



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF THE GENERAL COUNSEL

Peter Flaherty, Chairman
Paul D. Kamenar, Counsel
National Legal and Policy Center
107 Park Washington Court
Falls Church, VA 22046

via electronic mail

June 18, 2020

Dear Chairman Flaherty and Counsel Kamenar:

The U.S. Department of Education ("Department") is in receipt of your letter, dated May 20, 2020, regarding Section 117 of the Higher Education Act of 1965, 20 U.S.C. § 1011f, the University of Pennsylvania, and the Biden Center for Diplomacy and Global Engagement. *See Exhibit 1.*

The Department shares your concerns regarding the potentially adverse impact of money from certain undisclosed foreign sources on teaching, research, academic freedom, campus political climate, and national security. For example, a recent bipartisan Congressional investigation of the Chinese Communist Party's "Confucius Centers" found these foreign-funded propaganda operations on U.S. campuses were part of "China's broader, long-term strategy" to promote "complacency towards China's pervasive, long-term initiatives against both government critics at home and businesses and academic institutions abroad." *See* <https://www.hsgac.senate.gov/imo/media/doc/2019-11-18%20PSI%20Staff%20Report%20-%20China's%20Talent%20Recruitment%20Plans%20Updated2.pdf>

Since June 2019, the Department has initiated multiple Section 117 investigations of taxpayer-funded universities which have failed to make statutorily required disclosures of gifts, contracts, and/or restricted conditional gifts or contracts, from or with a statutorily defined foreign source(s). Section 117 does *not* authorize anonymized reporting of foreign source gifts and contracts. To the contrary, universities are required to identify the sources of qualifying foreign gifts and contracts. Unfortunately, the Department has discovered massive failures by universities to identify foreign sources (frequently identifying the sources as "anonymous," in violation of the statutory requirement to identify foreign sources). Our records suggest universities have anonymized the foreign sources of approximately \$8.4 billion qualifying gifts and contracts. Since 2010, for example, universities anonymized the foreign donors of gifts and contracts worth over \$1.147 billion from the People's Republic of China (\$599 million), Qatar (\$268 million), Saudi Arabia (\$205 million), and Russia (\$75 million).

400 MARYLAND AVE. S.W., WASHINGTON, DC 20202-1100
www.ed.gov

The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

The Department is committed to the enforcement of Section 117's clear statutory requirement that taxpayer-funded American universities disclose the identities of foreign donors for qualifying gifts and contracts. Whether involving qualifying foreign source gifts and contracts and the University of Pennsylvania or any other university, universities have a statutory duty to identify foreign donors pursuant to Section 117 disclosure obligations to the Department. The Department anticipates issuance of an Electronic Announcement on or about June 22, 2020, reminding universities of the ongoing foreign source disclosure obligation (disclosed on the Department's Section 117 reporting system at <https://partners.ed.gov/ForeignGifts>).

The Department believes full and timely Section 117 compliance is a matter of urgent importance to the national security and educational integrity of our universities. The national security concerns created by universities' concealment of foreign source identities for gifts to or contracts with domestic or international policy "centers" and other persons or entities that might serve as instruments of or platforms for foreign influence and/or propaganda efforts ought to be self-evident. Here especially students, parents, taxpayers, and policy makers need and deserve universities' compliance with law, transparency, and accountability.

The Department appreciates the Center's concern that universities meet their statutory disclosure obligations. However, the information you have provided to the Department is currently insufficient to justify further investigation. The Department, however, will continue to consider and evaluate information relating to disclosure failures involving the University of Pennsylvania or other American universities.

Sincerely,



Paul R. Moore
Chief Investigative Counsel
Office of the General Counsel
(202) 230-0059
Paul.Moore@ed.gov

cc: Reed D. Rubinstein
Principal Deputy General Counsel delegated
the Authority and Duties of the General Counsel

EXHIBIT 1

National Legal and Policy Center

"promoting ethics in public life"



Co-Founder
Ken Boehm 1949-2018

Board of Directors
Peter Flaherty, Chairman
Kurt Christensen, Vice-Chairman
Michael Falcone
Richard F. LaMountain
David Wilkinson

Since 1991

May 20, 2020

The Honorable Betsy DeVos
Secretary, Department of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Via Email

Paul R. Moore, Esq.
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., S.W.,
Room 6E300 Washington, D.C. 20202
Paul.Moore@ed.gov

Re: Investigation of University of Pennsylvania and the Penn Biden Center for Diplomacy and Global Engagement for Failing to Disclose Anonymous Gifts and Contracts from China in violation of Section 117 of the Higher Education Act and Referral to the Department of Justice for Enforcement Action and Payment of Investigation Costs

Dear Secretary DeVos and Mr. Moore:

The National Legal and Policy Center (NLPC) hereby requests that the Department of Education conduct a full Investigation and Records Request of all monetary gifts and contracts that have been received by the University of Pennsylvania and its Penn Biden Center for Diplomacy and Global Engagement from China sources, many of which are listed as Anonymous in their semi-annual reports, and thus is in clear violation of Section 117 of the Higher Education Act, 20 U.S.C. 1011f, that all gifts or contracts exceeding \$250,000 must disclose the foreign ownership and control of the gift or contract.

Moreover, NLPC requests that the Department obtain and inspect all copies of the monetary gifts and contracts, whether or not listed as Anonymous, in order to determine what if any conditions or restrictions were or are placed on those gifts or contracts, which is also required to be disclosed by federal law and to release them to the public as required by 20 U.S.C. 1011f(e).

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703-237-1970 • fax 703-237-2090 • www.nlpc.org

Finally, NLPC requests that the Secretary refer to the Attorney General a civil enforcement action in federal court pursuant to 20 U.S.C. 1001f(f)(1) to obtain a court order seeking payment to the U.S. Treasury of “the full costs to the United States of obtaining compliance, including all associated costs of investigation and enforcement” because the violations were clearly knowing and willful.

