose to incorporate in Delaware is because its is low tax, and has strict corporate secrecy rules. No data is collected on beneficial owners so it has become a haven for shell companies

In 2009, Thornton deepened its ties with China's central government, meeting with the following CPC foreign affairs agencies:

²⁰ www.thorntonasia.com/english/news2-24.html

²¹ <https://www.ft.com/content/8acfe40e-410b-11e7-9d56-25f963e998b2>

²² <https://www.wsj.com/articles/who-owns-hna-we-still-dont-know-1500965846>

²³ www.thorntonasia.com/english/news2-25.html

²⁴ www.thorntonasia.com/english/news2-26.html

²⁵ https://opencorporates.com/companies/us_de/4703140; <https://theintercept.com/2019/05/03/biden-son-china-business/>

²⁶ <https://nypost.com/2018/03/15/inside-the-shady-private-equity-firm-run-by-kerry-and-bidens-kids/>

²⁷ <https://www.abqjournal.com/1401175/theres-a-hunter-bidensanta-fe-connection-ex-its-through-the-old-rosemont-realty-now-controlled-by-a-chinese-firm.html?paperboy=loggedin630am>

²⁸ <https://2009-2017.state.gov/e/eb/tpp/bta/sed/2009/index.htm>

MOFA - Ministry of Foreign Affairs (外交部)

MOFA is the government department responsible for the PRC's foreign relations and is administered by the State Council (国务院), which is China's chief government administrative authority, and chaired by Chinese Premier Li.

United Front - United Front Work Department of the CPC's Central Committee (中共中央统一战线工作部)

The United Front is the core organization used by the CPC to advance its interests. It administers and subordinates target groups in China and abroad, with the goal of co-opting organizations that might threaten it.²⁹ Foreign targets can include the overseas Chinese communities, government officials, education institutions and any persons deemed influential such as Lin, Bulger, Archer and Hunter.

CPIFA - Chinese People's Institute of Foreign Affairs (中国人民外交学会)

Subordinate to the Ministry of Foreign Affairs, the purpose of the CPIFA is to “carry out exchanges with statesmen, scholars, noted personages, relevant research institutions and social organizations of various countries, with a view to enhancing mutual understanding and friendship between the people of China and the world”, according to a 2019 Xinhua article on the CPIFA's 70th anniversary commemoration event attend by Wang (now Vice-President) and Yang.³⁰

CAIFC - China Association for International Friendly Liaison (中国国际友好联络会联合)

A United Front organization run by the Liaison Department of the Political Work Department of the Central Military Commission (中央军事委员会) (the CPC's military command and control organization), and is active in intelligence collection and overseas influence operations to promote the interests of the CPC. The department conducts ideological and political work on foreign armies and with the aim of dampening their morale and breaking them up. CAIFC was established in 1984 by Deng, and his daughter Rong has been a vice-president of the organization since 1990.³¹

CCPIT - China Council for the Promotion of International Trade (中国国际贸易促进委员会)

The CCPIT organizes trade fairs and events. according to a now declassified 1957 Central Intelligence Agency report (p.63), the CCPIT's main objective is to persuade overseas businessmen that trade embargoes on China are detrimental to their own interests.³²

These CPC agencies are either directly responsible for the CPC's foreign relations or function as proxies for CPC propaganda and seek to engineer a discourse landscape favorable to CPC policy.³³ They do so by cultivating enough people in the right places so that the CPC can use others to change the debate. Thornton was surrounded by CPC agencies seeking to influence US foreign policy, and actively supported their influence with US politicians.

First Sino - US Provincial Legislative Leaders Forum (中美省 / 州级立法领导人论坛)

The culmination of Thornton's efforts was the First Sino - US Provincial Legislative Leaders Forum (中美省 / 州级立法领导人论坛) held at PKU on November 10 to November 15.³⁴ The event was co-sponsored by the SLLF, CPIFA, CAIFC, and the General Office of the Standing Committee of the NPC, according to a report written by Xinhua, China's official press agency and published on China's government website.³⁵

²⁹ <https://theconversation.com/inside-chinas-vast-influence-network-how-it-works-and-the-extent-of-its-reach-in-australia-119174>

³⁰ http://www.xinhuanet.com/english/2019-12/16/c_138635959.htm

³¹ <https://qz.com/933971/the-intricate-ties-between-the-woman-who-paid-16-million-for-trumps-condo-and-chinas-power-elite/>

³² <https://www.cia.gov/library/readingroom/docs/CIA-RDP78-00915R000600210003-9.pdf>

³³ <https://sinopsis.cz/en/ep/>

³⁴ <http://www.thorntonasia.com/english/news3-9.html>

³⁵ http://www.gov.cn/jrzq/2009-11/11/content_1462078.htm

The goal was to “*discuss issues of mutual interest and expand opportunities for trade and investment*”. Xu delivered the opening ceremony speech. The then director of MOFA’s Department of North American and Oceanian Affairs said “*it is hoped that the legislative bodies of China and the United States and people of insight from all walks of life will become supporters and participants of Sino-US relations*”.

Below is a summary of the meetings between US and Chinese politicians arranged by Thornton in 2009:

- On April 10-12, a delegation from the Hangzhou Economic and Technological Development Area (杭州经济技术开发区), on behalf of the Hangzhou Municipal Government, met with Bulger’s father William and other Massachusetts representatives in Boston.³⁶
- On April 24, Thornton and CCPIT organized the West China International Investment and Cooperation Forum in Hong Kong, attended by provincial government delegations from West China.³⁷
- On May 5, Lin met with the Director-General of the China Electric Council (中国电力企业联合会).³⁸
- June 11 PKU Founder Alliance.³⁹ The news item notes that Founder’s “*unique status is underscored by its close relationships with Peking University and the Chinese Central Government*”.
- On June 19, Thornton entered into a strategic alliance agreement with the ministerial level government trade and investment agency CCPIT.⁴⁰
- On June 24, Lin and Lakis met with NPC FAC’s Peng (for the second time), with Founder chairman Wei also in attendance, to initiate the launch of the Sino-US Summit.⁴¹
- 2009 07 14 Lin and Nanjing officials from CCPIT met with representatives of the Nanjing Government.⁴²

On June 23, 2009, Thornton announced that Lin was appointed as SLLF’s Asia/China Bureau Head, giving him a formal role in the organization and a suitable title for meeting with Chinese politicians.⁴³ The same announcement included a photo of Lin and Lakis standing inside the Great Hall of the People.

Hunter Courts CPC Money

2010

In 2010, Rosemont Realty acquired BGK, owned 135 commercial buildings in 22 states. Burrell was appointed CEO, and Hunter was appointed to the board of advisors.

On April 12 and 13, Biden met with then Chinese President Hu Jintao (胡锦涛) in Washington as part of the Nuclear Security Summit.

Just a few days prior, between April 7 and 9, Hunter took a business trip to Beijing where he joined Thornton’s Lin and Bulger for several meetings with some of China’s most powerful state financial institutions. The English news item is no longer accessible on Thornton’s website, but the Chinese version remains.⁴⁴

³⁶ <http://www.thorntonai.com/chinese/newscount.asp?ArticleID=180>; <http://www.thorntonasia.com/english/news2-32.html>

³⁷ <http://www.thorntonasia.com/english/news2-30.html>

³⁸ <http://www.thorntonasia.com/english/news2-34.html>

³⁹ <http://www.thorntonasia.com/english/news2-39.html>

⁴⁰ <http://www.thorntonasia.com/english/news2-40.html>

⁴¹ <http://www.thorntonasia.com/english/news2-36.html>

⁴² <http://www.thorntonasia.com/english/news2-43.html>

⁴³ <http://www.thorntonasia.com/english/news2-41.html>

⁴⁴ <http://www.thorntonai.com/chinese/newscount.asp?ArticleID=282>

According to Thornton's news item, Hunter was introduced as the chairman of Rosemont Seneca and the second son of the US Vice-President, and the purpose of his visit was to "*deepen mutual understanding and explore the possibility of commercial cooperation*".

Hunter visited multiple parties in one day, with each meeting appearing to last no more than one hour or two. It is unclear what meaningful discussions could have taken place during the short space of time, other than for Thornton to deliver Hunter to their Chinese counterparties and flaunt their US political connections. Regardless of Hunter's intentions, his hosts will have treated his visit at a quasi-state level.

In chronological order, Hunter met with the following Chinese financial institutions.

SSF - National Council for Social Security Funds (全国社会保障基金理事会)

On April 7, Hunter met with Ji Guoqiang (冀国强) <Guo>, head of the SSF's equity assets department. The SSF was established by the Central Committee of CPC and the State Council, and manages the National Social Security Fund.

Guo's official CV shows in 2009 he attended the CPC's Central Party School (中央党校) <CPS>, the higher education institution which specifically trains CPC cadres.⁴⁵ Xi was CPS president during Guo's time there. Guo is now a Tianjin Standing Committee member and its United Front minister.⁴⁶ The Tianjian government is an owner of Bohai Industrial Investment partnering with Rosemont Seneca, and its subsequent entities, in BHR Equity.



