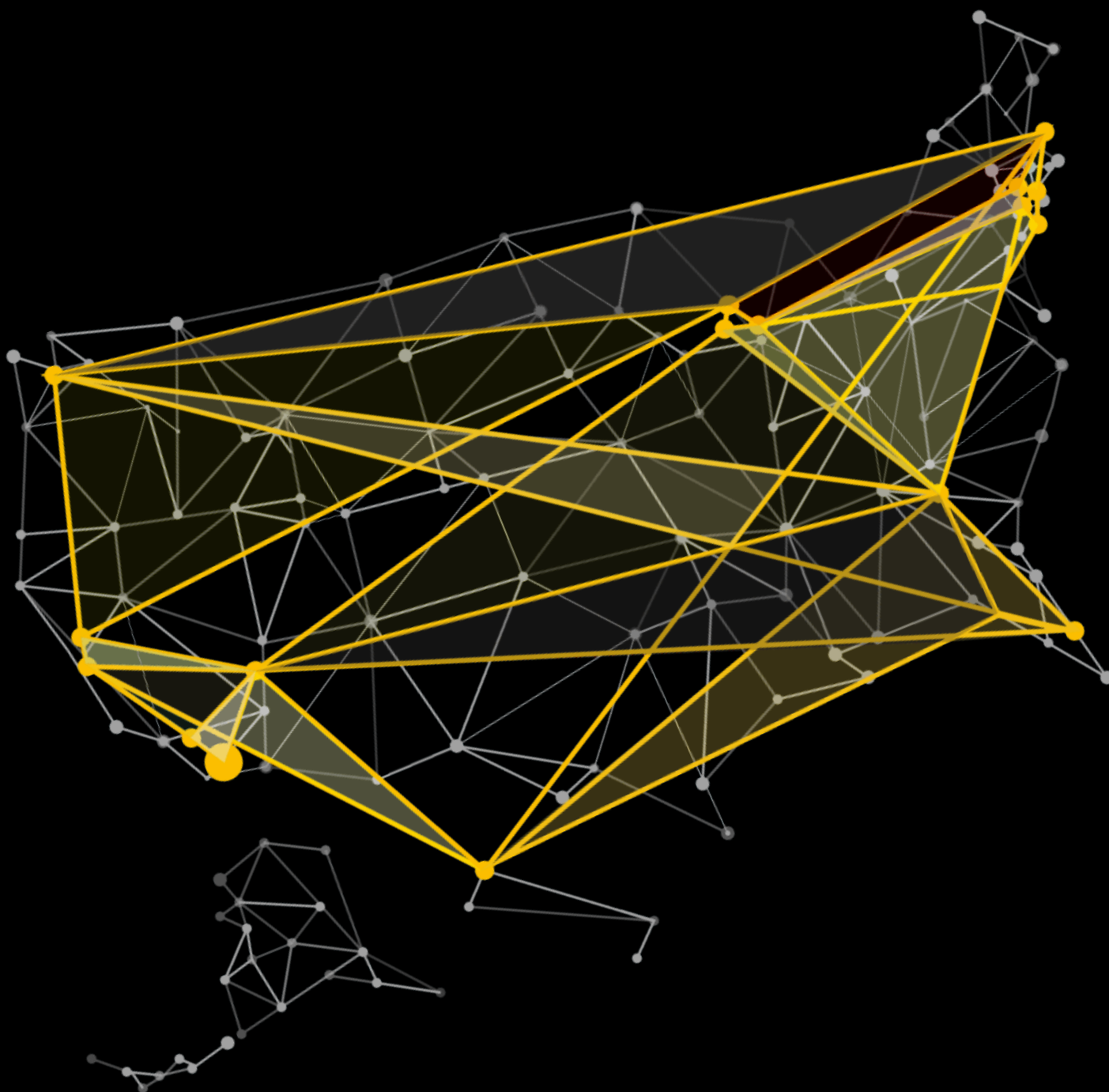


# The S.A.R. Network



## Uncovering the Hong Kong Government's Subnational Foreign-Influence Campaign in America

A Report by  
Hong Kong Democracy Council





**The S.A.R. Network:  
Uncovering the Hong Kong Government's Subnational  
Foreign-Influence Campaign in America**

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<b>Executive Summary</b>	<b>1</b>
Key Takeaways	1
<b>Introduction: The S.A.R. Network, Foreign Influence and C.C.P. Propaganda</b>	<b>2</b>
<b>S.A.R. Government Entities</b>	<b>6</b>
The Hong Kong Economic and Trade Offices (H.K.E.T.O.s)	7
The Hong Kong Trade Development Council (H.K.T.D.C.)	9
Other S.A.R. Government Entities	12
<b>The Hong Kong Associations</b>	<b>13</b>
Overview	14
Structure and Links	15
Local Political Relationships	18
Networking With Hong Kong Officials	20
Ties to Cultural Institutions, Universities, and Think Tanks	22
Ties to C.C.P.-Linked Organizations and the United Front	25

**Foreign Agents** ————— **26**

*Sing Tao Daily* and Robin Mui **27**

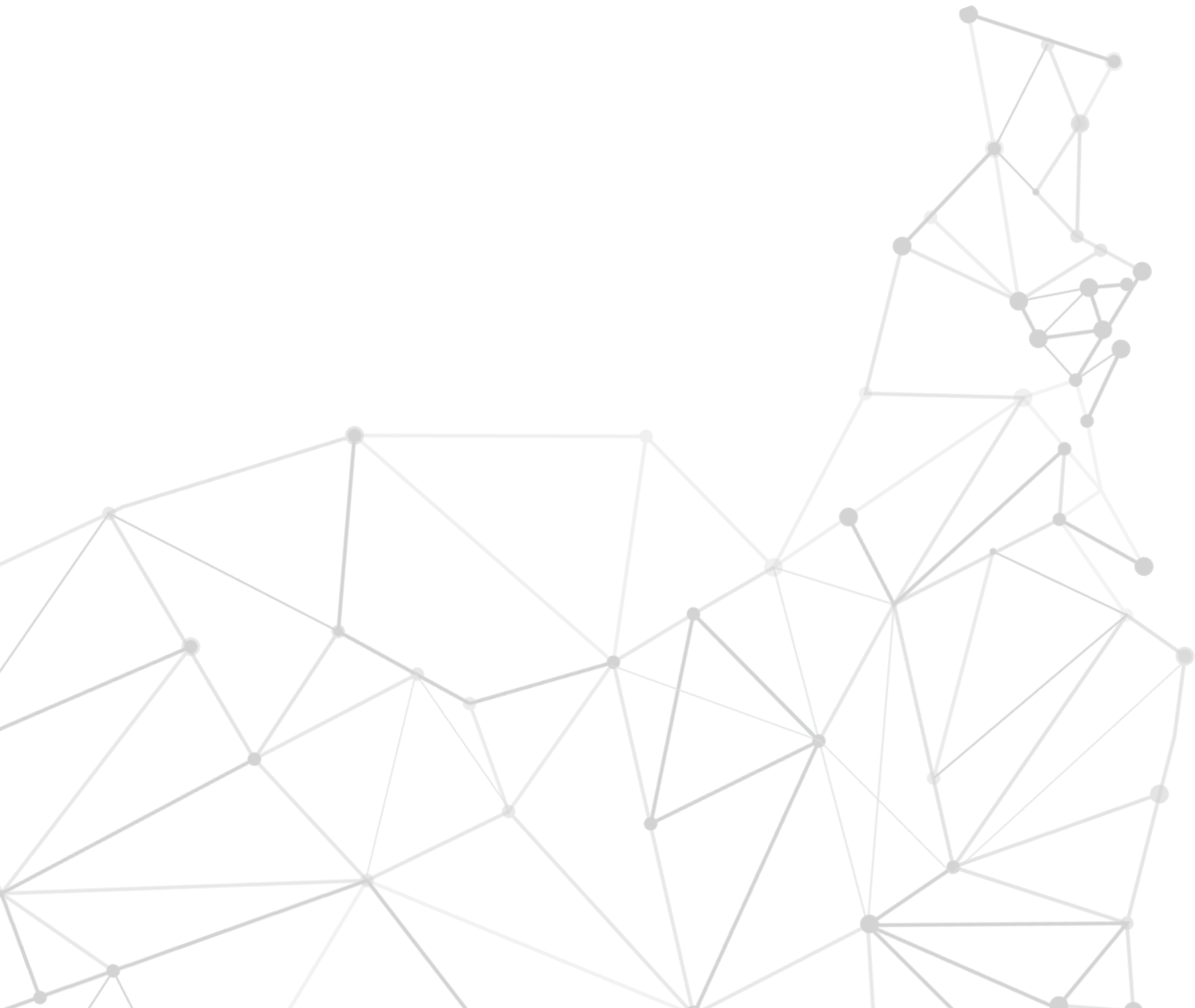
**Policy Recommendations** ————— **29**

**Conclusion** ————— **33**

**Methodology Statement & Disclaimer** ————— **35**

**Appendix** ————— **37**

# Executive Summary



## Executive Summary

This report focuses on attempts by the Hong Kong Special Administrative Region (S.A.R.) government to build ties with American civil-society actors and local governments, tying these efforts to comprehensive attempts by the Chinese Communist Party (C.C.P.) to influence American politics.

The contents of this report are a summary of findings about efforts by S.A.R. government entities and their cutouts to influence the American public and politics at the **subnational level**. They cover the activities of three different types of organizations involved in

these efforts: S.A.R. government entities, Hong Kong Associations, and C.C.P.-affiliated organizations from mainland China. The relevant entities and activities form the “S.A.R. Network.”

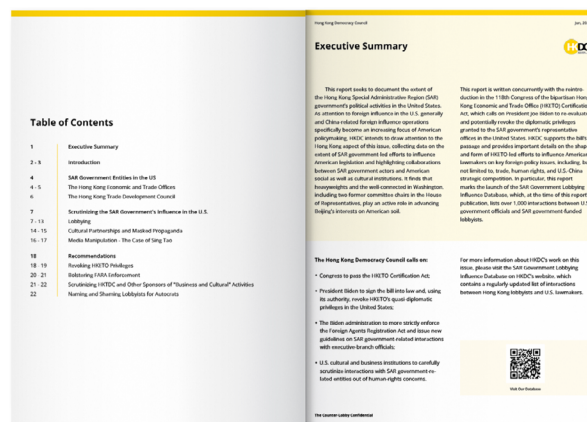
This report expands upon the work in HKDC’s 2023 report, *The Counter-Lobby Confidential: How Beltway Insiders Do the Hong Kong Government’s Bidding*, as well as the documentation outlined in HKDC’s [Hong Kong S.A.R. Government Influence Database](#).