NLPC. Founded in 1991, NLPC is a non-profit public interest organization based in the Washington, D.C. area that promotes ethics in public life and government and corporate accountability through research, investigation, education, and legal action. See www.nlpc.org. In particular, NLPC’s Corporate Integrity Project recently requested BlackRock’s President Larry Fink to divest its portfolio of Chinese companies in response to China’s coverup of the coronavirus and human rights abuses. <https://nlpc.org/2020/05/12/larry-fink-asked-to-divest-blackrock-from-chinese-companies-in-response-to-coronavirus-human-rights-abuses/>

Systematic Reporting Violations by the University of Pennsylvania of China Monetary Gifts and Contracts

Over 30 years ago, Congress enacted Section 117 of the Higher Education Act of 1965 (HEA) in light of concerns about the growing financial relationship between U.S. universities and foreign sources. Congress balanced academic freedom and national security by mandating financial transparency through required reporting of contracts with and gifts from a foreign source that, alone or combined, are valued at \$250,000 or more in a calendar year.

The law could not be any clearer: universities must disclose the source of the monetary gifts and contracts over \$250,000 in a calendar year. 20 U.S.C. 1011f provides in relevant part:

(a) Disclosure report

Whenever any [institution](#) is owned or controlled by a [foreign source](#) or receives a [gift](#) from or enters into a [contract](#) with a [foreign source](#), the value of which is \$250,000 or more, considered alone or in combination with all other [gifts](#) from or [contracts](#) with that [foreign source](#) within a calendar year, the [institution](#) shall file a disclosure report with the [Secretary](#) on January 31 or July 31, whichever is sooner.

(b) Contents of report

Each report to the [Secretary](#) required by this section shall contain the following:

(1) For [gifts](#) received from or [contracts](#) entered into with a [foreign source](#) other than a foreign government, the aggregate dollar amount of such [gifts](#) and [contracts](#) attributable to a particular country. The country to which a [gift](#) is attributable is the country of citizenship, or if unknown, the principal residence for a [foreign source](#) who is a natural person, and the country of incorporation, or if unknown, the principal place of business, for a [foreign source](#) which is a legal entity.

(2) For gifts received from or contracts entered into with a foreign government, the aggregate amount of such gifts and contracts received from each foreign government.

(3) In the case of an institution which is owned or controlled by a foreign source, the identity of the foreign source, the date on which the foreign source assumed ownership or control, and any changes in program or structure resulting from the change in ownership or control.

(c) Additional disclosures for restricted and conditional gifts

Notwithstanding the provisions of subsection (b), whenever any institution receives a restricted or conditional gift or contract from a foreign source, the institution shall disclose the following:

(1) For such gifts received from or contracts entered into with a foreign source other than a foreign government, the amount, the date, and a description of such conditions or restrictions. The report shall also disclose the country of citizenship, or if unknown, the principal residence for a foreign source which is a natural person, and the country of incorporation, or if unknown, the principal place of business for a foreign source which is a legal entity.

(2) For gifts received from or contracts entered into with a foreign government, the amount, the date, a description of such conditions or restrictions, and the name of the foreign government.

Nevertheless, in spite of this clear statutory requirement, the University of Pennsylvania, since at least October 30, 2013 through June 30, 2019, has knowingly and willfully violated 20 U.S.C. 1011f multiple times by listing many such gifts over \$250,000 only as “Anonymous” as evidenced on the Department’s database of all foreign donations.¹

From 2013-2019, the University of Pennsylvania received more than \$67 million from China sources. More significantly, after the Penn Biden Center opened here in Washington,

¹ <https://studentaid.gov/data-center/school/foreign-gifts>. A copy of the China gifts and contracts to the University of Pennsylvania from October 30, 2013 through September 30, 2019 is attached hereto into two sets of spread sheets: the first from October 30, 2013 through September 30, 2019, and the second overlapping set from March 27, 2017 through December 31, 2019. The gifts or contracts that are labeled as Anonymous are highlighted in yellow. Note, there are several contracts listed in the second set that do not list the name of the donor nor does it list it as “Anonymous.” Instead, they are listed as 6-digit numbers in gifts in July 2019 and August 2019 and elsewhere. NLPC does not know whether those are Anonymous gifts or whether the Department has the name of the donor that matches the number. In any event, the name of the donor is required by law to be disclosed, not just a number.

D.C., in February 2018,² the China gifts poured in all the more, and continued after Biden announced his candidacy of the presidency on April 25, 2019:

2017: Total: \$7,734,790 Anonymous: \$500,000

2018: Total: \$27,104,246 Anonymous: \$15,800,000

2019: Total: \$26,947,074 Anonymous: \$6,004,975

The purpose of the disclosure requirement by Congress was to ensure that our universities are not beholden to foreign governments and entities in their educational activities and programs. The Senate Permanent Subcommittee on Investigations [described](#) foreign spending on U.S. schools as “a black hole” because colleges and universities “routinely” fail to comply with the law, and reported foreign money can come with strings attached that might compromise academic freedom.