National Council of Social Security Funds, April 7, 2010 (14:52)

Hillhouse - Hillhouse Capital

On April 8, Hunter met with a leading Chinese private equity investor Zhang Lei (张磊) <Zhang>, who founded the leading private equity firm Hillhouse. Zhang is also a former Yale graduate in 2005, who started Hillhouse in 2005 with seed capital from the Yale Endowment.⁴⁷ Hillhouse was an early Tencent backer, and more recently of video conferencing software Zoom.⁴⁸ Zhang is a multi-billionaire who is affiliated with several China friendly government and non-governmental organizations <NGOs>, some of which are linked with the UF's foreign influence activities.⁴⁹

CUSEF - China-United States Exchange Foundation (中美交流基金會)

Zhang is a Governing Board Member of the CUSEF, which aims to "*improve communications and enhance understanding between the peoples of China and the US*", and was founded by the former Hong Kong Special Administrative Region <HKSAR> Chief Executive Tung Chee-

⁴⁵ <http://dzl.people.com.cn/dfzlk/front/personPage4075.htm>

⁴⁶ <http://news.tju.edu.cn/info/1003/52427.htm>

⁴⁷ <https://yaledailynews.com/blog/2019/01/16/zhang-brings-finance-acumen-to-the-corporation/>

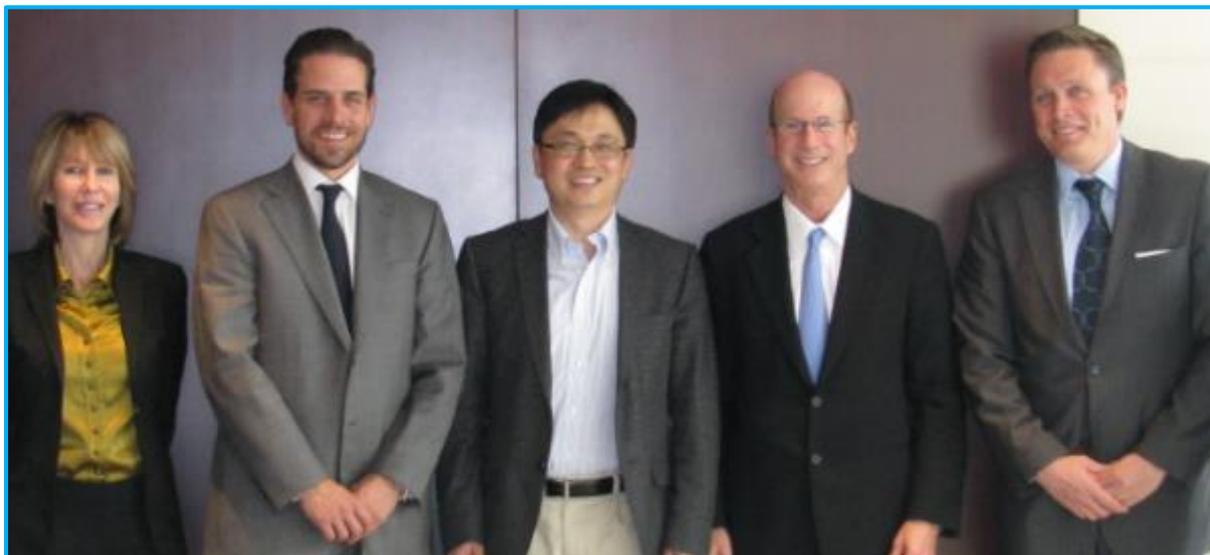
⁴⁸ <https://www.scmp.com/tech/venture-capital/article/3081927/tencent-and-zoom-investor-hillhouse-reloads-after-building>

⁴⁹ <https://www.berggruen.org/people/lei-zhang/>

hwa GBM (董建華) <Tung>. Tung is now a Chinese People's Political Consultative Conference (中国人民政治协商会议) <CPPCC> vice-chairman.

The CPPCC is a CPC led advisory committee and the highest ranked entity overseeing the UF, according to a 2018 U.S.-China Economic and Security Review report.⁵⁰ The same report says that the CUSEF has spent hundreds of thousands of dollars lobbying for China-U.S. relations as a registered foreign agent, and is involved in Chinese government influence operations, having collaborated with the CAIFC on multiple projects.

CUSEF paid public relations firm Brown Lloyd James \$20,000 per month to arrange various activities aimed at making the U.S. information environment friendlier to Beijing, according to 2011 disclosures filed under the Foreign Agents Registration Act.⁵¹



Hillhouse Capital founder Zhang Lei, April 8, 2010 (10:28 am)

CIC - China Investment Corporation (中国投资有限责任公司)

On April 8, Hunter met with Gao Xiqing, the then CPC Secretary and general manager of CIC, a Chinese sovereign wealth fund backed by the Ministry of Finance <MOF>. Gao would go on to become the Minister of Finance after managing CIC one of the worlds largest sovereign wealth fund. Rosemont Seneca via BHR would go on to partner with CIC subsidiary companies such as the Bank of China.

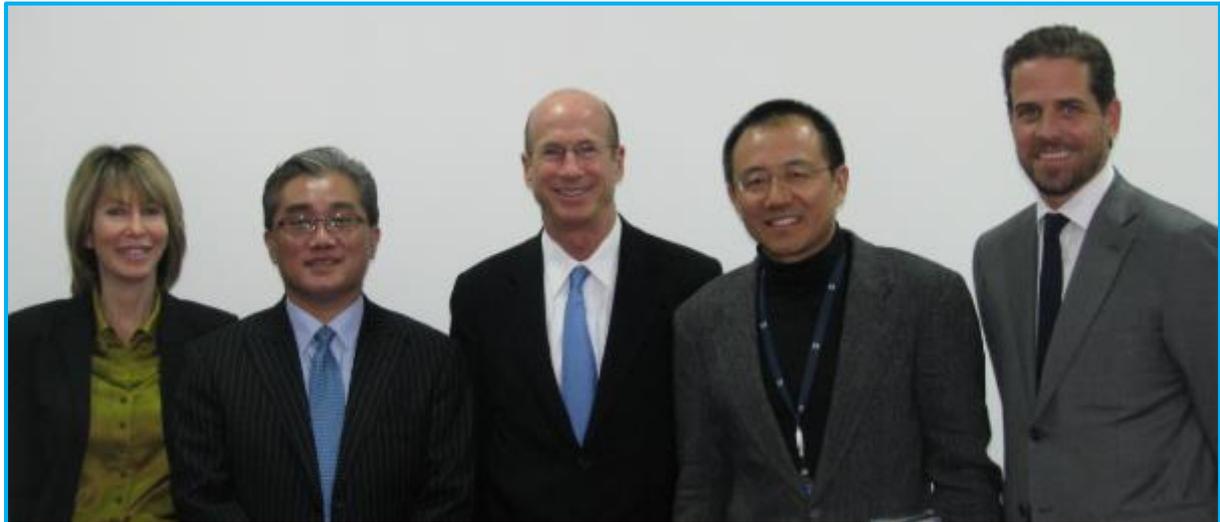
MOF is the national executive agency of the central government which administers macroeconomic policies and the national annual budget.⁵²

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https://www.uscc.gov/sites/default/files/Research/China's%20Overseas%20United%20Front%20Work%20-%20Background%20and%20Implications%20for%20US_final_0.pdf

⁵¹ <https://efile.fara.gov/docs/5875-Exhibit-AB-20110714-23.pdf>

⁵² http://english.www.gov.cn/state_council/2014/09/09/content_281474986284115.htm



China Investment Corporation, April 8, 2010 (11:37 am)

China Life - China Life Insurance (Group) Company (中国人寿保险 (集团) 公司)

On April 8, Hunter met with Cui Yong (崔勇), Vice President of China Life Asset Management Co Ltd (中国人寿资产管理有限公司), China's largest asset manager, which is owned by China Life Insurance (Group) Company (中国人寿保险 (集团) 公司) <China Life>, a state-owned enterprise <SOE>, and China's largest life insurer.⁵³ China Life is controlled by and a holding company for MOF.⁵⁴ Cui is now the CPC Secretary and CEO of China Life.⁵⁵ China Life was a key stakeholder in Bohai Industrial Investment the key partner in BHR.



China Life Asset Management, April 8, 2010 (3:45 pm)

PSBC - Postal Savings Bank of China (中国邮政储蓄银行)

On April 9, Hunter met with the PSBC general manager Peng Zuogang (彭作刚). The PSBC is the banking arm of the State Post Bureau (国家邮政局), and provides financial services to small business and rural or low income customers. PSBC was a key minority shareholder on Bohai Industrial Investment partnering with BHR.

⁵³ <https://www.chinalifepe.com/en/about-us>; <https://www.caixinglobal.com/2017-09-01/chinas-biggest-asset-manager-forks-out-455-billion-for-real-economy-101139232.html>

⁵⁴ <https://www.sec.gov/Archives/edgar/data/1268896/000119312516536354/d177639dex991.htm>

⁵⁵ <http://www.chinalifepension.cn/rsbx/496641/530210/530428/598306/598308/index.html>



Postal Savings Bank of China, April 9, 2010 (10:28 am)

On April 9, Hunter met with Founder Group chairman Wei, whom Lin previously met with in 2007 (with the NPC vice-chairman in attendance), and again in 2009, alongside the SLLF’s Lakis.



Founder Group, April 9, 2010 (2:39 pm)

The Secret Service protects, by statute, the president and vice president and their families.⁵⁶ As the son of a sitting Vice-President, Hunter will have had secret service protection during his business trip to China. Freedom of Information Act <FOIA> request records show that Hunter visited China from April 6 to April 9, 2010.⁵⁷ There were no media report son Biden’s visit in the English or Chinese media.

Therefore, his father Biden (even if unaware personally, which is unlikely given how close to each other they live and work), will have been aware of his son’s business trip to Beijing through official channels. Given the sensitive nature of US-China relations, Hunter would have been closely watched by various Chinese securities agencies during the trip.

⁵⁶ <https://apnews.com/b3733a39038467ec65e03fb522c8fc85>

⁵⁷ <https://www.judicialwatch.org/wp-content/uploads/2020/06/Hunter-Biden-travel-June-2020-FOIA.pdf>

Hunter's Undetailed Visit to China

2011

From April 18 to April 20, Hunter visited leading Taiwan banks and financial institutions, along with Thornton Chairman Bulger and CEO Lin.⁵⁸ Hunter was introduced this time as a senior consultant of Rosemont Realty. Rosemont Realty's website is no longer accessible, but archived records show Hunter was listed as an advisor in 2011.⁵⁹

FOIA records show that after departing Taiwan, Hunter visited China, staying there until April 22. There are no media reports on the purpose of his visit.

Biden's Trip to China and Sichuan

On August 17 Biden visited China for a five-day trip, meeting Chinese Foreign Minister Yang. Chinese financial sector sources indicate that BHR and Hunter enjoy direct access to the Politburo via Yang who is now a member and director of the Office of Foreign Affairs for the Communist Party of China. Outside analysts have indicated Yang is a likely key connection to Hunter still given the link through the Ministry of Foreign Affairs influence institutions which focus on working with elites rather than the United Front focused on different influence cultivation.



