

MOFFITT'S CHINA INTERNAL INVESTIGATION ABSTRACT

Summary of Foreign Influence Issues

The National Institutes of Health (NIH) of the U.S. Department of Health and Human Services (HHS) supports international collaborative biomedical research to advance science and expand biomedical knowledge. Scientific cooperation between the U.S. and the People's Republic of China ("China") was initiated over 30 years ago and has grown rapidly in recent years. Recognizing that enhanced cooperative biomedical research would be of mutual benefit to the U.S. and China, the NIH Director and the President of the National Natural Science Foundation of China (NSFC) signed a Memorandum of Understanding (MOU) in October 2010 and renewed in October 2015. NIH and NSFC signed an Implementing Arrangement (IA) in December 2010 to develop a new U.S.-China Program for Biomedical Research Cooperation. A Joint Working Group (JWG), made up of members from both NIH and NSFC, developed strategic plans for collaboration, review and clearance of proposed U.S.-China projects. Both the NIH and NSFC allocated funds to support joint activities pursued under this program.¹

Over the past few years however, the U.S. government, including the NIH, has become concerned that U.S. universities and academic medical centers have been the targets of foreign governments, particularly that of the China, which have developed research and academic collaborations with a goal of illegally obtaining technology and intellectual property. On February 14, 2018, Federal Bureau of Investigation ("FBI") Director Christopher Wray testified to the Senate Intelligence Committee that universities and other academic institutions have unwittingly enabled foreign powers, in particular China, to exploit U.S. research and development activities.² Alerted to these concerns by law enforcement and Congressional leaders, the National Institutes of Health ("NIH") in early 2018 began a systemic effort to address these risks, insofar as the suspect collaborations and U.S. faculty activities relate to NIH-funded programs and projects. In April 2019, FBI Director Christopher Wray told the Council on Foreign Relations "China has pioneered a societal approach to stealing innovation in any way it can from a wide array of businesses, universities, and organizations," Wray said. "They're doing it through Chinese intelligence services, through state-owned enterprises, through ostensibly private companies, through graduate students and researchers, through a variety of actors all working on behalf of China. At the FBI we have economic espionage investigations that almost invariably lead back to China in nearly all of our fifty-six field offices, and they span just about every industry or sector."

In March 2018, NIH clarified its financial conflict of interest rules for investigators whose work is supported by NIH funding. At that time, NIH highlighted requirements that faculty whose research is supported by NIH funding report to their home institutions all personal income and research support

¹ National Institute of Allergy and Infectious Diseases (NIAID), *Notice of a Change to the Funding Opportunity Announcement, RFA-AI-16-006, U.S.-China Program for Biomedical Collaborative Research (R01)*, available: <https://grants.nih.gov/grants/guide/notice-files/NOT-AI-16-018.html>, (December 22, 2015).

² Associated Press, *FBI chief says Chinese operatives have infiltrated scores of 'naive' U.S. universities*, available: <https://www.scmp.com/news/world/united-states-canada/article/2133274/fbi-chief-says-chinese-operatives-have-infiltrated>, (February 14, 2018.); E. Redden, *The Chinese Student Threat?*, Inside Higher Ed, <https://www.insidehighered.com/news/2018/02/15/fbi-director-testifies-chinese-students-and-intelligence-threats>, (February 15, 2018.)

from foreign universities and foreign educational institutions,³ and that those U.S. institutions in turn analyze such foreign income and research support to determine whether they implicate conflict of interest and conflict of commitment concerns. A series of subsequent NIH policy statements have focused on investigator and institutional failure to report and analyze foreign support and affiliations. The NIH has undertaken, during 2018 and 2019, a broad-based communications effort to inform the affected academic community of these concerns and of their various reporting obligations.⁴

