

14. App

UNPUBLISHED
UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT
NO.22-1424

BING CHEN,
Plaintiff-Appellant

v.

JOSEPH R. BIDEN, JR., in his official capacity as the President of the United States; Mike R. Pompeo, in his former official capacity as Secretary of State; ANTONY J. BLINKEN, in his official capacity as Secretary of State; United States Department of State, Antony J. Blinken of Secretary; NANCY PELOSI, In his official capacity as Speaker of the House of Representatives; UNITED STATES HOUSE OF REPRESENTATIVES, Speaker Nancy Pelosi; MARCO RUBIO, in his official Capacity as United States Senator from Florida; TOM COTTON, in his official Capacity as United States Senator from Arkansas ; CONGRESSIONAL-EXECUTIVE COMMISSION ON CHINA, Jeffrey Alan Merkley of Chairman; UNITED STATES HOUSE COMMITTEE ON FOREIGN AFFAIRS, Gregory Meeks of Chairman; UNITED STATES COMMISSION ON INTERNATIONAL RELIGIOUS FREEDOM, Erin D. Singshinsuk of Executive Director; UNITED STATES DEPARTMENT OF THE TREASURY, Janet Yellen, Secretary; UNITED

STATES DEPARTMENT OF COMMERCE,
Gina Raimondo , Secretary; UNITED STATES
DEPARTMENT OF HOMELAND SECURITY,
Alejandro Mayorkas, Secretary; OFFICE OF THE
UNITED STATES TRADE REPRESENTATIVE,
Katherine Chi Tai, Representative; UNITED STATES
DEPARTMENT OF LABOR, Martin J. Walsh,
Secretary; IISHAT HASSAN KOKBORE, former
chairman of Uyghur American Association (UAA);
NURY TURKEL, in his official Capacity as Chair
of the U.S. Commission on International Religious
Freedom; GULCHEHRA HOJA, Correspondent of
Uighur Language Department, Radio Free Asia;
RUSHAN ABBAS, founder and Executive Director of
Campaign for Uyghurs; ADRIAN ZENZ, Senior Fellow
of Victims of Communism Memorial Foundation;
UYGHUR HUMAN RIGHTS PROJECT (UHRP),
Nury Turkel of Board Chair; CAMPAIGN FOR
UYGHURS, Rushan Abbas , Founder and Executive
Director; RADIO FREE ASIA, Bay Fang , President;
BRITISH BROADCASTING CORPORATION
(BBC), Richard Sharp, Chairman; CNN CENTER,
Jeff Zucker, Chairman; THE NEW YORK TIMES
COMPANY, Arthur Gregg Sulzberger, Chairman;
THE WASHINGTON POST, Fred Ryan, Publisher;
THE SLATE GROUP, LLC (FP),
Ravi Agrawal, Editor; THE UNITED STATES
HOLOCAUST MEMORIAL MUSEUM'S SIMON-
SKJODT CENTER, Naomi Kikoler , Director;
NEWLINES INSTITUTE FOR STRATEGY AND

POLICY, Ahmed Alwani, Founder and President; AMNESTY INTERNATIONAL, Agnès Callamard, Secretary-General; Human Rights Watch, Tirana Hassan, Executive Director; STANFORD UNIVERSITY, Marc Tesr-Lavigne, President; THE NATIONAL ENDOWMENT FOR DEMOCRACY (NED), Damon Wilson, President; CENTER FOR STRATEGIC AND INTERNATIONAL STUDIES (CSIS), John Hamre, President; PULITZER PRIZES BOARD, Katherine Boo, Chair,

Defendants-Appellees

Appeal from the United States District Court for the District of Maryland, at Greenbelt. Paula Xinis, District Judge. (8:22-cv-00025-px)

Submitted: August 18, 2022

Decided: August 22, 2022

Before WYNN, THACKER, and HEYTENS, Circuit Judges.

Affirmed as modified by unpublished per curiam opinion.

Bing Chen, Appellant Pro Se.

Unpublished opinions are not binding precedent in this circuit.

