How the CCP Built a Killed-to-Order Organ Industry, and What to Do About It

Written submission to the Congressional Executive Commission on China (CECC)'s May 14, 2026 hearing "A Market Built on Victims: Stopping Illegal Trafficking in China and Beyond"

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1. INTRODUCTION

Mr. Chairman, Co-Chairman, and distinguished members of the Commission, thank you for the opportunity to testify today.

How many of us in the United States would knowingly participate in a system that rips organs from unwilling donors and treats human lives as disposable commodities? It should be zero. But it's not.

What is happening in China is something far more systematic and industrialized than the organ trafficking in black markets that one might normally think of. It is communist China's state-sponsored killing of their own citizens on demand—to supply a multi-billion-dollar transplant industry.

I'll start with a telling example from my book, *Killed to Order: China's Organ Harvesting Industry & the True Nature of America's Biggest Adversary*:

> "An affluent German woman from Mönchengladbach, with the rare AB blood type, struggled with alcoholism for years, and faced liver failure. In systems like Germany's, finding a match might take years, or not happen at all. Yet she obtained three livers in China around 2015–2019, each in just months, for approximately $400,000, involving a visit to China for each procedure. Her continued drinking, combined with anti-rejection medications, led to quick rejections of each liver—one about every two years."[1]

In any ethical transplant system such as that of the United States, vital organs typically come from catastrophic accidents. To reduce the chance of rejection, blood type and histology are also matched. Thus the supply of organs is always much less than the demand. Yet wait times in China are often measured not in years, or months—but in weeks or even days.[2]

In another well-documented case, an American man traveled to China, and received a perfectly matched kidney in just two weeks. According to the 2009 book *Larry's Kidney*, he was aware someone was killed for it.[3] Now compare that to here, where the average wait time for a new kidney isn't two weeks, but 156 to 260 weeks.

Evidence of forced organ harvesting in China has been extensively documented by David Matas, David Kilgour, Ethan Gutmann, Matthew Robertson, other investigatory groups, and the landmark 2019 China Tribunal, chaired by Sir Geoffrey Nice KC, which concluded:

> "The Tribunal's members are certain – unanimously, and sure beyond reasonable doubt – that in China forced organ harvesting from prisoners of conscience has been practiced for a substantial period of time involving a very substantial number of victims" and that

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[1] Jan Jekielek, *Killed to Order: China's Organ Harvesting Industry and the True Nature of America's Biggest Adversary* (New York: Skyhorse, 2026), 148.
[2] China Tribunal, *The Independent Tribunal into Forced Organ Harvesting from Prisoners of Conscience in China: Judgment* (London, March 1, 2020), 112–114, https://chinatribunal.com/wp-content/uploads/2020/03/ChinaTribunal_JUDGMENT_1stMarch_2020.pdf.
[3] Daniel Asa Rose, *Larry's Kidney: Being the True Story of How I Found Myself in China with My Black Sheep Cousin and His Mail-Order Bride, Skirting the Law to Get Him a Transplant—and Save His Life* (New York: Harper, 2010), 253.

> "Falun Gong practitioners have been one – and probably the main – source of organ supply."[4]

Mainstream American media have largely failed to follow this issue. Some, such as The New York Times, have even actively downplayed atrocities committed by the Chinese Communist Party (CCP), dismissed the crimes of organ harvesting, and amplified CCP propaganda against Falun Gong.[5]

A former New York Times correspondent testified to the 2019 China Tribunal that she was prevented from pursuing evidence of forced organ harvesting by her editors at the Times.[6] Her testimony reflected broader concerns that many major American media organisations have continued to ignore, minimise, or in some cases effectively whitewash these crimes.

2. HOW KILLED-TO-ORDER BECAME POSSIBLE

To help Americans understand how a state-facilitated organ industry could emerge in China, and why it fundamentally differs from the black-market organ trade seen in other countries, I want to highlight two essential tools that the CCP has refined over decades.

The first is the regime's creation of "black classes," designated enemy groups that the rest of the population is taught to hate, fear, and see as subhuman. First it was the landowners, then the "counter-revolutionaries," then the intellectuals during the Cultural Revolution, with others following. This is the pattern: designate a group as subhuman, flood the information space with propaganda, and the population becomes psychologically prepared for atrocities against the target group.

The second key tool is the infrastructure to incarcerate large numbers of people at will. Prisons, black jails, re-education camps, and forced labor camps are just part of an incarceration system with capacity for millions.

In 1999, the CCP designated Falun Gong practitioners as a black class targeted for eradication, setting the stage for killed-to-order forced organ harvesting.

Falun Gong, or Falun Dafa, is an ancient qigong, or slow-motion exercise practice, rooted in the principles of Truthfulness, Compassion, and Forbearance. (These principles can also be translated as being True, Good and Enduring). Falun Gong features extensive teachings written by its founder, Master Li Hongzhi. It's also characterized by an unusual lack of organizational structure: no collection of funds, no roster, no hierarchy, and no worship of a deity. It spread by word of mouth in the 1990s in China, growing, by government estimate, to 70 to 100 million people from all walks of life.[7]

There are different theories about why then-Chinese leader Jiang Zemin ordered the persecution of Falun Gong. Perhaps it was because the number of practitioners had grown greater than

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[4] China Tribunal, *Judgment*, March 1, 2020.
[5] Falun Dafa Information Center, "The Falun Gong Distortion," November 25, 2024, https://faluninfo.net/new-york-times-falun-gong-distortion/.
[6] Didi Kirsten Tatlow, "Submission to the Independent Tribunal into Forced Organ Harvesting from Prisoners of Conscience in China" (written testimony, China Tribunal, 2019), https://chinatribunal.com/wp-content/uploads/2019/06/DidiKirstenTatlow_Submission.pdf.
[7] Falun Dafa Information Center, "Statistics & Evidence – Persecution of Falun Gong in Numbers," Faluninfo.net, accessed May 21, 2026, https://faluninfo.net/key-statistics-related-to-falun-gong/.

communist party membership; perhaps he had personal animosity toward the practice's founder. Or perhaps the CCP, with its decades of totalitarian rule, simply couldn't abide the individual agency that practicing Falun Gong fostered in people. If one were to design a system that could withstand totalitarian control and overreach, I believe it might look something like Falun Gong.

Large numbers of Falun Gong practitioners refused to be re-educated, at a scale the regime had never before encountered. As a result, the CCP incarcerated a massive number of them, and enacted an unwritten rule: all Falun Gong deaths in China's massive incarceration system would be considered suicides.[8] In 2005, the U.S. State Department estimated that half of all people in China's Reeducation Through Labor camp system were Falun Gong practitioners.[9] In 2006, the UN Special Rapporteur on Torture, Manfred Nowak, reported that Falun Gong practitioners accounted for 66 percent of torture cases he documented.[10]

As I recount in Chapter 5 of *Killed to Order*, the regime took the massive population of healthy, dehumanized and incarcerated Falun Gong practitioners, and started blood-typing, tissue-typing, and organ-scanning them, and creating a database. When a transplant was needed, whether for a Chinese elite or foreign transplant tourist, a match could be found and the victim killed to order.

2.1 THE EXPANSION & COVER-UP

In just a few short years, from 1999 to 2004, the number of transplant centers in China grew almost fourfold.[11]

It is important to note that China did not even have a nationwide public donor registry until 2014[12] and even today, the CCP only claims about 7 million registered donors[13]—less than 5% of the United States' more than 170 million.[14]

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[8] Falun Dafa Information Center, "Killed for Their Beliefs," July 19, 2022, https://faluninfo.net/killed-for-their-beliefs/.
[9] U.S. Department of State, Bureau of Democracy, Human Rights, and Labor, "China's Human Rights Record and Falun Gong" (remarks, July 21, 2005), https://2001-2009.state.gov/g/drl/rls/rm/2005/50110.htm.
[10] Manfred Nowak, "Report of the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment: Mission to China," UN Doc. E/CN.4/2006/6/Add.6 (March 10, 2006), https://digitallibrary.un.org/record/570962.
[11] American Public Health Association, "Building a Public Health Response to Organ Transplant Abuse in China," policy statement, January 12, 2021, https://www.apha.org/policy-and-advocacy/public-health-policy-briefs/policy-database/2021/01/13/building-a-public-health-response-to-organ-transplant-abuse-in-china.
[12] Doctors Against Forced Organ Harvesting (DAFOH), "Unusual Course of Organ Donation Registry Numbers in China," January 14, 2017, https://dafoh.org/unusual-course-of-organ-donation-registry-numbers-in-china/.
[13] "China's Registered Organ Donors Exceed 7 Million," *China Daily*, April 2, 2025, https://www.chinadaily.com.cn/a/202504/02/WS67ec96b9a3104d9fd381d30b.html.
[14] Donate Life America, "Donor Registration and the UAGA," February 24, 2026, https://donatelife.net/donation/donor-registries/donor-registration-and-the-uaga/.