In August 2018, NIH Director Francis S. Collins, M.D., Ph.D., sent a letter to 10,000 U.S. institutions to warn that foreign entities were mounting “systematic programs to influence NIH researchers and peer reviewers” leading to “unacceptable breaches of trust.” NIH has expanded its administrative investigation activities, sending individual inquiry letters to awardee institutions, raising issues about individual researchers and asking awardees to conduct investigations.⁵ Multiple departures and terminations of scientists from U.S. institutions have followed, including apparent terminations of faculty at Emory University and MD Anderson Cancer Center that were widely reported in April and May 2019.⁶ As of November 2019, NIH sent letters to more than seventy U.S. academic institutions, naming hundreds of scientists as possible violators of NIH grant terms and conditions, and has referred more than twenty-four cases to the U.S. Department of Health and Human Services Office of Inspector General (“OIG”) for possible criminal proceedings and debarment from future receipt of NIH grant support.⁷

NIH Director Collins has said that NIH has identified “utterly unacceptable” and “egregious instances where our funding of grants in this country is being taken advantage of by individuals who are not following the appropriate rules.”⁸ Of particular concern, according to Collins, are the “Talent Programs” offered and promoted by various portions of the Chinese government, under which U.S. investigators are awarded significant personal incomes and research funds, in return for the U.S. investigators fulfilling specific terms and conditions for academic and research collaborations with Chinese-based institutions. The NIH has indicated that the Chinese Talent Programs are intended to induce U.S. investigators to share sensitive scientific information with Chinese collaborators and to use their established expertise to advance China’s scientific and national interests.

China’s government has been recruiting experts and academic leaders from around the globe for more than a decade through the “Talents” and other academic engagement programs. These efforts provide financial, professional and personal incentives in exchange for research collaboration, teaching, and

³ National Institutes of Health (NIH), *Financial Conflict of Interest: Investigator Disclosures of Foreign Financial Interests*, NOT-OD-18-160, available: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-18-160.html>, (March 20, 2018).

⁴ Nat’l Inst. of Health, *Frequently Asked Questions: Other Support and Foreign Components*, <https://grants.nih.gov/grants/faq-other-support-foreign-components.htm#5940> (last visited Nov. 7, 2019).

⁵ Jeffrey Mervis, *U.S. Universities reassess collaboration with foreign scientists in wake of NIH letters*, SCIENCE (Apr. 26, 2019), <https://www.sciencemag.org/news/2019/04/us-universities-reassess-collaborations-foreign-scientists-wake-nih-letters>.

⁶ Mara Hvistendahl, *Major U.S. cancer center ousts ‘Asian’ researchers after NIH flags their foreign ties*, SCIENCE (Apr. 19, 2019), <https://www.sciencemag.org/news/2019/04/exclusive-major-us-cancer-center-ousts-asian-researchers-after-nih-flags-their-foreign>; Mihir Zaveri, *Wary of Chinese Espionage, Houston Cancer Center Chose to Fire 3 Scientists*, N.Y. TIMES (Apr. 22, 2019), <https://www.nytimes.com/2019/04/22/health/md-anderson-chinese-scientists.html>.

⁷ Jeannie Baumann, *Holes Found in NIH Oversight of Conflicts, Foreign Influence*, BLOOMBERG LAW (Sep. 27, 2019), <https://news.bloomberglaw.com/pharma-and-life-sciences/holes-found-in-nih-oversight-of-conflicts-foreign-influence>; Gina Kolata, *In FBI’s Sights: Stolen Research Flowing to China*, N.Y. TIMES, Nov. 4, 2019, at A1.

⁸ Jocelyn Kaiser, *Universities will soon announce action against scientists who broke NIH rules, agency head says*, SCIENCE (Apr. 11, 2019), <https://www.sciencemag.org/news/2019/04/universities-will-soon-announce-action-against-scientists-who-broke-nih-rules-agency>.

other activities in China, done in conjunction with Chinese universities and medical centers. U.S. investigators were asked to share knowledge and skills to enable China to grow its research capacity, which, in principle, is exactly the kind of scientific exchange the U.S. government has encouraged for decades.