PER CURIAM

Bing Chen appeals the district court's order

dismissing his amended civil complaint for lack of jurisdiction. We have reviewed the record and found no reversible error. Accordingly, we affirm the district court's order, as modified to reflect that the dismissal of the amended complaint is without prejudice. See *Ali v. Hogan*, 26 F.4th 587, 600 (4th Cir. 2022) (explaining that dismissals for lack of jurisdiction must be without prejudice). We deny Chen's emergency motion to suspend a portion of the Uyghur Forced Labor Prevention Act and his motion for appointment of counsel. We dispense with oral argument because the facts and legal contention are adequately presented in the materials before this court and argument would not aid the decisional process.

Affirmed as Modified

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
PACIFIC RESEARCH and EDUCATION
INSTITUTE (PREI), and *
CHEN BING, *
Plaintiffs, *
v. * Civil Action No. CBD-22-25
JOSEPH ROBINETTE BIDEN, JR., et al.,
Defendants. *

ORDER

On January 6, 2022, self-represented plaintiff Chen Bing filed a 181-page Complaint on behalf of himself and the Pacific Research and Education Institute (“PREI”), alleging defamation against United States President Joseph R. Biden and 36 additional defendants. ECF No. 1. As “[i]t has been the law for the better part of two centuries . . . that a corporation may appear in the federal courts only through licensed counsel,” *Rowland v. California Men’s Colony*, 506 U.S. 194, 201-02 (1993), PREI’s claims may not proceed unless a licensed attorney enters their appearance on PREI’s behalf. Moreover, because it is unclear what plaintiffs’ claims are against each defendant, plaintiffs will be required to file an Amended Complaint not to exceed 30 pages.

Under Federal Rule of Civil Procedure 8(a), a pleading which sets forth a claim for relief shall contain: (1) a short and plain statement of the grounds for the court’s jurisdiction; (2) a short and plain statement of

the claim showing that the pleader is entitled to relief; and (3) a demand for the relief sought. The “short and plain statement of the claim” must simply “give the defendant fair notice of what the plaintiff’s claim is and the grounds upon which it rests.” *Swierkiewicz v. Sorema N. A.*, 534 U.S. 506, 512 (2002) (quoting *Conley v. Gibson*, 355 U.S. 41, 47 (1957)). Under Rule 8(d) (1), each allegation in a complaint should be “simple, concise, and direct.” Furthermore, a pleading that offers labels and conclusions or a formulaic recitation of the elements of a cause of action does not satisfy Rule 8’s basic pleading requirements. *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555 (2007)).

Although a complaint need not contain detailed allegations, the facts alleged must be enough to raise a right to relief above the speculative level and require “more than labels and conclusions,” as courts “are not bound to accept as true a legal conclusion couched as a factual allegation.” *Twombly*, 550 U.S. at 555. A complaint must contain “enough facts to state a claim to relief that is plausible on its face.” *Id.* at 570. Once a claim has been stated adequately, it may be supported by showing any set of facts consistent with the allegations in the complaint. *Id.* At 561.

Pro se pleadings, however, are liberally construed and held to a less stringent standard than pleadings drafted by lawyers. *Erickson v. Pardus*, 551 U.S. 89, 94 (2007) (citing *Estelle v. Gamble*, 429 U.S. 97, 106 (1976)); accord *Brown v. N.C. Dep’t*

of Corr., 612 F.3d 720, 722 (4th Cir. 2010). Pro se complaints are entitled to special care to determine whether any possible set of facts would entitle the plaintiff to relief. *Hughes v. Rowe*, 449 U.S. 5, 9-10 (1980). Nonetheless, “[w]hile pro se complaints may ‘represent the work of an untutored hand requiring special judicial solicitude,’ a district court is not required to recognize ‘obscure or extravagant claims defying the most concerted efforts to unravel them.’” *Weller v. Dep’t of Soc. Servs. for Balt.*, 901 F.2d 387, 391 (4th Cir. 1990) (quoting *Beaudett v. City of Hampton*, 775 F.2d 1274, 1277 (4th Cir. 1985)).

As presented, plaintiffs’ Complaint is 181 pages of historical narrative that fails to clearly and succinctly state the basis of their claims against the 37 defendants. At a minimum, it is unclear what each named defendant did to defame PREI and Bing. To the extent plaintiffs make any allegations against defendants, they are conclusory in nature and lack factual support. Because of Bing’s self-represented status, plaintiffs shall be afforded the opportunity to file an Amended Complaint, not to exceed 30 pages, that provides brief, concise, and clear factual allegations in compliance with the federal pleading standards. Plaintiffs should succinctly state the basis of their defamation claim as to each defendant. As previously noted, PREI’s participation in this suit may proceed only if licensed counsel enters their appearance on PREI’s behalf.