The University of Pennsylvania and the Penn Biden Center are particularly vulnerable to China government influences due to the large amounts of China donations and contracts. For example, at the height of the Chinese coverup of the pandemic, Penn Global³ sponsored the **2020 Penn China Research Symposium** on January 31, 2020, that included opening remarks by Ambassador Huang Ping, Consul-General of the People’s Republic of China in New York. At least one of the panelists at the symposium was from the Penn Biden Center.⁴ Moreover, the University of Pennsylvania since 2015 has established a Penn China Research and Engagement Fund where university funds are awarded for research projects about China.⁵

While the Penn Biden Center has yet to criticize China for its pandemic coverup for the coronavirus, it has publicly attacked both Hungary and Poland, U.S. NATO Allies, for the efforts those countries have taken to control the spread of the virus as being undemocratic even though United States governors have exercised similar emergency powers and issued stay-at-home orders.⁶

² Philadelphia Tribune, *Penn opens Biden Center for Diplomacy in Washington D.C.* (Feb. 14, 2018) https://www.phillytrib.com/penn-opens-biden-center-for-diplomacy-in-washington-d-c/article_bf91aac7-35c4-551d-a063-d99cb4126963.html

³ *Penn Global is comprised of the following [seven divisions](#): the Office of the Vice Provost for Global Initiatives, ***Penn Biden Center for Diplomacy and Global Engagement***, Perry World House, Penn Abroad, International Student and Scholar Services (ISSS), Global Support Services, and Penn Global Finance and Administration.*

⁴ <https://global.upenn.edu/global-initiatives/event/2020-penn-china-research-symposium>

⁵ <https://global.upenn.edu/global-initiatives/penn-china-research-and-engagement-fund>

⁶ <https://twitter.com/PennBiden/status/1256273201958653953>

Joe Biden's affiliation with the Penn Biden Center further raises concerns of foreign influence not unlike those raised when the Clinton Foundation received millions of dollars in donations while Hillary Clinton was running for president.⁷

Particularly troubling is that the Chairman of the Board of Trustees of the University of Pennsylvania, David L. Cohen, a political lobbyist and Democratic fundraiser, was a major fundraiser for Barack Obama and now for Joe Biden. As publicly reported:

2009: Cohen becomes chairman of the [University of Pennsylvania Board of Trustees](#).

June 30, 2011: Hosts a fundraiser catered by Stephen Starr for [President Barack Obama](#) and the Democratic National Committee, with tickets ranging from \$10,000 to \$38,500.

2012: Cohen [raises more than \\$500,000](#) for Obama's reelection.

April 25, 2019: On his first day as a declared presidential candidate, [Joe Biden](#) visits Cohen's home for a fundraiser with 150 guests.

John Duchneskie, Philadelphia Inquirer, *Lawyer, corporate mover, political power broker: A look at David L. Cohen's career* (updated Dec. 5, 2019)⁸

CONCLUSION

For the foregoing reasons, NLPC requests that the Department of Education immediately begin its investigation of the numerous reporting violations of the University of Pennsylvania and its Penn Biden Center, refer the matter to the Department of Justice for civil enforcement in federal court, and seek recoupment of all costs to the U.S. government for investigating and enforcing the reporting and disclosure laws of China monetary gifts and contracts.

Sincerely yours,

/s/ Peter Flaherty

Peter Flaherty

Chair of NLPC

/s/ Paul D. Kamenar

Paul D. Kamenar

Counsel to NLPC

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Washington, DC 20006

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⁷ <https://www.nytimes.com/2016/08/21/us/politics/hillary-clinton-presidential-campaign-charity.html>

⁸ <https://www.inquirer.com/news/david-cohen-career-penn-philadelphia-comcast-20191205.html>

10/30/2013	\$300,000.00	Monetary Gift	CHINA	Arrail Group
09/27/2013	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
09/27/2013	\$2,000,000.00	Monetary Gift	CHINA	Anonymous
09/27/2013	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
04/18/2014	\$511,232.00	Monetary Gift	CHINA	China Minsheng Banking Co., Ltd.
04/14/2014	\$821,500.00	Monetary Gift	CHINA	E-House (China) Holdings Limited
04/23/2014	\$252,400.00	Contract	CHINA	Chifeng city rong Jitang Pharmaceut
04/19/2014	\$890,000.00	Monetary Gift	CHINA	Beijing Longfor Properties Co., Ltd
08/11/2014	\$725,999.00	Monetary Gift	CHINA	Shanghai Noah Investment Management
10/27/2014	\$661,000.00	Monetary Gift	CHINA	State Administration Foreign Expert
07/06/2015	\$260,000.00	Monetary Gift	CHINA	KWG Property Holding Limited Guangz
09/01/2015	\$818,593.00	Monetary Gift	CHINA	Industrial Bank Co. Ltd. (China Ind
09/07/2015	\$275,000.00	Monetary Gift	CHINA	China Zheshang Bank Co., Ltd.
09/17/2015	\$250,680.00	Monetary Gift	CHINA	Guanghua School of Management (Peki
09/24/2015	\$1,445,495.00	Monetary Gift	CHINA	E-House (China) Holdings Limited
10/12/2015	\$579,450.00	Monetary Gift	CHINA	State Administration Foreign Expert
11/12/2015	\$532,745.00	Monetary Gift	CHINA	Ping An Bank Co., Ltd.
11/16/2015	\$531,000.00	Monetary Gift	CHINA	China Minsheng Banking Co., Ltd.

12/18/2015	\$270,000.00	Monetary Gift	CHINA	Shanghai Institute of International
04/10/2016	\$252,200.00	Monetary Gift	CHINA	Bank of Communications
03/23/2016	\$500,000.00	Monetary Gift	CHINA	Anonymous
05/15/2016	\$1,573,972.00	Monetary Gift	CHINA	Ping An Bank Co., Ltd.
06/27/2016	\$413,992.00	Monetary Gift	CHINA	China Zheshang Bank Co., Ltd.
06/29/2016	\$300,000.00	Monetary Gift	CHINA	Anonymous
08/14/2016	\$831,170.00	Monetary Gift	CHINA	Shanghai Real Estate Education & Te
07/31/2016	\$426,311.00	Monetary Gift	CHINA	China Minsheng Banking Co., Ltd.
08/29/2016	\$532,500.00	Monetary Gift	CHINA	Hainan Airlines Co., Ltd.
09/09/2016	\$926,802.00	Monetary Gift	CHINA	E-House (China) Holdings Limited
09/04/2016	\$500,322.00	Monetary Gift	CHINA	Shanghai Automotive Industry Corpor
10/17/2016	\$598,850.00	Monetary Gift	CHINA	State Administration Foreign Expert
03/27/2017	\$536,340.00	Monetary Gift	CHINA	Shanghai Real Estate Education & Te
06/12/2017	\$634,996.00	Monetary Gift	CHINA	China Construction Bank Corporation
07/12/2017	\$579,200.00	Monetary Gift	CHINA	Nanjing Sample Technology Co., Ltd.
07/14/2017	\$500,000.00	Monetary Gift	CHINA	Anonymous
08/07/2017	\$512,063.00	Monetary Gift	CHINA	Hainan Airlines Co., Ltd.