In the U.S. government's view, the problem arises when relationships with China are not disclosed appropriately in research award applications or periodic required reporting to NIH, or when those relationships with China, such as the Talents programs, include terms and conditions that are at odds with the U.S. funding agency and/or U.S. institutional commitments. NIH has emphasized that it wants "transparency and vetting" of all foreign collaborations and arrangements when they relate to NIH funding. Failure to report and vet such collaborations causes NIH to question institutional competence to serve as a responsible steward of federal funding. In a conference call with the cancer center directors from all 71 NCI-designated cancer centers, on December 20, 2019, the NCI Director, Dr. Ned Sharpless, commended the Compliance Office of Moffitt for identifying and reporting the violations by their individuals and the need to continue to work closely with the NCI and NIH.⁹

H. Lee Moffitt Cancer Center and Research Institute ("Moffitt") Collaboration with Tianjin Medical University Cancer Institute and Hospital ("TMUCIH")

In 2008, Moffitt began an affiliation with TMUCIH to provide training and consultation in the delivery of oncology services, education and research. In 2014, as agreed to by Dr. Alan List, Moffitt's former President and CEO, TMUCIH pays Moffitt \$500,000 annually for Moffitt's services, including participation in tumor boards and other activities.

Dr. Sheng Wei, Dr. List's primary scientific collaborator at Moffitt, is a graduate of Tianjin Medical University ("TMU") and a naturalized U.S. citizen. He has been employed at Moffitt since 2008 and has served as a key interface between Moffitt and TMUCIH for many years. Since the launch of the Moffitt affiliation, TMUCIH has grown, for example, with the creation of a personalized medicine center, the International Personalized Cancer Center ("IPCC").

Following various federal efforts highlighting the risks of foreign influence on NIH-funded research in 2018 and early 2019, including specific concerns raised about China and its Talents programs, the Moffitt Compliance Office began an informal investigation of the conduct of individuals associated with Moffitt's relationship with TMUCIH to determine, based on the most recent national guidance by the NIH, if there was evidence of predatory activity by the Chinese. Based on information derived from the informal investigation, the Joint Corporate Compliance Committee of Moffitt's Board of Directors began a formal investigation. The internal Moffitt review identified Talents program participation involving at least six Moffitt faculty members beginning at different time periods over the last decade.

The earliest known participant is Dr. Wei, who joined a Talents program through TMU in either 2010 or 2011, and through TMUCIH has recruited all Moffitt Talents program participants, except for one (Dr. Howard McLeod). The recent compliance review indicated that over several years at Moffitt, Dr. Wei recruited Moffitt faculty into the Talents program. Another faculty member, Dr. Howard McLeod, began Talents program participation through Central South University in Changsha, China before he

⁹ Matthew Bin Han Ong, *Moffitt CEO Alan List, director Thomas Sellers resign over conflicts of interests involving China*, Cancer Letter NIH (Dec. 20, 2019)

joined Moffitt in 2013, and did so without Dr. Wei's involvement. Dr. McLeod maintains an extensive ongoing research program in China.

It did not violate Moffitt policies, for these individuals to have participated in the Talents programs, or to have had other academic positions, consulting positions, or research collaborations with Chinese colleagues or Chinese institutions. However, under Moffitt policies and NIH regulations, such activities must be timely disclosed and approved in advance after they have been analyzed for possible conflicts of interest or other compliance risks. Problems also arise when the participation in Chinese activities specifically conflicts with a Moffitt leader's or faculty member's duties to Moffitt and/or to U.S. government agencies like the NIH, or when a Moffitt official accepts undisclosed personal compensation from an entity (TMUCIH) with which Moffitt does business, which would represent a conflict of interest. Other problems arise if a full-time Moffitt leader or faculty member agrees to spend significant professional time and effort on non-Moffitt activities, without permission, which would represent a conflict of commitment.

