

# National Legal and Policy Center

*"promoting ethics in public life"*



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**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](mailto: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).

107 Park Washington Court • Falls Church, VA • 22046  
703-237-1970 • fax 703-237-2090 • [www.nlpc.org](http://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](http://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.<sup>1</sup>

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,

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<sup>1</sup> <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,<sup>2</sup> 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 Global<sup>3</sup> 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.<sup>4</sup> 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.<sup>5</sup>

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.<sup>6</sup>

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<sup>2</sup> 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](https://www.phillytrib.com/penn-opens-biden-center-for-diplomacy-in-washington-d-c/article_bf91aac7-35c4-551d-a063-d99cb4126963.html)

<sup>3</sup> *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.*

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

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

<sup>6</sup> <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.<sup>7</sup>

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.

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**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)<sup>8</sup>

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

<sup>8</sup> <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.

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



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

ID	OPEID	Institution Name	City	State	Foreign Gift Received Date	Foreign Gift Amount	Gift Type	Country of Gifor	Gifor Name
22546	00337800	University of Pennsylvania	Philadelphia	PA	03/27/2017	\$536,340.00	Monetary Gift	CHINA	Shanghai Real Estate Education & Te
22556	00337800	University of Pennsylvania	Philadelphia	PA	06/12/2017	\$634,996.00	Monetary Gift	CHINA	China Construction Bank Corporation
22560	00337800	University of Pennsylvania	Philadelphia	PA	07/12/2017	\$579,200.00	Monetary Gift	CHINA	Nanjing Sample Technology Co., Ltd.
22561	00337800	University of Pennsylvania	Philadelphia	PA	07/14/2017	\$500,000.00	Monetary Gift	CHINA	Anonymous
22563	00337800	University of Pennsylvania	Philadelphia	PA	08/07/2017	\$512,063.00	Monetary Gift	CHINA	Hainan Airlines Co., Ltd.
22566	00337800	University of Pennsylvania	Philadelphia	PA	08/21/2017	\$617,000.00	Monetary Gift	CHINA	Guangzhou Pearl River Enterprises G
22567	00337800	University of Pennsylvania	Philadelphia	PA	08/29/2017	\$538,500.00	Monetary Gift	CHINA	China Minsheng Banking Co., Ltd.
22568	00337800	University of Pennsylvania	Philadelphia	PA	09/17/2017	\$324,800.00	Monetary Gift	CHINA	China Everbright Group
22569	00337800	University of Pennsylvania	Philadelphia	PA	09/17/2017	\$491,840.00	Monetary Gift	CHINA	Shanghai Automotive Industry Corpor
22576	00337800	University of Pennsylvania	Philadelphia	PA	10/16/2017	\$502,750.00	Monetary Gift	CHINA	State Administration Foreign Expert
22577	00337800	University of Pennsylvania	Philadelphia	PA	10/16/2017	\$633,550.00	Monetary Gift	CHINA	Bank of Communications
22584	00337800	University of Pennsylvania	Philadelphia	PA	11/18/2017	\$1,863,751.00	Monetary Gift	CHINA	E-House (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 3/30/2020

ID	OPEID	Institution Name	City	State	Foreign Gift Received Date	Foreign Gift Amount	Gift Type	Country of Gifto	Gifto Name
22561	00337800	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 Gifor	Gifor 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.
22616	00337800	University of Pennsylvania	Philadelphia	PA	04/18/2018	\$304,504.00	Monetary Gift	CHINA	KWG Property Holding Limited Guangz
22620	00337800	University of Pennsylvania	Philadelphia	PA	04/18/2018	\$416,150.00	Monetary Gift	CHINA	Shanghai Real Estate Education & Te
22624	00337800	University of Pennsylvania	Philadelphia	PA	04/18/2018	\$1,228,885.00	Monetary Gift	CHINA	E-House (China) Holdings Limited
22625	00337800	University of Pennsylvania	Philadelphia	PA	04/18/2018	\$718,650.00	Monetary Gift	CHINA	Guangzhou R&F Properties
22629	00337800	University of Pennsylvania	Philadelphia	PA	04/19/2018	\$950,000.00	Monetary Gift	CHINA	China Merchants Bank
22636	00337800	University of Pennsylvania	Philadelphia	PA	05/29/2018	\$14,500,000.00	Monetary Gift	CHINA	Anonymous
22646	00337800	University of Pennsylvania	Philadelphia	PA	07/16/2018	\$2,937,158.00	Contract	CHINA	CHINA MERCHANTS BANK
22647	00337800	University of Pennsylvania	Philadelphia	PA	07/25/2018	\$378,891.00	Contract	CHINA	SHANGHAI REAL ESTATE EDUCATION TECH
22650	00337800	University of Pennsylvania	Philadelphia	PA	08/08/2018	\$393,343.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FINA
22653	00337800	University of Pennsylvania	Philadelphia	PA	08/21/2018	\$330,000.00	Contract	CHINA	GUANGZHOU R&F PROPERTIES CO., LTD.
22657	00337800	University of Pennsylvania	Philadelphia	PA	10/01/2018	\$1,032,745.00	Contract	CHINA	GUANGDONG PEARL RIVER INVESTMENT HO
22658	00337800	University of Pennsylvania	Philadelphia	PA	10/01/2018	\$622,120.00	Contract	CHINA	CHINA MINSHENG BANK CO. LTD.
22660	00337800	University of Pennsylvania	Philadelphia	PA	10/09/2018	\$390,250.00	Contract	CHINA	SAIC MOTOR HK INVESTMENT LIMITED
22661	00337800	University of Pennsylvania	Philadelphia	PA	10/12/2018	\$332,250.00	Contract	CHINA	CHINA EVERBRIGHT GROUP
22665	00337800	University of Pennsylvania	Philadelphia	PA	12/10/2018	\$734,300.00	Contract	CHINA	MARY KAY (CHINA) CO., LTD.
						\$27,104,246.00			