Plaintiffs are forewarned that the failure to

comply with this Order within the time specified may result in dismissal of the case without prejudice and without further notice.

Accordingly, it is this 10th day of January, 2022, by the United States District Court for the District of Maryland, hereby ORDERED that:

1. Plaintiffs ARE GRANTED twenty-eight (28) days from the date of this Order to file an Amended Complaint not exceeding 30 pages addressing the deficiencies noted herein;

2. Plaintiffs ARE FOREWARNED that the failure to file an Amended Complaint within the time specified may result in the dismissal of this case without prejudice and without further notice from the Court;

3. Plaintiffs ARE FOREWARNED that PREI's claims will be dismissed without prejudice and without further notice from the Court if a licensed attorney does not enter their appearance on PREI's behalf within twenty-eight (28) days of the date of this Order; and

4. The Clerk shall MAIL a copy of this Order to plaintiffs.

Charles B. Day
Date: 2022.01.10

Charles B. Day
United States Magistrate Judge

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

| | | |
|--------------------------------------|---|---------------------------|
| PACIFIC RESEARCH and EDUCATION | * | |
| INSTITUTE (PREI), and | * | |
| CHEN BING, | * | |
| Plaintiffs, | * | |
| v. | * | Civil Action No. PX-22-25 |
| JOSEPH ROBINETTE BIDEN, JR., et al., | | |
| Defendants. | * | |

ORDER

On January 11, 2022, this Court forewarned plaintiffs that Pacific Research and Education Institute's claims may not proceed unless a licensed attorney enters an appearance on its behalf. ECF No. 4. The Court also directed plaintiffs to file an Amended Complaint within 28 days and cautioned that failure to do so would result in dismissal of the Complaint without prejudice. *Id.*

Plaintiff Chen Bing filed an Amended Complaint, naming himself as the sole plaintiff. ECF No. 5. Bing, however, claims that he brings this lawsuit on behalf of eight other Chinese citizens residing in the United States and China. *Id.* at 1-2. For the reasons that follow, the Complaint shall be dismissed.

Bing's Amended Complaint names numerous defendants, including President Joseph R. Biden, former Secretary of State Mike Pompeo, Secretary of State Antony Blinken, and federal agencies, departments, and organizations. *Id.* Putting aside the

far flung alleged violations of Chinese law, the pleading also appears to allege common law defamation on behalf of Chinese people generally. See *id.*; see also *Talbert v. United States*, 932 F.2d 1064, 1066 (4th Cir. 1991) (noting that defamation is a tort that includes libel and slander). Specifically, Bing avers that news reports including statements made by the federal government regarding Xinjiang, China “are lies that demonize the Chinese government and the Chinese people and deceive the American people.” *Id.* at 7. As relief, Bing seeks revocation of certain domestic laws and published research reports, declaratory and injunctive relief, punitive damages, and monetary damages of \$1.00 to each American and Pacific Islander living in the United States and to each Chinese person living in mainland China. *Id.* at 32-33.

Bing proceeds *pro se*, and so the Court is mindful that it must construe the Complaint allegations liberally. See *Erickson v. Pardus*, 551 U.S. 89, 94 (2007); see also *White v. White*, 886 F.2d 721, 722-23 (4th Cir. 1989). Nevertheless, this Court may dismiss claims *sua sponte* where the matters asserted are plainly frivolous. *Smith v. Kagan*, 616 F. App’x 90 (4th Cir. 2015). Notably, “dismissal prior to service of process is permissible when a Court lacks subject matter jurisdiction over a patently frivolous complaint.” *Id.*; see also Fed. R. Civ. P. 12(h)(3) (“Whenever it appears . . . that the court lacks jurisdiction of the subject matter, the court shall dismiss the action.”).

A federal court is of limited jurisdiction, empowered to hear claims presenting a federal question or where the parties are completely diverse in citizenship. 28 U.S.C. §§ 1331-1332. Otherwise, “if Congress has not empowered the federal judiciary to hear a matter, then the case must be dismissed.” *Home Buyers Warranty Corp. v. Hanna*, 750 F.3d 427, 432 (4th Cir. 2014).

