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WASHINGTON, DC 20510-6250

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March 23, 2017

Bobby R. Burchfield
King & Spalding LLP
1700 Pennsylvania Ave NW, Suite 200
Washington, D.C. 20006

George A. Sorial
The Trump Organization
725 Fifth Avenue
New York, NY 10022

Dear Mr. Burchfield and Mr. Sorial:

According to documents filed with the New York City Department of Finance, Xiao Yan Chen, also known as Angela Chen, recently purchased a residential condo unit in the Trump Park Avenue building for a cash payment of \$15.8 million.¹ Ms. Chen is the founder and Managing Director of Global Alliance Associates LLC, a “boutique business relationship consultancy” that provides clients “a smooth and efficient transition into China by putting them in direct contact with key decision makers.”² As the website for Global Alliance explains, “[e]stablishing a network of credible and proprietary relationships...is the single most important aspect of initiating and sustaining a successful business venture in China.”³

More recently, public reporting has connected Ms. Chen “to important members of the Chinese ruling elite and to an organization considered a front group for Chinese military intelligence.”⁴ Specifically, Ms. Chen reportedly chairs the New York branch of the China Arts Foundation, which was founded by Deng Rong, the youngest daughter of Chinese leader Deng

¹ New York City Department of Finance, Office of the City Register, Document ID 2017022300040002 (Feb. 21, 2017); *see also Businesswoman Who Bought Trump Penthouse is Connected to Chinese Intelligence Front Group*, Mother Jones (March 15, 2017) (online at <http://www.motherjones.com/politics/2017/03/exclusive-donald-trump-penthouse-buyer-has-ties-group-chinese-military-intelligence>).

² Global Alliance Associates LLC, Overview (online at http://gaa.lucita.org/about_overview.shtml) (accessed March 16, 2017).

³ Global Alliance Associates LLC, Access (online at http://gaa.lucita.org/about_overview_access.shtml) (accessed March 16, 2017).

⁴ *Businesswoman Who Bought Trump Penthouse is Connected to Chinese Intelligence Front Group*, Mother Jones (March 15, 2017).

Xiaoping; Ms. Deng, in turn, has served as an official with the China Association for International Friendly Contacts (CAIFC).⁵ According to the U.S.-China Economic and Security Review Commission, CAIFC serves as a “front organization for the International Liaison Department of the PLA General Political Department,” which “performs dual roles of intelligence collection and conducting [Chinese] propaganda and perception management campaigns, particularly in the case of efforts focused on foreign military forces.”⁶ According to Norm Eisen, chief ethics adviser to President Obama, connections between the Trump Organization, Ms. Chen, and Chinese government entities raise “a series of very profound and troubling questions.”⁷

These concerns have arisen against the backdrop of other reported ties between President Trump, his family and business interests, and Chinese entities. As I noted in a March 1, 2017, letter to Secretary of the Treasury Steven Mnuchin, “for at least one building in which President Trump has an ownership interest—the office tower at 1290 Avenue of the Americas—the Bank of China is a major lender, contributing \$950 million along with three other entities.”⁸ In addition, the largest tenant at Trump Tower is the state-owned Industrial and Commercial Bank of China,⁹ and Kushner Companies, recently helmed by senior advisor Jared Kushner, will reportedly receive \$400 million from the Chinese government-connected Anbang Insurance Group in a planned redevelopment of the building at 666 Fifth Avenue.¹⁰ Finally, President Trump recently received approval from China’s Trademark Office to register 38 trademarks shortly after revising his policies on Taiwan, which the *New York Times* noted “could add to criticism over potential conflicts.”¹¹

The purchase of the unit at the Trump Park Avenue building also occurred after the Trump Organization undertook certain ethical obligations to screen potential transactions for

⁵ *Id.*

⁶ U.S.-China Economic and Security Review Commission, *2011 Report to Congress*, 338 (Nov. 9, 2011) (online at https://www.uscc.gov/sites/default/files/annual_reports/annual_report_full_11.pdf).