## Key Takeaways

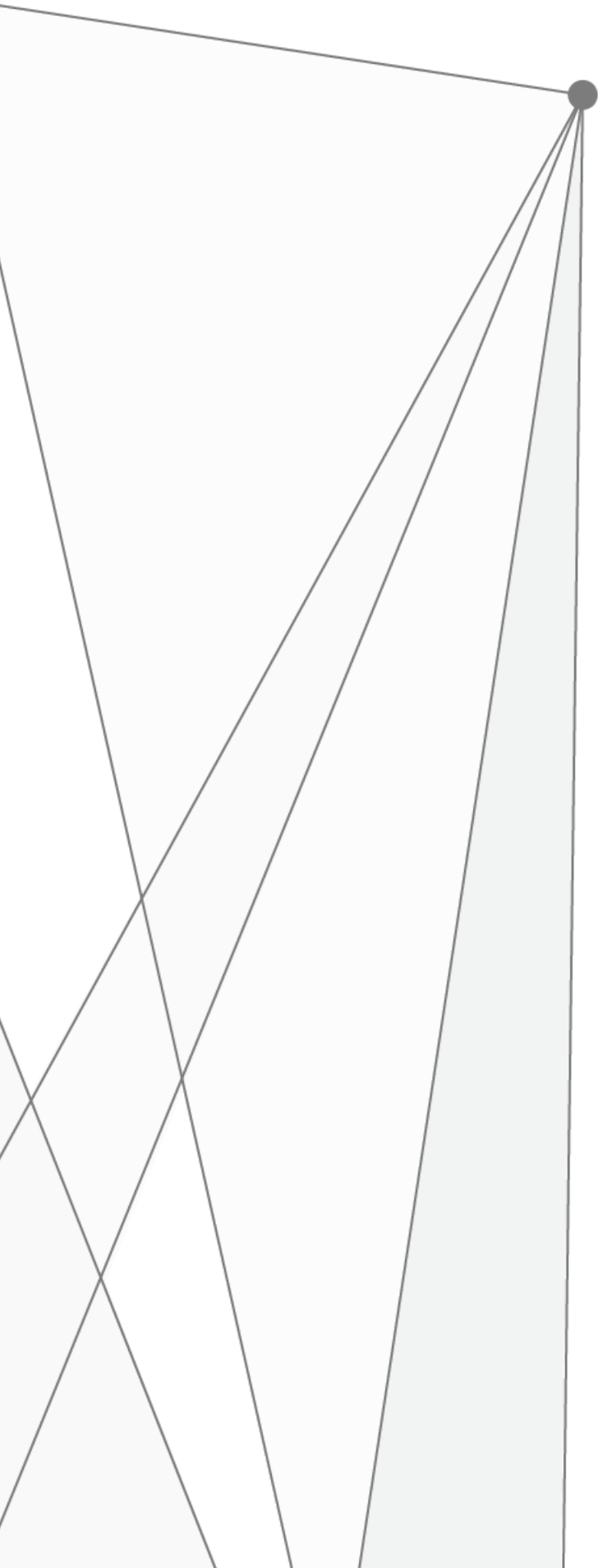
- Over the past decade, the S.A.R. government has cultivated U.S. ties at the state and local levels using government organizations and astroturf groups (the “S.A.R. network”) as part of a broader national foreign influence campaign.
- The three Hong Kong Economic and Trade Offices in New York, San Francisco, and Washington, D.C. have played a central role in the formation of the S.A.R. network, financially supporting astroturf groups and hiring American political consultants to spread propaganda at the local level.
- The S.A.R. network strategically targets media, think tanks, and business communities at the subnational level, where the S.A.R. government’s efforts are less likely to be noticed by China watchers and human rights defenders.
- The S.A.R. network relentlessly pushes pro-C.C.P. propaganda, promoting C.C.P. foreign policy priorities like the Belt & Road Initiative, maligning Hong Kong’s democratic movement, and whitewashing the S.A.R. government’s human rights abuses.

## Policy Recommendations

- **For Congress:** Revoke the privileges of the H.K.E.T.O.s by passing the Hong Kong Economic and Trade Office Certification Act.
- **For the Administration:** The Department of Justice should designate the Hong Kong Associations and similar organizations as foreign agents under FARA. Strengthen capacity in combating foreign influence.
- **For politicians, think tanks, media, and other U.S. organizations:** Conduct background research before endorsing, partnering up, or engaging with relevant organizations.



Read HKDC's 2023 report [here](#)



# Introduction



# Introduction: The S.A.R. Network, Foreign Influence and C.C.P. Propaganda

The activities of the S.A.R. government-affiliated organizations detailed in this report therefore cannot be disentangled from broader efforts by the C.C.P. to advance its propaganda on U.S. soil. Readers of this report should put them in the context of a wider range of reporting on the C.C.P.'s global influence campaign, such as recent [coverage](#) of Uyghur community-related C.C.P. infiltration, or the recent [exposé](#) of the role of C.C.P.-affiliated organizations in carrying out transnational repression published jointly by HKDC and Students for a Free Tibet.

HKDC's report, *The Counter-Lobby Confidential*, documented a long history, dating back to well before the 2014 Umbrella Movement, of S.A.R. government efforts to establish relationships with U.S. political actors, spread masked propaganda, and dominate the conversation around Hong Kong at national cultural institutions. In general, the organizations involved in the S.A.R. government's local outreach follow the same pattern when attempting to insert themselves into American politics and society. They coordinate outreach to politicians, use ostensibly neutral institutions to spread propaganda, and forge cultural partnerships that crowd out genuinely grassroots local Hong Kong diaspora organizations.

This report covers these subnational influence efforts, beginning with examples of how S.A.R. government entities such as H.K.E.T.O.s and the H.K.T.D.C. work to spread pro-C.C.P. narratives and smear anti-C.C.P.

voices at the subnational level. In particular, it focuses on the work of S.A.R. government entities in Atlanta and San Francisco as representative examples of their subnational influence. The report then moves to cover the operation and extent of S.A.R. government-backed organizations working in the U.S., as well as the broader assortment of pro-C.C.P. billionaires, media conglomerates, and C.C.P.-affiliated organizations that support their work.

HKDC's 2023 report, *The Counter-Lobby Confidential*, uncovered efforts led by the Hong Kong Economic and Trade Offices (H.K.E.T.O.s) and financed by the Hong Kong Trade Development Council (H.K.T.D.C.) to influence federal policymaking in the U.S. through a \$15 million lobbying campaign that resulted in more than 1,000 interactions with Congressional offices and executive-branch officials.<sup>1</sup>

This new report, *The S.A.R. Network: Uncovering the Hong Kong Government's Subnational Foreign-Influence Campaign in America*, extends HKDC's efforts to document the S.A.R. government's organized political efforts in the U.S., focusing on the subnational aspect of a broader campaign to influence American civil society and local politics. The report documents the structure and political activities of a coordinated group of S.A.R. government organizations, astroturf groups, and registered foreign agents, collectively dubbed the "S.A.R. network" by HKDC.

It must be noted that though this report focuses on the S.A.R. government and its influence network in the U.S., the issues documented do not pertain

solely to Hong Kong. In all cases, the propaganda and local outreach efforts of the S.A.R. network are to the benefit of the C.C.P., and in many cases, **the propaganda efforts are specifically focused on promoting C.C.P. foreign-policy priorities like the Belt and Road Initiative.**

In other cases, S.A.R.-backed groups help coordinate propaganda offensives in tandem with C.C.P. organizations. Some even boast close financial ties to the C.C.P.: For example, to C.C.P.-controlled state enterprises in China or to local Chinese governmental entities. In one particularly striking case during the 2023 APEC meeting in San Francisco, an S.A.R.-backed astroturf organization [coordinated](#) a photo op with S.A.R. Financial Secretary Paul Chan and a San Francisco city government official where Chan [reportedly](#) spoke about Hong Kong's "positive outlook" at the same time that supporters of the S.A.R. government were [harassing](#) prominent Hong Kong human-rights activists.

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<sup>1</sup> The H.K.E.T.O.s are the S.A.R. government's foreign representative offices. The United States hosts three H.K.E.T.O.s, located in San Francisco, New York, and Washington, D.C. The H.K.T.D.C. is a statutory body of the S.A.R. government, ostensibly tasked with promoting Hong Kong businesses. In actuality, the H.K.T.D.C. has a well-documented history of involvement in political matters, including lobbying against U.S. legislation concerning human rights and national security.



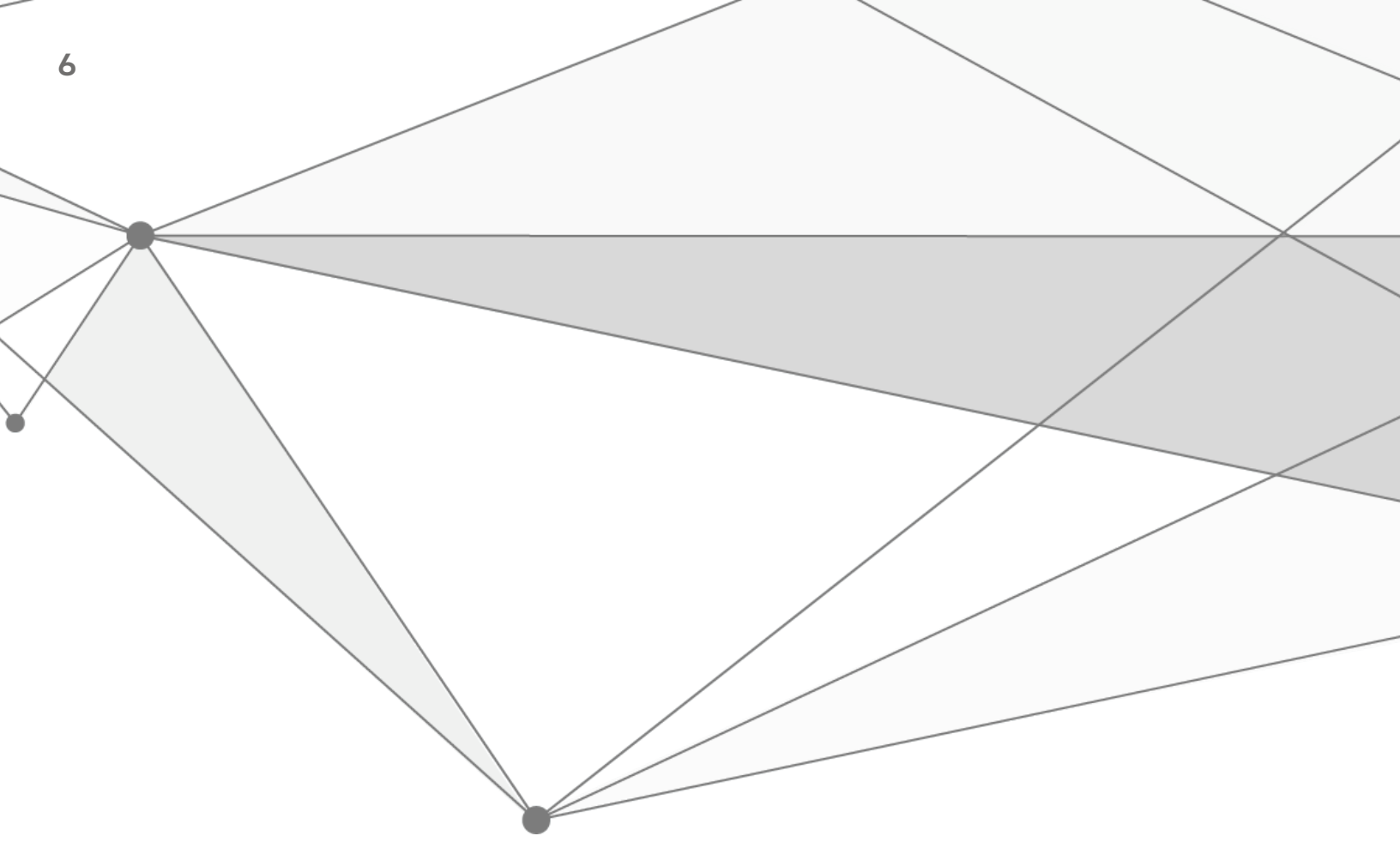
*Paul Chan (right) with the U.S. Secretary of the Treasury, Dr Janet Yellen (left) at the APEC Finance Ministers' Meeting*

*(Photo: Hong Kong Government's press release)*



*Paul Chan (first row, center) with members on the Board of Directors or the Executive Committee of the Hong Kong Association of Northern California, San Francisco H.K.E.T.O. Director Jacko Tsang, and San Francisco Human Rights Commissioner Irene Riley*

*(Photo: Hong Kong Government's press release)*



**S.A.R.  
Government  
Entities**

## The Hong Kong Economic and Trade Offices (H.K.E.T.O.s)

By themselves, the H.K.E.T.O.s are a potent force of pro-S.A.R. government propaganda. At the national and federal level, H.K.E.T.O.s direct lobbying efforts against human-rights legislation, gather political intelligence on Congressional bills that might negatively affect the C.C.P., and push pro-Beijing [propaganda](#) at otherwise non-political cultural and educational venues. At the subnational level, H.K.E.T.O.s finance the establishment of astroturf groups and help embed pro-S.A.R. government propaganda into local media.

