



To the Presidents and Governing Boards of US Flagship Public Universities:

The People's Republic of China is engaged in a global campaign to exterminate the culture, religion, and language of the Uyghur people.

According to a [January 19, 2021 determination](#) by the US Department of State, the Chinese government's atrocities against Uyghurs, **including the forced detention of more than one million civilians, forced sterilization of thousands of Uyghur women, widespread restrictions on free religious practice, widespread use of torture, and efforts to reduce or eliminate entirely the use of the Uyghur language**, amount to genocide. On March 30, 2021, the Biden administration [formalized this determination](#), affirming a nonpartisan consensus that China's actions constitute genocide. Around the world, atrocities against Uyghurs have been recognized as genocide by the independent [Uyghur Tribunal](#) and by [Canada](#), the [Czech Republic](#), [France](#), the [United Kingdom](#), and a growing number of other countries.

These abuses do not end at China's borders. Uyghurs living outside China face a campaign of [systematic harassment and surveillance](#) designed to silence them or coerce them into returning to China. **Universities have been at the center of this campaign, with students on US college campuses often facing surveillance, manipulation, and coercion from proxies of the Chinese state.** At the same time, the widespread use of Uyghur forced labor in China and major Chinese firms' alleged participation in atrocities – including everything from [medical experimentation](#) to the development of [facial recognition technology](#) designed to identify Uyghurs – means that investors in China risk complicity in genocide. Given the scale of these atrocities and the number of firms implicated, **it is likely that much of the more than \$820 billion in US university endowment funds under management as of last year is invested in firms complicit in genocide**, despite urgings from the US Department of State for universities to reduce their exposure to Chinese stocks.

For these reasons, **we are asking you to take all possible steps to investigate your institution's endowment, including the endowment of any institutionally related foundation, for ties to entities complicit in the genocide of Uyghurs, and to divest from any such holdings.** In doing so, you will protect the independence needed to keep your students safe, promote academic freedom, and stay true to the values you profess. These goals are particularly vital for public research universities, which form the bedrock upon which this country's extraordinary academic and scientific achievements have been built. As the leading public university in your state, your institution is a beacon to which others turn for guidance and leadership. **By divesting, you will stay true to your own university's values and send a strong message to Wall Street, the Chinese government, and other universities that the American academic community will not stay neutral in the fight for human rights.**

Around the world, institutional investors like [Norway's sovereign wealth fund](#) are beginning to divest from firms complicit in atrocities against Uyghurs. Universities have been at the center of this trend. Last year, the [Catholic University of America](#) responded to student pressure by becoming the first university in the world to publicly commit to audit its endowment for investments in entities complicit in the genocide of Uyghurs. In January, Yale University's Advisory Committee on Investor Responsibility [began to investigate](#) Yale's investments in Chinese companies for ties to human rights abuses. We are particularly proud of the role that students have played, mobilizing for divestment on campuses like [Georgetown](#), [George Washington University](#), the [University of Virginia](#), and [UCLA](#). This grassroots



movement is growing, and universities have an opportunity to stand with their students as leaders.

Divestment is a moral, regulatory, and fiduciary necessity. As then-Under Secretary of State Keith Krach noted in an August 18, 2020 [letter to the governing boards of American universities](#), Article 177 of China's Securities Law prohibits Chinese firms from providing many internal documents to foreign regulatory agencies, impairing their ability to abide by US accounting standards and investors' ability to engage in adequate due diligence. Many of the largest Chinese firms continue to violate the 2021 Holding Foreign Companies Accountable Act by ignoring Public Company Accounting Oversight Board (PCAOB) auditing standards, putting them at risk of delisting from major stock exchanges. **For firms on the Commerce Department's Entity List and other firms likely to run afoul of US laws and regulations, the risk of delisting is particularly acute.**

These risks would become particularly acute if China were to invade Taiwan, a long-term goal of the Chinese government which Taiwanese leaders fear could come as early as the [next 3 years](#). Such a conflict would be a source of immense risk to US investors in Chinese firms, particularly if the United States and allied countries were to implement a strong sanctions regime comparable to that imposed on Russia since February 24. As you may know, many universities, pension funds, and other institutional investors have begun to divest of Russian assets, including the [University of Colorado](#) and the [public university system of Arizona](#). These steps are commendable, but because they took place only after the outbreak of war and the implementation of sanctions, they often came at a significant financial loss. This example is a powerful illustration of the fiduciary necessity of divestment from authoritarian regimes like China's. The lesson could not be more clear: **divestment must happen before an economic crisis, not after.**

In addition to divesting your endowment from entities complicit in the genocide of Uyghurs, we are asking you to take other steps to reduce your university's exposure to China. We urge you to carefully review any large donations your institution receives from individuals and entities with ties to the Chinese government, particularly if those donations are likely to influence academic affairs. We also urge you to take steps to ensure that any research partnerships with Chinese institutions are subject to the due diligence needed to ensure that ethical standards are maintained and cutting edge research does not inadvertently fuel human rights abuses or the development of military technology.