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 3/30/2020

ID	OPEID	Institution Name	City	State	Foreign Gift Received Date	Foreign Gift Amount	Gift Type	Country of Gifto	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
22636	00337800	University of Pennsylvania	Philadelphia	PA	05/29/2018	\$14,500,000.00	Monetary Gift	CHINA	Anonymous
						\$15,800,000.00			

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 3/30/2020

ID	OPEID	Institution Name	City	State	Foreign Gift Received Date	\$0.00	Gift Type	Country of Gifor	Gifor Name
22669	00337800	University of Pennsylvania	Philadelphia	PA	01/01/2019	\$167,500.00	Contract	CHINA	MOELIS & COMPANY
22670	00337800	University of Pennsylvania	Philadelphia	PA	01/01/2019	\$258,000.00	Contract	CHINA	GUANGZHOU TIMES PROPERTY HOLDING L
22674	00337800	University of Pennsylvania	Philadelphia	PA	01/09/2019	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
22675	00337800	University of Pennsylvania	Philadelphia	PA	01/09/2019	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
22694	00337800	University of Pennsylvania	Philadelphia	PA	01/24/2019	\$107,100.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22721	00337800	University of Pennsylvania	Philadelphia	PA	02/05/2019	\$1,100,000.00	Contract	CHINA	Guangzhou R&F Properties Co., Ltd.
22724	00337800	University of Pennsylvania	Philadelphia	PA	02/12/2019	\$83,750.00	Contract	CHINA	MOELIS & COMPANY
22726	00337800	University of Pennsylvania	Philadelphia	PA	02/13/2019	\$163,461.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22739	00337800	University of Pennsylvania	Philadelphia	PA	02/27/2019	\$60,320.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22758	00337800	University of Pennsylvania	Philadelphia	PA	03/23/2019	\$274,670.00	Contract	CHINA	SAIC MOTOR HK INVESTMENT LIMITED
22766	00337800	University of Pennsylvania	Philadelphia	PA	04/01/2019	\$250,000.00	Monetary Gift	CHINA	Hua Medicine
22767	00337800	University of Pennsylvania	Philadelphia	PA	04/01/2019	\$123,282.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22772	00337800	University of Pennsylvania	Philadelphia	PA	04/05/2019	\$150,000.00	Contract	CHINA	ZHEJIANG UNIVERSITY
22780	00337800	University of Pennsylvania	Philadelphia	PA	04/15/2019	\$258,000.00	Contract	CHINA	TIMES PROPERTY HOLDINGS LIMITED
22781	00337800	University of Pennsylvania	Philadelphia	PA	04/15/2019	\$258,000.00	Contract	CHINA	GUANGZHOU TIMES PROPERTY HOLDING L
22787	00337800	University of Pennsylvania	Philadelphia	PA	04/19/2019	\$447,042.00	Contract	CHINA	Guangzhou R&F Properties Co., Ltd.
22802	00337800	University of Pennsylvania	Philadelphia	PA	05/15/2019	\$5,000.00	Monetary Gift	CHINA	1471450
22814	00337800	University of Pennsylvania	Philadelphia	PA	05/28/2019	\$150,000.00	Contract	CHINA	ZHEJIANG UNIVERSITY
22818	00337800	University of Pennsylvania	Philadelphia	PA	05/31/2019	\$22,215.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22824	00337800	University of Pennsylvania	Philadelphia	PA	05/31/2019	\$100,000.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22825	00337800	University of Pennsylvania	Philadelphia	PA	05/31/2019	\$125,236.00	Contract	CHINA	ZHEJIANG UNIVERSITY
22826	00337800	University of Pennsylvania	Philadelphia	PA	06/03/2019	\$4,975.00	Monetary Gift	CHINA	Anonymous
22827	00337800	University of Pennsylvania	Philadelphia	PA	06/03/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22828	00337800	University of Pennsylvania	Philadelphia	PA	06/03/2019	\$400,000.00	Monetary Gift	CHINA	Anonymous
22837	00337800	University of Pennsylvania	Philadelphia	PA	06/11/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22839	00337800	University of Pennsylvania	Philadelphia	PA	06/13/2019	\$328,500.00	Contract	CHINA	Vipshop (China) Co. Ltd.
22842	00337800	University of Pennsylvania	Philadelphia	PA	06/14/2019	\$222,900.00	Contract	CHINA	CITY UNIVERSITY OF HONG KONG
22845	00337800	University of Pennsylvania	Philadelphia	PA	06/18/2019	\$1,762,561.00	Contract	CHINA	E-House (China) Holdings Unlimited
22846	00337800	University of Pennsylvania	Philadelphia	PA	06/18/2019	\$651,200.00	Contract	CHINA	E-House (China) Holdings Unlimited