The Complaint avers that jurisdiction is premised on filing suit against the United States government. Civil Cover Sheet, ECF No. 1-1. But this supposed basis does not extend to the other named individual defendants. As to them, no facts support any jurisdictional basis for the claims to proceed. The claims may be dismissed as to the individual defendants on this ground alone.

Additionally, even if federal question jurisdiction somehow exists as to any party, the Complaint must be dismissed for lack of standing. *Taylor v. Kellogg Brown & Root Servs., Inc.*, 658 F.3d 402, 412 (4th Cir. 2011); see *In re Bulldog Trucking*, 147 F.3d 347, 352 (4th Cir. 1998) (a federal court is required, sua sponte, to determine if a valid basis for its jurisdiction exists, “and to dismiss the action if no such ground appears.”). Article III of the United States Constitution demands that federal courts adjudicate only “actual, ongoing cases or controversies.” *Lewis v. Cont’l Bank Corp.*, 494 U.S. 472, 477 (1990) (citations omitted); see *Clapper v. Amnesty Int’l USA*, 568 U.S. 398, 408 (2013). “One element of the case-or-controversy requirement” is that a plaintiff must establish standing to sue. *Raines*

v. Byrd, 521 U.S. 811, 818 (1997). That is, the Court must ascertain “whether a plaintiff ha[s] the requisite stake in the outcome of a case” *Deal v. Mercer Cty. Bd. of Educ.*, 911 F.3d 183, 187 (4th Cir. 2018) (citing *Friends of the Earth, Inc. v. Laidlaw Envt’l Servs. (TOC), Inc.*, 528 U.S. 167, 180 (2000)). A plaintiff has standing where (1) he has suffered an injury which is concrete, particularized and imminent, not hypothetical or conjectural; (2) his claimed injury is “fairly traceable to the challenged action of the defendant”; (3) the injury “will be redressed by a favorable decision.” *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 560 (1992); see also *Susan B. Anthony List v. Driehaus*, 573 U.S. 149, 168 (2014); *Sierra Club v. U.S. Dep’t of the Interior*, 899 F.3d 260, 284 (4th Cir. 2018).

Although the Complaint is replete with facts alleging all manner of mistreatment of Chinese nationals, none of the allegations involve Bing. The Complaint is devoid of any alleged harm that he has suffered as a result of the claimed wrongdoing. As to the remaining standing requirements, traceability or redressability, Bing expressly seeks relief not for himself but for injured third parties. Viewing the Complaint facts most favorably to him, Bing lacks standing to pursue this matter. The Complaint must therefore be dismissed.

Accordingly, it is this 9th day of March 2022, by the United States District Court for the District of Maryland, hereby ORDERED that:

1. The Complaint IS DISMISSED;
2. The Emergency Motion (ECF No. 3) IS DENIED as moot;
3. The “Motion of Stop Publishing the Book,” construed as a Motion for Injunctive Relief (ECF No. 6) IS DENIED as moot;
4. The Clerk SHALL SEND a copy of this Order to Plaintiff; and
5. The Clerk SHALL CLOSE this case.

/s/

Paula Xinis
United States District Judge (03/09/22)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

BING CHEN, et al.,
Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official Civil Action
No. 22-239 (CKK)
capacity as the President of the United
States, et al.,
Defendants.

MEMORANDUM OPINION

(February 2, 2022)

This matter is before the court on its initial review of plaintiff's prose [1] Complaint and [2], [3] Emergency Motions. The court shall deny both motions because they present non-justiciable political questions. The court will dismiss the case because the complaint fails to meet the minimal pleading requirements of Rule 8(a) of the Federal Rules of Civil Procedure.

Plaintiff's two emergency motions seek an order directing the "[United States] government to stop the diplomatic boycott of the 2022 Beijing Winter Olympics." See Pls.' 2d Mot. at 5, ECF No. 3. "The principle that the courts lack jurisdiction over political questions that are by their nature 'committed to the political branches to the exclusion of the judiciary' is as old as the fundamental principle of judicial review." *Schneider v. Kissinger*, 412 F.3d 190, 193 (D.C. Cir.