Biden and Yang at the Beijing Capital International Airport on August 17, 2011

On August 18, Biden held talks with Xi, then Chinese Vice-President. At the meeting Biden said the US “fully understands that Taiwan and Tibet issues are China's core interests, the U.S. will continue to resolutely pursue the one China policy, the U.S. does not support ‘Taiwan's independence’, and the U.S. fully recognizes that Tibet is an inalienable part of the People's Republic of China.”⁶⁰

⁵⁸ <http://www.thorntonai.com/chinese/newscount.asp?ArticleID=288>

⁵⁹ <https://web.archive.org/web/20110910163551/http://www.rosemontrealty.com/board-of-advisors/>

⁶⁰ <http://www.fmcofpc.gov.hk/eng/zgwjsw/t850184.htm>



Great Hall of the People on August 19, 2011 in Beijing

On August 19, Biden met with Hu at the Great Hall of the People, the same state building where the Thornton/Rosemont Solebury/SLLF delegation met with the Director General of the FAC in 2008.⁶¹ Biden said that a strong, prosperous and successful China that plays a bigger role in global affairs is in the interests of the US and the world at large. Biden urged the two nations to properly handle sensitive issues, boost people-to-people exchanges, economic cooperation, dialogue and consultations in regional and global affairs to rise to challenges facing the international community.

On August 22, Biden delivered a speech at Sichuan University (四川大学) (in West China), where he said that *“China’s development and prosperity are in line with the interest of the U.S”*, in comments on the university’s website.⁶² The Obama Whitehouse records published a transcript of the speech during which Biden said *“Let me be clear -- let me be clear: I believed in 1979 and said so and I believe now that a rising China is a positive development, not only for the people of China but for the United States and the world as a whole...In order to cement this robust partnership, we have to go beyond close ties between Washington and Beijing, which we’re working on every day, go beyond it to include all levels of government, go beyond it to include classrooms and laboratories, athletic fields and boardrooms.”*



August 22, 2011

⁶¹ <http://www.china-embassy.org/eng/zmgx/t850947.htm>

⁶² <http://en.scu.edu.cn/info/1065/3043.htm>

On November 28, Thornton co-hosted a trade event with CCPIT in New York, attended by senior partners of US banks and companies.⁶³ The CCPIT director called for greater Sino-US trade and investment, including the subsequent flow of personnel and technology.

Hunter's China Deal #1 - Wanxiang

2012

On February 17, Biden met with Xi, then Vice-President (but soon to be China President) in California.⁶⁴ By Biden's count, he met with Xi for a rough total of 25 hours in 2011 and 2012.⁶⁵ One topic of discussion was access for US film companies in the China market.⁶⁶



International Studies Learning Center, South Gate, California, 2012

On February 19, Hunter's Seneca Global Advisors advised GreatPoint, a US energy technology start-up in receiving an equity investment of USD 420 million and project funding of USD 1.25 billion from Wanxiang Group (万向集团) <Wanxiang>, the largest foreign venture capital investment into the US that year.⁶⁷ The two parties agreed to jointly-develop a coal-to-natural gas facility in Xinjiang (an autonomous territory in northwest China). The signing ceremony was attended by senior US and Chinese government officials, such as Xi.⁶⁸

⁶³ <http://www.thorntonai.com/chinese/newscount.asp?ArticleID=292>

⁶⁴ https://qctimes.com/news/national/on-a-photo-of-biden-with-chinese-president-xi-jinping/article_0dde172b-d5b8-5681-8e0c-37d7a8f5ce62.html

⁶⁵ <https://www.defenseone.com/policy/2020/06/bidens-china-policy-starts-building-stronger-america/166555/>

⁶⁶ <https://www.latimes.com/politics/story/2019-07-17/joe-biden-money-hollywood-studios-china>

⁶⁷ <https://www.ft.com/content/3904f888-e8ef-11e9-a240-3b065ef5fc55>

<https://www.businesswire.com/news/home/20120521005722/en/Wanxiang-GreatPoint-Energy-Announce-1.25-Billion-Investment>

⁶⁸ <https://www.wsj.com/articles/SB10001424052970204792404577229501058611924>

Wanxiang founder Lu Guanqiu (鲁冠球), had met with Obama in January 2011, and employed Obama's ally, former Chicago Mayor Richard Daley.⁶⁹ We note Hunter had previously worked for Richard's brother Secretary of Commerce William Daley, as Executive Director of E-Commerce Policy Coordination.⁷⁰ Wanxiang is a long-established and politically well-connected industrial conglomerate based in Hangzhou, where Lu knew Xi from Xi's days as Zhejiang CPC Secretary in the early 2000s (and Xi's father in the 1980s).

Following the millions given to Massachusetts based GreatPoint, Wanxiang appears to have benefited from US policy decisions where Biden was involved: In 2013, Wanxiang acquired the bankrupt assets of A123 Systems Inc <A123>, and in 2014, won a bankruptcy auction for the assets of Fisker Automotive <Fisker>, the defunct manufacturer of the Karma plug-in hybrid sports car.⁷¹ Both Fisker and A123 were funded in part with US government loans to build cars in Delaware, Biden's home state, which meant Wanxiang obtained technology developed with US taxpayer money. An investigative report said Biden's administration pushed for the loans in 2009.⁷²

Bankruptcy filings show Hunter was also listed as a Fisker creditor, meaning he either had put down a deposit for a car, or was an early investor.⁷³ Wanxiang also picked up a GM plant from the Fisker purchase, and sensitive technology from the A123 acquisition, that could be put to use by the Chinese military.⁷⁴ Wanxiang is active in China's foreign influence operations, including paying for Delaware students to study Mandarin in China.⁷⁵ Wanxiang supports the Chinese government's investments in North Korea, where it owns a major copper mine.⁷⁶ Wanxiang's imports also support the North Korean regime, and despite being one of the largest importers of North Korean minerals, it has so far managed to evade US sanctions which have ensnared its smaller competitors during Obama's presidency.⁷⁷

Bohai Capital - Bohai Industry Investment Fund Management Co Ltd (渤海产业投资基金管理有限公司)

Bohai Capital is the private equity arm of Bank of China International Holdings Ltd (中银国际控股有限公司) <BOCI> and China's first-ever RMB-denominated private equity fund approved by the State Council.⁷⁸ BOCI is wholly-owned by Bank of China Limited (中国银行股份有限公司) <BOC>, one of China's big-four state banks, with state-level foreign exchange responsibilities. BOC was formerly part-owned by SSF, and is now controlled by Central Huijin Investment (中央汇金投资有限责任公司), a Chinese government investment fund.

Bohai Capital's top shareholders are the following major China state-owned financial institutions: BOCI (48%), TEDA Investment Holding Co Ltd (天津泰达投资控股有限公司) <TEDA> (22%), Bank of China Group Investment Limited (中银集团投资有限公司) (5%), SSF (5%), PSBC (5%), China Development Bank Capital Corporation Ltd (国开金融有限责任公司) (5%) China Life (5%), etc. TEDA is a Tianjin government SOE, where as mentioned Guo is now a Tianjin Standing Committee member.

⁶⁹ Peter Schweizer's book, "Secret Empires; <https://www.forbes.com/pictures/mil45jig/lu-guanqiu-2/>;

<https://www.gettyimages.ch/fotos/wanxiang-america?mediatype=photography&sphrase=wanxiang%20america&sort=mostpopular>

⁷⁰ <http://www.energysecurityforum.org/speakers/186-hunter-biden-s>

⁷¹ <https://www.reuters.com/article/us-fisker-auction/chinas-wanxiang-wins-u-s-bankruptcy-auction-for-fisker-automotive-idUSBREA1E04B20140215>

⁷² <https://investigativeresearchcenter.org/hunter-biden-listed-as-fisker-creditor-raising-questions-about-green-energy-boondoggle/>

⁷³ <https://eu.delawareonline.com/story/money/industries/2013/12/06/fisker-owe-you-money-get-in-line-thousands-listed-as-creditors/3898639/>

⁷⁴ <https://www.delawarepublic.org/post/wanxiang-acquire-boxwood-road-plant-after-fisker-asset-auction>;

<https://www.reuters.com/article/us-a123-wanxiang-approval/chinese-firm-wins-a123-despite-u-s-tech-transfer-fears-idUSBRE90S0JN20130129>

⁷⁵ <https://news.delaware.gov/2015/12/03/funding-announced-to-expand-china-study-abroad-program/>

⁷⁶ <https://www.sipri.org/sites/default/files/PP/SIPRI40.pdf>; <https://nautilus.org/napsnet/napsnet-special-reports/recent-activities-in-the-dprk-minerals-sector/>

⁷⁷ https://www.upi.com/Top_News/World-News/2016/10/05/Report-Chinese-company-has-exclusive-rights-to-North-Korea-mineral-deposits/9801475686795/

⁷⁸ <http://www.bhrpe.com/list.php?catid=7&page=1>; https://macropolo.org/chinese_firm/bhr-partners/

At some point during the same year, according to US and Chinese media reports, the catalyst for Hunter's first deal in China was when the Bohai Capital CEO Jonathan Li, Li Xiangsheng (李祥生) visited New York at an unspecified time in 2012 and met with Archer to discuss finding a suitable investment partner.

"Don't you think that I'm the most suitable business partner for you?" Archer told Li as they smoked cigars in a Manhattan bar, according to an account in the 21st Century Business Herald, a Communist Party-owned newspaper.⁷⁹ "Companies globally all like to have powerful people on the board as these connections help raise capital, smooth joint ventures, and add outside insight," said Andrew Collier, managing director of Orient Capital Research, a Hong Kong-based consulting firm. Archer was "very convincing," the story said, in part because Archer's company "has a deep network of contacts in U.S. political circles. R. Hunter Biden, the son of U.S. Vice President Biden, is one of the company's executives." "China is particularly connection-heavy because government relations often spell the difference between success and failure, both in raising money and in getting contracts," he said. "It's not clear that Hunter Biden did anything more than put his name on the door of this particular company."

Washington Post, October 13, 2019

Our research shows that Hunter did more than “put his name on the door” and Li’s 2012 visit to New York was unlikely the genesis for a future investment partnership with Hunter et al.

Hunter had already met with Bohai Capital’s key stakeholders in several meetings in 2010. He may have met with connected persons during his 2011 trip to China. By 2012, Hunter, Bulger and Archer were already ensconced with the Chinese government and its key financial institutions. Furthermore, the Chinese foreign minister at the time Yang knew Biden from his time in Washington and Lin maintaining clients under the Ministry of Foreign Affairs as Thornton clients.

On June 11, Thornton’s Lin met with “senior executives” from Bohai Capital, according to Thornton’s website.⁸⁰ While Li is not mentioned by name, it is likely he was either present or aware of the meeting.