Attached to this document, you will find a copy of Athenai's "Uyghur Genocide Divestment Pledge." In addition, you will find a list of firms deemed by the US government and by the Athenai Institute to have particularly extensive ties to atrocities against Uyghurs and other practices contrary to your university's values. By signing the Pledge, you would be committing to investigate your endowment for any ties to these entities or others deemed complicit in the genocide of Uyghurs. By agreeing to take these steps, you would join the growing ranks of university administrators who are choosing not to allow their funds to be invested in a regime which actively seeks to undermine the values that have made American universities great. It would be an honor to have your support in this fight.

Sincerely,

John Metz
President
Athenai Institute

Co-Signatories

CURRENT AND FORMER PUBLIC OFFICIALS

Congresswoman **Claudia Tenney** (NY-22)

Congressman **Michael Gallagher** (WI-08)

Congressman **Michael McCaul** (TX-10)

Nikki R. Haley – United States Ambassador to the United Nations (2017-19)

Keith Krach – United States Under Secretary of State for Economic Growth, Energy, and the Environment (2019-2021)

Kelley Currie – United States Ambassador-at-Large for Global Women’s Issues (2020-2021)

ORGANIZATIONS

Campaign for Uyghurs

Christian Coalition for Uyghur Freedom

Citizen Power Initiatives for China

Coalition for a Prosperous America

College Democrats of America

College Republican National Committee

Cornell Society for the Promotion of East Asian Liberty

Formosan Association for Public Affairs

Hong Kong Student Advocacy Group - NYU

Hong Kong Watch

Human Rights Foundation

Humanitarian China

Jewish Movement for Uyghur Freedom

Krach Institute for Tech Diplomacy at Purdue

McMaster Stands with Hong Kong

No Business With Genocide

Perth Anti-CCP Association

San Francisco Regional Tibetan Youth Congress

Students for Hong Kong

Students for Uyghurs

Tennessee College Democrats

Theta Chapter, Alpha Phi Omega (University of Virginia)

Tibet Action Institute

Uyghur American Association

Uyghur Collective

Uyghur Human Rights Initiative at GW Law (George Washington University)

Uyghur Human Rights Project

Uyghur Times

Vandenberg Coalition

Victims of Communism Memorial Foundation

We the Hongkongers

ACTIVISTS

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Founder, Uyghur Times

Wei Shioh Fong

Yang Jianli
Founder, Citizen Power
Initiatives for China



Uyghur Genocide Divestment Pledge

“According to the body of available evidence, the People’s Republic of China is actively committing genocide against members of the Uyghur minority. To invest in entities complicit in this genocide or in associated crimes against humanity would be an affront to our values. Therefore, _____ University hereby pledges not to invest in any entity complicit in the genocide of Uyghurs, including but not limited to firms in the appended list, and to divest from any existing holdings in any such entity, pending a full audit or other investigation.”

Firms Complicit in the Genocide of Uyghurs

- All companies that are participants in the PRC’s Military-Civil Fusion development strategy, as defined by Section 1260H of the 2021 National Defense Authorization Act (NDAA);
- Any companies that develop, produce, or implement surveillance technology in China, including but not limited to any subsidiaries of, or firms affiliated with, Hikvision Digital Technology, Zhejiang Dahua Technology, and SenseTime;
- Any biotech companies in China involved in genomic identification, including BGI Group and other entities identified by the Bureau of Industry and Security as being connected to the genocide and forced labor of the Uyghurs and other Turkic minorities;
- Chinese tech firms suspected to have participated in or profited from the forced labor or internment of Uyghur and Turkic minorities, including Huawei, Alibaba, and Tencent;
- All entities listed on the OFAC Chinese Military Industrial Complex (CMIC) List, and Chinese companies listed on the Department of Commerce Bureau of Industry and Security (BIS) Entity List;
- Any and all companies associated with individuals or entities on the Department of the Treasury’s Specially Designated Nationals and Blocked Persons (SDN) List;
- All entities that have been subject to a U.S. Customs and Border Protection Withhold Release Order (WRO) related to use of forced labor in Xinjiang, including those covering tomatoes, cotton, and polysilicon;
- PRC and Hong Kong companies which do not comply with the Public Company Accounting Oversight Board (PCAOB) accounting requirements, which can be identified by their SEC filings and/or IPO disclosures;
- All Variable Interest Entities (VIEs);
- Any entity that fails to comply with the provisions of the Uyghur Forced Labor Prevention Act; and
- Any major shareholder in any of the firms described in this list (i.e. firms holding a minimum of a 5% ownership share).

The Athenai Institute is a bipartisan, student-founded 501(c)(3) formed in May 2020. Athenai’s Divestment Campaign promotes university divestment from entities complicit in the genocide of Uyghurs.