Though there are only three H.K.E.T.O.s in the U.S. — located in Washington, New York, and San Francisco — these offices are responsible for conducting political activities across the entire country. Thus, they often contract out political services to American lobbyists and consultants. This has been a hallmark of H.K.E.T.O.s' federal influence operation: As HKDC's S.A.R. Government Lobbying Influence Database has documented, H.K.E.T.O.-directed federal lobbying is typically carried out by American lobbyists and consultants, rather than solely by officials at any given H.K.E.T.O. This pattern remains the same at the state and local levels, where H.K.E.T.O.s hire American political consultants who are well embedded into different communities, making use of their local ties and trusted reputations to spread pro-S.A.R. government propaganda.

One particularly notable example is that of Eugene

“Gene” Hanratty III, a former U.S. Army Special Forces officer who currently works as a political consultant on China-related issues. [Dubbed](#) by local news as “Hong Kong’s man in Atlanta,” Hanratty worked as an H.K.E.T.O. consultant for more than 30 years, retiring recently from that role in February 2023.

A highly involved member of the Atlanta community, Hanratty [worked](#) as the Southeast U.S. Coordinator and Senior Consultant to the New York H.K.E.T.O. while also serving on local political entities such as the Mayor’s International Committee for Community Relations, the International Leadership Council of Atlanta, and the Diversity Committee of the Atlanta Regional Commission. At the same time, Hanratty also remained involved with Asian-American [organizations](#) such as the National Association of Asian Americans and sat on the boards of the Asian American Chamber of Commerce and the Asian American Heritage Foundation. In his capacity as a consultant, Hanratty organized a wide range of Atlanta-area outreach efforts and cultural partnerships for the H.K.E.T.O., [including](#) the Atlanta Hong Kong Dragon Boat Festival.

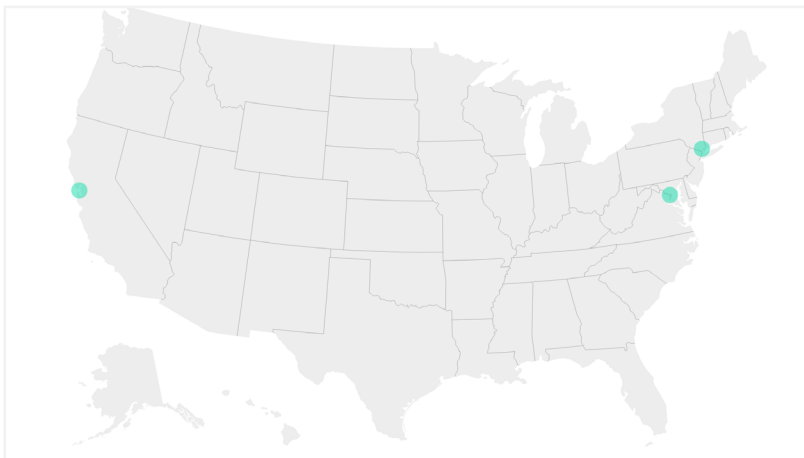
On behalf of the H.K.E.T.O., Hanratty has used the Atlanta Hong Kong Dragon Boat Festival as a platform to spread pro-C.C.P. propaganda. In 2019, Hanratty used a news appearance on behalf of the Atlanta Hong Kong Dragon Boat Festival to speak about then-ongoing protests in Hong Kong. The news article in which Hanratty was quoted repeatedly

described Hong Kong as plagued by “violence” and characterized Hong Kong’s pro-democracy protests as “antigovernment protesters wreak[ing] havoc on the city.” In the interview, Hanratty alleged involvement by “gangs” in the city’s unrest, claimed that the protests were principally motivated by economic factors rather than a desire for democracy, and expressed “serious” doubts that the One Country, Two Systems arrangement would be dismantled before 2047.

Similarly, during the pro-democracy Umbrella Movement of 2014, Hanratty helped coordinate a media [appearance](#) by then-H.K.E.T.O. Commissioner Clement C. M. Leung, where Leung extensively attacked protests as “illegal” and “over-the-top,” defended the C.C.P.’s undemocratic practices in Hong Kong as representative of “Hong Kong people,”

characterized the actions of the Hong Kong Police Force as “lenient,” and claimed that Hong Kong was “a center for free expression as well as free enterprise” that was “moving inexorably in the direction of more openness and accountability.”

These types of media appearances by H.K.E.T.O. employees wearing multiple hats demonstrate the sophistication of the S.A.R. government’s propaganda efforts. By both speaking through an American political consultant with strong ties to the Atlanta area and also going to certain lengths to use a cultural event like the Atlanta Hong Kong Dragon Boat Festival as a platform to smear protestors, H.K.E.T.O.s are able to use trusted community voices to place pro-C.C.P. propaganda in local news sources without attracting much attention.



● H.K.E.T.O.s in the U.S.

## The Hong Kong Trade Development Council (H.K.T.D.C.)

Though a great deal of emphasis has been placed on the role of H.K.E.T.O.s in shaping and directing S.A.R. government influence in the U.S., the H.K.T.D.C. plays an equally important part, serving as a nexus of influence and propaganda for the S.A.R. government.

The H.K.T.D.C. is a key hub for S.A.R. government influence not only at the federal level, where it has funded efforts to lobby against the passage of key human-rights legislation pertaining to Hong Kong, but also at the state level. FARA records [compiled](#) in HKDC's S.A.R. Government Lobbying Influence Database show that since 2021, lobbyists paid by the H.K.T.D.C. have engaged in outreach to the governments of 22 states: Arkansas, California, Connecticut, Delaware, Florida, Illinois, Indiana, Kentucky, Michigan, Maryland, Massachusetts, Nevada, New Jersey, New York, North Carolina, Ohio, Oklahoma, Oregon, Texas, Utah, Virginia, and Washington.

In addition to its role as a conduit of funds for S.A.R. government lobbying campaigns at both the state and federal levels, the H.K.T.D.C. is an important facilitator of pro-C.C.P. propaganda. In fact, since 2019, a key function of the H.K.T.D.C. has been to mislead U.S. investors and members of the business community about the political environment in Hong Kong.

In this capacity, the H.K.T.D.C. has pioneered new ways to advance pro-C.C.P. propaganda at the state and local levels. In particular, the H.K.T.D.C.'s partnership

with a prominent California think tank called the Bay Area Council Economic Institute is worth examining as a model for how future efforts by C.C.P. and S.A.R. government propagandists might operate.

The Bay Area Council Economic Institute is a think tank operated by the Bay Area Council, a business association in San Francisco with a long history of wielding significant influence over the region's economic policy. Since its founding, the Bay Area Council has played an important [role](#) in the development of San Francisco's public-transportation system as well as in the establishment of several local government agencies.

Because of their outsized role in economic policymaking, the Bay Area Council and the Bay Area Council Economic Institute have long covered California's relationship with China and Hong Kong. The Bay Area Council claims on its website to have been [key](#) to the establishment of California's California-China Office of Trade and Investment, and the Council's China Initiative has produced a number of research reports on issues such as China's growing [technology](#) industry or the [status](#) of California-China business ties.

This prominence and subject matter focus have made the Bay Area Council Economic Institute and the Bay Area Council China Initiative a key target for S.A.R. government influence. Though previous reports from

the Bay Area Council Economic Institute and the Bay Area Council China Initiative have taken a relatively balanced view, [warning](#) US companies of “slower GDP growth, currency controls, rising production costs, intellectual property and transparency issues, and political risks” as well as a [slew](#) of barriers to trade resulting from cooling US-China ties, Bay Area Council Economic Institute coverage of these issues has taken a decidedly more pro-engagement turn since 2021.

In 2021, the H.K.T.D.C. established a first-of-its kind partnership with the Bay Area Council Economic Institute, commissioning and funding a glowing [report](#) on the Greater Bay Area — a C.C.P. initiative to link Hong Kong and Macau with nine cities in mainland China to create an integrated commercial and financial hub and to concurrently erase the unique identity of Hong Kong — that encouraged “deeper engagement” with China on the part of California businesses.<sup>2</sup> The release of the report was accompanied by a range of media materials and events, including a [webinar event](#) at California’s Commonwealth Club that featured a Bay Area Council Economic Institute director and an H.K.T.D.C. official. In a separate joint press [release](#) with the H.K.T.D.C., Sean Randolph, the report’s author and a senior director at Bay Area

Council Economic Institute, claimed that Hong Kong was a society with “openness” and an “established legal system,” echoing an H.K.T.D.C. official who touted Hong Kong’s “rule of law.”

The report also repeated typical S.A.R. government talking points, speaking highly of the business environment in the so-called Greater Bay Area by suggesting that most businesses did not see the environment in Hong Kong as dangerous and noting in its introduction that “for the foreseeable future [ . . . ] the new political environment [in Hong Kong] is unlikely to directly impact the operations of most foreign companies, Hong Kong’s financial markets, or the integrity of commercial law or commercial arbitration.”

Elsewhere, the report described protests as “increasingly violent.” And in its brief section about the draconian Beijing-imposed legislation in 2020, the report claimed that “there has been considerable support for the National Security Law” despite criticisms by the international community and reassured businesses that “there is no indication to date that Hong Kong officials have sought data under its provisions,” reiterating that the changed political

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2 Per the *South China Morning Post*, the H.K.T.D.C.-Bay Area Council Economic Institute partnership [marks](#) “the first time an American think tank has been asked to draw up such a report.”



environment in Hong Kong “won’t directly impact” foreign companies. News coverage and research reports, including HKDC’s report *Business Not As Usual: International Companies in the New Authoritarian Hong Kong*, suggest otherwise.

This relationship, as well as the Bay Area Council Economic Institute’s parroting of pro-S.A.R. government propaganda, has persisted past the release of the report. In the time since the report’s release, Bay Area Council Economic Institute has hosted multiple [events](#) with the C.C.P.-affiliated China Development Institute, in one case partnering with another American think tank, the Chicago Council on Global Affairs, to host a Belt and Road Initiative-themed [panel](#). Additionally, similar to the situation resulting from H.K.E.T.O.s’ use of Eugene Hanratty as a conduit to spread pro-S.A.R. government local news outlets, the Bay Area Council Economic Institute has promoted the talking points from its H.K.T.D.C.-funded report on local California [news](#).

The Bay Area Council Economic Institute’s H.K.T.D.C. partnership has also extended to other S.A.R. government entities, including joint events with S.A.R. government officials [such](#) as Financial Secretary Christopher Hui. In 2023, the Bay Area Council hosted the Chinese Consul General in San Francisco at an H.K.E.T.O.-sponsored [gala](#), and as recently as May of this year, a Bay Area Council official, Alex Foard, gave an [interview](#) to the *South China Morning*

*Post* dismissing the idea that Hong Kong had lost its autonomy and urging the S.A.R. government to be more aggressive in “proactive promotional efforts” to “counter negative narratives about Hong Kong.”