And this donor registry data has proven to be falsified. In fact, China's official donor numbers from 2010 to 2018 were shown—in peer-reviewed research—to conform almost perfectly to a quadratic equation.[15]

Even after the CCP's claims of reforms, Chinese hospitals continue to promise astonishingly short wait times—although they do so less publicly than before.[16]

In an investigation by a South Korean undercover film crew in 2017, one of China's largest transplant centers promised organ wait times from days to weeks and offered expedited transplants in exchange for a monetary "donation" of 10,000 yuan (roughly $1,500).[17]

The film crew also traveled to the Chongqing hospital and research lab supervised by Wang Lijun, who reportedly oversaw macabre human experiments to research methods that would better preserve organ conditions. On the wall were blueprints for a machine that would inflict brain-stem injuries that would cause brain death. When the undercover reporter asked about the machine's purpose, the lab staff confirmed that the machine could be used on a human to render him brain dead while simultaneously keeping all other organs of the body healthy and viable for harvesting.[18]

In August 2016, a Canadian patient waited a mere three days for a kidney transplant during his trip to China.[19] In November 2016, an Australian Senator Derryn Hinch said he was encouraged to seek an organ in China: "I was told by a senior businessman in Melbourne that I could go to Shanghai and for $150,000 get a new liver next week."[20]

This is why I titled my book *Killed to Order*. It's deadly, boutique selection and delivery of human body parts: organs matched in advance, delivered on a schedule, extracted from living human beings who are then discarded. It is industrialized forced organ harvesting made possible by the CCP's unique combination of totalitarian control, mass dehumanization, and the willingness to turn human beings into spare parts for profit, power and elite longevity.

Falun Gong refugees who fled to the United States have continued to give harrowing accounts of blood tests and other costly and suspicious medical exams while detained in China. A recent survey identified 113 facilities across China in which these health screenings took place, with the most recent incident reported in 2024. Shockingly, one respondent described how, in 2023,

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[15] Matthew P. Robertson and Jacob Lavee, "Analysis of Official Deceased Organ Donation Data Casts Doubt on the Credibility of China's Organ Transplant Reform," *BMC Medical Ethics* 20, no. 79 (2019), https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6854896/.
[16] American Public Health Association, "Building a Public Health Response to Organ Transplant Abuse in China."
[17] Annie Wu, "South Korean TV Documentary Confirms Organ Harvesting Still Occurring in China," The Epoch Times, October 8, 2018, https://www.theepochtimes.com/china/south-korean-tv-documentary-confirms-organ-harvesting-still-occurring-in-china-2394332.
[18] Ibid.
[19] Nomaan Merchant, "Does China still harvest organs of executed? Doctors divided," *AP News,* accessed May 22, 2026, https://apnews.com/general-news-52c840af614b48d988244a316ff0d660.
[20] Derryn Hinch, Speech on the Australian Organ and Tissue Donation and Transplantation Authority Amendment (New Governance Arrangements) Bill 2016, Senate, Parliament of Australia, November 24, 2016, https://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id%3A%22chamber%2Fhansards%2Fe7337364-8906-4997-8e24-5b67db7968a7%2F0185%22

even non-detained practitioners in Anqing City, Anhui Province, were summoned for these chilling exams.[21]

We now also have the first known survivor. Cheng Peiming, a Falun Gong practitioner, was taken for surgery against his will while detained and awoke with a 14-inch gash in his side in 2004. Medical imaging later confirmed that parts of his liver and lung had been removed.[22]

Tragically, after years of little meaningful international action, the CCP expanded this atrocity to another group. They further dehumanized the Uyghur Muslim population, mass incarcerated them, and have even gone door-to-door to people's homes in Xinjiang collecting DNA and blood samples.[23]

Compounding the danger is new technology that perfuses organs for extended periods in a box—increasing organ preservation significantly to, in some cases, over 24 hours. These revolutionary breakthroughs will no doubt save countless lives, however in the hands of the CCP, it also could potentially enable shipping of organs anywhere in the world—which would have chilling implications.[24]

2.2 THE GENOCIDE QUESTION

The official position of the U.S. government is that the CCP is committing a genocide against its Uyghur Muslim population.[25] There has been significant debate over whether the persecution and forced organ harvesting of Falun Gong also constitutes genocide. I offer the following analysis to help clarify this question.

It is critical to understand that the organ harvesting procedures performed in China against Falun Gong (in addition to other groups such as the Uyghurs) serve as part of a far more comprehensive pattern of abuses that are inflicted on believers as the final stage of a violent suppression campaign.

Indeed, pursuant to the instructions of Mao Zedong, violent suppression campaigns are carried out periodically in China against any group that threatens Communist Party rule.[26] In all such campaigns, special and general security forces are mobilized, including special Party forces (such as the 610 officers used by the Party to torture and violently suppress Falun Gong) and

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[21] Levi Browde and James Yu, "Written Testimony for the Record," submitted to the Congressional-Executive Commission on China (CECC), May 6, 2026, http://www.cecc.gov/sites/evo-subsites/cecc.house.gov/files/evo-media-document/cecc_hearing_statement_fdic_finalsubmission.pdf.

[22] Jekielek, *Killed to Order*, 57–61.

[23] Human Rights Watch, "China: Minority Region Collects DNA from Millions," December 13, 2017, https://www.hrw.org/news/2017/12/13/china-minority-region-collects-dna-millions.

[24] Such technologies are advancing rapidly. Commercially available normothermic machine perfusion (NMP) systems, such as TransMedics Organ Care System (https://www.transmedics.com/), OrganOx Metra (https://www.organox.com/), can preserve livers for up to 24 hours. In pre-clinical trials, BMI OrganBank (https://bmiorganbank.com/) has been able to preserve kidneys for over 24 hours. In research settings, ETH Zurich's Liver4Life machine can keep human livers metabolically functional for as long as 7 days (https://ethz.ch/en/news-and-events/eth-news/news/2020/01/pr-liver4life.html).

[25] U.S. Department of State, "Determination of the Secretary of State on Atrocities in Xinjiang" (press statement, January 19, 2021). https://2017-2021.state.gov/determination-of-the-secretary-of-state-on-atrocities-in-xinjiang/

[26] Human Rights Law Foundation, "Jiang Zemin and the Party's Douzheng Campaign against Falun Gong," Minghui.org, May 6, 2015, https://en.minghui.org/html/articles/2015/5/6/150033.html.

general police forces operating under the aegis of the Party, to identify, round up, arbitrarily detain, and physically and mentally abuse individual members of the "group." The aim is to force these so-called "enemies" to renounce their group identity and beliefs and "join forces" with the Party to attack other members of the targeted group using the same methods. Those who refuse are subjected to far more intense bouts of torture and even extrajudicial killing, including in the form of organ harvesting.[27]

Scholars argue that China's practice of organ harvesting demonstrates China acts with genocidal intent towards Falun Gong believers. International courts have concluded that Genocide requires intent to destroy the relevant group in a biological or physical sense. Like other international legal experts, Caylan Ford argues that China has engaged in genocide against Falun Gong. Her reasoning is straightforward.[28]

Since the intent of the persecutory campaign has been to purge China of Falun Gong, in other words, to eradicate the practice and its adherents, the intent element (or mens rea) is satisfied. Communist Party documents frequently called for the "complete eradication" of Falun Gong. The 610 Office oversees the campaign in every province and village and has sent regular directives to officials, as well as schools and workplaces, with instructions on how to imprison, re-educate, monitor, and propagandize against Falun Gong practitioners in order to eliminate the group. The Communist Party and 610 Office dehumanize practitioners in the media; socially isolate them; deprive them of education, housing, and employment; harass their families; destroy their religious literature and symbols; deny them basic legal rights; and punish those who refuse to recant their faith, including through extrajudicial imprisonment, torture, and killing. Moreover, the perpetrated atrocities are precisely what the Genocide Convention requires. In addition to large-scale and prolonged imprisonment of Falun Gong practitioners without due process, the Party ordered local authorities to forcibly convert practitioners using virtually any means. By early 2001, the Party officially sanctioned the systematic use of violence against Falun Gong practitioners in detention.

These policies have led to severe physical and psychological torture, often resulting in serious and lasting bodily and psychological harm. Detailed reports of torture in custody span every Chinese province. The methods have exceeded the punishment targeting other classes of prisoners. Numerous deaths have resulted from torture and abuse in custody. Additionally, the evidence of systematic organ harvesting accumulated over the last two decades has demonstrated that medical professionals working in collusion with Party entities may have deliberately killed large numbers of Falun Gong practitioners.