Archer's China Deal – Sichuan Chemical

Sichuan Chemical – Sichuan Chemical Holdings (Group) Co Ltd (四川化工控股 (集团) 有限责任公司的)

Also present at Lin’s June 11 Bohai Capital meeting were executives from the SOE Sichuan Tianhua Company Limited (四川天华股份有限公司), which is one of the main production bases for the SOE Sichuan Chemical.

On October 29, Thornton’s Lin visited local government officials in Xinjiang meeting with executives from Sichuan Chemical for the second time.⁸¹

⁷⁹ <https://finance.sina.com.cn/roll/20140228/023518359435.shtml>

⁸⁰ <http://www.thorntonai.com/chinese/newscount.asp?ArticleID=297>

⁸¹ <http://www.thorntonai.com/chinese/newscount.asp?ArticleID=301>

One week prior on October 22, a press release announced that Sichuan Chemical had signed a USD 2-billion 10-year agreement to purchase 500,000 metric tons of potash annually from Prospect Global Resources Inc <Prospect Global> (NASDAQ: PGRX), equivalent to 25% of the projected output.⁸²

Archer was a Prospect Global director and the lead negotiator in the deal. He commented that *"Today's agreement is the product of six months of negotiation and due diligence carried out in China and the United States. That process has resulted in a high level of trust and respect on the part of both parties. As we look forward to a long relationship with Sichuan Chemical, we are proud of the role that Prospect Global can play in helping to bring food security to China while meaningfully impacting the US/China trade balance over the next decade."*

In its SEC filings, Prospect Global noted that the deal was subject final approval by the Sichuan Provincial Government and affiliates, confirming that this was a deal between Archer's company and the Sichuan government.⁸³

Archer was only on the board of directors from March 2012 to November 2012, according to SEC filings, but received compensation worth approximately USD 3 million.⁸⁴ The deal with Sichuan Chemical appears to be Prospect Global's only announced deal. The company was delisted from NASDAQ on July 10, 2014 and its website is no longer live.⁸⁵

This implies that Archer and Prospect Global began negotiations with Sichuan Chemical a few months after Biden's visit to Sichuan, while at the same time, Lin was meeting with Sichuan Chemical executives. It is unlikely that all parties, including Biden, were unaware of the others actions, particularly when the deal was billed in the press release as one of the *"largest potash export contracts in US history"*.

Hunter's China Deal #2 - BHR

2013

On February 1, Kerry became the 68th US Secretary of State.

On May 28, Rosemont Seneca Thornton LLC was incorporated in Delaware.⁸⁶

BHR - Bohai Harvest RST (渤海华美 (上海) 股权投资基金管理有限公司)

The result of Hunter's and Thornton's efforts was the 2013 incorporation of BHR, a private equity firm established with some of the same SOEs met with since 2010. BHR's founding shareholders were: Rosemont Seneca Thornton LLC, Bohai Capital, Angju Investment Consulting (Shanghai) Co Ltd (昂驹投资咨询 (上海) 有限公司) <Angju Investment> (owned by Li), and Shanghai Ample Harvest Financial Services Co Ltd (上海丰实金融服务有限公司). The third and fourth Chinese characters in BHR's Chinese name represent China (华) and America (美) respectively, indicating that the business is likely viewed by the Chinese SOE shareholders (and the Chinese government) as a country-level business partnership.

⁸² <https://www.prnewswire.com/news-releases/prospect-global-resources-and-sichuan-chemical-sign-2-billion-plus-10-year-purchase-and-sale-agreement-for-potash-175181341.html>

⁸³ <https://sec.report/Document/0001104659-13-070962/>

⁸⁴ <https://sec.report/Document/0001047469-14-001504/>

⁸⁵ www.prospectgri.com

⁸⁶ https://opencorporates.com/companies/us_de/5341255

The future BHR shareholders reportedly signed an agreement in 2013. A photo posted on Lin's LinkedIn profile shows Biden (back row third from left), alongside Lin and Bulger. Media reports do not specify the date of signature, but FOIA records show that Hunter visited Shanghai on June 13 – 14, and then stayed in Beijing until June 15. Hunter was accompanied by Bulger, Lin, and Archer.



BHR signing agreement, June 2013⁸⁷

Zhao - Zhao Yuji (赵玉吉)

Zhao has been listed as “venture partner” of BHR since at least December 25, 2015 according to website records.⁸⁸ Referred to as an SOE manager, and known for his later real estate and investment businesses, Zhao has ties with China's elite and China's military. From 1992 to 1995, Zhao worked as the general manager of the China National Defense Military Industry Materials Corporation (中国国防军工物资总公司), a position which he obtained after marrying into an elite family. According to Chinese blogs, his second-wife was Huang Tao (黄涛), allegedly the daughter of Chinese minister Huang Yicheng (黄毅诚).⁸⁹ His wife was a PLA troupe performer, according to a 2018 report by Vogue, who interviewed his daughter Zhao Ting (赵婷).⁹⁰ Aka Chloé Zhao, Zhao's daughter has become a successful filmmaker in the US, and directed the upcoming Marvel movie, The Eternals.⁹¹



Biden and Hunter visit China and meet BHR CEO Li

On December 4, Hunter accompanies Biden on his official trip to China.

⁸⁷ Lin's LinkedIn profile XXX and <https://kknews.cc/finance/pgxybpb.html>

⁸⁸ https://web.archive.org/web/20151225102614/http://www.bhrpe.com/_d276816574.htm; <http://www.bhrpe.com/show.php?catid=35&id=78>

⁸⁹ <http://www.coventrynv.com/renwu/259611.html>; <https://twitter.com/mischaedm/status/1139364073974325248>

⁹⁰ <https://www.vogue.com/article/chloe-zhao-the-rider-vogue-april-2018>

⁹¹ <https://www.scmp.com/magazines/style/celebrity/article/3049560/eternals-who-chloe-zhao-beijing-born-female-director>



Hunter arrives in Beijing, December 4, 2013⁹²



Liu Xian Guan Teahouse, Dongcheng District, Beijing - December 5, 2013⁹³



⁹² https://media1.s-nbcnews.com/j/news/cms/2019_40/3033201/191001-joe-biden-hunter-china-cs-354p_f8f375533a90ff93de2ba2994b8f1ae8.nbcnews-fp-1200-630.jpg

⁹³ <https://obamawhitehouse.archives.gov/issues/foreign-policy/asia-trip-2013>

Shop in a Beijing hutong alley - December 5, 2013⁹⁴December 4-5, 2013⁹⁵

Hunter Biden told the New Yorker that he met Li during the December 2013 trip but described it as social encounter. “*How do I go to Beijing, halfway around the world, and not see them (Li) for a cup of coffee?*” he said. Hunter arranged a quick meeting in the lobby of the American delegation’s hotel in Beijing between Biden and Li, the BHR CEO. This was followed by a “social meeting” between Hunter and Li, according to reports by the New Yorker.

The trip by Hunter coincided with an official trip by the Ukrainian President Viktor Yanukovich.⁹⁶ Many business deals were signed including numerous that have ties to firms Hunter is known to be involved with such as the Bohai Commodity Exchange, owned by the same local governments that own a part of Bohai Industrial Investment.

On 16 December 2013, a week after the Biden and Hunter visit to Beijing, BHR was incorporated in Shanghai, with its registered address in the Shanghai Free Trade Zone, according to State Market Regulatory Administration <SMRA> records.⁹⁷

Hunter’s profile no longer appears on the BHR website. One archived version lists him as a director on November 16, 2015.⁹⁸ Biden is referred to in the profile as a managing partner of Rosement Seneca Partners and a consultant at Boies Schiller Flexner LPP <Boies Schiller>. According to a statement by Biden’s lawyer George Mesires on October 13, 2019, Biden was of counsel with Boies Schiller and advising Ukraine-linked Burisma Holdings Limited on its corporate reform initiatives.⁹⁹ He is also listed on Chinese PE websites where he is also referred to by the Chinese name ‘Hengte Baideng’ (亨特·拜登).¹⁰⁰

⁹⁴ <https://images.wsj.net/im-113674?width=620&size=1.5>

⁹⁵ <https://thediplomat.com/2013/12/bidens-china-visit-a-failure-to-communicate/>

⁹⁶ https://www.fmprc.gov.cn/mfa_eng/wjb_663304/zjzg_663340/dozys_664276/gjlb_664280/3250_664382/

⁹⁷ The State Administration for Industry and Commerce at the time - <https://www.qcc.com/firm/1a7250b750eef9e9adbd39a6d97bee4d.html>

⁹⁸ https://web.archive.org/web/20151116003212/http://www.bhrpe.com/_d276566053.htm

⁹⁹ <https://medium.com/@george.mesires/a-statement-on-behalf-of-hunter-biden-dated-october-13-2019-d80bc11087ab>

¹⁰⁰ <https://zdb.pedaily.cn/people/show9423/>



董事

R. Hunter Biden 先生

Biden先生现任RSP的管理合伙人以及Boies Schiller Flexner LPP律师事务所顾问。

Biden先生目前是世界粮食计划署美国项目的董事会主席以及非盈利的美国国家政策中心、社鲁门国家安全项目、美国领导人联盟董事。Biden先生同时是美国国际战略研究中心发展执行委员会、美国国家民主研究所主席咨询委员会、美国华盛顿特区天主教慈善会主席咨询委员会成员。在2006-2009年，Biden先生曾担任美国铁路公司董事，并在2007-2009年，担任该公司副董事长。此前，Biden先生还曾参与创办Oldaker Biden Belair LLP律师事务所，并曾受克林顿总统委派，Biden先生还曾担任美国商务部部长William Daley领导下的电子商务政策协调机构的执行董事。

Biden先生先后获得乔治敦大学学士学位以及耶鲁大学法律博士学位。

[Hunter's profile on BHR's archived website, 2015](#)

SMRA records show Hunter invested purchased 10% of BHR on October 23, 2017 (via his investment vehicle Skaneateles LLC) and was a director until April 20, 2020.

BHR's current shareholders are Bohai Capital (30%), Shanghai Ample Harvest Financial Services Group Co Ltd (上海丰实金融服务(集团)有限公司) (30%), Angju Investment (10%), Thornton (10%), Ulysses Diversified Inc (10%), Skaneateles LLC (10%). According to Chinese corporate records, the original owner of the US stake in BHR was Rosemont, Seneca Thornton, LLC with a 30% shareholding. This was split just under two years later into what is believed to be 20%/10% holding between Rosemont, Seneca, Bohai LLC and Thornton LLC. This was later changed again splitting Rosemont, Seneca, Bohai into Skanletes and Ulysses. As Rosemont is the Heinze Kerry vehicle and Seneca is the Biden vehicle, it is believed that the final split allowed Heinz to exit the partnership divesting to Archer.