While the Bay Area Council Economic Institute’s partnership with the H.K.T.D.C. represents a particularly clear instance of S.A.R. government attempts to influence the U.S. policymaking discourse at a subnational level, it is by no means the only such attempt to do so. The H.K.T.D.C. has long sponsored all manner of events — for example, [with](#) the New York City Bar Association — to promote pro-C.C.P. economic narratives, and the success of the Bay Area Council Economic Institute initiative is likely to lead to more attempts to co-opt local institutions to use as propaganda outlets.

## Other S.A.R. Government Entities

There is growing evidence of other efforts by S.A.R. government entities attempting to advance propaganda at the subnational level. Recently, Invest Hong Kong — a full-fledged department of the S.A.R. government responsible for cultivating foreign direct investment — hired the American public relations and marketing firm Edelman, the largest and arguably most prestigious PR firm in the world, to help attract financial technology companies and related investors to Hong Kong. The firm in question, Edelman, has a [history](#) of representing authoritarian government clients and is reported to specialize in “stealth media” [campaigns](#) that prop up “astroturf” groups to create the illusion of organic support for policies favored by corporate clients such as Microsoft, [TransCanada](#), and [Wal-Mart](#).<sup>3</sup>

While Edelman’s FARA filings indicate only a 12-month contract with InvestHK, the S.A.R. government’s hiring of a firm that specializes in astroturf tactics is notable given the documented existence of S.A.R.-backed astroturf organizations masquerading as grassroots Hong Kong community groups, which will be elaborated on below. These organizations, backed not only by H.K.E.T.O.s and the H.K.T.D.C. but also by

other S.A.R. government agencies, make up another key vector of S.A.R. government influence at the subnational level.

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OMB No. 1124-0004; Expires October 31, 2026

U.S. Department of Justice  
Washington, DC 20530

**Exhibit B to Registration Statement**  
**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

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**INSTRUCTIONS.** A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. Compliance is accomplished by filing an electronic Exhibit B form at <https://www.fara.gov>.

**Privacy Act Statement.** The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the FARA Unit in Washington, DC. Statements are also available online at the FARA Unit’s webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

**Public Reporting Burden.** Public reporting burden for this collection of information is estimated to average 32 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, FARA Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

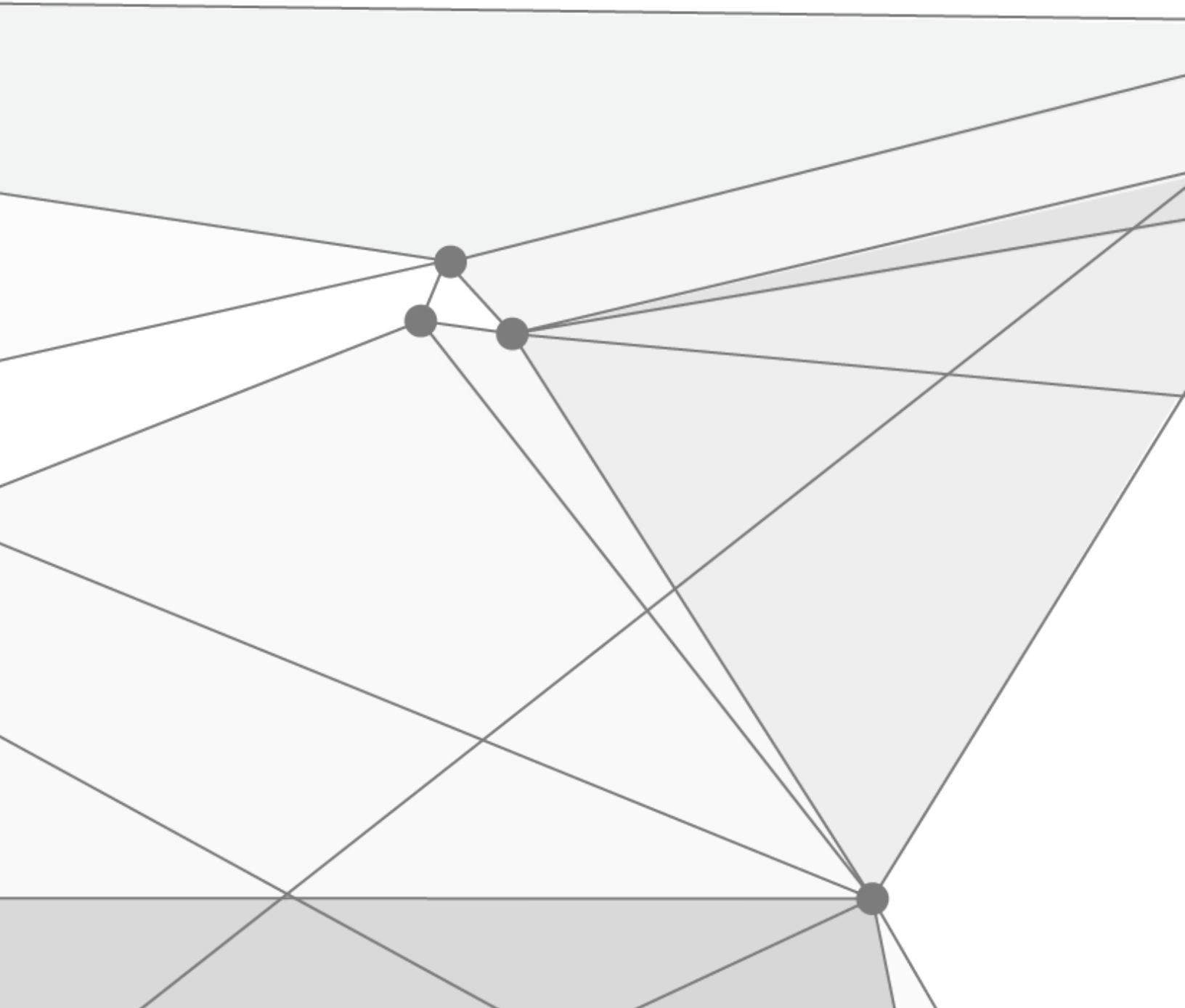
1. Name of Registrant daniel j. edelman, inc.	2. Registration Number 5634
3. Name of Foreign Principal invest hong kong	

*Edelman’s FARA filings listing Invest Hong Kong as the foreign principal*

Photo: [Source](#)

3 “Astroturfing” is a term [referring](#) to a “strategy by which established, politically motivated groups (such as corporations, interest groups, political campaigns, etc.) impersonate grassroots activist movements for political gain.”

# The Hong Kong Associations



## Overview

In addition to forging propaganda partnerships with U.S. think tanks like the Bay Area Council, S.A.R. government entities have helped establish a wide array of regional organizations known as Hong Kong Associations. These organizations often purport to be representatives of Hong Kong diaspora communities in the U.S., but are in actuality funded and closely partnered with S.A.R. government entities and serve to assist their influence efforts.

The Hong Kong Associations serve several purposes

for the S.A.R. government: They cultivate ties with key state and local politicians; serve as platforms for S.A.R. government officials; and develop working relationships with cultural, academic, and intellectual networks in the United States. In many cases, the Hong Kong Associations also help amplify or spread S.A.R. government propaganda, [participating](#) in public-relations efforts such as the S.A.R. government's recent attempt to rebrand the city through a campaign titled "Hello Hong Kong."



*John Lee at the "Hello Hong Kong" Campaign Launch Ceremony*

*(Photo: Hong Kong Government's press release)*

## Structure and Links

More broadly, the Hong Kong Associations serve to conduct influence work and facilitate connections in places where more nationally-minded S.A.R. entities like H.K.E.T.O.s lack local capacity — a U.S.-based S.A.R. official, for example, has [remarked](#) that the Hong Kong Associations on the West Coast regularly “render assistance” to the San Francisco H.K.E.T.O. when it seeks to “lay connections” locally.

The activities of the Hong Kong Associations are also continuous with efforts by the C.C.P. to cultivate its interests at the local and subnational level. In many cases, the Hong Kong Associations advocate not just for the specific interests of the S.A.R. government, but also the broader economic and foreign policy interests of the C.C.P. and the People’s Republic of China.

On paper, the U.S. plays host to a dozen Hong Kong Associations, which divide themselves by geographic region. These 12 groups identify themselves as serving, respectively, Atlanta, Florida, Hawaii, Massachusetts, the Midwest, Nevada, New York, Northern California, Northern Texas, Pennsylvania, Southern California, and Washington State. They do not have a standard naming scheme (typically calling themselves “business associations” or “Hong Kong associations”), but in no case do they adopt names that would clearly indicate their ties to S.A.R. authorities.

It should be noted that not all of these organizations maintain active operations. According to I.R.S. records, the Hong Kong Association of Northern Texas had its tax-exempt status revoked in 2011.<sup>4</sup> Similarly, the Hong Kong Business Association of Pennsylvania appears to be an offshoot of another S.A.R.-affiliated group rather than an independent entity, and it has ceased signs of public activity since

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4 The IRS lists the Hong Kong Association of Northern Texas (Employer ID # 75-2718150) as an “organizatio[n] whose federal tax exempt status was automatically revoked for not filing a Form 990-series return or notice for three consecutive years,” with a revocation date of 5/15/2011.

around 2016.<sup>5</sup> For the purposes of tracking recent activity by S.A.R.-backed entities, there are ten active Hong Kong Associations which appear to be active, as listed in Fig. 1 of this report.

Though the various Hong Kong Associations do not typically present themselves as such, all of them should be considered cutouts of the S.A.R. government. This is especially important to note because Hong Kong Associations go to great lengths to position themselves at the local level as representatives of the overseas Hong Konger community, often engaging in cultural activities that link them closely with legitimate grassroots diaspora groups or Asian-American organizations. Despite this, their structure, leadership, and financial backing clearly indicate that they should be treated as quasi-governmental

entities rather than as organically emerging Hong Kong community groups.

All ten of the active Hong Kong Associations have self-disclosed financial or political links to the S.A.R. government, and nine of the ten have links to multiple S.A.R. government entities.<sup>6</sup> Typically, these organizations list H.K.E.T.O.s and the H.K.T.D.C. as key partners or sponsors, but some are additionally supported by S.A.R. government entities like the Hong Kong Tourism Board (H.K.T.B.) or the Hong Kong Monetary Authority (H.K.M.A.).<sup>7</sup> Some Hong Kong Associations, such as the Hong Kong Business Association of [Nevada](#) and the Hong Kong Association of [New York](#), have attempted to frame the networks they form with S.A.R. government entities as a “Hong Kong Family.”

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5 The Hong Kong Business Association of Pennsylvania does not maintain an independent website (rather, it has a now-defunct page on the website of the National US-Hong Kong Business Association at <http://philadelphia.nushkba.org/>). Additionally, a 2016 announcement involving the Hong Kong Business Association of Pennsylvania lists information about the National US-Hong Kong Business Association rather than the Pennsylvania organization.

6 See Fig. 1.

7 The H.K.T.B. is an S.A.R. government-funded entity tasked with promoting tourism to Hong Kong. Though the H.K.T.B. is not a government agency, its board is wholly appointed by S.A.R. authorities and it is always partially directed by an S.A.R. cabinet official. The H.K.M.A. is the S.A.R. government's central banking institution. Unlike the US Federal Reserve or the European Central Bank, the H.K.M.A. does not enjoy independence from political authorities.

Each of the ten active Hong Kong Associations counts a representative from an H.K.E.T.O. or the H.K.T.D.C. on its board. In some cases, these entities are actually managed or operated in part by Hong Kong government officials or their representatives. The Hong Kong Business Association of the Midwest, for example, [lists](#) Winchell Cheung, Midwest Director for the H.K.T.D.C., as its board secretary, and the board of directors of the Hong Kong Association of Massachusetts is [entirely](#) made up of representatives from H.K.E.T.O.s and the H.K.T.D.C. Similarly, the Hong Kong Association of Atlanta [counts](#) in its leadership team Eugene Hanratty III, the aforementioned Atlanta political consultant who represented the New York H.K.E.T.O. for three decades.