As Ms. Ford so aptly concludes, China's persecutory campaign that includes, indeed features, organ harvesting, constitutes genocide. A number of international legal experts, including Dr.

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[27] As early as June 7, 1999, at a meeting of the elite Politburo of the Party, then-leader Jiang Zemin delivered his well-known speech, titled "Swiftly Handle and Solve the Falun Gong Problem." In this speech, Jiang Zemin described in graphic detail the initial plan to wipe out the Religion, including objectives, strategy and instructions to include key CCP and government offices at national and regional levels. In addition to his use of phrases like "wipe out" Falun Gong, he made clear in the body of the letter that the goal was to "disintegrate"–indeed–dissolve Falun Gong. In other words, purge China of the religion and its adherents. Speech text: https://beijingspring.com/bj2/2001/60/2003727210907.htm

[28] Caylan Ford, "Genocide in the People's Republic of China: Violations of International Criminal Law in the Suppression of Falun Gong," Journal of Political Risk 10, no. 7 (July 2022), https://www.jpolrisk.com/genocide-in-the-peoples-republic-of-china-violations-of-international-criminal-law-in-the-suppression-of-falun-gong/.

Maria Cheung[29] and Nina Shea,[30] have similarly concluded that these atrocities against Falun Gong demonstrate genocidal intent.

3. U.S. ENGAGEMENT WITH THE CHINESE TRANSPLANT SECTOR

Below, I will now detail specific instances of U.S. engagement—whether witting or unwitting—with China's organ transplant system. While this is by no means an exhaustive accounting, these examples reveal troubling patterns and expose critical gaps in oversight that demand further investigation.

For the specific Chinese hospitals and transplant centers discussed below, the exceptionally short reported wait times are included because they constitute strong evidence of likely unethical organ sourcing.

Significant evidence of these short wait times as well as sourcing from Falun Gong practitioners comes from undercover phone calls conducted over many years by the World Organization to Investigate the Persecution of Falun Gong (WOIPFG).[31] [32] Many of these calls have been independently assessed by the 2019 China Tribunal and found to be credible and accurate.[33] [34] [35]

3.1 SUPPLY OF IMMUNOSUPPRESSIVE DRUGS AND MEDICAL TECHNOLOGIES

American companies supply critical immunosuppressive drugs and medical technologies used in Chinese transplant procedures.

Below are a few examples:

- Pfizer Inc. - maker of Sirolimus, a post-transplant immunosuppressant, has significant documented China sales

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[29] Maria Cheung et al., "Cold Genocide: Falun Gong in China," *Genocide Studies and Prevention: An International Journal* 12, no. 1 (2018): 38–62, https://digitalcommons.usf.edu/gsp/vol12/iss1/6/.
[30] Nina Shea, "The CCP Wages a Second Genocide—Against Falun Gong," *National Review,* February 4, 2022, https://www.hudson.org/human-rights/the-ccp-wages-a-second-genocide-against-falun-gong.
[31] World Organization to Investigate the Persecution of Falun Gong (WOIPFG), various investigative telephone recordings (2006–present), archived and compiled at https://www.zhuichaguoji.org/ (or https://www.upholdjustice.org/). These include hundreds of calls to Chinese hospitals and officials in which staff discussed short organ wait times (often days to weeks) and, in multiple instances, confirmed sources linked to Falun Gong practitioners.
[32] Submission of the World Organization to Investigate the Persecution of Falun Gong (WOIPFG) to the China Tribunal. https://chinatribunal.com/wp-content/uploads/2020/02/A18_Submission_WOIPFG_DrWang_FINAL.pdf.
[33] China Tribunal, *Judgment*, 91–105.
[34] China Tribunal, "Phone Calls Verification" (London, China Tribunal, 2020), https://chinatribunal.com/wp-content/uploads/2020/02/PhoneCallsVerification_AcademicCommentators_15May.pdf.
[35] China Tribunal, Phone Call Content Verification Report (for WOIPFG Investigation Calls) (London: China Tribunal, 2020), https://chinatribunal.com/wp-content/uploads/2020/02/Phone-call-content-verification-report.pdf.

- Lifeline Scientific Inc. (acquired by a Chinese company in 2016) - maker of Lifeport Kidney Transporter, a machine perfusion device for organ preservation, through its subsidiary Organ Recovery Systems
- Intuitive Surgical - maker of the da Vinci Surgical System, a robot used in China for minimally invasive organ procurement and transplant surgery
- One Lambda, Inc. (owned by Thermo Fisher Scientific) - maker of HLA typing kits used for donor-recipient matching, a prerequisite for every transplant[36]

This list is far from exhaustive. There are many more American companies operating in the Chinese market and offering products related to transplantation. Their products haven't been necessarily mentioned by name in the media or scientific literature as being used by China's transplant industry, but they likely have been. The fact that there's no way to tell for sure highlights the lack of oversight in this area.

3.2 FUNDING OF CHINESE TRANSPLANT INSTITUTIONS AND ACTIVITIES

An analysis of federal award data from USAspending.gov reveals the Department of Health and Human Services (HHS) has funded research collaborations through sub-awards totaling $2.95 million across four major Chinese universities—Central South University, Fudan University, Jilin University, Peking University—with affiliated hospitals documented to be participating in forced organ extraction from prisoners (more details below).

While the identified funding is not specifically transplant-related, these relationships remain highly concerning not only because they provide substantial financial support to institutions accused of serious human-rights abuses, but also because they raise questions as to whether transplant-related activities could unknowingly be funded under related biomedical fields such as cardiology, immunology, surgery, or other organ-related specialities, including under less obvious funding descriptions.

These cases also raise concerns as to whether such institutions have effectively been treated as eligible or "white-listed" recipients for federally supported research collaborations through intermediary funding mechanisms. At a minimum, they highlight the need for robust due diligence and clear NIH safeguards to ensure that no U.S. funding directly or indirectly supports unethical transplant activities and forced organ harvesting.

3.2.1 HHS Awards to Implicated Chinese Institutions

Central South University

Award ID: ASST_NON_R01MH127631_075
Prime Awardee: New York University
Research Purpose: Longitudinal trajectories in treated and untreated schizophrenia
Total Sub-award Amount: $1,581,105 (across 3 sub-awards)

[36] Pavel Porubiak and Lukas Kudlacek, *The Economics of Organ Harvesting in China* (Prague: Institute to Research the Crimes of Communism (IRCC), 2019), https://theirccdotorg.wordpress.com/wp-content/uploads/2019/12/the-economics-of-organ-harvesting-in-china-ircc-2019-1.pdf.

Award Period: Through July 31, 2027[37]

Central South University's affiliated hospitals, particularly the Third Xiangya Hospital, are high-volume transplant centers with documented involvement in forced organ harvesting, according to undercover phone calls from 2016 and 2018.[38] [39] The Third Xiangya Hospital is a national research base for transplantation technology that leads China in total solid organ transplants. In 2001, it invested nearly one billion RMB to build a 150-bed transplantation medical center, with capacity to perform seven major transplant surgeries simultaneously.[40]

The main Xiangya Hospital set a record completing 17 organ transplants in a single day on April 28, 2006.[41] The Second Xiangya Hospital operates a nationwide organ source sharing network with surgeons working up to more than 20 consecutive hours, and in one case, completing nine kidney transplants in one day.[42]

Fudan University

Award ID: ASST_NON_UM1AI104681_075
Prime Awardee: Duke University
Research Purpose: Antibacterial Resistance Leadership Group (ARLG)
Total Sub-award Amount: $387,107
Award Period: Through November 30, 2026[43]

Fudan University presents the most concerning case, with multiple affiliated hospitals directly implicated in organ trafficking and recent evidence of continued violations. Zhongshan Hospital is one of China's first and most comprehensive organ transplant centers, with documented

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[37] U.S. Department of Health and Human Services, National Institutes of Health, "ASST_NON_R01MH127631_075: Research Project (R01) – Neurodegenerative Model of Schizophrenia," USAspending.gov, accessed May 21, 2026, https://www.usaspending.gov/award/ASST_NON_R01MH127631_075.

[38] World Organization to Investigate the Persecution of Falun Gong. "Phone transcript: Doctor Liu of the Third Xiangya Hospital of Central South University", April 5, 2016. https://archive.org/details/recording-30-appendix-25-doctor-liu-of-the-third-xiangya-hospital-of-central-south-university.

[39] World Organization to Investigate the Persecution of Falun Gong. "Phone transcript: Ye Qifa: Vice President of the Third Xiangya Hospital of Central South University", November 6, 2018. https://archive.org/details/recording-18-appendix-7-ye-qifa-vice-president-of-the-third-xiangya-hospital-of-.