In summary, the Chinese government funded a business that it co-owned along with the son of a sitting US vice president and Secretary of State who was directly or indirectly invested in the holding company.

2014

In 2014, Biden quit the Rosemont Realty board of advisors.

On February 13, Rosemont Seneca Bohai was incorporated in Delaware.¹⁰¹

Around April, Archer had a private meeting with Biden at the White House late into the night, according to White House records.¹⁰²

On May 7 - 8 2014, Hunter visited China for the fifth time, for undisclosed reasons, according to FOIA records.

A photo taken in August 2014, showed Biden playing golf with Hunter and Archer.¹⁰³ It is unlikely that Biden, as US Vice-President, was unaware of his son's business dealings with China's elite at this point in time, and clearly he knew Archer well, who closed the Sichuan Chemical deal a year after Biden's visit there.

¹⁰¹ https://opencorporates.com/companies/us_de/5481769

¹⁰² <https://donpesci.blogspot.com/2019/10/the-blumenthal-burisma-connection.html>

¹⁰³ <https://www.foxnews.com/politics/joe-hunter-biden-seen-golfing-with-ukraine-gas-company-exec-back-in-2014-photo-shows>



Devon, unidentified, Biden, Hunter, in the Hamptons in August 2014

On October 3, Biden delivered a speech in which he had this to say on China: “*don’t know how long I’ve been hearing about how China -- and I want China to succeed, it’s in our interest they succeed economically -- about how China is eating America’s lunch.*”¹⁰⁴

Hunter’s China Deal #3 – Sino-Ocean

2015

Sino-Ocean – Sino-Ocean Group Holding Limited (遠洋集團控股有限公司)

The largest shareholder of Sino-Ocean, with a 29.59% holding is China Life, according to Sino-Ocean’s latest annual report.¹⁰⁵ China Life has been the largest shareholder since at least 2010 and has appointed 4 of Sino-Ocean’s current non-executive directors. Sino-Ocean’s former name was COSCO Real Estate Development Co Ltd, incorporated in 1993 as a subsidiary of COSCO Group.¹⁰⁶ COSCO is a Chinese state-owned shipping and logistics services supplier but considered a front for Chinese intelligence by a task force of the US House of Representatives.¹⁰⁷ COSCO sold its substantial shareholding 2011.

In 2015, Rosemont Realty was acquired by Gemini Investments, which is wholly-owned by Hong Kong listed PRC real estate developer, Sino-Ocean.¹⁰⁸ Rosemont Realty were promised USD 3 billion as part of the deal for its US commercial property portfolio.¹⁰⁹ Notably, Kerry through family trusts, was likely either directly or indirectly invested in Rosemont Realty. In other words, the Chinese government purchased a business from a relative of the Secretary of State, while also being the major financier for the Vice-President’s son (via BHR).

A representative of Gemini Rosemont issued this statement in 2019: “*Hunter Biden had a brief relationship with Rosemont Realty and was on its advisory board from 2010 to 2014. Gemini Rosemont was formed after that relationship with Hunter Biden ended and Gemini Rosemont has never had a relationship with Hunter Biden. We do not know about his*

¹⁰⁴ <https://obamawhitehouse.archives.gov/the-press-office/2014/10/03/remarks-vice-president-john-f-kennedy-forum>

¹⁰⁵ <https://www.sinooceangroup.com/en-us/investor/FinancialReports>

¹⁰⁶ <https://www.sinooceangroup.com/en-us/AboutUs/DevelopmentHistory>

¹⁰⁷ <https://greatgameindia.com/cosco-shipping-a-front-of-chinese-intelligence/>

¹⁰⁸ 3377.HK - https://www.chinadaily.com.cn/business/2016-06/17/content_25751582.htm <https://www.pnewswire.com/news-releases/gemini-investments-and-rosemont-realty-form-joint-venture-300132117.html>

¹⁰⁹ <https://nypost.com/2019/10/10/6-facts-about-hunter-bidens-business-dealings-in-china/>

affiliations with other companies, other than what we read in the news."¹¹⁰ Clearly Hunter's top-level Chinese connections, in particular with China Life, would have helped seal the deal, even though he quit before it was announced.

On June 23, Biden met with State Councilor Yang at the 2015 S&ED held in Washington D.C., commenting that they had spent "*a lot of time together*".¹¹¹ This is quite possible not just since Biden became Vice-President in 2009, but prior to that in Washington, where Yang spent a total of ten years working in key positions in the Chinese embassy between 1983 and 2004.¹¹²

On the same day, the 30% stake in BHR held by Rosemont, Seneca, Thornton was split into two separate holdings. The new holding of the US partners are now split between Rosemont, Seneca, Bohai LLC and Thornton Group LLC.

AVIC - Aviation Industry Corporation of China (中国航空工业集团公司)

AVIC is a Chinese state-owned aerospace and defense conglomerate.¹¹³ In 2015 it was accused of selling China's fifth-generation jet fighter J-31, which is allegedly based on stolen technology in relation to the US made F-35.

On September 15, BHR and AVIC Auto acquired US automotive supplier Henniges Automotive with a 49% share and 51% share respectively, according to a press release.¹¹⁴ AVIC Auto, which is described in the press release as BHR's joint venture partner, is a subsidiary of AVIC. Henniges described the deal as "*one of the largest acquisitions by a Chinese company of a U.S.-based automotive manufacturing company in history*".

On September 17, Biden met with Yang once more, this time in Los Angeles, where Yang as usual was acting as Xi's "Special Representative".¹¹⁵



Biden meets with Yang in Los Angeles, September 17, 2020

¹¹⁰ <https://www.abqjournal.com/1401175/theres-a-hunter-bidensanta-fe-connection-ex-its-through-the-old-rosemont-realty-now-controlled-by-a-chinese-firm.html?paperboy=loggedin630am>

¹¹¹ <https://china.usembassy-china.org.cn/chinese-u-s-officials-opening-strategic-dialogue/>

¹¹² https://www.chinavitae.com/biography/Yang_Jiechi/career

¹¹³ <https://www.avic.com/en/aboutus/index.shtml>

¹¹⁴ <https://www.prnewswire.com/news-releases/bhr-and-avic-auto-acquire-henniges-automotive-300143072.html>

¹¹⁵ https://www.fmprc.gov.cn/mfa_eng/zxxx_662805/t1298449.shtml

2016

September 8, 2016 China Molybdenum enters into an agreement with Freeport McMoran to purchase 56% of a holding company with ownership of an operational mine in the Democratic Republic of the Congo with BHR purchasing an additional 24%. China Moly and BHR act in concert with China Moly acting as the managing partner bringing their stake in the mine to 80%.

Hunter Receives Diamond from Corrupt Chinese Businessman

2017

In May 2017, Hunter met privately with Ye Jianming (叶简明) <Ye>, chairman of Chinese energy company CEFC (中国华信能源), at a Miami hotel.¹¹⁶ The purpose of the meeting was for Hunter to use his contacts to help “*identify investment opportunities for Ye’s company CEFC China Energy.*” Afterwards, Hunter received a 2.8-carat diamond. Ye was detained and put under investigation in March 2018 on suspicion of economic crimes, while CEFC was declared bankrupt in March 2020, alleged to have faked deals and bribed foreign governments for oil rights (facilitated by Patrick Ho (何志平), CCPCC member and the former Hong Kong Secretary for Home Affairs in Tung’s administration.¹¹⁷

Biden Meets with Hunter’s China Fixer, Lin

Lin posed with Biden on an unspecified date on Biden’s American Promise Tour which began in mid-2017.¹¹⁸

¹¹⁶ <https://www.cnn.com/interactive/2018/12/asia/patrick-ho-ye-jianming-cefc-trial-intl/>

¹¹⁷ <https://www.caixinglobal.com/2020-04-25/fallen-energy-conglomerate-cefc-declared-bankrupt-101547143.html>;

<https://hongkongfp.com/2017/11/21/explainer-patrick-hos-bribery-allegations-top-hong-kong-official-us-police-custody/>

¹¹⁸ <https://hk.epochtimes.com/news/2019-10-09/65750756>



Biden and Lin, circa 2017

October 23, the Rosemont, Seneca, Bohai LLC holding is split once more. The new US holders of BHR are Thornton (10%), Ulyssees Diversified Inc (10%) and Skaneateles LLC (10%). Ulyssees Diversified is a Delaware corporation for whom no shareholder information is available though it is suspected to tie to Devon Archer. Skaneateles is a District of Columbia LLC owned by Hunter Biden, which means Hunter became a 10% shareholder of BHR on this date.

On November 18, 2017, Patrick Ho (何志平) <Ho>, former HK Secretary for Home Affairs (under Tung), was arrested at the John F. Kennedy International Airport on bribery and money-laundering charges. He called Hunter for assistance.¹¹⁹ Hunter later told *The New Yorker* that he doesn't see Ye as a “*shady character at all*,” and he characterized the outcome as “*bad luck*.”

Bulger and Lin Promote Chinese Culture

2018

On January 23, Biden said in a discussion hosted by the Council on Foreign Relations, that “*I’ve spent more time in private meetings with Xi Jinping than any world leader. I have 25 hours of private dinners with him, just he and I, and one interpreter.*”¹²⁰

In 2018 Lin promoted his new investment business Michelangelo Investment Holdings Ltd < Michelangelo >, which offers similar services to Thornton, namely cross-border financing and

¹¹⁹ <https://www.nytimes.com/2018/10/04/business/cefc-china-weapons-iran.html>

¹²⁰ <https://www.cfr.org/event/foreign-affairs-issue-launch-former-vice-president-joe-biden>

investment and M&A, but with a focus on investment in Chinese media¹²¹ and film. Lin still represents Thornton¹²², sometimes at the same time as representing Michelangelo¹²³, and sometimes with Bulger still. The main theme underpinning their events is promoting Chinese culture.

On January 29, Lin and Lakis delivered speeches (with Bulger in attendance) at a ceremony sponsored by the Tianjin Government, which launched a new brand “blending film culture, public culture and traditional culture to cultivate national spirit and promote social development”. The CPC’s English newspaper China Daily reported on the event under the headline, “Michelangelo devoted to spreading Chinese traditional culture.”¹²⁴



January 29, 2018, Renaissance Tianjin Lakeview Hotel

After a decade in dealing with China’s elite, it is unclear why Lin, Bulger and Lakis feel obliged to attend such events, or what the benefit is for Thornton? The benefits for China and the CPC are obvious.