In addition to their close ties to the S.A.R. government, the Hong Kong Associations also coordinate with one another. An organization called the National U.S.-Hong Kong Business Association serves as a coordinating hub for the Hong Kong Associations and S.A.R. authorities and frequently hosts events for its “national network;” in 2022, for example, it hosted a national mixer which prominently featured [remarks](#) from representatives of the San Francisco and New York H.K.E.T.O.s as well as the H.K.T.D.C. [All](#) 12 Hong Kong Associations in the United States are also linked to one another through the Federation of Hong Kong Business Associations Worldwide, an organization that was [formed](#) by the H.K.T.D.C. and [counts](#) John Lee — the current chief executive of Hong Kong and a

sanctioned human-rights offender under U.S. law — as its “honorary patron.”

In general, the Hong Kong Associations should more properly be considered astroturf offshoots of the S.A.R. government rather than as grassroots organizations or even chambers of commerce. We can contextualize these organizations’ activities within a larger scope of what the Technology and Social Change Project at the Harvard Kennedy School has [referred](#) to as a larger pattern of groups “friendly to the Chinese Communist Party” using astroturfing tactics to “generate an illusion of grassroots support for the Chinese government and its positions.” For example, astroturfed [protests](#) against Hong Kong human-rights legislation organized by C.C.P.-[backed](#) Committee to Promote the Reunification of China - San Francisco Bay Area Chapter and [promoted](#) by Chinese state media. The specific contours of these tactics and activities are outlined below.

## Local Political Relationships

A key function of the Hong Kong Associations is to develop relationships with local politicians and government officials. These relationships are clearly advertised to members: As an illustration, the Hong Kong Association of Florida [claims](#) that it “will invite distinguished business leaders and senior government officials to speak at its events, updating members on major topics relating to Hong Kong, China, [the] U.S., and Latin America.”

In general, events held by Hong Kong Associations featuring local U.S. politicians and officials are either co-hosted or financed by an H.K.E.T.O. A 2024 gala [hosted](#) by the Hong Kong Association of Northern California and sponsored by the San Francisco H.K.E.T.O., for example, featured officials from the State of California as well as the City of San Francisco. In some cases, [officials](#) from the C.C.P. have joined Hong Kong Associations in these events with local U.S. politicians.

American local officials and politicians also sometimes hold formal positions with Hong Kong Associations. The Hong Kong Association of Northern California includes an [official](#) from the San Francisco Human

Rights Commission on its Executive Committee, and the [president](#) of the Greater China-Hong Kong Business Association of Washington is an official at the Port of Seattle.<sup>8</sup> A Las Vegas city councilman also [serves](#) on the advisory board of the Hong Kong Business Association of Nevada. In one instance, a Hong Kong Association facilitated an [interaction](#) between a visiting S.A.R. Executive Council member and a local San Francisco official with an Association position.

Notably, the Hong Kong Associations often try to cultivate ties with local politicians with potential for higher office, or whose prominence extends beyond the region they serve. For instance, a [reception](#) co-hosted by the New York H.K.E.T.O. and the Hong Kong Business Association of the Midwest featured written remarks from then-Chicago Mayor Rahm Emanuel, who previously served as White House Chief of Staff to President Barack Obama and currently holds the position of U.S. Ambassador to Japan. In a similar vein, a 2023 Hong Kong Association of Northern California gala — also sponsored by the San Francisco H.K.E.T.O — was [attended](#) by California State Treasurer Fiona Ma, now a candidate for the state’s lieutenant governorship.

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<sup>8</sup> It should be noted that these officials do not appear to be in violation of any US law or local ethics code by simultaneously holding positions with city government entities and the Hong Kong Associations.





*Annual reception in Chicago held by the New York H.K.E.T.O. From left to right: President of the Hong Kong Business Association of the Midwest, Peter Kelty; Director of the New York H.K.E.T.O, Anita Chan; the Representative of Chicago Mayor Rahm Emanuel, Andrew Spinelli; Secretary for Financial Services and the Treasury, Professor K C Chan; Consul-General of the P.R.C. in Chicago, Zhao Weiping; Hong Kong Commissioner for Economic and Trade Affairs, U.S.A., Donald Tong; Director Midwest, Chicago Office, H.K.T.D.C., Wing Sham; and Head of Investment Promotion at the New York H.K.E.T.O, Kelly Jones*

*(Photo: Hong Kong Government's press release)*

## Networking With Hong Kong Officials

Another key function of the Hong Kong Associations is to facilitate the visits of S.A.R. government officials and help them establish local contacts. Hong Kong Associations also frequently serve as platforms for S.A.R. government representatives based in the United States, usually by hosting networking [events](#) that [feature](#) senior officials from H.K.E.T.O.s or the H.K.T.D.C.

In some cases, Hong Kong Associations host what are essentially press [conferences](#) for H.K.E.T.O. officials to promote S.A.R. government initiatives. Hong Kong Associations also serve as local outreach for broader S.A.R. influence efforts: the Hong Kong Association of Atlanta even proudly [notes](#) on its website that it has been assisting the New York H.K.E.T.O. in “strengthen[ing] ties in Atlanta.”

Hong Kong Associations frequently advertise exclusive or private meetings with senior S.A.R. government officials as a benefit of association membership. In almost all instances, these visits and speeches are used to promote a ‘business as usual’ narrative that paints Hong Kong as a safe and thriving environment: take the Hong Kong Association of Northern California’s closed-door meeting with Joseph Chan, Under Secretary of the Bureau of Financial Services and the Treasury, which [featured](#) an “emphasi[s on] Hong Kong’s status as a gateway to China and Asia.” In another event, a Hong Kong Association [hosted](#) an S.A.R. government official for a “presentation [about]

more connect[i]ons] with the government in Beijing.”

In many instances, Hong Kong Associations essentially serve as advance teams for propaganda tours to the United States. When S.A.R. officials visit the U.S. to promote government initiatives, they are typically received in each city they visit by a Hong Kong Association, which then offers private face time with the officials for members. Most recently, Financial Secretary Christopher Hui was [hosted](#) by the Hong Kong Business Association of the Midwest during his U.S. visit. Similarly, when Jack So, chairman of the Hong Kong Airport Authority, visited in 2022, the Hong Kong Associations in [Northern](#) California and [Southern](#) California hosted him for private meetings.



*Christopher Hui (third left) attended a breakfast seminar in Chicago co-hosted by the H.K.T.D.C. and the Hong Kong Business Association of the Midwest*

*(Photo: Hong Kong Government's press release)*

# Ties to Cultural Institutions, Universities, and Think Tanks

It is important to note that outside of their explicit collaboration with S.A.R. authorities, the Hong Kong Associations are often active in more subtle ways, usually involving U.S. civil society actors.

The Hong Kong Associations have remarkably strong ties to U.S. academia, sometimes including deep connections with specific academics. The Hong Kong Business Association of Nevada counts multiple professors from the University of Nevada, Las Vegas on its board, and a senior administrator at Georgia Tech [serves](#) on the board of the Hong Kong Association of Atlanta.

Financial ties to U.S. academia exist as well: The Hong Kong Association of Northern California maintains a [foundation](#) that offers scholarships to California undergraduates, conditional on their membership in the organization and their participation in “at least one major fundraising event and general event” or “other available volunteer project.” [According](#) to Angela Cheung, a member of the foundation’s scholarship committee, the organization has raised over \$400,000 since 2001, with \$3,000 disbursed to five eligible undergraduate students each year.

**HONG KONG ASSOCIATION OF NORTHERN CALIFORNIA SCHOLARSHIP PROGRAM**  
2024/2025 美國北加州香港商會獎學基金

Contact us: [scholarship@hkanc.com](mailto:scholarship@hkanc.com) | 415-398-4506  
Website: [www.hkanc.com/scholarship-foundation](http://www.hkanc.com/scholarship-foundation)

**ABOUT THE FOUNDATION**

In 2001, The Hong Kong Association of Northern California (HKANC) initiated a Scholarship fund designed to provide scholarships to undergraduate university students of high academic distinction.

Since the program's inception, we have provided more than \$435,000 to community colleges and universities in Northern California for deserving students of outstanding community involvement and academic achievement with financial needs. The HKANC believes scholarships are a core investment for the future, providing the opportunity of a lifetime to talented young scholars, many of whom will make vital contributions to our society later in life.

HKANC Scholarship Foundation established in 2017 is a 501(c)3 nonprofit organization (TIN: 82-1256009).

**HOW TO APPLY?**

Please mail the completed scholarship application form and required documents to PO Box 374, San Francisco, CA 94014 OR e-mail to [scholarship@hkanc.com](mailto:scholarship@hkanc.com). (Attn: HKANC Scholarship Foundation Committee)

Your application should be submitted no later than **Friday, August 30, 2024**. The award winner will be contacted directly via email or by phone provided on the scholarship application. We look forward to reviewing your submission. Good luck!

**FUNDING FOR 2024/2025 SCHOLARSHIP PROGRAM**

Application Begins: May 6, 2024  
Deadline: August 16, 2024  
Announcement: August 30, 2024  
Number of Scholarship Awards: 5  
Scholarship Award: \$3000 each

**SELECTION CRITERIA**

1. U.S. Citizen, Permanent Residence OR International Student.
2. MUST be currently enrolled in a Undergraduate (Full-time: 12 units) OR Graduate (Half-time: 6 units) program in a 2- OR 4- year college or university located in Northern California.
3. Any majors with a GPA of 3.5 or above.
4. Volunteered at least one major fundraising event and general event OR participated in other available volunteer projects, AND joined HKANC free student membership (preferred)
5. Demonstrated fluency in Chinese AND English (verbal required, verbal & written preferred)
6. Must provide completed scholarship application form and required documents.

WWW.HKANC.COM | PO BOX 374, SAN FRANCISCO, CA 94014 | SCHOLARSHIP@HKANC.COM | 415-398-4506

*The Hong Kong Association of Northern California scholarship program*

*(Photo: The Hong Kong Association of Northern California)*

These efforts have garnered the Hong Kong Associations good press locally. The aforementioned scholarship program, for example, has led to K.T.S.F. Television, a local San Francisco news channel, [promoting](#) the work of the Hong Kong Association of Northern California. Importantly, these actions raise the credibility of the Hong Kong Associations in their local communities, allowing them to viably position themselves as representatives of the Hong Konger community in the U.S. — an opportunity the Hong Kong Associations have already exploited.

Concerningly, the Hong Kong Association of Northern California has managed to present itself as a local representative of “Hong Kong culture,” allowing the Association to bring the San Francisco H.K.E.T.O. into [partnership](#) with grassroots Hong Kong diaspora organizations, like the campaign to “Save Cantonese” at American universities; Stanford University’s Cantonese language program even [lists](#) a Hong Kong Association as a community resource.

These partnerships, as well as the broader insertion of S.A.R. government-affiliated entities into Hong Kong diaspora communities, have the potential to crowd out dissident voices and severely distort the discourse surrounding Hong Kong communities in the United States. Previous partnerships between the Washington H.K.E.T.O. and cultural institutions have been [criticized](#) on these grounds, but the Hong Kong Associations’ local cultural credibility provides another

avenue for S.A.R. entities to establish a foothold in Hong Kong’s artistic and cultural communities overseas.