[40] David Kilgour, Ethan Gutmann, and David Matas, *Bloody Harvest / The Slaughter: An Update* (2016; rev. April 2017), 139–45, https://endtransplantabuse.org/wp-content/uploads/2017/05/Bloody_Harvest-The_Slaughter-2016-Update-V3-and-Addendum-20170430.pdf.

[41] Xiangya Hospital Party Committee Office, "湘雅医院器官移植创历史新高：一天完成17台移植手术" (Organ Transplant Record Reached New High: Seventeen Transplants Completed in One Day), May 15, 2006, Xiangya Hospital of Central South University, originally at http://news.csu.edu.cn/info/1142/97907.htm, archived at https://archive.is/ogLUL.

[42] "龙腾虎跃正当时——记中南大学湘雅二医院器官移植中心肾移植科" (The Time for Dragons to Soar and Tigers to Leap—A Record of the Kidney Transplant Department, Organ Transplant Center, Second Xiangya Hospital of Central South University), 大众卫生报 *(Public Health News*), Hunan Daily Press Group, October 21, 2005, archived at https://archive.is/xIZWE.

[43] U.S. Department of Health and Human Services, National Institutes of Health, "ASST_NON_UM1AI104681_075: Antibacterial Resistance Leadership Group (ARLG)," USAspending.gov, accessed May 21, 2026, https://www.usaspending.gov/award/ASST_NON_UM1AI104681_075.

evidence of using organs from Falun Gong practitioners. In March 2006, a doctor told undercover investigators "all of ours are those types" when asked via phone for organs from Falun Gong practitioners. Another director in 2015 stated "we don't care who it's from" when asked about using organs from Falun Gong practitioners.[44]

Fudan University's Zhongshan Hospital was also specifically identified in the 2022 peer-reviewed study published in the American Journal of Transplantation titled "Execution by organ procurement: Breaching the dead donor rule in China." This computational analysis of 2,838 Chinese transplant papers found evidence that doctors at this hospital participated in executions by organ removal, where "the removal of the heart during organ procurement must have been the proximate cause of the donor's death."[45]

Jilin University

Award ID: ASST_NON_R01CA181275_075
Prime Awardee: Baylor College of Medicine
Research Purpose: Automated, Augmented Reality High Resolution Microendoscopy for Esophageal Neoplasia
Total Sub-award Amount: $287,640
Award Period: Through August 31, 2028[46]

The First Hospital of Jilin University operates a massive organ transplant program with 5,939 beds and kidney transplant volumes ranking among China's top ten.[47] The founder of its kidney transplant program completed 3,000 kidney transplants by April 2009[48]—a figure that remained unchanged in his online bios for years despite continued operations.[49]

Peking University

Award IDs: ASST_NON_R01AG071649_075, ASST_NON_R01AG067625_075, ASST_NON_R56AG081586_075
Prime Awardees: Ohio State University, University of Southern California
Research Purpose: COVID-19 policy analysis, aging and dementia research
Total Sub-award Amount: $375,935 (across 4 sub-awards)

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[44] Kilgour, Gutmann, and Matas, *Bloody Harvest / The Slaughter: An Update*, 65–68.
[45] Matthew P. Robertson and Jacob Lavee, "Execution by Organ Procurement: Breaching the Dead Donor Rule in China," *American Journal of Transplantation* 22, no. 7 (July 2022): 1804–12, https://doi.org/10.1111/ajt.16969.
[46] U.S. Department of Health and Human Services, National Institutes of Health, National Cancer Institute, "ASST_NON_R01CA181275_075: Research Project (R01) – High-Resolution Microendoscopy for the Management of Esophageal Neoplasia," USAspending.gov, accessed May 21, 2026, https://www.usaspending.gov/award/ASST_NON_R01CA181275_075.
[47] Kilgour, Gutmann, and Matas, Bloody Harvest / The Slaughter: An Update, 190-191.
[48] "傅耀文" (Fu Yaowen)," 名人网 *(Celebrity Net)*, archived April 14, 2016, https://archive.is/v3Xxl#selection-1411.250-1411.253.
[49] "傅耀文 (Fu Yaowen)," 百度百科 (Baidu Baike), https://baike.baidu.com/item/%E5%82%85%E8%80%80%E6%96%87/5948834.

Award Period: Through July 31, 2026[50] [51] [52]

Peking University operates a coordinated, high-volume organ transplant system through the Peking University Organ Transplant Center, established in 2001 under guidance of the Vice Chairman of the National People's Congress. The center's director told China Economic Weekly in September 2013: "Our hospital conducted 4,000 liver and renal transplant operations within a particular year, and all of the organs were from prisoners sentenced to death"—a figure that far exceeds the hospital's official website claims of just over 1,100 transplants over more than a decade.[53]

3.3 MEDICAL PARTNERSHIPS, TRAINING & COLLABORATION

American universities have played a significant role in training Chinese transplant surgeons and supporting the development of China's organ transplantation system over several decades.

Over 300 of China's transplant surgeons are documented to have received transplant training in the United States.[54]

One prominent example is the University of Pittsburgh's Thomas E. Starzl Transplantation Institute, a global leader in transplant medicine. The Institute has set up institutional partnerships with multiple Chinese transplant centers and trained dozens of Chinese surgeons in transplantation techniques.[55]

Among those who have trained there is Fan Jia, now one of China's most prominent liver transplant surgeons. Between 1999 and 2000, Fan conducted clinical surgical research in liver transplantation at the University of Pittsburgh as a senior visiting scholar. He currently serves as Director of the Organ Transplantation Center at Fudan University and President of Zhongshan Hospital.[56]

As previously stated, Zhongshan Hospital is one of China's first and most comprehensive organ transplant centers, with documented evidence of using organs from Falun Gong practitioners. It was identified in the 2022 peer-reviewed study "Execution by organ procurement: Breaching the dead donor rule in China" and has been implicated in undercover phone calls conducted by investigators from WOIPFG.

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[50] U.S. Department of Health and Human Services, National Institutes of Health, National Institute on Aging, "ASST_NON_R01AG071649_075: Research Project (R01) – COVID-19 Mitigation Policies: Cross-Country Impact Analysis," USAspending.gov, accessed May 21, 2026, https://www.usaspending.gov/award/ASST_NON_R01AG071649_075.
[51] U.S. Department of Health and Human Services, National Institutes of Health, National Institute on Aging, "ASST_NON_R01AG067625_075: Influences of Early and Later Life Events on Cognition and All-Cause Dementia in China," USAspending.gov, accessed May 21, 2026, https://www.usaspending.gov/award/ASST_NON_R01AG067625_075.
[52] U.S. Department of Health and Human Services, National Institutes of Health, National Institute on Aging, "ASST_NON_R56AG081586_075: Vaccine Hesitancy: Exploring the Role of Temporal and Cross-Country Variation in Covid Rules, Media Coverage, and Public Health Policies," USAspending.gov, accessed May 21, 2026, https://www.usaspending.gov/award/ASST_NON_R56AG081586_075.
[53] Kilgour, Gutmann, and Matas, *Bloody Harvest / The Slaughter: An Update*, 89-90.
[54] World Organization to Investigate the Persecution of Falun Gong (WOIPFG), "List of Chinese Transplant Doctors Who Studied or Conducted Transplants Overseas," June 3, 2022, accessed May 21, 2026, https://www.upholdjustice.org/node/547.
[55] Kilgour, Gutmann, and Matas, *Bloody Harvest / The Slaughter: An Update*.
[56] Kilgour, Gutmann, and Matas, *Bloody Harvest / The Slaughter: An Update,* 65-68.

In March 2006, a doctor told undercover investigators "all of ours are those types" when asked for organs from Falun Gong practitioners. The wait time promised in the call was about one week. A few months later, a doctor again told an investigator that "yes" they sourced organs from Falun Gong and indeed that other hospitals did too: "Every hospital is the same."[57] Another director in 2015 stated "we don't care who it's from" when asked about using organs from Falun Gong practitioners.[58]

Fan Jia conducted his first liver transplant in 2001[59] and is reported to have conducted more than 3,000 liver transplants by 2021.[60]

Another example is Peng Chenghong, who trained at Starzl Transplantation Institute from 1997-1998, later conducted China's first split liver transplant,[61] and became director of Rui Jin Hospital's Organ Transplant Center.[62]

Beyond individual training, the Starzl Transplantation Institute has partnered with Chinese institutions to establish multiple transplant centers in China:

- The Sino-American Liver Transplant Center with Beijing You'an Hospital in 2003
- The International Cooperative Liver Transplant Center with the Southwest Hospital of Hepatobiliary Surgery in 2004
- Liaison Center with Zhongshan Hospital, one of the earliest hospitals capable of performing organ transplant operations in China, in 2003[63]

Importantly, US-China medical and university collaborations and training programs have continued after evidence of forced organ harvesting in China first emerged in 2006.