2005) (quoting *Antolok v. United States*, 873 F.2d 369, 379 (D.C. Cir. 1989)). It is well-established that the “conduct of foreign relations of our government is committed by the Constitution to the executive and legislative—‘the political’—departments of the government, and the propriety of what may be done in the exercise of this political power is not subject to judicial inquiry or decision.” *Oetjen v. Central Leather Co.*, 254 U.S. 297, 311 (1918) (collecting cases). The President possesses “plenary and exclusive power” in the international arena and “as the sole organ of the federal government in the field of international relations[.]” *United States v. Curtiss–Wright Export Corp.*, 299 U.S. 304, 320 (1936). Plaintiff’s two emergency motions ask the Court to interfere in the conduct of foreign affairs by the Executive branch—a political question over which the Court lacks jurisdiction. Therefore, both motions shall be DENIED.

As to Plaintiff’s Complaint, pro se litigants must comply with the Federal Rules of Civil Procedure. *Jarrell v. Tisch*, 656 F. Supp. 237, 239 (D.D.C. 1987). Rule 8(a) of the Federal Rules of Civil Procedure requires complaints to contain “(1) a short and plain statement of the grounds for the court’s jurisdiction [and] (2) a short and plain statement of the claim showing that the pleader is entitled to relief.” Fed. R. Civ. P. 8(a); see *Ashcroft v. Iqbal*, 556 U.S. 662, 678–79 (2009); *Ciralsky v. CIA*, 355 F.3d 661, 668–71 (D.C. Cir. 2004). The Rule 8 standard ensures that defendants

receive fair notice of the claim being asserted so that they can prepare a responsive answer and an adequate defense and determine whether the doctrine of res judicata applies. *Brown v. Califano*, 75 F.R.D. 497, 498 (D.D.C. 1977). It also assists the Court in determining whether it has jurisdiction over the subject matter.

Plaintiff Chen Bing is a resident of Maryland¹ who sues thirty-seven different defendants, including President Joseph R. Biden, former Secretary of State Mike Pompeo, current Secretary of State Antony Blinken, various members and committees of the United States Congress, several executive agencies, journalists, and non-profit organizations, among many others. In general terms, he appears to claim that each defendant has made statements about human rights abuses perpetrated by the Chinese government and alleges that these statements are not true.

The 168-page complaint is simply baffling; a pleading, such as here, that is “rambling, disjointed, incoherent, or full of irrelevant and confusing material will patently fail [Rule 8(a)’s] standard,” as will “a complaint that contains an untidy assortment of claims that are neither plainly nor concisely stated[.]” *Jiggetts v. District of Columbia*, 319 F.R.D. 408, 413 (D.D.C. 2017), *aff’d sub nom. Cooper v. District of Columbia*, No. 17-7021, 2017 WL 5664737 (D.C. Cir. Nov. 1, 2017) (internal quotation marks and citations omitted). Therefore, this case will be **DISMISSED**.

A separate order accompanies this Memorandum Opinion.

/s/

COLLEEN KOLLAR-KOTELLY

Date: February 2, 2022 United States District Judge

1 The Complaint is also purportedly brought on behalf of Pacific Research and Education Institute, a “think tank.” However, no counsel is listed on the complaint as representing that entity, and none has entered an appearance. Only individuals, not corporations or other entities may proceed pro se. See *Lennon v. McClory*, 3 F. Supp. 2d 1461, 1462 n.1 (D.D.C. 1998) (stating that a corporation cannot appear pro se); *McDaniel v. CIA*, 2008 WL 5423259, at *1 (D.D.C. Dec. 30, 2008) (dismissing claims brought by unrepresented entity).

Convention on the Prevention and Punishment of the Crime of Genocide

Article I The Contracting Parties confirm that genocide, whether committed in time of peace or in time of war, is a crime under international law which they undertake to prevent and to punish.

Article II In the present Convention, genocide means any of the following acts committed with intent to destroy, in whole or in part, a national, ethnical, racial or religious group, as such: (a) Killing members of the group; (b) Causing serious bodily or mental harm to members of the group; (c) Deliberately inflicting on the group conditions of life calculated to bring about its physical destruction in whole or in part; (d) Imposing measures intended to prevent births within the group; (e) Forcibly transferring children of the group to another group.