Hong Kong Associations’ partnerships with think tanks and policy institutions are a more noticeably problematic example of this type of influence. Although the Hong Kong Associations are locally based, they often attempt to leverage region-specific ties to build relationships with nationally influential think tanks. These ties are especially concerning not only because they have the potential to subtly shape U.S. policy towards Hong Kong and China, but also because they demonstrate a level of success in inserting S.A.R. government entities and their astroturf organization allies into the conversation around American foreign policy.

The Hong Kong Association of Atlanta, for example, has hosted a number of events with the Carter Center on U.S. policy towards China and Hong Kong. One [event](#) — co-hosted by the Hong Kong Association of Atlanta, the Carter Center China Program, and the New York H.K.E.T.O. — featured two S.A.R. government officials discussing the 20th anniversary of Hong Kong’s handover to China.

In some cases, Hong Kong Associations have established relationships with think tanks that cut out H.K.E.T.O.s entirely, allowing for a greater appearance of independence from S.A.R. authorities.

The Hong Kong Association of Atlanta has co-hosted a [discussion](#) on the C.C.P.'s Belt and Road Initiative with the India China America Institute and the Carter Center, and the Hong Kong Association of New York has attracted support from the Asia Society Policy Institute to host an [event](#) featuring a conversation between former Australian Prime Minister Kevin Rudd and the chairman of the Hong Kong Association of New York.

## Ties to C.C.P.-Linked Organizations and the United Front

The relationships between various Hong Kong Associations and influential think tanks serve as an important example of the ways in which the Hong Kong Associations' promotion of S.A.R. government interests often cross over into interventions in China policy more broadly. It is difficult, if not impossible, to separate the Hong Kong Associations' work on behalf of S.A.R. government interests from their broader advocacy of pro-C.C.P. positions: because of this, the Hong Kong Associations should be considered a problem of not just S.A.R. influence in the U.S., but also of C.C.P. influence as well.

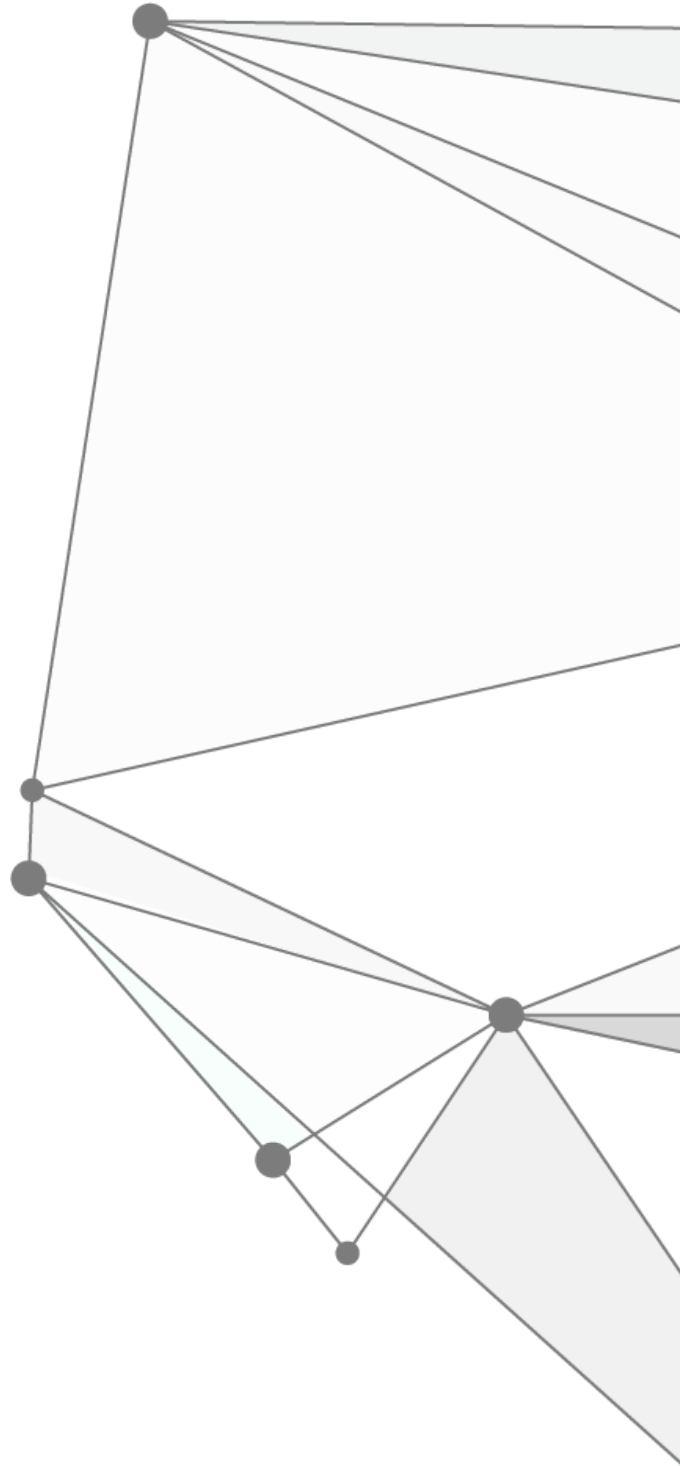
There is ample evidence that the Hong Kong Associations collaborate with other organizations to promote C.C.P. interests in the United States. The Hong Kong Association of Massachusetts [includes](#) a local Chinese Students and Scholars Association — one of many associations that [receive](#) “funding and guidance” from the “United Front Work Department [and Chinese] diplomatic posts” — as an important organization for members to contact.

Hong Kong Associations have been particularly aggressive in promoting the C.C.P.'s Belt and Road Initiative. The Hong Kong Association of Southern California lists “illustrat[ing] the advantages of the Belt and Road Initiative” as one of its organizational purposes, and the same Association has [collaborated](#) with the Chinese Consulate in Los Angeles to assure American observers that the Belt and Road project “is

not a geopolitical tool [of] China.” Likewise, the Hong Kong Association of Atlanta has partnered with the C.C.P.-funded Confucius Institute of Georgia State University to host an event [promoting](#) the Belt and Road Initiative; the event, which featured multiple Georgia academics, a representative from a U.S. think tank, and an official from H.K.T.D.C. as headlining speakers, focused on Hong Kong's role as a “Super Connector” in the Belt and Road.

Hong Kong Associations also often boast deep financial or personal ties to mainland Chinese authorities. The Hong Kong Business Association of Hawaii's [largest](#) sponsor is the North American Representative Office of Shenzhen, China, a “liaison for the City of Shenzhen” located in San Jose which “handle[s] all economic inquiries” on behalf of the Shenzhen city government. According to its website, all of the Hong Kong Business Association of Hawaii's other sponsors are S.A.R. government entities. Likewise, the [president](#) of the Hong Kong Association of Atlanta, Henry Yu, is a private banker who served as an advisor or partner to a variety of Chinese governmental organizations, including the People's Bank of China and the city governments of Nanjing, Hangzhou, and Guangzhou. Fig. 1 outlines other ties between Hong Kong Associations and C.C.P.-controlled entities.

# Foreign Agents





## *Sing Tao Daily* and Robin Mui

As noted in the case of the Hong Kong Associations, mainland Chinese organizations often play a significant role in supporting S.A.R. government influence operations. In some cases, Hong Kong-linked organizations and individuals registered as foreign agents of China have played a role in advancing C.C.P. interests in the U.S.

HKDC's previous reporting on the S.A.R. government's U.S. foreign influence campaign drew attention to the role of the *Sing Tao Daily*, a Chinese-language newspaper based in Hong Kong with distribution in the U.S. In 2021, the Department of Justice required *Sing Tao* to register as a foreign agent, arguing that its media output in the U.S. [constituted](#) "political activity" on behalf of a foreign principal. *Sing Tao* also faces [accusations](#) by other observers, such as the former editor of Hong Kong's pro-C.C.P. *Commercial Daily*, that the newspaper has significant ties to the United Front Work Department and other C.C.P. influence operations.

Though most coverage of *Sing Tao's* activities have pertained to its lavish spending on media activities as disclosed in its mandatory financial reporting under the Foreign Agents Registration Act of 1938, *Sing Tao* also plays a significant role in engaging with local politicians, particularly in California and New York, where politicians often see *Sing Tao* as a useful venue

to reach Asian-American voters.

San Francisco Mayor London Breed, for example, has long maintained a Chinese-language [column](#) in the *Sing Tao Daily*. In an unusual arrangement, Breed receives no compensation for the articles she writes but, in turn, essentially gets the space for which the newspaper offers her for free. Following controversy about the ethics of the arrangement, *Sing Tao* reclassified Breed's column, though it still [runs](#) in the newspaper's print issue and is often accompanied by opinion pieces by Hong Kong politicians.

The mayor's engagement with the newspaper goes beyond her column: She has also attended a lavish banquet celebrating *Sing Tao's* 80th anniversary, where she [praised](#) the newspaper for "keeping [San Francisco's] Chinese community informed of what is happening both locally and internationally." But Breed is far from the only politician who has attempted to use *Sing Tao* to reach out to San Francisco's Asian-American community. In fact, Daniel Lurie, one of her opponents in the 2024 mayoral election, has also used *Sing Tao* as a [venue](#) for campaign advertisements.

Robin Mui, *Sing Tao's* U.S.-based CEO, plays a large part in New York politics, where he has donated significantly — often at the legal maximum for any given race — to a wide range of state, federal, and

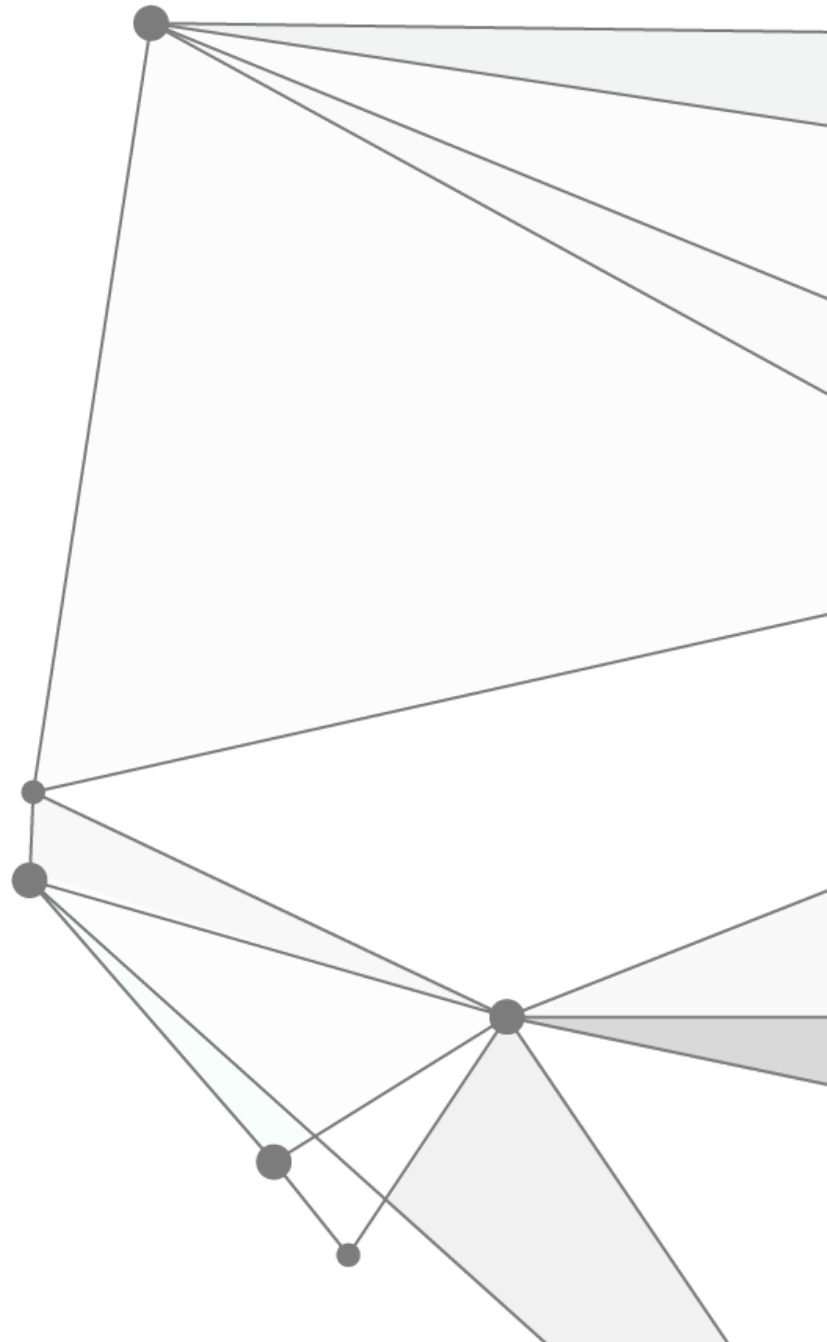
local candidates totaling more than \$40,000.<sup>9</sup> Mui, a [registered](#) Republican and [registered](#) foreign agent, has contributed to candidates of both parties and helped raise five-figure sums for the campaign of New York's Democratic Mayor Eric Adams under the auspices of a local Chinatown project, and facilitated travel for municipal officials by soliciting funds from the Chinese government. Mui has also [organized](#) events in New York that ostensibly represent the state's Asian-American community but exclude groups related to Taiwan and Hong Kong.