3.3.1. Collaboration Examples

American universities and hospitals that receive significant federal research funding continue to partner with Chinese medical institutions with implicated transplant centers, train Chinese transplant surgeons, and conduct joint research.

The following section provides examples of interactions between U.S. universities and medical institutions and Chinese transplant institutions or their affiliates. This information was primarily gathered by the International Coalition to End Transplant Abuse in China in their landmark report "Under the Radar."[64] Additional examples will be provided to the Committee as the report that CECC commissioners requested during the hearing on May 14.

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[57] China Tribunal, *Judgment, 101.*
[58] Kilgour, Gutmann, and Matas, *Bloody Harvest / The Slaughter: An Update*, 65–68.
[59] "樊嘉：具有神秘色彩的肝外科主任" (Fan Jia: The Liver Surgery Director with a Mysterious Aura). 人物 *(Renwu / Figures Magazine)*. October 21, 2005. https://news.sina.cn/sa/2005-10-21/detail-ikknscsi8063101.d.html.
[60] "医心向党 | 樊嘉：中国器官移植技术走向世界舞台" (Healing Hearts Toward the Party | Fan Jia: China's Organ Transplant Technology Steps onto the World Stage). 央视网 (CCTV Net), August 17, 2021. https://news.sina.cn/gn/2021-08-17/detail-ikqcfncc3387416.d.html.
[61] "彭承宏" (Peng Chenghong). 中國名醫百強榜 (China's Top 100 Famous Doctors List). Archived February 2, 2016. https://archive.is/j2zFy.
[62] Kilgour, Gutmann, and Matas, *Bloody Harvest / The Slaughter: An Update*, 104.
[63] Kilgour, Gutmann, and Matas, *Bloody Harvest / The Slaughter: An Update,* 30, 65, 95.
[64] International Coalition to End Transplant Abuse in China (ETAC), *Under the Radar: U.S. Interactions with China's Forced Organ Harvesting Industry* (2022, updated 2026). https://bit.ly/ETAC-Report_Under-the-Radar

The degree to which these relationships have materially supported or enabled organ harvesting crimes remains unresolved and warrants further investigation. They raise significant concerns about whether these American institutions are undertaking appropriate human rights due diligence, in line with the Global Rights Compliance (GRC) Legal Advisory Report and Policy Guidance (more details on the GRC Advisory below), with respect to their Chinese partners, affiliates, and links to entities implicated in China's forced organ harvesting regime.

Numerous additional examples have been identified through materials published on U.S. and Chinese university and hospital websites, institutional reports, medical journal articles, conference proceedings, and mainstream media coverage, which in many cases provide the only publicly accessible basis for identifying and tracing these relationships. However, determining the precise nature, scope, and extent of these collaborations is often difficult due to limited public disclosure and inconsistent reporting practices. This lack of transparency itself raises further concerns regarding the oversight of relationships between U.S. institutions and entities connected to China's organ transplant system.

This opacity is itself a matter of concern and warrants greater scrutiny.

University of Chicago Medical Center

In 2018, the University of Chicago Medical Center reached a preliminary intent of international strategic cooperation, which included training medical students and doctors, remote consultation, and other medical services with the Shulan (Hangzhou) Hospital—also known as Zhejiang University International Hospital—a high-volume transplant hospital.[65]

The Director of Shulan Hospital's Hepatobiliary and Pancreatic organ transplant center, Zheng Shusen, has been identified in investigations as a key figure in persecuting Falun Gong practitioners and engaging in research fraud when it comes to organ sourcing.[66] [67] (*A local media report from 2019 described a man who was able to get a liver match in just two days).*[68] *Investigative phone calls between 2016 and 2019 have found wait times for a liver at Shulan Hospital to be as short as two weeks.*)[69] [70]

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[65] "美医国际邀芝加哥大学医学中心赴树兰医院（浙江大学国际医院）战略合作交流" [Meiyi International Invites University of Chicago Medical Center to Visit Shulan Hospital (Zhejiang University International Hospital) for Strategic Cooperation Exchange], DocExpress via Sohu, May 29, 2018, https://www.sohu.com/a/233286246_100087458.

[66] Zheng Shusen, one of China's most high-profile transplant surgeons, notably was director of the Zhejiang branch of the "China Anti-Cult Association," one of the key organs of the Chinese Communist Party's persecution campaign against Falun Gong, from 2007 to 2017, according to evidence documented by the China Tribunal.

[67] China Tribunal, "Profiles of Chinese Transplant Surgeons – Zheng Shusen," June 12, 2019, https://chinatribunal.com/wp-content/uploads/2019/06/12_SurgeonProfileOne_ZhengShusen.pdf.

[68] 杭州日报 [Hangzhou Daily], "树兰（杭州）医院即将开展心脏和肺移植 四大器官移植引领全院各学科发展" (Shulan (Hangzhou) Hospital is about to carry out heart and lung transplants: Four major organ transplants leading the development of all disciplines in the hospital), October 30, 2019, accessed May 21, 2026, archived at https://archive.is/eTGNV.

[69] World Organization to Investigate the Persecution of Falun Gong. "Phone transcript: Zheng Shusen, President of Shulan (Hangzhou) Hospital," November 3, 2018. https://www.zhuichaguoji.org/media_files/Recordings/Recording16_Appendix%203.%20Zheng%20Shusen.%20President%20of%20Shulan%20(Hangzhou)%20Hospital.pdf.

[70] World Organization to Investigate the Persecution of Falun Gong. "Phone transcript: Xie Qinfen, Organ Procurement Coordinator for Liver Transplantation at Shulan (Hangzhou) Hospital," February 28, 2017. https://www.zhuichaguoji.org/media_files/Recordings/Recording50_Appendix%2091.%20Xie%20Qinfen.

In 2019, the University of Chicago held a Conference on Global Health with Chinese counterparts to discuss their recent and ongoing medical collaborations, including joint projects in transplantation science. Attendees included leaders from four major Chinese transplant institutions: China Medical University, Wuhan University, Peking University, and Capital Medical University.[71] *(Wait times at their affiliated hospitals have been found in many instances to be notably brief based on Chinese media reporting, transplant literature, and undercover phone calls between 2019 and 2020: as short as 10 days at Wuhan University People's Hospital,[72] [73] seven days for a liver[74] and 23 days for a heart-lung transplant at Zhongnan Hospital;[75] potentially half a month to one month for a kidney at Peking University Third Hospital,[76] and five weeks for a liver at Beijing You'an Hospital.[77])*

As recently as 2025, the University of Chicago Medical Center signed a formal cooperation framework agreement with Westlake University School of Medicine in Zhejiang Province for medical education, affiliate hospital development, and clinical medical faculty training.[78] Westlake's primary clinical affiliate performs liver transplants,[79] continuing a pattern of deep engagement with institutions operating in this high-risk environment.

Harvard University

Last year, the House Select Committee on the CCP spotlighted Harvard's organ transplant research collaborations with China-based partners and listed seven studies published between 2022 and 2024 where Harvard researchers co-authored papers on organ transplantation-related

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%20Organ%20Procurement%20Coordinator%20for%20Liver%20Transplantation%20at%20Shulan%20(Hangzhou)%20Hospital%20(aka%20Zhejiang%20University%20International%20Hospital).pdf

[71] "Conference on Global Health: Chicago - China: Collaborations in Medicine," The University of Chicago Center in Beijing, archived March 27, 2018. https://web.archive.org/web/20180327160618/https://www.uchicago.cn/events/conference-on-global-health-chicago-china-collaborations-in-medicine/.

[72] Health Commission of Hubei Province, "【健康报】换肺，从手术到出院仅用13天]" ("[Health News] Lung replacement, it only takes 13 days from surgery to discharge"), November 21, 2019, archived at https://archive.is/z3zQN.

[73] 文匯 (Wenhui), "突遭意外生命停摆捐献器官 95后男孩让多人重燃生命之光," (Sudden Accidental Life Suspension, Organ Donation, Boy Born in 1995 Makes Many People Rekindle the Light of Life), July 25, 2019, archived at https://archive.is/P3AMg.

[74] Guangming Daily Client 光明日报, "湖北首例ECMO支持下器官移植获得成功" (Hubei's First Organ Transplant with ECMO Support Was Successful), November 21, 2020, archived at https://archive.is/EyCDi.

[75] 长江网 (Yangtze River Network), "他带着自己种的西瓜来汉复查，只因三年前的那次手术" (He Brought the Watermelons He Grew Himself to Wuhan for a Follow-up Examination, All Because of That Surgery Three Years Ago), July 27, 2020, https://archive.is/aooaC.