CIECI - China International Economic Cooperation and Investment Inc (中国国际经济合作投资公司)

The CIECI is an enterprise under the CCPIT, and its purpose is to promote exchanges between Chinese and foreign companies.¹²⁵

On April 24, Lin and Bulger attended the China Internet Film Television Annual Conference, with Lin delivering a keynote speech.¹²⁶ The event was attended by Lin Xinxian, Member of the Standing Committee of Tianjin CPPCC and Chief Director of Zhongguang New Media Institute (sat to the left of Bulger) and Yang Xiaodong, President of CIECI (in the next seat to the left).

¹²¹ https://www.sohu.com/a/231237090_100078051?spm=smc.author.fd-d.27.159886089398830wxRVz

¹²² https://www.sohu.com/a/239422512_100078051?spm=smc.author.fd-d.15.159886089398830wxRVz

¹²³ https://www.sohu.com/a/239422512_100078051?spm=smc.author.fd-d.15.159886089398830wxRVz

¹²⁴ <http://govt.chinadaily.com.cn/s/201801/29/WS5b78002f498e855160e8a9f6/michelangelo-devoted-to-spreading-chinese-traditional-culture.html>

¹²⁵ <http://www.cieci.com.cn/about/intro/>; http://en.ccpit.org/info/info_8a8080a94fd37680014fd3c885fc0006.html

¹²⁶ https://www.sohu.com/a/229318544_100078051?spm=smc.author.fd-d.31.159886089398830wxRVz



April 24, 2018, Beijing International Hotel

CPAFFC - Chinese People's Association for Friendship with Foreign Countries (中国人民对外友好协会)

The CPAFFC was established in 1954, is under MOFA, and is one of New China's oldest and influential foreign affairs institutions. CPAFFC may also fall under the Central Committee Foreign Affairs Commission, which is headed by Yang.¹²⁷ Like most of the Chinese foreign affairs related organizations mentioned in this report, the CPAFFC is ostensibly a national people's organization engaged in "people-to-people diplomacy". President from 2011 to April 2020 was CPPCC member Li Xiaolin (李小林) <Xiaolin>, who is the daughter of Li Xiannian (李先念), former Chinese president from 1983 to 1989, under Paramount Leader Deng.¹²⁸ Li is married to General Liu Yazhou (刘亚洲), a former PLA deputy political commissar. Li's predecessor, Chen Haosu (陈昊苏), led the institution during the 2000s, and is the son of marshal Chen Yi (陈毅). Former Central Intelligence Agency director Mike Pompeo, described the CPAFC as "the public face of the CPC's official foreign influence agency, the United Front", and warned that the CPAFFC was seeking to cultivate ties at the state and local levels to advance the CPC's goals.¹²⁹

On May 21, Michelangelo "underwent rigorous review" and formally joined the SLLF advisory group. In other words, Lin and Bulger established a new company and re-entered the SLLF.¹³⁰ Michelangelo is currently not listed on the SLLF advisory council, which is comprised of major US companies.¹³¹ SLLF's affiliates are mainly US universities and institutes, apart from one foreign institution, the CPAFFC.

3rd China-U.S. Sub-national Legislatures Cooperation Forum (中国国际经济合作投资公司)

The forum aims to promote the exchanges and cooperation between the sub-national legislatures of China and the US, and was established to implement one of the important outcomes of Xi's visit to the US in 2015.¹³² This was effectively a relaunch of the Thornton/SLLF arranged Sino - US Provincial Legislative Leaders Forum. The first China-U.S. Sub-national Legislatures Cooperation Forum was held on June 30, 2016 in Hawaii. Photos of the event show a low-key casual affair, not in keeping with a major political event. That is to say, the event tends to have only been publicized in Chinese state media or on Chinese government websites, rather than by the US government or in US media.

¹²⁷ [https://csbaonline.org/uploads/documents/CSBA8225_\(Uncovering_Chinas_influence_Report\)_FINAL.pdf](https://csbaonline.org/uploads/documents/CSBA8225_(Uncovering_Chinas_influence_Report)_FINAL.pdf)

¹²⁸ https://www.cpaaffc.org.cn/index/xiehui/xiehui_list/cate/18/lang/2.html; [https://en.wikipedia.org/wiki/Li_Xiaolin_\(politician\)](https://en.wikipedia.org/wiki/Li_Xiaolin_(politician))

¹²⁹ <https://www.state.gov/u-s-states-and-the-china-competition/>

¹³⁰ https://www.sohu.com/a/232366905_100078051

¹³¹ <https://www.sllf.org/about-us/advisory-council/>

¹³² <http://www.china-embassy.org/eng/ggwjhd/t1376656.htm>



On November 29, Lin and Bulger attended the 3rd China-U.S. Sub-national Legislatures Cooperation Forum held in Las Vegas, this time representing Michelangelo, and with Bulger holding the title of SLLF's Asia Head, previously held by Lin.¹³³ The event was co-hosted by SLLF and the CPAFFC.¹³⁴ The event was attended by Chinese Embassy in the US Minister Councilor Yin Chengwu (尹承武) <Yin>, who read a congratulatory message from Chinese Ambassador to the US, Cui Tiankai (崔天凯).¹³⁵ Yin said the China-U.S. Sub-national Legislatures Cooperation Forum was the outcome of Xi's US trip in 2015. CPAFFC president at the time Xiaolin was also in attendance, and Consul General Wang Donghua (王东华) from China's San Francisco consulate, which is known as Chinese spy hub in the US.¹³⁶



XXX

¹³³ https://www.sohu.com/a/280314097_100078051?spm=smc.author.fd-d.7.159886089398830wxRVz

¹³⁴ http://www.xinhuanet.com/english/northamerica/2018-11/30/c_137642370.htm

¹³⁵ <http://www.china-embassy.org/eng/ggwjhd/t1618912.htm>

¹³⁶ <https://nypost.com/2020/07/28/chinese-consulates-in-nyc-san-francisco-identified-as-spy-hubs/>

Hunter Denies Benefiting from China Deals

2019

On May 2, Biden remarked, “*They can't figure out how they're going to deal with the corruption that exists within the system. I mean, you know, they're not bad folks, folks. But guess what, they're not, they're not competition for us.*”

On May 3, it was reported that BHR invested in Face++, a Chinese surveillance company which develops facial-recognition software for law enforcement in China, including targeting ethnic minority Muslims Xinjiang.¹³⁷

In September 2019, Biden said this of Hunter’s business deals:¹³⁸

“I have never spoken to my son about his overseas business dealings,”

As pointed out, it appears likely Biden was aware of Hunter’s business dealings with the Chinese government. If he was not, then this was a dereliction of duty on his part.

¹³⁷ <https://www.ft.com/content/41d08870-71a7-11e9-bf5c-6eeb837566c5>

¹³⁸ <https://www.nbcnews.com/politics/2020-election/biden-s-trip-china-son-hunter-2013-comes-under-new-n1061051>

China: BHR (Shanghai) Equity Investment Fund Management Company (“BHR”)

Founded in 2013, BHR (Shanghai) Equity Investment Fund Management Company (“BHR”) is a Chinese limited liability company formed with the stated intent to invest Chinese capital outside of China. Hunter neither played a role in the formation or licensure of the company, nor owned any equity in it while his father was Vice President. He served only as a member of its board of directors, which he joined based on his interest in seeking ways to bring Chinese capital to international markets. It was an unpaid position.

BHR was capitalized with 30 million renminbi (RMB), or approximately \$4.2 million USD at today’s currency exchange rates. In October 2017, Hunter committed to invest approximately \$420,000 USD (as of 10/12/2019) to acquire a 10% equity position in BHR, which he still holds.

To date, Hunter has not received any compensation for being on BHR’s board of directors. He has not received any return on his investment; there have been no distributions to BHR shareholders since Hunter obtained his equity interest. Moreover, Hunter played no role in directing or making BHR’s investments. Hunter intends to resign from the BHR board of directors on or by October 31, 2019.

Extract taken from a statement on behalf of Hunter Biden by George Mesires, October 13, 2019¹³⁹

2020

On January 31, the Biden center arranged the Penn China Research Symposium, where current Ambassador Huang Ping (黄屏) delivered the opening remarks.¹⁴⁰

¹³⁹ <https://medium.com/@george.mesires/a-statement-on-behalf-of-hunter-biden-dated-october-13-2019-d80bc11087ab>

¹⁴⁰ <https://global.upenn.edu/global-initiatives/event/2020-penn-china-research-symposium>

On August 8, the top foreign policy adviser of China's ruling Communist Party, Yang Jiechi, said

"China has no interest in meddling in U.S. domestic politics."

Associated Press¹⁴¹

¹⁴¹ <https://apnews.com/e98a8285f773403af163bc720d70fc2d>

3. CORPORATE BACKGROUND OF KEY COMPANIES

Bohai Industrial Investment is a locally owned state-owned enterprise with backing from the central government. The owners of BII are comprised of two distinct groups: major centrally owned SOE financial institutions and local state-owned financial institutions and governments. The shareholding composition of BII is as follows:

Shareholder	Shareholding Percentage
BOC International Holdings Limited	48.0%
Tianjin Teda Investment Holdings Co., Ltd.	22.0%
BOC Group Investment Co., Ltd.	5.0%
National Council of Social Security Funds	5.0%
China Post Savings Bank Co.	5.0%
CDB Investment	5.0%
Tianjin City Infrastructure Investment Group Co., Ltd.	2.5%
Chinese Life Insurance (Group) Company	2.5%
Tianjin Jinneng Investment Co., Ltd.	2.5%

By benefit of its two separate holdings, Bank of China Group is the majority shareholder in BII. In some filings, BoC is described as controlling BII and subsequently BHR. Bank of China is the 4th largest bank in China and the world by asset size at \$3.3 trillion USD but it holds a key position within China. In addition to being the flagship brand and one of the biggest Chinese financial institutions outside of China, BoC has a near monopoly on foreign exchange settlement and clearing for the RMB granted by the Chinese Ministry of Finance. Owned by the Ministry of Finance through the state sovereign wealth fund the China Investment Corporation, the BoC is one of the most important and largest financial institutions in all of China.