These attempts by *Sing Tao* and Robin Mui to ingratiate themselves with local politicians and put themselves forward as representatives of the Asian-American community should be taken as seriously as all other instances of C.C.P. influence and propagandizing listed above. While no explicit instances of this influence being utilized to benefit the C.C.P. have emerged in the *Sing Tao*-related cases, they represent yet another instance of C.C.P.-backed astroturf groups attempting to establish a monopoly over the discussion on Asian-American affairs, preventing local politicians from reaching their Asian-American constituents and crowding out news organizations, cultural groups, and other local players who might challenge pro-C.C.P. narratives.

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9 See Fig. 3.

# Policy Recommendations



**For Congress:  
Revoke H.K.E.T.O. Privileges**

On September 10, 2024, the House of Representatives passed H.R. 1103, the Hong Kong Economic and Trade Office Certification Act. If passed by the Senate and signed into law by the president, this bill would reverse President Bill Clinton's Executive Order 13052 and allow Congress and the executive branch to exercise oversight of the activities of the three U.S.-based H.K.E.T.O.s.

H.R. 1103 would mandate that the secretary of state make an annual determination as to whether H.K.E.T.O.s merit an extension of the legal privileges, exemptions, and immunities they currently enjoy. In the event that a determination was made that H.K.E.T.O.s do not merit an extension, they must terminate their U.S. operations within 180 days. The legislation also allows Congress to override the executive branch's determination in the event of an extension. In light of the role played by H.K.E.T.O.s in foreign influence campaigns at not only the federal but the subnational level, the Hong Kong Economic and Trade Office Certification Act should become law and the H.K.E.T.O.s should have their privileges revoked.

**For the Administration: Designate the Hong Kong Associations as foreign agents under FARA and strengthen capacity on combating foreign influence**

In light of the Department of Justice's determination that the media activities of pro-C.C.P. newspapers like Sing Tao Daily constitute political activity on behalf of a foreign principal, it is reasonable to consider the Hong Kong Associations as engaged in similar political activity on behalf of the S.A.R. government. HKDC encourages federal authorities to designate the Hong Kong Associations as foreign agents under FARA, which would provide greater transparency into their finances and activities and serve to clearly label these organizations' relationship with the S.A.R. government.

The State Department and Justice Department should also designate resources to research foreign influence by the S.A.R. government and the C.C.P. at both the federal and state levels and help devise strategies to counter these influence campaigns.

**For politicians, think tanks, media, and other American organizations: Conduct background research before endorsing, partnering up, or engaging with relevant organizations**

State and local politicians, think tanks, and media organizations should be aware of the explicit and implicit ties between the S.A.R. government and astroturf groups that disguise themselves as grassroots diaspora organizations. HKDC encourages these individuals and groups to consider boycotting events hosted by S.A.R. network organizations and instead support genuine diaspora groups of the Hong Kong community.

Politicians and think tanks should be aware of and reconsider support and donations from registered foreign agents representing the C.C.P. or the S.A.R. government. HKDC further recommends that politicians and think tanks consider rejecting donations from foreign agents and rejecting proposed collaborations with the H.K.T.D.C., H.K.E.T.O.s, and the Hong Kong Associations.

Community organizations should conduct due diligence on local figures, local Hong Kong groups, and any media outlets before partnering up or accepting individuals into leadership roles, especially in instances where registered foreign agents or other individuals working on behalf of the S.A.R. government claim to represent the Asian-American community.



# Conclusion

The information in this report is meant to substantiate ongoing concerns raised by Hong Kong democracy activists about the role of S.A.R. government organizations and their allies (the “S.A.R. network”) at the local level.

Activists, researchers, and local governments should also keep close track of the activities of their local S.A.R. network organizations. Even in the face of growing awareness of C.C.P. influence tactics and organizations, groups such as the H.K.T.D.C. or the Hong Kong Associations may escape the attention of otherwise conscientious government and civil society actors. Their relatively non-apparent connections to the S.A.R. government and the C.C.P. make the Hong Kong Associations particularly capable tools of subnational influence, and they remain an important part of understanding the S.A.R. government’s attempts to ingratiate itself with political actors and civil society organizations in the United States.

These local engagements menace the ability of the Hong Kong diaspora to speak for themselves in the United States. In a situation where Hong Kong-related topics as wide-ranging as Cantonese education, U.S.-China trade ties, and Chinese-language coverage of local politics are all dominated by S.A.R. government entities and their affiliates, it becomes incredibly difficult for Hong Kongers to assert their voice as a community in America. We should consider the foreign-influence efforts documented in this report,

which help drown out the voices of Hong Kongers overseas, as continuous with the S.A.R. government’s efforts to silence Hong Kongers in their own city.

S.A.R. network organizations have substantial ties to cultural, intellectual, and political formations in the United States, and both civil society groups and local governments should carefully reconsider any existing relationships with their local Hong Kong Associations. In general, HKDC counsels avoidance of any partnerships with H.K.E.T.O.s and the H.K.T.D.C., and for local governments and civil society organizations to treat quasi-government groups like the Hong Kong Associations with suspicion befitting their role as key players in a foreign government’s attempts to whitewash its governing record, influence American politics, and sway public opinion.



# **Methodology Statement & Disclaimer**



All facts, figures, data, analysis, and statements of opinion in this report are assembled from objective information gathered from various reliable and publicly available sources. HKDC has made efforts to reach out to all individuals and organizations mentioned in this report. Any responses by individuals or organizations mentioned in this report will be published on HKDC's website.

This report does not allege the violation of any law by any entity, organization, or individual mentioned.



# Appendix

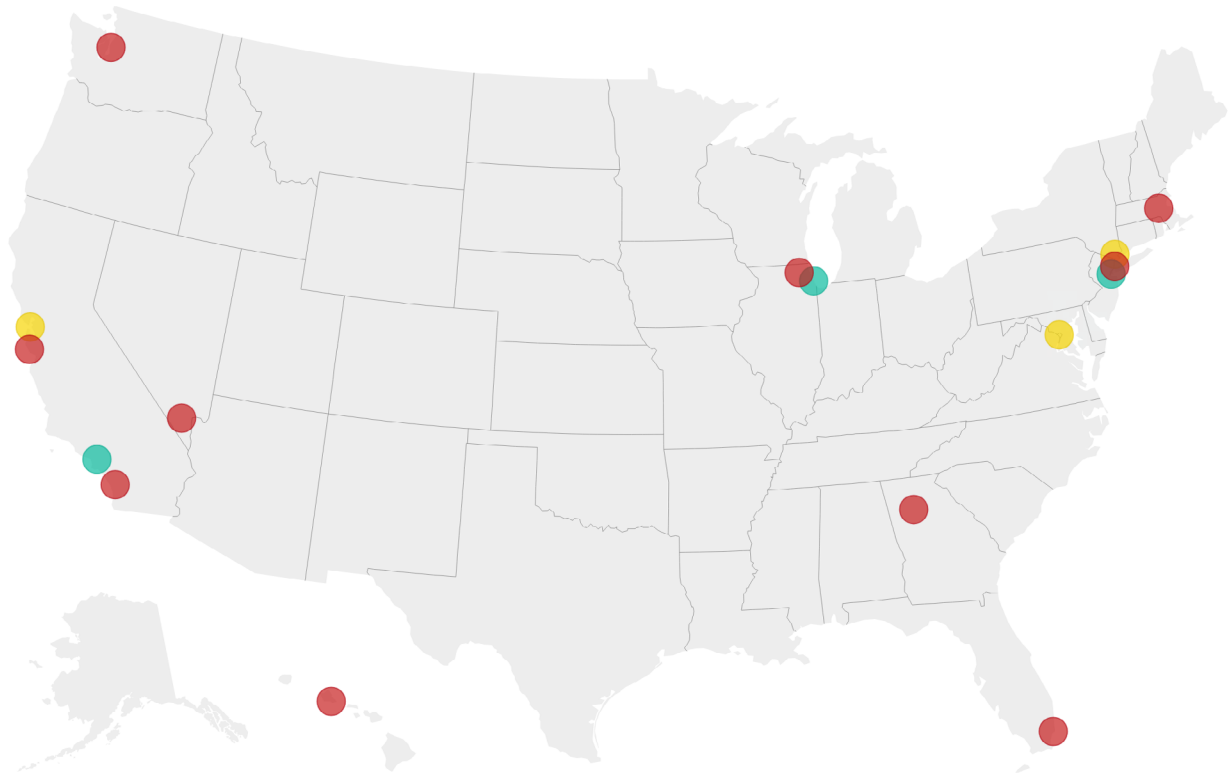
**Fig. 1. Chart of Hong Kong Association Connections to the S.A.R. Government and C.C.P. Entities**