⁷ *Businesswoman Who Bought Trump Penthouse is Connected to Chinese Intelligence Front Group*, Mother Jones (March 15, 2017).

⁸ Letter from Sen. Claire McCaskill to Secretary of the Treasury Steven Mnuchin (March 1, 2017).

⁹ Erwin Chemerinsky, *Trump May Violate the Constitution on Day One*, Los Angeles Times (Jan. 12, 2017).

¹⁰ *Kushners May Get \$400 Million From Chinese on Tower*, Bloomberg (March 13, 2017) (online at <https://www.bloomberg.com/news/articles/2017-03-13/kushners-set-to-get-400-million-from-chinese-on-marquee-tower>).

¹¹ *In China, Trump Wins a Trove of New Trademarks*, New York Times (March 8, 2017) (online at <https://www.nytimes.com/2017/03/08/business/china-trademark-donald-trump.html>).

conflicts of interest concerns. Specifically, a January 2017 memorandum from the law firm of Morgan, Lewis & Bockius LLP explained that new domestic deals for the Trump Organization “will go through a rigorous vetting process,” including written confirmation from Mr. Burchfield that a proposed transaction “involves an appropriate counterparty, and that it does not raise potential conflicts of interest.”¹² The memorandum also explains that a trust agreement prohibits the Trump Organization from “entering into any new transaction or contract with a foreign country, agency, or instrumentality thereof, including a sovereign wealth fund, foreign government official, or member of a royal family.”¹³

As President Trump prepares for an impending meeting with Chinese President Xi Jinping—preparations in which Mr. Kushner “is heavily involved”¹⁴—it is vital to understand the actions the Trump Organization has undertaken to prevent its financial ties and transactions from affecting U.S. foreign policy. Accordingly, please respond to the following requests for information:

1. Please describe the vetting process you or the Trump Organization have applied or will apply to prospective purchasers of units in Trump properties, including any efforts to determine whether purchasers are “appropriate parties,” pose conflicts of interest, or maintain ties with foreign countries or foreign government officials.
2. Please describe the vetting procedures, if any, you or the Trump Organization applied to the purchase by Ms. Chen, specifically. If Mr. Burchfield provided written confirmation concerning this purchase, please provide a copy of the confirmation.
3. If purchases of units in Trump properties do not qualify as “domestic deals” requiring written confirmation from Mr. Burchfield, please define the term “domestic deals” as used in the Morgan Lewis memorandum.
4. Please describe any procedures you or the Trump Organization have applied or will apply to determine the source of funds used to purchase units in Trump properties, including any connection between such funds and foreign countries, foreign agencies, or sovereign wealth funds.

¹² Morgan, Lewis & Bockius LLP, *Conflicts of Interest and the President* (Jan. 11, 2017).

¹³ *Id.*

¹⁴ *A Breezy Resort, and a Thorny Agenda, for Trump's Meeting with Xi Jinping of China*, New York Times (March 14, 2017) (online at <https://www.nytimes.com/2017/03/14/world/asia/xi-jinping-trump-mar-a-lago.html>).

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5. Ivanka Trump, daughter of President Trump, reportedly owns at least two units inside the Trump Park Avenue building, including one unit used as a residence.¹⁵ Please describe any coordination, if any, between the Trump Organization and the U.S. Secret Service concerning vetting of prospective purchasers of units in the Trump Park Avenue building or other Trump properties.

Please provide your responses as soon as possible, but in no event later than April 13, 2017. If you have any questions related to this request, please contact Brandon Reavis of the Committee staff at Brandon_Reavis@hsgac.senate.gov or (202) 224-2627. Please send any official correspondence relating to this request to Amanda_Trosen@hsgac.senate.gov.

Sincerely,



Claire McCaskill
Ranking Member

cc: Ron Johnson
Chairman

¹⁵ *Ivanka Trump Has Listed One of Her New York City Condos for \$4.1 Million*, Business Insider (Dec. 14, 2016) (online at <http://www.businessinsider.com/ivanka-trump-lists-4-million-condo-2016-12>).