08/21/2017	\$617,000.00	Monetary Gift	CHINA	Guangzhou Pearl River Enterprises G
09/17/2017	\$491,840.00	Monetary Gift	CHINA	Shanghai Automotive Industry Corpor
09/17/2017	\$324,800.00	Monetary Gift	CHINA	China Everbright Group
08/29/2017	\$538,500.00	Monetary Gift	CHINA	China Minsheng Banking Co., Ltd.
10/16/2017	\$633,550.00	Monetary Gift	CHINA	Bank of Communications
10/16/2017	\$502,750.00	Monetary Gift	CHINA	State Administration Foreign Expert
11/18/2017	\$1,863,751.00	Monetary Gift	CHINA	E-House (China) Holdings Limited
04/01/2018	\$535,000.00	Monetary Gift	CHINA	China Minsheng Banking Co., Ltd.
03/20/2018	\$300,000.00	Monetary Gift	CHINA	Anonymous
03/15/2018	\$250,000.00	Monetary Gift	CHINA	Anonymous
03/15/2018	\$500,000.00	Monetary Gift	CHINA	Anonymous
03/15/2018	\$250,000.00	Monetary Gift	CHINA	Anonymous
04/18/2018	\$1,228,885.00	Monetary Gift	CHINA	E-House (China) Holdings Limited
04/18/2018	\$416,150.00	Monetary Gift	CHINA	Shanghai Real Estate Education & Te
04/18/2018	\$718,650.00	Monetary Gift	CHINA	Guangzhou R&F Properties
04/19/2018	\$950,000.00	Monetary Gift	CHINA	China Merchants Bank
04/18/2018	\$304,504.00	Monetary Gift	CHINA	KWG Property Holding Limited Guangz
05/29/2018	\$14,500,000.00	Monetary Gift	CHINA	Anonymous

07/25/2018	\$378,891.00	Contract	CHINA	SHANGHAI REAL ESTATE EDUCATION TECH
07/16/2018	\$2,937,158.00	Contract	CHINA	CHINA MERCHANTS BANK
08/08/2018	\$393,343.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FINA
08/21/2018	\$330,000.00	Contract	CHINA	GUANGZHOU R&F PROPERTIES CO., LTD.
10/09/2018	\$390,250.00	Contract	CHINA	SAIC MOTOR HK INVESTMENT LIMITED
10/01/2018	\$1,032,745.00	Contract	CHINA	GUANGDONG PEARL RIVER INVESTMENT HO
10/01/2018	\$622,120.00	Contract	CHINA	CHINA MINSHENG BANK CO. LTD.
10/12/2018	\$332,250.00	Contract	CHINA	CHINA EVERBRIGHT GROUP
12/10/2018	\$734,300.00	Contract	CHINA	MARY KAY (CHINA) CO., LTD.
01/01/2019	\$167,500.00	Contract	CHINA	MOELIS & COMPANY
01/01/2019	\$258,000.00	Contract	CHINA	GUANGZHOU TIMES PROPERTY HOLDING L
01/09/2019	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
01/09/2019	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
01/24/2019	\$107,100.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN

02/05/2019	\$1,100,000.00	Contract	CHINA	Guanghzhou R&F Properties Co., Ltd.
02/12/2019	\$83,750.00	Contract	CHINA	MOELIS & COMPANY
02/13/2019	\$163,461.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
02/27/2019	\$60,320.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
03/23/2019	\$274,670.00	Contract	CHINA	SAIC MOTOR HK INVESTMENT LIMITED
04/01/2019	\$123,282.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
04/01/2019	\$250,000.00	Monetary Gift	CHINA	Hua Medicine
04/05/2019	\$150,000.00	Contract	CHINA	ZHEJIANG UNIVERSITY
04/15/2019	\$258,000.00	Contract	CHINA	GUANGHZHOU TIMES PROPERTY HOLDING L
04/15/2019	\$258,000.00	Contract	CHINA	TIMES PROPERTY HOLDINGS LIMITED
04/19/2019	\$447,042.00	Contract	CHINA	Guanghzhou R&F Properties Co., Ltd.
05/28/2019	\$150,000.00	Contract	CHINA	ZHEJIANG UNIVERSITY
06/03/2019	\$4,975.00	Monetary Gift	CHINA	Anonymous
06/03/2019	\$400,000.00	Monetary Gift	CHINA	Anonymous
06/03/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
06/11/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
06/13/2019	\$328,500.00	Contract	CHINA	Vipshop (China) Co. Ltd.