Organization name/acronym	H.K.E.T.O. represented on board?	H.K.T.D.C. represented on board?	Additional S.A.R. or C.C.P.-linked board representation?	Financial or other ties to S.A.R. government entities?	Financial or other ties to C.C.P.-controlled entities?
<b>Hong Kong Association of Atlanta</b>	<b>Yes</b> (Maisie Ho, N.Y. H.K.E.T.O.)	No	<b>Yes</b> (Gene Hanratty, N.Y. H.K.E.T.O. political consultant)	<b>Yes</b> (lists H.K.E.T.O., H.K.T.B., H.K.T.D.C., and H.K.M.A. as “partners”)	No
<b>Hong Kong Association of Florida</b>	<b>Yes</b> (Joanne Chu, N.Y. H.K.E.T.O. as of 2019)	<b>Yes</b> (Anna Fan, H.K.T.D.C. as of 2022)	<b>Yes</b> (Linda Ho, H.K.T.B.)	<b>Yes</b> (H.K.E.T.O.; H.K.T.D.C.), sponsored	No
<b>Hong Kong Association of Florida</b>	<b>Yes</b> (Joanne Chu, N.Y. H.K.E.T.O. as of 2019)	<b>Yes</b> (Anna Fan, H.K.T.D.C. as of 2022)	<b>Yes</b> (Linda Ho, H.K.T.B.)	<b>Yes</b> (H.K.E.T.O.; H.K.T.D.C.), sponsored	No
<b>Hong Kong Business Association of Hawaii</b>	<b>Yes</b> (ex officio directorship to Jacko Tsang, S.F. H.K.E.T.O.)	<b>Yes</b> (Tiffany Wong, H.K.T.D.C.)	No	<b>Yes</b> (H.K.E.T.O., H.K.T.D.C., H.K.T.B.)	<b>Yes</b> (Shenzhen representative office in North America)
<b>Hong Kong Business Association of Massachusetts</b>	<b>Yes</b> (Michael Kwan, N.Y. H.K.E.T.O. as of 2019) H.K.E.T.O.)	<b>Yes</b> (Anthony Mak, H.K.T.D.C. as of 2019)	No	<b>Yes</b> (lists H.K.T.D.C. and H.K.E.T.O. as partners)	No
<b>Hong Kong Business Association of the Midwest</b>	No	<b>Yes</b> (Winchell Cheung, HKTDC)	No	<b>Yes</b> (HKTDC)	No
<b>Hong Kong Business Association of Nevada</b>	<b>Yes</b> (Jacko Tsang, S.F. H.K.E.T.O)	<b>Yes</b> (Tiffany Wong, H.K.T.D.C.)	No	<b>Yes</b> (“supported” by H.K.E.T.O. and H.K.T.D.C.)	No
<b>Hong Kong Association of New York</b>	<b>Yes</b> (Maisie Ho, N.Y. H.K.E.T.O.)	<b>Yes</b> (Curtis Louie, H.K.T.D.C.)	<b>Yes</b> (Linda Ho, H.K.T.B.; Anson Law, H.K.M.A.; Peter Reisman, Bank of China)	<b>Yes</b> (“supported” by H.K.E.T.O., H.K.T.B., H.K.T.D.C.)	<b>Yes</b> (“supported” by Bank of China)

Organization name/acronym	H.K.E.T.O. represented on board?	H.K.T.D.C. represented on board?	Additional S.A.R. or C.C.P.-linked board representation?	Financial or other ties to S.A.R. government entities?	Financial or other ties to C.C.P.-controlled entities?
<b>Hong Kong Association of Northern California</b>	<b>Yes</b> (honorary directorship to Jacko Tsang, S.F. H.K.E.T.O.)	No	No	<b>Yes</b> (H.K.E.T.O., H.K.T.D.C.)	No
<b>Hong Kong Association of Southern California</b>	<b>Yes</b> (ex officio directorship to Jacko Tsang, S.F. H.K.E.T.O.)	<b>Yes</b> (honorary secretaryship to Tiffany Wong, H.K.T.D.C.)	<b>Yes</b> (Michael Lim, H.K.T.B.)	<b>Yes</b> (H.K.E.T.O., H.K.T.D.C., H.K.T.B. all listed as "website sponsors")	No
<b>Hong Kong-Greater China Business Association of Washington</b>	<b>Yes</b> (honorary directorship to Jacko Tsang, S.F. H.K.E.T.O.)	<b>Yes</b> (honorary directorship to Tiffany Wong, H.K.T.D.C.)	No	<b>Yes</b> (sponsored by H.K.E.T.O., H.K.T.D.C.)	No

**Fig. 2. Map of S.A.R. Network Organizations**

■ H.K.E.T.O.s ■ Hong Kong Associations ■ H.K.T.D.C. Offices



New York H.K.E.T.O. (New York)  
 Washington H.K.E.T.O.  
 (Washington, D.C.)  
 San Francisco H.K.E.T.O. (San  
 Francisco)

H.K.T.D.C. New York Office (New  
 York)  
 H.K.T.D.C. Chicago Office  
 (Chicago)  
 H.K.T.D.C. Los Angeles Office (Los  
 Angeles)

Hong Kong Association of  
 Massachusetts (Boston)  
 Hong Kong Association of New  
 York (New York)  
 Hong Kong Association of Atlanta  
 (Atlanta)  
 Hong Kong Association of Florida  
 (Miami)  
 Hong Kong Business Association  
 of the Midwest (Chicago)  
 Hong Kong Business Association  
 of Nevada (Las Vegas)  
 Hong Kong Greater China  
 Business Association of  
 Washington (Seattle)  
 Hong Kong Association of  
 Northern California (San  
 Francisco)  
 Hong Kong Association of  
 Southern California (Los Angeles)  
 Hong Kong Business Association  
 of Hawaii (Honolulu)

**Fig. 3. Robin Mui's Political Donations**

Date	Candidate/ Committee	Race Type	Amount	State	Party	Source
7/6/1998	Matt Fong	US Senate	\$1,000	California	Republican	<a href="#">website</a>
11/5/1999	Dave Wu	US Congress	\$500	Oregon	Democratic	<a href="#">website</a>
11/8/2001	Chuck Schumer	US Senate	\$500	New York	Democratic	<a href="#">website</a>
11/29/2001	George Pataki	NY Governor	\$1,000	New York	Republican	<a href="#">website</a>
3/28/2002	Dave Wu	US Congress	\$1,000	Oregon	Democratic	<a href="#">website</a>
6/26/2002	Chuck Schumer	US Senate	\$1,000	New York	Democratic	<a href="#">website</a>
8/2/2002	Chuck Schumer	US Senate	\$500	New York	Democratic	<a href="#">website</a>
8/2/2002	Chuck Schumer	US Senate	Refund of \$500	New York	Democratic	<a href="#">website</a>
10/9/2002	Meilin Tan	NY State Assembly	\$1,000	New York	Republican	<a href="#">website</a>
6/22/2004	Nydia Velazquez	US Congress	\$500	New York	Democratic	<a href="#">website</a>
5/29/2008	Felix Ortiz	NY State Assembly	\$100	New York	Democratic	<a href="#">website</a>
8/18/2010	Judy Chu	US Congress	\$500	California	Democratic	<a href="#">website</a>
12/22/2010	John Liu	NYC Comptroller	\$100	New York	Democratic	<a href="#">website</a>
3/30/2011	Education & Opportunity Fund II	N/A	\$2,400	N/A	Democratic	<a href="#">website</a>
4/22/2011	Judy Chu	US Congress	\$2,500	California	Democratic	<a href="#">website</a>
2/23/2012	Peter Koo	NYC City Council	\$500	New York	Democratic	<a href="#">website</a>
5/15/2012	John Liu	NYC Comptroller	\$1,000	New York	Democratic	<a href="#">website</a>
7/10/2012	John Liu	NYC Comptroller	\$1,000	New York	Democratic	<a href="#">website</a>

Date	Candidate/ Committee	Race Type	Amount	State	Party	Source
9/30/2012	Grace Meng	US Congress	\$1,000	New York	Democratic	<a href="#">website</a>
5/8/2013	Peter Koo	NYC City Council	\$500	New York	Democratic	<a href="#">website</a>
7/9/2013	Margaret Chin	NYC City Council	\$500	New York	Democratic	<a href="#">website</a>
8/26/2013	Robert Jackson	Manhattan Borough President	\$175	New York	Republican	<a href="#">website</a>
8/4/2014	John Liu	NY State Senate	\$1,000	New York	Democratic	<a href="#">website</a>
4/21/2015	NY Republican Federal Campaign Committee	N/A	\$1,00	New York	Republican	<a href="#">website</a>
6/17/2015	Eric Adams	Brooklyn Borough President	\$250	New York	Democratic	<a href="#">website</a>
3/10/2016	Yuh-Line Niou	NY State Assembly	\$500	New York	Democratic	<a href="#">website</a>
7/10/2016	Eric Adams	Brooklyn Borough President	\$250	New York	Democratic	<a href="#">website</a>
8/29/2016	Yuh-Line Niou	NY State Assembly	\$1,000	New York	Democratic	<a href="#">website</a>
1/22/2017	Yuh-Line Niou	NY State Assembly	\$1,000	New York	Democratic	<a href="#">website</a>
3/6/2017	Judy Chu	US Congress	\$2,700	California	Democratic	<a href="#">website</a>
8/1/2017	Nancy Tong	NYC City Council	\$200	New York	Democratic	<a href="#">website</a>
9/25/2017	Grace Meng	US Congress	\$2,700	New York	Democratic	<a href="#">website</a>
5/29/2018	NY Republican Federal Campaign Committee	N/A	\$1,000	New York	Republican	<a href="#">website</a>



Date	Candidate/ Committee	Race Type	Amount	State	Party	Source
9/11/2018	Allan Fung	RI Governor	\$1,000	Rhode Island	Republican	<a href="#">website</a>
1/3/2019	Eric Adams	Brooklyn Borough President	\$2,000	New York	Democratic	<a href="#">website</a>
6/26/2019	Eric Adams	Brooklyn Borough President	Refund of \$1,000	New York	Democratic	<a href="#">website</a>
11/29/2019	Eric Adams	Brooklyn Borough President	\$2,000	New York	Democratic	<a href="#">website</a>
3/13/2020	Corey Johnson	NYC City Council	\$175	New York	Democratic	<a href="#">website</a>
5/24/2020	WinRed	N/A	\$100	N/A	Republican	<a href="#">website</a>
2/25/2021	Kathryn Garcia	NYC Mayor	\$250	New York	Democratic	<a href="#">website</a>
5/1/2021	Robert Cornegy	NYC City Council	\$250	New York	Democratic	<a href="#">website</a>
5/7/2021	Robert Cornegy	NYC City Council	\$250	New York	Democratic	<a href="#">website</a>
5/12/2021	Elizabeth Crowley	Queens Borough President	\$175	New York	Democratic	<a href="#">website</a>
5/17/2021	Edwin Wong	NYC City Council	\$175	New York	Democratic	<a href="#">website</a>
6/1/2021	Michelle Wu	Boston Mayor	\$100	Boston	Democratic	<a href="#">website</a>
9/12/2021	Michael Conigliaro	NY State Assembly	\$250	New York	Republican	<a href="#">website</a>
8/10/2022	Brian Kavanagh	NY State Senate	\$500	New York	Democratic	<a href="#">website</a>
8/27/2022	Lee Zeldin	NY Governor	\$1,000	New York	Republican	<a href="#">website</a>

Date	Candidate/ Committee	Race Type	Amount	State	Party	Source
9/17/2022	Judy Chu	US Congress	\$1,000	California	Democratic	<a href="#">website</a>
8/18/2010	Judy Chu	US Congress	\$1,000	California	Democratic	<a href="#">website</a>
10/22/2022	Allan Fung	US Congress	\$1,000	Rhode Island	Republican	<a href="#">website</a>
11/4/2022	Michael Henry	NY Attorney General	\$500	New York	Democratic	<a href="#">website</a>
11/5/2022	Max Rose	US Congress	\$1,000	New York	Democratic	<a href="#">website</a>
3/15/2023	Wai Yee Chan	NYC City Council	\$175	New York	Democratic	<a href="#">website</a>
3/31/2023	Nydia Velazquez	US Congress	\$1,000	New York	Democratic	<a href="#">website</a>
5/30/2023	NY Republican Federal Campaign Committee	N/A	\$1,000	New York	Republican	<a href="#">website</a>
10/3/2023	Justin Brannan	NYC City Council	\$250	New York	Democratic	<a href="#">website</a>
10/6/2023	Christopher Marte	NYC City Council	\$250	New York	Democratic	<a href="#">website</a>
2/14/2024	WinRed	N/A	\$1,000	N/A	Republican	<a href="#">website</a>

Note: Fig. 3 is based on a combination of state and federal donation records, as well as the contents of Robin Mui's personal FARA disclosures as mandated by his legal responsibilities as a registered foreign agent. In cases where campaign finance records show a donation where Mr. Mui's FARA disclosures do not, the donation is included in Fig. 3.



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