22874	00337800	University of Pennsylvania	Philadelphia	PA	06/25/2019	\$200,000.00	Monetary Gift	CHINA	AKO FOUNDATION
22875	00337800	University of Pennsylvania	Philadelphia	PA	06/25/2019	\$200,000.00	Monetary Gift	CHINA	Anonymous
22876	00337800	University of Pennsylvania	Philadelphia	PA	06/25/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22877	00337800	University of Pennsylvania	Philadelphia	PA	06/26/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22881	00337800	University of Pennsylvania	Philadelphia	PA	06/26/2019	\$400,000.00	Monetary Gift	CHINA	Anonymous
22882	00337800	University of Pennsylvania	Philadelphia	PA	06/26/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22894	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$383,054.00	Monetary Gift	CHINA	Anonymous
22895	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$500,000.00	Monetary Gift	CHINA	Anonymous
22896	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$483,667.00	Monetary Gift	CHINA	Anonymous
22897	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$416,721.00	Monetary Gift	CHINA	Anonymous
22898	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$333,279.00	Monetary Gift	CHINA	Anonymous
22899	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$383,279.00	Monetary Gift	CHINA	Anonymous
22900	00337800	University of Pennsylvania	Philadelphia	PA	07/01/2019	\$240,000.00	Contract	CHINA	GUANGZHOU R&F PROPERTIESCO.,LTD
22907	00337800	University of Pennsylvania	Philadelphia	PA	07/17/2019	\$1,250,000.00	Monetary Gift	CHINA	2429945
22909	00337800	University of Pennsylvania	Philadelphia	PA	07/17/2019	\$500,000.00	Monetary Gift	CHINA	2429945
22910	00337800	University of Pennsylvania	Philadelphia	PA	07/17/2019	\$750,000.00	Monetary Gift	CHINA	2429945
22915	00337800	University of Pennsylvania	Philadelphia	PA	07/26/2019	\$1,289,634.00	Contract	CHINA	CHINA MERCHANTS BANK
22918	00337800	University of Pennsylvania	Philadelphia	PA	07/29/2019	\$336,730.00	Contract	CHINA	SAIC MOTOR HK INVESTMENT LIMITED
22920	00337800	University of Pennsylvania	Philadelphia	PA	08/02/2019	\$250,000.00	Monetary Gift	CHINA	CATHAY FORTUNE INTERNATIONAL COMP
22921	00337800	University of Pennsylvania	Philadelphia	PA	08/02/2019	\$350,000.00	Monetary Gift	CHINA	CATHAY FORTUNE INTERNATIONAL COMP
22922	00337800	University of Pennsylvania	Philadelphia	PA	08/02/2019	\$400,000.00	Monetary Gift	CHINA	CATHAY FORTUNE INTERNATIONAL COMP
22927	00337800	University of Pennsylvania	Philadelphia	PA	08/14/2019	\$338,387.00	Contract	CHINA	E-HOUSE(CHINA) HOLDINGS UNLIMITED
22928	00337800	University of Pennsylvania	Philadelphia	PA	08/15/2019	\$1,040,000.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22930	00337800	University of Pennsylvania	Philadelphia	PA	08/20/2019	\$522,607.00	Contract	CHINA	CRISPR THERAPEUTICS
22931	00337800	University of Pennsylvania	Philadelphia	PA	08/20/2019	\$397,580.00	Contract	CHINA	CRISPR THERAPEUTICS
22934	00337800	University of Pennsylvania	Philadelphia	PA	08/23/2019	\$43,730.00	Contract	CHINA	SAIC MOTOR HK INVESTMENT LIMITED
22946	00337800	University of Pennsylvania	Philadelphia	PA	08/31/2019	\$1,723.00	Contract	CHINA	SHANGHAI ADVANCED INSTITUTE OF FIN
22947	00337800	University of Pennsylvania	Philadelphia	PA	09/04/2019	\$321,675.00	Contract	CHINA	GUANGDONG PEARL RIVER INVESTMENT
22955	00337800	University of Pennsylvania	Philadelphia	PA	09/27/2019	\$383,521.00	Contract	CHINA	MARY KAY(CHINA) CO.,LTD
22974	00337800	University of Pennsylvania	Philadelphia	PA	10/17/2019	\$482,200.00	Contract	CHINA	YUWELL-JIANGSU YUYUE MEDICAL EQUIP
22975	00337800	University of Pennsylvania	Philadelphia	PA	10/22/2019	\$150,930.00	Contract	CHINA	MOELIS & COMPANY
22981	00337800	University of Pennsylvania	Philadelphia	PA	10/25/2019	\$300,000.00	Monetary Gift	CHINA	2447717
22982	00337800	University of Pennsylvania	Philadelphia	PA	10/25/2019	\$100,000.00	Monetary Gift	CHINA	2447717
22984	00337800	University of Pennsylvania	Philadelphia	PA	10/31/2019	\$85,512.00	Contract	CHINA	SHENZHEN GUOSHENGYUAN TRADING CO.
22987	00337800	University of Pennsylvania	Philadelphia	PA	11/01/2019	\$397,580.00	Contract	CHINA	CRISPR THERAPEUTICS