06/18/2019	\$1,762,561.00	Contract	CHINA	E-House (China) Holdings Unlimited
06/18/2019	\$651,200.00	Contract	CHINA	E-House (China) Holdings Unlimited
06/25/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
06/26/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
06/26/2019	\$400,000.00	Monetary Gift	CHINA	Anonymous
06/25/2019	\$200,000.00	Monetary Gift	CHINA	AKO FOUNDATION
06/25/2019	\$200,000.00	Monetary Gift	CHINA	Anonymous
06/26/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
06/30/2019	\$500,000.00	Monetary Gift	CHINA	Anonymous
06/30/2019	\$383,279.00	Monetary Gift	CHINA	Anonymous
06/30/2019	\$483,667.00	Monetary Gift	CHINA	Anonymous
06/30/2019	\$416,721.00	Monetary Gift	CHINA	Anonymous
06/30/2019	\$383,054.00	Monetary Gift	CHINA	Anonymous
06/30/2019	\$333,279.00	Monetary Gift	CHINA	Anonymous

99 donations from China between 2013-2019

Sum: \$67,618,610

Largest: \$14.5 million on 5/29/2018

2013: \$4.3 million

2014: \$3.8 million

2015: \$4.9 million

2016: \$6.8 million

2017: \$7.7 million

2018: \$27.3 million

2019: \$12.7 million

Foreign Schools Gift and Contracts Report with Date Range 01/01/2014 to 12/31/2019

Grouped by: OPEID, State, Foreign Gift Received Date

Data Source: Postsecondary Education Participation System 3/30/2020

OPEID	Institution Name	City	State	Foreign Gift Received Date	Foreign Gift Amount	Gift Type	Country of Giftor	Giftor Name
23546 00337800	University of Pennsylvania	Philadelphia	PA	03/27/2017	\$536,340.00	Monetary Gift	CHINA	Shanghai Real Estate Education & Te
23556 00337800	University of Pennsylvania	Philadelphia	PA	06/12/2017	\$634,996.00	Monetary Gift	CHINA	China Construction Bank Corporation
23560 00337800	University of Pennsylvania	Philadelphia	PA	07/12/2017	\$579,200.00	Monetary Gift	CHINA	Nanjing Sample Technology Co., Ltd.
23561 00337800	University of Pennsylvania	Philadelphia	PA	07/14/2017	\$500,000.00	Monetary Gift	CHINA	Anonymous
22583 00337800	University of Pennsylvania	Philadelphia	PA	08/07/2017	\$512,093.00	Monetary Gift	CHINA	Hainan Airlines Co., Ltd.
22567 00337800	University of Pennsylvania	Philadelphia	PA	08/21/2017	\$617,000.00	Monetary Gift	CHINA	Guangzhou Pearl River Enterprises G
22568 00337800	University of Pennsylvania	Philadelphia	PA	08/29/2017	\$538,500.00	Monetary Gift	CHINA	China Minsheng Banking Co., Ltd.
22569 00337800	University of Pennsylvania	Philadelphia	PA	09/17/2017	\$324,800.00	Monetary Gift	CHINA	China Everbright Group
22576 00337800	University of Pennsylvania	Philadelphia	PA	09/17/2017	\$491,840.00	Monetary Gift	CHINA	Shanghai Automotive Industry Corpor
22571 00337800	University of Pennsylvania	Philadelphia	PA	10/16/2017	\$502,750.00	Monetary Gift	CHINA	State Administration Foreign Expert
22584 00337800	University of Pennsylvania	Philadelphia	PA	10/16/2017	\$633,550.00	Monetary Gift	CHINA	Bank of Communications
				11/18/2017	\$1,463,751.00	Monetary Gift	CHINA	E-Home (China) Holdings Limited
					\$7,734,790.00			

Foreign Schools Gift and Contracts Report with Date Range 01/01/2014 to 12/31/2019

Grouped by: OPEID, State, Foreign Gift Received Date

Data Source: Postsecondary Education Participation System 3/6/2020

ID	OPEID	Institution Name	City	State	Foreign Gift Received Date	Foreign Gift Amount	Gift Type	Country of Gift	Giftor Name
22561	0037800	University of Pennsylvania	Philadelphia	PA	07/14/2017	\$500,000.00	Monetary Gift	CHINA	Anonymous

Foreign Schools Gift and Contracts Report with Date Range 01/01/2014 to 12/31/2019
Grouped by: OPEID, State, Foreign Gift Received Date
Data Source: Postsecondary Education Participation System 3/30/2020

ID	OPEID	Institution Name	City	State	Foreign Gift Received Date	Foreign Gift Amount	Gift Type	Country of Giftor	Giftor Name
22609	00337800	University of Pennsylvania	Philadelphia	PA	03/15/2018	\$500,000.00	Monetary Gift	CHINA	Anonymous
22610	00337800	University of Pennsylvania	Philadelphia	PA	03/15/2018	\$250,000.00	Monetary Gift	CHINA	Anonymous
22611	00337800	University of Pennsylvania	Philadelphia	PA	03/15/2018	\$250,000.00	Monetary Gift	CHINA	Anonymous
22612	00337800	University of Pennsylvania	Philadelphia	PA	03/20/2018	\$300,000.00	Monetary Gift	CHINA	Anonymous
22613	00337800	University of Pennsylvania	Philadelphia	PA	04/01/2018	\$535,000.00	Monetary Gift	CHINA	China Minsheng Banking Co., Ltd.
22614	00337800	University of Pennsylvania	Philadelphia	PA	04/18/2018	\$384,504.00	Monetary Gift	CHINA	KWG Property Holding Limited Guangxi
22615	00337800	University of Pennsylvania	Philadelphia	PA	04/18/2018	\$416,150.00	Monetary Gift	CHINA	Shanghai Real Estate Education & Le
22616	00337800	University of Pennsylvania	Philadelphia	PA	04/18/2018	\$1,278,885.00	Monetary Gift	CHINA	E-House (China) Holdings Limited
22617	00337800	University of Pennsylvania	Philadelphia	PA	04/19/2018	\$718,650.00	Monetary Gift	CHINA	Guangzhou R&E Properties
22618	00337800	University of Pennsylvania	Philadelphia	PA	05/29/2018	\$950,000.00	Monetary Gift	CHINA	China Merchants Bank
22619	00337800	University of Pennsylvania	Philadelphia	PA	05/29/2018	\$14,500,000.00	Monetary Gift	CHINA	Anonymous
22620	00337800	University of Pennsylvania	Philadelphia	PA	07/16/2018	\$2,937,158.00	Contract	CHINA	CHINA MERCHANTS BANK
22621	00337800	University of Pennsylvania	Philadelphia	PA	07/25/2018	\$378,891.00	Contract	CHINA	SHANGHAI REAL ESTATE EDUCATION TECH
22622	00337800	University of Pennsylvania	Philadelphia	PA	08/08/2018	\$383,343.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FINA
22623	00337800	University of Pennsylvania	Philadelphia	PA	08/31/2018	\$330,800.00	Contract	CHINA	GUANGZHOU R&E PROPERTIES CO., LTD.
22624	00337800	University of Pennsylvania	Philadelphia	PA	09/01/2018	\$1,032,345.00	Contract	CHINA	GUANGDONG PEARL RIVER INVESTMENT HO
22625	00337800	University of Pennsylvania	Philadelphia	PA	10/01/2018	\$622,120.00	Contract	CHINA	CHINA MINGSHENG BANK CO. LTD.
22626	00337800	University of Pennsylvania	Philadelphia	PA	10/01/2018	\$980,500.00	Contract	CHINA	SALC MOTOR HK INVESTMENT LIMITED
22627	00337800	University of Pennsylvania	Philadelphia	PA	10/09/2018	\$332,250.00	Contract	CHINA	CHINA EVERBRIGHT GROUP
22628	00337800	University of Pennsylvania	Philadelphia	PA	12/19/2018	\$734,300.00	Contract	CHINA	MARY KAY (CHINA) CO., LTD
22629	00337800	University of Pennsylvania	Philadelphia	PA		\$27,104,346.00			