[76] World Organization to Investigate the Persecution of Falun Gong, "Phone transcript: Ma Lulin, Chief Physician of Kidney Transplantation, Peking University Third Hospital," October 29, 2019. https://www.zhuichaguoji.org/sites/default/files/investigation_report/125981/125981_140.pdf.

[77] Libo Sun et al., "Prevention and Control of Organ Donation and Liver Transplantation during the Perioperative Period of the Novel Coronavirus Pneumonia Epidemic," *Chinese Journal of Organ Transplantation* 41, no. 4 (2020): 217–220, archived at https://archive.is/0Uuzr.

[78] "Westlake School of Medicine and University of Chicago Medical Center Sign Cooperation Agreement," Marco Amabili Lab, Westlake University, July 16, 2025, https://amabili.lab.westlake.edu.cn/info/1015/1053.htm.

[79] "肝胆胰外科" (Hepatobiliary and Pancreatic Surgery). 杭州市第一人民医院 (Hangzhou First People's Hospital). Accessed May 21, 2026. https://www.hz-hospital.com/service/deptment_details/id/23.

research with Chinese researchers.[80] In 2017, Harvard University, University of Maryland, and Peking University reached an agreement to jointly build a medical "production, study and research demonstration base" in Zhengdong New District, Henan Province. They will cooperate in international cutting-edge medical technology and projects. The medical centers to be built in association with the collaboration will focus on several fields, including organ transplantation.[81]

Houston Methodist Hospital

In 2020, the Director of the Immunobiology and Transplant Science Center at Houston Methodist Hospital and a Tufts urologist (now at Brown) co-authored a paper on human liver transplantation research with Huang Jiefu of Peking Union Medical College Hospital and other doctors with First Affiliated Hospital, Sun Yat-sen University.[82] *(Wait times at First Affiliated Hospital of Sun Yat-sen University have been as short as one week to a few months for a kidney and 10 days to one month for a liver based on Chinese media reporting and undercover phone calls from 2017 to 2020.*[83] [84] [85] [86]

Huang is a central figure in China's organ harvesting industry and in the past publicly admitted to sourcing from death row prisoners.[87] [88]

Stanford University

In 2017, Stanford held a Stanford-China Cardiovascular Symposium that included organ transplantation presentations, and invited Chinese transplant researchers from several Chinese

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[80] John Moolenaar, Elise Stefanik, and Tim Walberg, Letter to Alan Garber, President, Harvard University, May 19, 2025, https://files.constantcontact.com/81b76c35801/fe984f78-d58c-4595-b77e-80d24de7c28a.pdf.

[81] *China Daily*, "河南：郑东新区要跟北大、美国哈佛、马里兰大学合作共建医学示范基地" (Henan: Zhengdong New Area to Cooperate with Peking University, Harvard University, and University of Maryland to Jointly Build a Medical Demonstration Base), June 17, 2017, archived at https://web.archive.org/web/20200807150117/http://www.chinadaily.com.cn/interface/zaker/1142841/2017-06-17/cd_29782409.html.

[82] Zhiyong Guo et al., "Liver Transplantation without Graft Ischemia in Humans," medRxiv preprint, posted April 24, 2020, https://doi.org/10.1101/2020.04.20.20065979.

[83] World Organization to Investigate the Persecution of Falun Gong. "Phone transcript: Doctor of Kidney Transplant Office, The First Affiliated Hospital of Sun Yat-sen University", November 9, 2019. https://www.zhuichaguoji.org/sites/default/files/investigation_report/125981/125981_150.pdf.

[84] 南方都市报APP (Southern Metropolis Daily APP), "等肝来，新未来：一场缝合了200多针的马拉松肝移植手术" (When the Liver Comes, a New Future: A Marathon Liver Transplant with More Than 200 Stitches), December 3, 2020. https://m.mp.oeeee.com/a/BAAFRD0000202011293852 31.html.

[85] World Organization to Investigate the Persecution of Falun Gong. "Phone transcript: He Xiaoshun, Vice President of the First Affiliated Hospital, Sun Yat-sen University", November 15, 2018. https://www.zhuichaguoji.org/media_files/Recordings/Recording12_Appendix%2013,%20Phone%20Investigation%20on%20HeXiaoshun,%20Vice%20President%20of%20the%20First%20Affiliated%20Hospital,%20SunYat-sen%20University.pdf.

[86] World Organization to Investigate the Persecution of Falun Gong."Phone transcript: Jiao Xingyuan: Director of Liver Transplantation of the First Affiliated Hospital of Sun Yat-sen University," October 7, 2017. https://www.zhuichaguoji.org/media_files/Recordings/Recording39_Appendix%2034,%20Jiao%20Xingyuan,%20Director%20of%20Liver%20Transplantation%20of%20the%20First%20Affiliated%20Hospital%20of%20Sun%20Yat-sen%20University%20in%20Guangzhou.pdf.

[87] Jekielek, *Killed to Order*, 14, 138, 186.

[88] "Appendix 3," China Tribunal, https://chinatribunal.com/wp-content/uploads/2020/02/Appendix-3.pdf.

transplant institutions, including Capital Medical University's Beijing Anzhen Hospital, Fuwai Hospital of Peking Union, Medical College, Second Affiliated Hospital of Zhejiang University School of Medicine (SAHZU).[89] *(Wait time at one of Capital Medical University's affiliated hospitals—Beijing You'an Hospital—was as short as five weeks for a liver in 2020.[90] Wait time at SAHZU was as short as six days for a double lung and liver transplant, according to Chinese media reporting in 2021.)*[91]

Further, in 2018, high ranking officials from Zhejiang University and its affiliated hospitals visited Stanford and attended the Zhejiang University–Stanford Academic Exchange Reception to promote in-depth exchanges and cooperation. The delegation met with Stanford's Provost and Dean of the Stanford School of Medicine. The two parties fully affirmed the existing medical cooperation and expressed their desire to further deepen cooperation and exchanges.[92] *(The minimum documented wait times in 2019 and 2020 at First Affiliated Hospital of Zhejiang University School of Medicine (FAHZU) were as short as one week to two months for a liver[93] and one month for a lung.[94] The minimum documented wait time at SAHZU was six days in 2021 for a double lung and liver transplant.)*[95]

University of Pittsburgh Medical Center

In 2017, Taikang Medical, part of the Tahoe Investment Group (which donated 100 million RMB to the China Organ Transplantation Development Foundation) signed a strategic cooperation memorandum with the University of Pittsburgh Medical Center (UPMC) to introduce UPMC expertise and technology in areas including organ transplantation, oncology, obstetrics and gynecology, and pediatrics to support the development of Taikang's hospital network.[96] UPMC International partnerships involve clinical, academic, and hospital management cooperation.[97]

University of Pittsburgh Medical Center (UPMC) has given significant support to Central South University's three hospitals (Xiangya Hospital, Second Xiangya Hospital, and Third Xiangya

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[89] Stanford Medicine and Stanford Cardiovascular Institute, "Stanford-China Cardiovascular Symposium, September 21–22, 2017," 2017, archived August 7, 2020. https://web.archive.org/web/20200807131925/http://med.stanford.edu/content/dam/sm/cvi/documents/pdf/stanford-china-program-2017.pdf.

[90] Sun et al., "Prevention and Control."

[91] Guangming Net, "全国首例双肺、肝脏同期联合移植术在杭州实施" (The country's first simultaneous double lung and liver transplantation was implemented in Hangzhou), March 1, 2021. Archived at https://archive.is/loQ0f.

[92] Zhejiang University, "浙大代表团访问美国顶尖高校 出席浙大—斯坦福学术交流招待会" (Zhejiang University Delegation Visits Top U.S. Universities and Attends the Zhejiang University–Stanford Academic Exchange Reception), May 17, 2018, https://www.zju.edu.cn/2018/0517/c41532a811006/page.htm.

[93] World Organization to Investigate the Persecution of Falun Gong."Phone transcript: Dr. Zheng, Liver Transplant, Office of the First Affiliated Hospital of Zhejiang University", September 12, 2019. https://www.zhuichaguoji.org/sites/default/files/investigation_report/125981/125981_097.pdf.

[94] 中国新闻网 [China News], "66岁老人患新冠肺炎后接受肺移植 30余名医护协力救治" (A 66-year-old Man Receives Lung Transplantation after Suffering from New Coronary Pneumonia), March 3, 2020, https://archive.is/8ENHp.

[95] Guangming Net, "全国首例双肺、肝脏同期联合移植术在杭州实施" (The country's first simultaneous double lung and liver transplantation was implemented in Hangzhou), March 1, 2021. Archived at https://archive.is/loQ0f.