Rome Statute of the International Criminal Court

Article 7 Crimes against humanity 1. For the purpose of this Statute, "crime against humanity" means any of the following acts when committed as part of a widespread or systematic attack directed against any civilian population, with knowledge of the attack: (a) Murder; (b) Extermination; (c) Enslavement; (d) Deportation or forcible transfer of population; (e) Imprisonment or other severe deprivation of

physical liberty in violation of fundamental rules of international law; (f) Torture; (g) Rape, sexual slavery, enforced prostitution, forced pregnancy, enforced sterilization, or any other form of sexual violence of comparable gravity; (h) Persecution against any identifiable group or collectivity on political, racial, national, ethnic, cultural, religious, gender as defined in paragraph 3, or other grounds that are universally recognized as impermissible under international law, in connection with any act referred to in this paragraph or any crime within the jurisdiction of the Court; (i) Enforced disappearance of persons; (j) The crime of apartheid; (k) Other inhumane acts of a similar character intentionally causing great suffering, or serious injury to body or to mental or physical health.

1. 全球独家坦克人谜底彻底揭开：特工表演者 (The mystery of the world's exclusive tank man is completely revealed: agent performers)
<https://www.usprei.org/blank>
2. Inside the Secret Prisoner Swap That Splintered the U.S. and China Detention of a Chinese executive to stand trial in the U.S. provoked a standoff between global rivals and opened an acrimonious new era
<https://www.wsj.com/articles/huawei-china-meng-kovrig-spavor-prisoner-swap-11666877779>
3. DETERMINATION OF THE SECRETARY OF STATE ON ATROCITIES IN XINJIANG
https://china.usembassy-china.org.cn/determination-of-the-secretary-of-state-on-atrocities-in-xinjiang/?_ga=2.75290258.1212711943.1613231197-189619064.1612647563
4. NOMINATION OF HON. ANTONY J. BLINKEN TO BE U.S. SECRETARY OF STATE PART I
<https://www.govinfo.gov/content/pkg/CHRG-117shrg43890/html/CHRG-117shrg43890.htm>
5. Biden Admin 'Reviewing' Uighur Genocide Designation, U.N. Ambassador Nominee Says
<https://freebeacon.com/biden-administration/biden-admin-reviewing-uighur-genocide-designation-u-n-ambassador-nominee-says/>
6. The administration's Approach to the People's Republic of China
<https://www.state.gov/the-administrations-approach-to-the-peoples-republic-of-china/>
7. The Administration's Approach to the People's

Republic of China

<https://www.state.gov/the-administrations-approach-to-the-peoples-republic-of-china/>

8. NATIONAL SECURITY STRATEGY 2022

<https://www.whitehouse.gov/wp-content/uploads/2022/10/Biden-Harris-Administrations-National-Security-Strategy-10.2022.pdf>

9. National Defense Strategy

<https://www.defense.gov/National-Defense-Strategy/>

10. OHCHR Assessment of human rights concerns in the Xinjiang Uyghur Autonomous Region, People's Republic of China

<https://www.ohchr.org/sites/default/files/documents/countries/2022-08-31/22-08-31-final-assesment.pdf>

11. State response to the assessment by china

https://www.ohchr.org/sites/default/files/documents/countries/2022-08-31/ANNEX_A.pdf

12. 46TH SESSION OF THE COUNCIL OF FOREIGN MINISTERS

<https://www.oic-oci.org/docdown/?docID=4447&refID=1250>

13. Sterilizations, IUDs, and Mandatory Birth Control: The CCP's Campaign to Suppress Uyghur Birthrates in Xinjiang

<https://jamestown.org/product/sterilizations-iuds-and-mandatory-birth-control-the-ccps-campaign-to-suppress-uyghur-birthrates-in-xinjiang/>

14. China's Genocide in East Turkistan: The Genocide of Uyghurs by Definition of the United Nations Convention on Genocide Prevention

<https://campaignforuyghurs.org/campaign-for-uyghurs-releases-new-genocide-report/>

15. The Xinjiang Papers: An Introduction¹

<https://www.politico.com/f/?id=0000017d-6dff-dac5-abff-edffb18d0000>

16. ‘Their goal is to destroy everyone’: Uighur camp detainees allege systematic rape

<https://www.bbc.com/news/world-asia-china-55794071>

17. CHINA’S REPRESSION AND INTERNMENT OF UYGHURS: U.S. POLICY RESPONSES <https://www.congress.gov/115/meeting/house/108718/witnesses/HHRG-115-FA05-Wstate-TurkelN-20180926.pdf>