The National Council of Social Security Funds is a public entity investing within specific limits in debt and equity instruments that pay higher rates of return than government debt and bank holdings. With approximately \$325 billion USD in assets under management, it is not a large institution by asset size but it politically very important and sensitive.

China Postal Savings Bank is the fifth largest bank in China and less than half of the size of the 4th largest bank, Bank of China, with less than \$1.5 trillion in AUM. China Postal is a politically important bank due to its large branch network throughout all of China, at one point the largest in all of China, due its origination of accepting deposits at postal branches.

The China Development Bank is a major financial institution with more than \$2.3 trillion in AUM at current exchange rates. However, they have significantly fewer employees with only 9,000 employees due to the large size of their projects focused on large infrastructure type projects. The CDB is one of three official policy banks in China whose mandate is to help meet official policy targets.

China Life Insurance Group is the largest insurance company in China and owned by the Chinese Ministry of Finance. While they are substantially smaller by assets than their banking counterparts, they are both politically and financially important seen as an easy source of investment funds for politically important projects.

The remaining ownership stakes are filled out by Tianjin local government entities and public investment firms. While relatively little known outside of China, Tianjin is an important city located nearby Beijing with a variety of important industries and financial firms locating major offices in Tianjin.

Harvest Fund Management is owned by three specific entities: China Credit Trust (CCT), Lixin, an Deutsche Bank Asset Management. China Credit Trust is not specifically state owned but the key stake holders are either state owned or heavily state linked entities. China Credit Trust is comprised primarily of mining and energy firms at both the national and local level. The key national level firms are China Coal, China Merchants Bank, Minmetals Group, and China People's Insurance, a state owned competitor to China Life. Provincial level firms include Fujian Energy and Shanxi Yan'an Mining. Though some firms are technically private through multiple channels they have close ties to the state.

China Credit Trust has been involved in problematic financial dealings. CCT was the first known trust company who collapsed and was subsequently bailed out by unknown parties after a product of theirs defaulted.¹⁴² This happened after a highly risky loan made to potentially corrupt entity was made and subsequently distributed via ICBC another of the big four state banks in China.

The unit of Deutsche Bank that owns a part of Harvest is the fund and asset management unit specializing in products like mutual funds and exchange traded funds. Harvest is actually most known for retail type products like basic mutual funds in both active and passive management styles. The reason Deutsche Bank matters more broadly is their link to other players. For instance, they were closely linked to the HNA Group with HNA at one point owning just less than 10% of DeutscheBank. There is little evidence however that Deutsche Bank is heavily involved in the day to day operations of Harvest.

The US partners for BHR came from three specific entities or individuals. The original incorporation of BHR in 2013 name Rosemont, Seneca, Thornton. Rosemont comes from Chris Heinz who is the son of Theresa Heinz an step-son of John Kerry. There are numerous Rosemont firms such as variations on Rosemont Seneca as well as Rosemont Capital and Rosemont Realty. The Heinz-Kerry family wealth via family trusts is both directly and indirectly invested in Rosemont corporations though we cannot say with specificity whether this comes from firm ownership or project investment as a limited partner for instance.

Seneca represents Hunter Biden with a number of his firms, and partnerships tied to Rosemont, bearing the name Seneca. Hunter however moved through numerous naming protocols of the firms he has owned over the years. Hunter Biden partnerships with Heinz were to all known records using Seneca to denote his involvement. The Seneca holding in BHR would go through numerous changes over time.

Thornton was headed by Lin and Bulger. A Massachusetts entity, they had two partners involved in public works constructions who were large donors to politicians and helped establish Lin and Bulger as key players making political and financial deals between China and the United States. The Thornton holding of BHR would go through multiple changes over time given their links to Heinz and Biden.

¹⁴² <https://www.bloomberg.com/news/articles/2014-01-29/china-credit-repays-principal-to-investors-of-bailed-out-trust>

The Importance of State-Owned Enterprise Involvement

The two Chinese partners Bohai Industrial Investment (Bohai) and Harvest Fund Management (Harvest) are key to understanding the importance of this deal. Bohai is technically a state owned enterprise (SOE), a specific type of corporate registration, and while Harvest is not an SOE its state linked roots are deep. Understanding these two companies helps us contextualize their importance.

Bohai is owned by a combination of national level SOEs and local governments. In China, there are thousands of local SOEs throughout each city, county, and province but a relatively small number but national SOEs.

The financial strength of Bohai comes primarily from its collection of national level SOE financials specifically Bank of China, China Postal Bank, China Development Bank, and National Social Security.¹⁴³ This combination of financial institutions confers upon Bohai both political and financial strength. Together these financial institutions manage nearly \$8 trillion USD in financial assets. Relative to China, this gives them financial assets equivalent to approximately 20% of the entire Chinese financial system. Bohai has an enormously deep pool of financial reserves it can easily tap.

The financial importance extends two steps further. Much of the financing of BHR projects would be financed primarily by Bohai shareholders via other financial vehicles or products. China Development Bank and Bank of China specifically appear repeatedly in BHR deals funding their projects throughout China and around the world. Additionally, key personnel from Bohai and BHR come from these institutions speaking to the overlap and relationship between these institutions.

This collection of financial institutions in China also carries clear political implications. These are some of the politically important SOE's and financial institutions in China. The Ministry of Finance has a majority direct or indirect stake in almost each case and all are centrally owned. Each has clear mandates from the central government in a range of areas such as BoC playing the dominant role in foreign exchange clearing and settlement leading them more into international markets, China Postal serving rural customers, and China Development being one of the three banks official policy banks.

Not only is each individual financial institution politically important, fact not lost on officials and Chinese market participants, but it also speaks to the specific attempt by official China to work with the princelings of key US public officials. While we do not have specific documentation proving this, based upon well known Chinese business practice, it seems highly unlikely this influence operation and business deal was not approved at a quasi-official level given the nature of working with the sons of two highly placed American officials.

There is one final channel the political influence appears. Due to the intensely political nature of the financial backing and positioning of Bohai, the deal flow and ultimate projects BHR invests in are effectively Chinese state backed projects. Internationally, BHR invests in projects with officially or nominally Chinese SOE firms.

Another major international investment involved BHR partnering with AVIC Automotive to purchase Henniges Automotive. Better known as the Aviation Industry Corporation of China (AVIC), AVIC is a vast sprawling military industrial complex company with nearly a half million employees across all its different divisions involved in everything from military

¹⁴³ It is worth noting, technically Bank of China is considered to have made two separate investments coming from different business units into Bohai which when combined give BoC 53% of total equity.

aircraft to robotics. AVIC in one form or another has regularly appeared on the US entity list over the years and alleged espionage activities against the US military. AVIC, like China Moly, is overseen by SASAC the manager of all state owned enterprises.

Even when the partner or investment is not explicitly a state owned enterprise it is effectively an SOE. Harvest Fund Management is technically a private company but receives significant backing from major state linked entities which have received public bailouts. One of the major shareholders in Harvest is a financial firm named China Credit Trust (CCT). CCT is a financial non-depository financial firm owned by a group of composed of provincial and national level coal and mining companies. The national SOE's are major firms including the China National Coal Group, China People's Insurance, and China Minmetals all directly under the powerful SASAC. Like the backing for Bohai, the backing for Harvest is very similarly state owned and linked.

The multilayered links to the state extends to investment. Despite the publicly stated reason for the investment fund to focus on international ventures, the large majority of investment appears to flow to domestic sources. Furthermore, not only is total fund investment primarily domestic but it appears to flow primarily to public-private investment.

Public-private investment in China consists of infrastructure, public works, and policy driven investment linked to government interests. This may consist of everything from toll roads to convention centers and investment funds, similar to Bohai, that are designed to stimulate activity. Public private investment in China has increased rapidly as local governments face restrictions on official public debt limits. To skirt central government rules that limit debt growth but still meet investment targets, local governments create off public balance sheet vehicles consisting of state linked companies with loans from banks or trust firms that provide investment capital.

The flow of capital to public-private projects is notable in this case as it provides further evidence of the state link between BHR and its purpose. The supposed purpose of the BHR partnership documents was for Chinese capital to invest abroad but records show most of invested domestically in state backed projects. Consequently, there appears no viable business reason for a foreign investor due to the primarily state backed nature of the investment and it effectively guarantees the investment.

The close links between the fund and the Chinese state at all levels raise valid and worrying concerns. The original partnership stems from an individual working closely with official Chinese state enterprises and government agencies, brought in major SOEs, invested in state policy projects both internationally and domestically effectively guaranteeing a return for investors. At every level the BHR partnership is linked to the Chinese state.

Tengke Fungurume

China Moly agreed to purchase the Tengke Fungurume cobalt and copper mine from Freeport McMoran in 2016 with BHR acting a co-investor. China Moly purchased 56% with BHR purchasing an additional 24%. Despite the appearances of an international free market arms length transaction, this is effectively a state backed investment. The major shareholder in China Moly is a beneficial owner for the State Owned Assets Supervision and Administration Commission of the State Council of China (SASAC). This follows the pattern the BHR is created with central SOE involvement and partners with state owned or linked entities.

BHRSEI held any other assets or made other material investments besides its purchase of the Sinopec investment.

There are a few notable aspects of BHRSEI. First, in its September 2014 filing on the Hong Kong Stock Exchange, Sinopec describes BHR as controlled by a Chinese SOE. Specifically in the filing it states:

*Bohai Harvest RST (Shanghai) Equity Investment Management Co., Ltd. (渤海華美(上海)股權投資基金管理有限公司, hereinafter “Bohai Harvest Management”) is the executive partner of Bohai Harvest RST. Bohai Harvest Management is a company established and **controlled** by Bohai Industrial Investment Fund Management Co., Ltd. (渤海產業投資基金管理有限公司, hereinafter “Bohai Industrial”), a company controlled by Bank of China Limited, to focus on mergers and acquisitions, and investment in and reforms of state-owned enterprise....Bohai Industrial currently entrusted to manage is Bohai Industrial Investment Fund which is a RMB-denominated industrial investment fund approved to be established by the State Council with the permit from the National Development and Reform Commission of the PRC.*

This has a clear and direct implication. The investment of Hunter Biden during the time his father was Vice President of the United States was classified and controlled as a state owned enterprise of the People’s Republic of China. It received state controlled funds to invest in state owned assets. This should raise serious ethical concerns.