Foreign School Gift and Contracts Report with Date Range 01/01/2014 to 12/31/2019

Grouped by: OPEID, State, Foreign Gift Received Date

Data Source: Postsecondary Education Participation System 3/20/2020

ID	OPEID	Institution Name	City	State	Foreign Gift Received Date	Foreign Gift Amount	Gift Type	Country of Origin	Gift Name
22602	00337000	University of Pennsylvania	Philadelphia	PA	03/15/2013	\$500,000.00	Monetary Gift	CHINA	Anonymous
22610	00337000	University of Pennsylvania	Philadelphia	PA	03/15/2013	\$250,000.00	Monetary Gift	CHINA	Anonymous
22611	00337000	University of Pennsylvania	Philadelphia	PA	03/15/2013	\$250,000.00	Monetary Gift	CHINA	Anonymous
22612	00337000	University of Pennsylvania	Philadelphia	PA	03/20/2013	\$500,000.00	Monetary Gift	CHINA	Anonymous
22635	00337000	University of Pennsylvania	Philadelphia	PA	03/29/2013	\$10,500,000.00	Monetary Gift	CHINA	Anonymous
						\$15,500,000.00			

Foreign Schools Gift and Contracts Report with Date Range 01/01/2014 to 12/31/2019

Grouped by: OPEID, State, Foreign CTR Received Date

Data Source: Postsecondary Education Participation System 3/30/2020

ID	ORG ID	Institution Name	City	State	Foreign Gift Received Date	\$,000	Gift Type	Country of Gift	Giftor Name
22669	00337800	University of Pennsylvania	Philadelphia	PA	01/01/2019	\$167,500.00	Contract	CHINA	INVELIS E-COMpany
22670	00337800	University of Pennsylvania	Philadelphia	PA	01/01/2019	\$238,000.00	Contract	CHINA	GUANGZHOU TIMES PROPERTY HOLDING L
22671	00337800	University of Pennsylvania	Philadelphia	PA	01/09/2019	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
22672	00337800	University of Pennsylvania	Philadelphia	PA	01/09/2019	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
22673	00337800	University of Pennsylvania	Philadelphia	PA	01/24/2019	\$1,071,100.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22674	00337800	University of Pennsylvania	Philadelphia	PA	02/05/2019	\$1,100,000.00	Contract	CHINA	Guangzhou R&F Properties Co., Ltd
22675	00337800	University of Pennsylvania	Philadelphia	PA	02/12/2019	\$33,750.00	Contract	CHINA	INVELIS E-COMpany
22676	00337800	University of Pennsylvania	Philadelphia	PA	02/12/2019	\$163,461.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22677	00337800	University of Pennsylvania	Philadelphia	PA	02/27/2019	\$60,320.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22678	00337800	University of Pennsylvania	Philadelphia	PA	02/27/2019	\$274,670.00	Contract	CHINA	SALIC MOTOR HK INVESTMENT LIMITED
22679	00337800	University of Pennsylvania	Philadelphia	PA	04/01/2019	\$350,000.00	Monetary Gift	CHINA	Paq Medicine
22680	00337800	University of Pennsylvania	Philadelphia	PA	04/01/2019	\$123,282.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22681	00337800	University of Pennsylvania	Philadelphia	PA	04/05/2019	\$150,000.00	Contract	CHINA	ZHEJIANG UNIVERSITY
22682	00337800	University of Pennsylvania	Philadelphia	PA	04/15/2019	\$238,000.00	Contract	CHINA	TIMES PROPERTY HOLDINGS LIMITED
22683	00337800	University of Pennsylvania	Philadelphia	PA	04/15/2019	\$238,000.00	Contract	CHINA	GUANGZHOU TIMES PROPERTY HOLDING L
22684	00337800	University of Pennsylvania	Philadelphia	PA	04/15/2019	\$447,042.00	Contract	CHINA	Guangzhou R&F Properties Co., Ltd
22685	00337800	University of Pennsylvania	Philadelphia	PA	05/15/2019	\$5,000.00	Monetary Gift	CHINA	Guangzhou R&F Properties Co., Ltd
22686	00337800	University of Pennsylvania	Philadelphia	PA	05/28/2019	\$150,000.00	Contract	CHINA	ZHEJIANG UNIVERSITY
22687	00337800	University of Pennsylvania	Philadelphia	PA	05/31/2019	\$22,215.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22688	00337800	University of Pennsylvania	Philadelphia	PA	05/31/2019	\$100,000.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22689	00337800	University of Pennsylvania	Philadelphia	PA	05/31/2019	\$125,236.00	Contract	CHINA	ZHEJIANG UNIVERSITY
22690	00337800	University of Pennsylvania	Philadelphia	PA	06/03/2019	\$4,975.00	Monetary Gift	CHINA	Anonymous
22691	00337800	University of Pennsylvania	Philadelphia	PA	06/03/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22692	00337800	University of Pennsylvania	Philadelphia	PA	06/03/2019	\$400,000.00	Monetary Gift	CHINA	Anonymous
22693	00337800	University of Pennsylvania	Philadelphia	PA	06/03/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22694	00337800	University of Pennsylvania	Philadelphia	PA	06/13/2019	\$338,500.00	Contract	CHINA	Yeshou China Co. Ltd
22695	00337800	University of Pennsylvania	Philadelphia	PA	06/14/2019	\$322,900.00	Contract	CHINA	CITY UNIVERSITY OF HONG KONG