[96] Winshang, "泰禾频频发力医疗 与UPMC签署战略合作谅解备忘录" (Tahoe Medical and UPMC sign strategic cooperation memorandum of understanding frequently). November 30, 2017. Archived at https://web.archive.org/web/20190825224902/http://news.winshang.com/html/063/0383.html.

[97] UPMC International, "How We Can Help You," Services page, archived October 11, 2018. https://web.archive.org/web/20181011053603/https://upmcinternational.com/services/.

Hospital). In 2014, UPMC partnered with Xiangya Hospital to set up the Xiangya International Medical Center. UPMC's WISER Simulation Center has given substantial clinical education to Second Xiangya Hospital and Third Xiangya Hospital.[98] (*Wait times for a liver at Second Xiangya Hospital, for instance, have been found to be as short as half a week in 2019.*)[99]

University of Pittsburgh - Thomas E. Starzl Transplantation Institute

In 2018, researchers affiliated with the Thomas E. Starzl Transplantation Institute at the University of Pittsburgh co-authored a human organ transplantation study with the Department of Urological Organ Transplantation at the Second Xiangya Hospital of Central South University in China.[100]

The Starzl Institute also employed lung-transplant researcher Dr. Xingan Wang, whose public biography stated that he had previously worked for 11 years as a surgeon at Shanghai Pulmonary Hospital, described as the largest lung surgery center in China. Publicly available University of Pittsburgh materials indicate he has continued to work in lung transplantation and ex vivo lung perfusion research at the institution.[101] [102]

Montefiore Einstein

In spring 2017, the Montefiore Einstein Department of Pathology and Department of Surgery hosted three visiting Chinese liver transplant surgeons from Henan Provincial People's Hospital, the teaching hospital for Zhengzhou University School of Medicine, for a month-long clinical observership. The stated purpose was to help the visitors establish Henan Provincial People's Hospital's first organ transplant program.[103]

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[98] Rong Hao, Pittsburgh Branch of the Xiangya Overseas Alumni Association, "Review and Prospects of the Tenth Anniversary of the Central South University-University of Pittsburgh Cooperation," January 10, 2017, archived at https://web.archive.org/web/20210904180850/https://www.xyoaa.org/sites/default/files/files/%E6%B9%98%E9%9B%85-UPMC%20%E5%90%88%E4%BD%9C%E5%9B%9E%E9%A1%BE%E5%92%8C%E5%B1%95%E6%9C%9B%281%29.pdf.

[99] World Organization to Investigate the Persecution of Falun Gong. "Phone transcript: Nurse in the liver transplantation ward of the Second Xiangya Hospital of Central South University", May 08, 2019. https://www.zhuichaguoji.org/sites/default/files/investigation_report/125981/125981_047.pdf.

[100] H. Dai, L. Peng, and F. Peng, "A Novel Technique for En Bloc Kidney Transplantation from Infant Donors with Extremely Low Body Weight by Using the Distal Abdominal Aorta as an Outflow Tract," *American Journal of Transplantation* 18, no. 9 (September 2018): 2200–2207, https://www.amjtransplant.org/article/S1600-6135(22)09692-7/fulltext.

[101] "Xingan Wang, MD PhD," Starzl Transplantation Institute, University of Pittsburgh, archived October 22, 2020. https://web.archive.org/web/20201022210218/http://www.stiresearch.health.pitt.edu/person/xingan-wang.

[102] "Xingan Wang, MD, PhD," Department of Medicine, University of Pittsburgh, accessed May 21, 2026, https://people.dom.pitt.edu/people/xingan-wang-md-phd.

[103] "Dr. Liu Brings Chinese Transplant Surgeons to Montefiore," Pathology Department News, Montefiore Einstein Department of Pathology, October 27, 2017, https://einsteinmed.edu/uploadedFiles/departments/pathology/News/NL_Visiting%20Chinese%20Scholars%20Story_modified_20171027.pdf.

4. SIGNIFICANT RECENT DEVELOPMENTS

I would also like to draw the Commission's attention to a critical and actionable development: the 2022 publication by Global Rights Compliance (GRC) of a landmark Legal Advisory Report and Policy Guidance titled "Do No Harm: Mitigating Human Rights Risks when Interacting with International Medical Institutions & Professionals in Transplantation Medicine."[104] GRC, led by Wayne Jordash KC, specializes in accountability, corporate responsibility, and atrocity-related legal risk under international law. This is the first comprehensive legal framework to map the human rights obligations and complicity exposure of the full range of actors in international transplant medicine.

The GRC Advisory was developed as a practical framework for universities, hospitals, medical associations, transplant professionals, pharmaceutical and biotechnology companies, investors and funding bodies, research institutions, medical journals, conference organizers, and all other stakeholders linked to organ transplantation.

The GRC Advisory examines human-rights and legal risks arising from interactions with international medical institutions and professionals in transplantation medicine, including research collaborations, clinical training, institutional partnerships, commercial engagement, technology transfers, and professional exchanges involving higher-risk jurisdictions, including China.

Drawing on established business and human rights principles, the GRC Advisory concluded that institutions and individuals could face complicity exposure under an "aiding and abetting" analysis where their activities substantially assist or facilitate serious human rights abuses, including forced organ harvesting and organ trafficking. The framework therefore set out practical human rights due diligence, compliance, and risk mitigation measures aimed at helping organizations avoid direct or indirect involvement in such abuses.

The guidance has particular relevance for US institutions, companies, universities, medical centers, investors, and research partners engaged in international collaborations because it applies established standards of institutional responsibility and complicity analysis to cross-border medical, academic, and commercial cooperation. It sets out model policy provisions, due-diligence questions, warning signs, and recommended safeguards to help all transplant related stakeholders avoid supporting activities linked to unethical organ transplantation.

In 2024, the New York City Bar Association hosted an online event focused specifically on the Legal Advisory Report and Policy Guidance and its implications for business and human rights obligations in transplantation medicine.[105] Related issues were also examined in the City Bar's report, "Human Organ Supply: Report on Ethical Considerations and Breaches in Organ Harvesting Practices."[106]

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[104] Global Rights Compliance, "Do No Harm: Mitigating Human Rights Risks when Interacting with International Medical Institutions & Professionals in Transplantation Medicine" (2022), https://globalrightscompliance.org/project/do-no-harm-legal-advisory-policy-guidance/.
[105] New York City Bar Association, "Do No Harm: Business and Human Rights in Transplantation Medicine" (online webinar, March 22, 2023), https://www.nycbar.org/videos/do-no-harm-business-and-human-rights-in-transplantation-medicine/.
[106] New York City Bar Association, "Human Organ Supply: Report on Ethical Considerations and Breaches in Organ Harvesting Practices" (2023),

The Legal Advisory Report and Policy Guidance additionally received endorsement from the Bar Human Rights Committee of England and Wales, which recognized the framework as an important contribution to addressing institutional human rights risks connected to organ trafficking and forced organ harvesting in international collaborations and partnerships.[107]

It has also been adopted by Elsevier[108]—one of the world's largest academic publishers—across five leading transplant journals: the American Journal of Transplantation,[109] Journal of Liver Transplantation,[110] Transplantation Proceedings,[111] Transplant Immunology,[112] and the Journal of Heart and Lung Transplantation.[113] This development is particularly significant because the American Journal of Transplantation is a leading U.S. transplant journal and the official journal of the American Society of Transplantation and the American Society of Transplant Surgeons.

Under the updated guidance, journals "will not accept manuscripts that contain data derived from unethically sourced organs or tissue, including from executed prisoners or prisoners of conscience." The revised requirements further provide that, for clinical studies, authors must provide a statement confirming informed consent from a patient or their nominated representative together with ethical approval from an appropriate institution; however, journals reserve the right to request additional supporting evidence where they consider the information provided to be insufficient.

Think tanks here in Washington D.C., civil society organizations—including a satellite Rotary Club dedicated to ending Forced Organ Harvesting—are mobilizing awareness and advocacy, and leading medical bodies are taking a stand.

The International Society for Heart and Lung Transplantation has also barred all Chinese submissions involving transplants from human donors.[114]

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https://www.nycbar.org/reports/human-organ-supply-report-on-ethical-considerations-and-breaches-in-organ-harvesting-practices/.

[107] Bar Human Rights Committee of England and Wales, "BHRC Responds to Global Rights Compliance Legal Advisory Report and Policy Guidance on Global Organ Trafficking and Forced Organ Harvesting," November 20, 2024, https://barhumanrights.org.uk/bhrc-responds-to-global-rights-compliance-legal-advisory-report-and-policy-guidance-on-global-organ-trafficking-and-forced-organ-harvesting/.