ID	OPEID	Institution Name	City	State	Foreign Gift Received Date	\$0.00	Gift Type	Country of Gifto	Gifto Name
23002	00337800	University of Pennsylvania	Philadelphia	PA	11/23/2019	\$329,980.00	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	\$1,292,260.00	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	\$191,760.00	Contract	CHINA	MARY KAY(CHINA) CO.,LTD
23037	00337800	University of Pennsylvania	Philadelphia	PA	12/31/2019	\$86,553.00	Contract	CHINA	SHENZHEN GUOSHENGYUAN TRADING CO.
						\$26,947,074.00			

**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 3/30/2020**

ID	OPEID	Institution Name	City	State	Foreign Gift Received Date	Foreign Gift Amount	Gift Type	Country of Gifor	Gifor Name
22674	00337800	University of Pennsylvania	Philadelphia	PA	01/09/2019	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
22675	00337800	University of Pennsylvania	Philadelphia	PA	01/09/2019	\$1,000,000.00	Monetary Gift	CHINA	Anonymous
22826	00337800	University of Pennsylvania	Philadelphia	PA	06/03/2019	\$4,975.00	Monetary Gift	CHINA	Anonymous
22827	00337800	University of Pennsylvania	Philadelphia	PA	06/03/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22828	00337800	University of Pennsylvania	Philadelphia	PA	06/03/2019	\$400,000.00	Monetary Gift	CHINA	Anonymous
22837	00337800	University of Pennsylvania	Philadelphia	PA	06/11/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22875	00337800	University of Pennsylvania	Philadelphia	PA	06/25/2019	\$200,000.00	Monetary Gift	CHINA	Anonymous
22876	00337800	University of Pennsylvania	Philadelphia	PA	06/25/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22877	00337800	University of Pennsylvania	Philadelphia	PA	06/26/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22881	00337800	University of Pennsylvania	Philadelphia	PA	06/26/2019	\$400,000.00	Monetary Gift	CHINA	Anonymous
22882	00337800	University of Pennsylvania	Philadelphia	PA	06/26/2019	\$100,000.00	Monetary Gift	CHINA	Anonymous
22894	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$383,054.00	Monetary Gift	CHINA	Anonymous
22895	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$500,000.00	Monetary Gift	CHINA	Anonymous
22896	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$483,667.00	Monetary Gift	CHINA	Anonymous
22897	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$416,721.00	Monetary Gift	CHINA	Anonymous
22898	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$333,279.00	Monetary Gift	CHINA	Anonymous
22899	00337800	University of Pennsylvania	Philadelphia	PA	06/30/2019	\$383,279.00	Monetary Gift	CHINA	Anonymous
						\$6,004,975.00			