22696	00337800	University of Pennsylvania	Philadelphia	PA	06/14/2019	\$1,762,561.00	Contract	CHINA	E-House (China) Holdings Unlimited
22697	00337800	University of Pennsylvania	Philadelphia	PA	06/18/2019	\$531,200.00	Contract	CHINA	E-House (China) Holdings Unlimited
22698	00337800	University of Pennsylvania	Philadelphia	PA	06/25/2019	\$100,000.00	Monetary Gift	CHINA	AKO FOUNDATION
22699	00337800	University of Pennsylvania	Philadelphia	PA	06/25/2019	\$900,000.00	Monetary Gift	CHINA	Anonymous
22700	00337800	University of Pennsylvania	Philadelphia	PA	06/25/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22701	00337800	University of Pennsylvania	Philadelphia	PA	06/25/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22702	00337800	University of Pennsylvania	Philadelphia	PA	06/25/2019	\$400,000.00	Monetary Gift	CHINA	Anonymous
22703	00337800	University of Pennsylvania	Philadelphia	PA	06/25/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22704	00337800	University of Pennsylvania	Philadelphia	PA	06/29/2019	\$383,054.00	Monetary Gift	CHINA	Anonymous
22705	00337800	University of Pennsylvania	Philadelphia	PA	06/29/2019	\$500,000.00	Monetary Gift	CHINA	Anonymous
22706	00337800	University of Pennsylvania	Philadelphia	PA	06/29/2019	\$483,667.00	Monetary Gift	CHINA	Anonymous
22707	00337800	University of Pennsylvania	Philadelphia	PA	06/29/2019	\$416,721.00	Monetary Gift	CHINA	Anonymous
22708	00337800	University of Pennsylvania	Philadelphia	PA	06/29/2019	\$333,276.00	Monetary Gift	CHINA	Anonymous
22709	00337800	University of Pennsylvania	Philadelphia	PA	06/29/2019	\$333,276.00	Monetary Gift	CHINA	Anonymous
22710	00337800	University of Pennsylvania	Philadelphia	PA	07/01/2019	\$100,000.00	Contract	CHINA	GUANGZHOU R&F PROPERTIES CO. LTD
22711	00337800	University of Pennsylvania	Philadelphia	PA	07/01/2019	\$240,000.00	Contract	CHINA	GUANGZHOU R&F PROPERTIES CO. LTD
22712	00337800	University of Pennsylvania	Philadelphia	PA	07/17/2019	\$1,250,000.00	Monetary Gift	CHINA	Anonymous
22713	00337800	University of Pennsylvania	Philadelphia	PA	07/17/2019	\$500,000.00	Monetary Gift	CHINA	Anonymous
22714	00337800	University of Pennsylvania	Philadelphia	PA	07/17/2019	\$120,000.00	Monetary Gift	CHINA	Anonymous
22715	00337800	University of Pennsylvania	Philadelphia	PA	07/26/2019	\$1,289,634.00	Contract	CHINA	CHINA MERCHANTS BANK
22716	00337800	University of Pennsylvania	Philadelphia	PA	07/29/2019	\$336,730.00	Contract	CHINA	SALIC MOTOR HK INVESTMENT LIMITED
22717	00337800	University of Pennsylvania	Philadelphia	PA	08/02/2019	\$250,000.00	Monetary Gift	CHINA	CATHAY FORTUNE INTERNATIONAL COMP
22718	00337800	University of Pennsylvania	Philadelphia	PA	08/02/2019	\$350,000.00	Monetary Gift	CHINA	CATHAY FORTUNE INTERNATIONAL COMP
22719	00337800	University of Pennsylvania	Philadelphia	PA	08/02/2019	\$400,000.00	Monetary Gift	CHINA	CATHAY FORTUNE INTERNATIONAL COMP
22720	00337800	University of Pennsylvania	Philadelphia	PA	08/14/2019	\$338,387.00	Monetary Gift	CHINA	E-HOUSE(CHINA) HOLDINGS UNLIMITED
22721	00337800	University of Pennsylvania	Philadelphia	PA	08/15/2019	\$1,040,000.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22722	00337800	University of Pennsylvania	Philadelphia	PA	08/20/2019	\$522,607.00	Contract	CHINA	CRISPIE THEARTFUTURES
22723	00337800	University of Pennsylvania	Philadelphia	PA	08/20/2019	\$397,580.00	Contract	CHINA	CRISPIE THEARTFUTURES
22724	00337800	University of Pennsylvania	Philadelphia	PA	08/23/2019	\$43,740.00	Contract	CHINA	CRISPIE THEARTFUTURES
22725	00337800	University of Pennsylvania	Philadelphia	PA	08/31/2019	\$1,725.00	Contract	CHINA	SALIC MOTOR HK INVESTMENT LIMITED
22726	00337800	University of Pennsylvania	Philadelphia	PA	09/01/2019	\$371,675.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22727	00337800	University of Pennsylvania	Philadelphia	PA	09/04/2019	\$383,521.00	Contract	CHINA	GUANGDONG PEILAI RIVER INVESTMENT
22728	00337800	University of Pennsylvania	Philadelphia	PA	09/17/2019	\$492,200.00	Contract	CHINA	MARY KATICHINA CO. LTD
22729	00337800	University of Pennsylvania	Philadelphia	PA	10/12/2019	\$150,930.00	Contract	CHINA	YUWELL-JIANGSU YUWELL MEDICAL EQUIP
22730	00337800	University of Pennsylvania	Philadelphia	PA	10/25/2019	\$300,000.00	Monetary Gift	CHINA	MOELIS & COMPANY
22731	00337800	University of Pennsylvania	Philadelphia	PA	10/25/2019	\$100,000.00	Monetary Gift	CHINA	2447717
22732	00337800	University of Pennsylvania	Philadelphia	PA	10/31/2019	\$85,512.00	Contract	CHINA	SHENZHEN GUOSHENGYUAN TRADING CO
22733	00337800	University of Pennsylvania	Philadelphia	PA	11/01/2019	\$397,580.00	Contract	CHINA	CRISP THEARTFUTURES