Second, the investment capital raised by BHR to invest in the Sinopec marketing arm came from state owned investors. China Everbright and China Southern Capital, both state owned firms, are foundational investors in this specific fund. This furthers the pattern that state enterprise links dominates BHR from clients to targets.

Third, the remaining investors, outside of BHR, in the Sinopec marketing arm are almost exclusively SOE. From Bank of China linked funds to ICBC, Cinda, and CICC all major Chinese SOE financial firms, there is effectively no private involvement. This simply furthers the picture that BHR is about recycling Chinese state investment allowing specific parties to skim from their involvement and not about adding specific value.

渤海华美二期(上海)股权投资基金合伙企业(有限合伙)

Bohai Huamei II (Shanghai) Equity Investment Fund Partnership

Bohai Harvest II (BHR II) appears to be a single asset SPV. Incorporated in October 2014, BHR II has three shareholders: BHR, Haikou Blue Sea Rhythm Business Consulting, and Beijing Shixin Rongtai Investment Management. Haikou in corporate records, appears as a small consulting operation with minimal financial assets or contributions to the partnership. The owners are not linked directly to other corporate registrations. Their involvement likely, especially coming from the southern island of Hainan which could imply some link to HNA with whom the Biden’s have connections mentioned previously. Given the lack of records on these individuals or firm, their involvement is puzzling. The other shareholder is Shixin Asset Management a holding company of state cooperative managed by the Beijing city government “link(ing) the Party and the government closely to the peasant masses”.

The financial purpose of the partnership was to take part in the China RE IPO which occurred in October 2015. What makes this notable however is it appears linked to the Bank

of China work on the IPO. In a filing with the Hong Kong exchange, the stock allocation was described as:

Certain offer shares are placed to the joint bookrunners and/or connected customers of the joint lead managers (definition (See the Guidelines for the Placement of Equity Securities as set out in Appendix 6 of the Listing Rules). Placing of 143,500,000 offer shares To Bohai Huamei Phase II (Shanghai) Equity Investment Fund Partnership (Limited Partnership) (for BOCI Asia Connected placee of a limited company)

Bank of China International, the Bank of China Hong Kong subsidiary handling IPO and other related investment banking work as well as traditional banking services such as foreign exchange settlement, is listed as a “Joint Bookrunner/Co-Lead Manager”. Out of this work, BHR II receives the a China RE stock allocation of 143 million shares. Given the size of the China RE sale, the team of bookrunners included BoC, CICC, UBS, ICBC, CITIC CLSA, and HSBC or some of the most connected and financially influence Chinese and global banks operating in China. BoC designated its place as BHR II. As BHR is technically considered a subsidiary of BoC, this is a connected party transaction. Financial records indicate significant capital injection into BHR II via BHR that likely comes from client funds.

The primarily problematic aspect is that BHR appears to be receiving preferential treatment in which the sons of the American Vice President and the son, and likely American Secretary of State, receive financial benefits. This is state allocation of financial benefits.

渤海华美瑞拉(上海)股权投资基金管理有限公司

Bohai Huamei (Shanghai) Equity Investment

BH Shanghai is a unique subsidiary for BHR. Unlike other first level subsidiaries, it is multiple additional sub-partnerships. While it is not unusual for specific partnership funds to be invested in multiple assets, this is one of the only subsidiary partnerships that appears to have multiple sub partnerships. The reason for this is not clear from available information.

There appears to be little logic behind the investments under the broad umbrella within BH Shanghai. Investments are scattered throughout a variety of industries and clients come from a variety of backgrounds. There is very likely a good reason why but there is little apparent pattern of investment holdings or clients within BH Shanghai.

One deal they appear to have partnered with a food technology subsidiary of AVIC to recapitalize a Chinese dairy. Notably, this Chinese dairy and now a subsidiary of AVIC also appear to own an Australian dairy.

Another deal run through a Chengdu partnership appears to make a project based investment into a relatively new real estate firm Topchain, in an industry dominated by established firms in China, partnering with a previously unknown Hong Kong based BHR named shell company BHR Win Aura. Topchain at the group level is linked closely to local government SOEs in key cities like Shenzhen and Guangzhou.

Other partnerships that move through Jiangxi shell companies either list no outward investment or list outward investments in partnerships in bonded port zones that offer investment incentives but no known assets within the partnerships.

Valuing the Partnership

A key question surrounding the BHR partnership concerns the value of the partnership and the underlying financing provided to the partnership by Chinese state linked financial firms. It should be noted at the outset that given the lack of documentation such as fee schedule and partnership agreement that will have significant impact on valuation and financial flows, we lack important details that would help us provide greater specificity and certainty about financial aspects of the BHR partnership. Where we lack detail that cannot be directly obtained about BHR, we will use industry standard or provide various scenarios based upon potential missing details.

The first major question about BHR financials concerns the size of the firms business. Most news reports have placed the value of assets under management (AUM) at BHR at \$1-1.5 billion USD. This number is likely to be significantly lower than reality. If we take just two international transactions, Tenke Fungurume mine in the DRC and the Henniges Automotive purchase in total sum to approximately \$1.6 billion USD leaving aside all other less public projects and various financing details which remain unknown but pertinent. Put another way, if we consider only two simultaneous projects, the total AUM would exceed the previously public estimates of BHR.

There is a more direct and likely more reliable estimate of \$6.5 billion USD for the current AUM of BHR. Thornton co-founder Michael Lin listing himself as a BHR co-founder declares total assets under management (AUM) as \$6.5 billion USD on his personal LinkedIn page. It is difficult to verify this statement because many BHR projects do not provide public financials or announcements. However, given the less conspicuous nature of the statement and his ability to make such a statement, it should be taken as credible given its first person testimony as to the state of the business.

Importantly, this puts the true nature of AUM as more than four times higher than previous estimates. This has a major impact on the valuation both in year to year cash flow terms and in terms of capital appreciation gains that would accrue to partners.

Private equity firms typically make money through two different channels in what is known in the industry as a 2/20 fee schedule. Private equity firms like BHR first receive annual management fee of 2% of committed or managed capital depending on the partnership agreement. If we assume that BHR receives annual revenue of 2% of \$6.5 billion then this would amount to \$130 million USD annually in ongoing management fees. According to BHR, they report the number of employees between 11-50 while news reports report the number at 20. Taking the high number of employees at fifty, this would place the annual fee revenue, excluding capital gains and similar revenue, per employee at approximately \$2.6 million per employee.

However, for multiple reasons most private equity firms make their big payouts from taking a percentage of capital appreciation gains. The standard fee is 20% of gains when the rate of return exceeds a specific hurdle rate. Let us take very simple example to illustrate the potential payout for BHR. Let us assume that BHR wishes to liquidate current assets and finds buyers willing to pay \$8 billion USD for its assets currently listed at \$6.5 billion. Assuming this exceeds the required hurdle rate, BHR would realize a payout of 20% of \$1.5 billion or \$300 million.

Private equity firms, and similar financial firms like hedge funds, are extremely difficult to value for asset purchase purposes due to the inherent volatility and human capital focus of key personnel. However, it would be clear that even just on a management fee basis, the firm

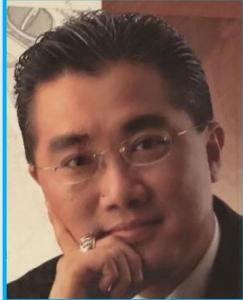
generates significant yearly revenue and would likely realize significant capital gains for partner distribution.

There are additional factors that make the BHR business difficult to value both for any asset sale and business sale as a going concern. There is effectively no open market for BHR assets or business. Given that the majority of their assets are now public projects or co-investments with major SOE's there is effectively no open market for BHR assets. BHR cannot liquidate its assets without Beijing or local government approval and the price is determined by the primary counter party rather than market valuation. The same holds for any valuation of BHR as a going concern. Given the SOE direct ownership and project financing, any purchaser would be dependent on the good will received by the politically connected owners. Any sale of BHR assets or the business is effectively a Chinese state decision.

This returns the entire partnership to the fundamental problem: two sons of the Vice President of the United States and the Secretary of State willingly entered into a financial partnership with a government their fathers were supposed to deal with in an impartial manner. Evidence indicates that the Secretary of State was directly or indirectly financially invested in his sons firms and benefitted from asset purchases made by firms directly linked to his son. Hunter Biden invested in a firm that by his own words has had almost nothing to do with, managed by state government with departments dedicated to elite capture, focusing on state enterprise deals in a foreign country, but has grown to manage \$6.5 billion in assets and likely realize yearly revenue of \$100-150 million. The ultimate price would be whatever the Chinese Communist Party decides his partnership stake is worth.

4. APPENDIX

Michael Lin

MICHAEL LIN			
 <p>Circa 1990</p>	 <p>Circa 2000</p>	 <p>Late 2000s</p>	 <p>Late 2010s</p>
NAME	Michael Lin / Lin Chun Liang /林俊良		
AGE	57		
NATIONALITY	Taiwan		
RESIDENCES	Taiwan, US, China		
EDUCATION	1991 – 1993: Yale School of Management, Master of Public and Private Management		
CAREER			

Sichuan Chemical Deal – Letter of Intent

四川化工控股(集团)有限责任公司

July 1st, 2013

Prospect Global Resources Inc.
1401 17th Street, Suite 1550
Denver, CO 80202

Re: Investment in Prospect Global Resources Inc.

Dear Mr. Barber:

In light of the Potash Supply Agreement signed between Prospect Global Resources Inc. ("PGRX") and Sichuan Chemical Industry Holding (Group) Co., Ltd. ("SCIHC") dated October 18, 2012, SCIHC has been looking for ways to deepen its cooperation with PGRX. To that end, please let this letter indicate that SCIHC has an interest in investing up to US\$20,000,000 in PGRX on terms to be agreed to and subject to final approval by the Sichuan Provincial Government and its affiliated State-owned Assets Supervision and Administration Commission ("SASAC"). While this letter does not represent a binding offer to invest, it may be considered a letter of intent.

SCIHC looks forward to working with PGRX in order to bring its Holbrook Basin project to completion and SCIHC will continue to pursue additional avenues of cooperation going forward.

Sincerely,
Sichuan Chemical Industry
Holding (Group) Co., Ltd.



Name: Xiaojun Chen
Title: Chairman

SEC Filings, September 19, 2013¹⁴⁸

¹⁴⁸ <https://sec.report/Document/0001104659-13-070962/>