[108] Elsevier, "Guide for Authors," American Journal of Transplantation, accessed May 21, 2026, https://www.sciencedirect.com/journal/american-journal-of-transplantation/publish/guide-for-authors.

[109] American Journal of Transplantation, "Guide for Authors," Elsevier, accessed May 21, 2026, https://www.sciencedirect.com/journal/american-journal-of-transplantation/publish/guide-for-authors.

[110] Journal of Liver Transplantation, "Guide for Authors," Elsevier, accessed May 21, 2026, https://www.sciencedirect.com/journal/journal-of-liver-transplantation/publish/guide-for-authors.

[111] Transplantation Proceedings, "Guide for Authors," Elsevier, accessed May 21, 2026, https://www.sciencedirect.com/journal/transplantation-proceedings/publish/guide-for-authors.

[112] Transplant Immunology, "Guide for Authors," Elsevier, accessed May 21, 2026, https://www.sciencedirect.com/journal/transplant-immunology/publish/guide-for-authors.

[113] Journal of Heart and Lung Transplantation, "Guide for Authors," Elsevier, accessed May 21, 2026, https://www.sciencedirect.com/journal/the-journal-of-heart-and-lung-transplantation/publish/guide-for-authors

[114] International Society for Heart and Lung Transplantation (ISHLT), "ISHLT Statement on Transplant Ethics," The Journal of Heart and Lung Transplantation, June 22, 2022, https://www.ishlt.org/docs/default-source/uploadedfiles/documents/ishlt-statement-transplant-ethics-2022.pdf.

5. RECOMMENDATIONS

First, I would like to commend co-Chair Chris Smith for his tremendous, persistent efforts over decades confronting China's large-scale forced organ harvesting from prisoners of conscience, and for championing China's persecuted innocents even longer. You grasped the totalitarian nature of the CCP long before most did, and that has culminated in your legislation H.R. 1503, the Stop Forced Organ Harvesting Act of 2025 (which passed the House near-unanimously).

I would also like to recognize another commissioner present at the hearing, Senator Jeff Merkley, for his leadership on this issue in the Senate and for co-sponsoring S. 4009, the Falun Gong and Victims of Forced Organ Harvesting Protection Act (the Senate update of H.R. 1540, which passed the House unanimously).

I will focus my recommendations on concrete steps Congress, the executive branch, and relevant institutions can take to address forced organ harvesting in China and U.S. complicity risks.

First, the Senate has a historic opportunity now, to pass these two bills to finally confront this egregious crime: H.R. 1503, the Stop Forced Organ Harvesting Act of 2025 and S. 4009, the Falun Gong and Victims of Forced Organ Harvesting Protection Act. Both are critical pieces of legislation that would make a real difference.

H.R. 1503, the Stop Forced Organ Harvesting Act of 2025, requires the President to impose property and visa-blocking sanctions on any person who facilitates forced organ harvesting and to maintain a list of such individuals. S. 4009, the Falun Gong and Victims of Forced Organ Harvesting Protection Act, directs the President to impose sanctions, restrict visas and financial transactions, and also specifically mandates annual reporting on foreign persons involved in forced organ harvesting in China. This annual reporting requirement is critical for ensuring sustained transparency, accountability, and congressional oversight.

Eight countries have enacted binding national laws addressing China's killed-to-order forced organ harvesting. It's time for the United States to do the same.

At the federal level, the U.S. should end all participation in and cooperation with China's organ transplant system. Congress should direct HHS, in coordination with the State Department and NIH, to conduct a full audit of any U.S. ties to China's transplant sector, including funding, research collaborations, physician training programs, data sharing, or procurement partnerships.

HHS should immediately cease issuing or recognizing Federalwide Assurances (FWAs) for any Chinese institutions connected to organ transplantation. The FWA is the formal process by which HHS certifies that a foreign institution meets U.S. ethical standards for human subjects research. Once granted, this certification allows the institution to receive federal funding and collaborate with American universities, hospitals, and researchers. Revoking FWAs for transplant-related Chinese entities would be a direct and effective way to cut off U.S. support.

In parallel, Congress should require NIH and HHS to condition relevant grants on certification of ethical organ sourcing and perhaps adopt a similar model to the GRC Advisory framework, if not the framework itself.

Financial enforcement mechanisms should also be strengthened. Congress should prohibit federal reimbursement and insurance coverage for organ transplants performed in China or

involving organs obtained outside approved procurement systems. The Block Organ Transplant Purchases from China Act of 2025 (H.R. 2114, the "BLOCK Act") introduced by Congressman Neal Dunn, currently in committee, provides a legislative pathway to achieve this and should be advanced.[115]

On the state level, six states have taken action—Texas,[116] Arizona,[117] Idaho,[118] Tennessee,[119] Utah,[120] and Arkansas[121]—which leaves forty-four left to go.

Congress should establish mandatory reporting requirements for healthcare providers to document cases in which U.S. citizens receive organ transplants in China. Such reporting would enhance transparency, support oversight and enforcement efforts, and help identify potential patterns of transplant tourism. Comparable legislation has already been introduced in the United Kingdom through amendments to the Health and Care Act requiring the recording of overseas transplants within the National Health Service system.

All US medical institutions, universities, private funding bodies and transplant associated entities including transplant societies, should also be required to introduce policy and adopt rigorous human rights due diligence procedures regarding any interactions and collaborations with Chinese transplant institutions—in alignment with the GRC Advisory framework.

Additionally, as I discuss in *Killed to Order*, other legal accountability tools should also be considered:

> "There are also more out-of-the-box legal approaches, like the one proposed by law professor Joanmarie Ilaria Davoli. Davoli argues in her January 2025 SSRN paper 'Harvesting Humans' that federal statute 18 U.S.C. §956 could be used to prosecute Americans involved in organ tourism or transplant arrangements tied to forced organ harvesting abroad. It's a creative interpretation, but a sound one. The statute makes it a crime for US citizens to conspire to kidnap, maim, or kill a person in a foreign country—and that is, in essence, what's happening when someone knowingly participates in a system built on murder for organs."[122]

Finally, the federal government should issue formal guidance to hospitals, transplant centers, insurers, universities, and medical associations outlining the ethical, legal, and human rights risks associated with transplantation activity in China and other high-risk jurisdictions.

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[115] H.R. 2114, 119th Cong. (2025). https://www.govinfo.gov/content/pkg/BILLS-119hr2114ih/pdf/BILLS-119hr2114ih.pdf.
[116] Texas Senate Bill 1040, 88th Leg., Regular Sess. (2023), https://legiscan.com/TX/text/SB1040/id/2819559.
[117] Arizona House Bill 2109, 57th Leg., 1st Sess. (2025) (Arizona End Organ Harvesting Act), https://www.azleg.gov/legtext/57leg/1R/bills/HB2109H.pdf.
[118] Idaho House Bill 670, 67th Leg., 2nd Sess. (2024) (End Organ Harvesting Act), https://legislature.idaho.gov/wp-content/uploads/sessioninfo/2024/legislation/H0670.pdf.
[119] Tennessee House Bill 395, 114th Gen. Assemb., Regular Sess. (2025) (Tennessee Genomic Security and End Organ Harvesting Act), https://capitol.tn.gov/Bills/114/Bill/HB0395.pdf.
[120] Utah Senate Bill 262, 2024 Gen. Sess. (Organ Transplant Amendments), https://le.utah.gov/~2024/bills/static/SB0262.html.
[121] Arkansas Senate Bill 311, 95th Gen. Assemb., Regular Sess. (2025) (End Organ and Genomic Harvesting Act), https://arkleg.state.ar.us/Bills/Detail?id=sb311&ddBienniumSession=2025%2F2025R.
[122] Jekielek, *Killed to Order*, 223; Full published article in the Belmont Law Review: https://repository.belmont.edu/cgi/viewcontent.cgi?article=1129&context=lawreview.

6. CONCLUSION

To conclude: On the eve of the 250th anniversary of America's founding, we should remember this country was built on a foundational belief in the God-given rights of every individual and the inherent dignity of every human being.

The Chinese Communist Party rejects that truth at its core. It views its own citizens, not as people with innate dignity, but as a collection of extractable body parts. And here is the hard truth: the CCP looks at America and Americans through the exact same lens. Just as it calculates the value of a prisoner's cornea or kidney, it calculates how to extract America's technology, its markets, its alliances, and ultimately its sovereignty.

While in Beijing earlier this year, Secretary of State Marco Rubio, who has championed earlier versions of S. 4009 as Senator, said, China's "rise cannot come at our expense." The lesson of the CCP's decades of killed-to-order forced organ harvesting is that the regime is capable of anything at others' expense.

Let us honor the 250th anniversary of this nation's founding by confronting this atrocity.

Thank you.