18. Testimony by Nury Turkel Board Chair, Uyghur Human Rights Project <https://www.congress.gov/117/meeting/house/112574/witnesses/HHRG-117-FA00-Wstate-TurkelN-20210506.pdf>

19. Beyond the Camps: Beijing’s Grand Scheme of Coercive Labor, Poverty Alleviation and Social Control in Xinjiang

<https://www.cecc.gov/sites/chinacommission.house.gov/files/documents/Beyond%20the%20Camps%20CECC%20testimony%20version%20%28Zenz%20Oct%202019%29.pdf>

20. Xinjiang police files

<https://www.xinjiangpolicefiles.org>

21. The Uyghur Genocide: An Examination of China’s Breaches of the 1948 Genocide Convention

<https://newlinesinstitute.org/uyghurs/the-uyghur->

[genocide-an-examination-of-chinas-breaches-of-the-1948-genocide-convention/](#)

22. China: “Like We Were Enemies in a War”: China’s Mass Internment, Torture, and Persecution of Muslims in Xinjiang

<https://www.amnesty.org/en/documents/asa17/4137/2021/en/>

23. Break Their Lineage, Break Their Roots

<https://www.hrw.org/report/2021/04/19/break-their-lineage-break-their-roots/chinas-crimes-against-hum>

24. UYGHUR TRIBUNAL JUDGMENT Summary Form

<https://uyghurtribunal.com/wp-content/uploads/2021/12/Uyghur-Tribunal-Summary-Judgment-9th-Dec-21.pdf>

25. Stronger: Adapting America’s China strategy in an age of competitive interdependence

<https://www.youtube.com/watch?v=FBMrZnlzpl4&t=1839s>

26. China Uses Rape as Torture Tactic Against Uighur Detainees, Victims Say

<https://www.voanews.com/a/south-central-asia-china-uses-rape-torture-tactic-against-uighur-detainees-victims-say/6201842.html>

27. Prisoners in China’s Xinjiang concentration camps subjected to gang rape and medical experiments, former detainee says

<https://www.independent.co.uk/news/world/asia/china-xinjiang-uighur-muslim-detention-camps-xi-jinping-persecution-a9165896.html>

28. Uyghur advocates speak out after horrifying accounts of rape and torture in Xinjiang camps in China

<https://www.abc.net.au/news/2021-02-03/uyghur-renew-calls-for-action-report-rape-abuse-xinjiang-camp/13118190>

29. 伊利夏提：新疆大学2000 名学生神秘失踪 中共对维吾尔族人实施种族灭绝(Ilshat H. Kokbore: 2,000 Xinjiang University Students Mysteriously Disappear, CCP Carries Out Genocide Against Uighurs)

<https://www.youtube.com/watch?v=1jaCdIYDEWU>

30. 被虐待、電擊、打落牙齒 逃離中國的美國維吾爾協會主席：臺灣人，我們就是一國兩制的範例(Abused, Electric Shocked, Teeth Knocked Out, Chairman of the American Uyghur Association Fleeing China :Taiwanese, we are a model of one country, two systems)

<https://musou.watchout.tw/read/>

[hwOwmpeKuMjwBzs0AFxX](https://musou.watchout.tw/read/hwOwmpeKuMjwBzs0AFxX)

31. 伊利夏提：维吾尔种族灭绝(Ilshat H. Kokbore: The Uyghur Genocide)

<https://www.rfa.org/mandarin/pinglun/jujiaoweiwuer/ylxt-01252021094537.html>

32. 聚焦维吾尔 | 伊利夏提：多里坤·艾沙与世界维吾尔代表大会(Focus on Uyghurs | Ilshat H. Kokbore : Dolkun Isa and the World Uyghur Congress)

<https://www.rfa.org/mandarin/pinglun/jujiaoweiwuer/ylxt-01312022160154.html>

33. 'Mass murder' fear for Muslim Uighurs

<https://www.bbc.co.uk/programmes/p06j4sjf>

34. CHINA'S REPRESSION AND INTERNMENT OF UYGHURS: U.S. POLICY RESPONSES Written Testimony of Nury Turkel Chairman of the Board, Uyghur Human Rights Project

<https://www.congress.gov/115/meeting/house/108718/witnesses/HHRG-115-FA05-Wstate-TurkelN-20180926.pdf>

35. 2020 ANNUAL REPORT—EXECUTIVE SUMMARY

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