ID	OFFID	Institution Name	City	State	Foreign Gift Received Date	\$0.00	Gift Type	Country of Giftor	Giftor Name
23002	00337800	University of Pennsylvania	Philadelphia	PA	11/23/2019	\$325,980.00	Contract	CHINA	AC IMMUNE
23005	00337800	University of Pennsylvania	Philadelphia	PA	11/25/2019	\$110,000.00	Contract	CHINA	CITY UNIVERSITY OF HONG KONG
23008	00337800	University of Pennsylvania	Philadelphia	PA	11/27/2019	\$29,990.00	Monetary Gift	CHINA	1643212
23009	00337800	University of Pennsylvania	Philadelphia	PA	11/27/2019	\$600,000.00	Monetary Gift	CHINA	1643212
23011	00337800	University of Pennsylvania	Philadelphia	PA	11/30/2019	\$86,433.00	Contract	CHINA	SHENZHEN GUOSHENGYUAN TRADING CO.
23021	00337800	University of Pennsylvania	Philadelphia	PA	12/11/2019	\$514,577.00	Contract	CHINA	GUANGZHOU PEARL RIVER ENTERPRISES
23027	00337800	University of Pennsylvania	Philadelphia	PA	12/18/2019	\$1,293,260.00	Contract	CHINA	CHINA MERCHANTS BANK
23032	00337800	University of Pennsylvania	Philadelphia	PA	12/24/2019	\$250,000.00	Monetary Gift	CHINA	1471450
23033	00337800	University of Pennsylvania	Philadelphia	PA	12/24/2019	\$250,000.00	Monetary Gift	CHINA	1471450
23034	00337800	University of Pennsylvania	Philadelphia	PA	12/27/2019	\$191,769.00	Contract	CHINA	MARY KAY CHINA CO. LTD
23037	00337800	University of Pennsylvania	Philadelphia	PA	12/31/2019	\$46,583.00	Contract	CHINA	SHENZHEN GUOSHENGYUAN TRADING CO.
						\$36,947,074.00			

Foreign Schools Gift and Contracts Report with Date Range 01/01/2014 to 12/31/2019

Grouped by: OPEID, State, Foreign Gift Received Date

Data Source: Postsecondary Education Participation System 3/06/2020

D	OPEID	Institution Name	City	State	Foreign Gift Received Date	Foreign Gift Amount	Gift Type	Country of Origin	Gift Name
22674	00337800	University of Pennsylvania	Philadelphia	PA	01/02/2019	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
22675	00337800	University of Pennsylvania	Philadelphia	PA	01/02/2019	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
22676	00337800	University of Pennsylvania	Philadelphia	PA	06/03/2019	\$4,975.00	Monetary Gift	CHINA	Anonymous
22677	00337800	University of Pennsylvania	Philadelphia	PA	06/03/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22678	00337800	University of Pennsylvania	Philadelphia	PA	06/03/2019	\$400,000.00	Monetary Gift	CHINA	Anonymous
22679	00337800	University of Pennsylvania	Philadelphia	PA	06/11/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22680	00337800	University of Pennsylvania	Philadelphia	PA	06/25/2019	\$200,000.00	Monetary Gift	CHINA	Anonymous
22681	00337800	University of Pennsylvania	Philadelphia	PA	06/25/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22682	00337800	University of Pennsylvania	Philadelphia	PA	06/26/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22683	00337800	University of Pennsylvania	Philadelphia	PA	06/26/2019	\$400,000.00	Monetary Gift	CHINA	Anonymous
22684	00337800	University of Pennsylvania	Philadelphia	PA	06/26/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22685	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$383,054.00	Monetary Gift	CHINA	Anonymous
22686	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$500,000.00	Monetary Gift	CHINA	Anonymous
22687	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$483,667.00	Monetary Gift	CHINA	Anonymous
22688	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$416,721.00	Monetary Gift	CHINA	Anonymous
22689	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$333,279.00	Monetary Gift	CHINA	Anonymous
22690	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$383,279.00	Monetary Gift	CHINA	Anonymous
22691	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$6,004,975.00	Monetary Gift	CHINA	Anonymous