With the possible limited exception of Dr. McLeod, as detailed below, none of the Moffitt faculty who were Talents program participants properly or timely disclosed their Talents program involvement to Moffitt, and none disclosed the full extent of their Talents program activities prior to Moffitt's internal investigation. Several Moffitt faculty cited the personal participation of Moffitt leadership in the Talents programs – specifically, the participation of Dr. List – as a reason for their own agreement to participate, and evidence reflects that in Dr. Wei's efforts to recruit other Moffitt faculty into the Talents programs, he cited Dr. List's personal participation as a means of encouraging others to join. All Moffitt faculty participants in the Talents programs acknowledged receiving personal payments that they did not promptly disclose to Moffitt. They also acknowledged having opened or maintained personal bank accounts in China to receive Talents program compensation.

It is not clear how much personal income or research support each involved individual at Moffitt received for his or her participation in the Talents programs. However, Chinese media sources indicate that the national "Recruitment Program for Foreign Experts" (an annual nine-month commitment for three years) award includes a one-time payment of RMB 1 million (~\$142,000 USD) and research subsidies of RMB 3 to RMB 5 million (~\$427,000 to ~\$711,000 USD). Chinese media sources also report that a long-term Tianjin 1000 Talents Program award includes a one-time payment of RMB 1 million (~\$142,000 USD), annual salary of RMB 250,000 to RMB 450,000 (~\$36,000 to ~\$64,000 USD), and research subsidies of RMB 200,000 to RMB 1 million, (~\$28,400 to ~\$142,000 USD), and that a short-term Tianjin 1000 Talents Program award includes a one-time payment of RMB 500,000 (~\$71,000 USD) and a work allowance of RMB 25,000 to RMB 35,000 (~\$3,500 to ~\$5,000 USD) per month, with the awardee required to work at the awarding institution for at least two months annually, for three years. Aside from these possible Talents program compensation and support, Moffitt individuals involved received travel benefits (such as escorted tourist trips in China paid for by TMUCIH), cash honoraria payments for speeches, and cash travel reimbursements while in China; many of these payments were not disclosed to Moffitt, in violation of Moffitt policies.¹⁰

¹⁰ However, evidence suggests that in many cases travel arranged and paid by Moffitt was reimbursed by TMUCIH via cash payments to Moffitt faculty, and that such cash travel reimbursement amounts were often tendered to Moffitt's finance department.

Summary of Specific Attempts at Foreign Influence

Dr. Sheng Wei

Dr. Wei began pursuing 1000 Talents Program funding and an “Honorary Professorship” at TMU in or around 2009, shortly after China initiated the 1000 Talents Program. He sought 1000 Talents Program funding through TMU and another entity, Fudan University. In 2010, he proposed through TMU an extensive research work plan, committing him to seek grants for TMU and work at least six months in China. By April 2011, he entered into a 1000 Talents Program through TMU. The arrangement included RMB 2 million (~\$300,000 USD) in salary and other benefits, e.g., research funds and lab space. Dr. Wei committed to work at least six months per year, for three years, to “conduct personnel exchanges” with Moffitt and cultivate additional researchers, research, and apply for Chinese grants for TMU, and he promised to further develop his research in China. On interview, Dr. Wei reported having received \$80,000 for purchasing a \$200,000 apartment in Tianjin in or around August 2013, although he did not report this to Moffitt prior to the recent investigation. Dr. Wei has asserted that he ceased his 1000 Talents Program participation in or around November 2013, reportedly because he could not fulfill the Program’s substantial time commitment. Yet contrary evidence indicates that he continued to obtain Chinese grants for TMU at least into 2014, and for a significant period thereafter. Further, he recruited Drs. List, Sullivan, Sellers, Epling-Burnette into the Talents program. He unsuccessfully sought to recruit other Moffitt faculty members. These recruitment efforts came after his stated voluntary termination of his other 1000 Talents Program participation.

As part of his recruitment efforts, Dr. Wei interfaced with China personnel, supplied forms, collected materials and videos, all to enable TMUCIH to gain Talents program participants from Moffitt (and at least a few U.S. scientists from outside Moffitt). Dr. Wei served as intermediary between Moffitt personnel and TMUCIH, often leading trips to TMUCIH translating communications. Over this period of time, Dr. Wei maintained contact regarding Talents program applications with TMUCIH personnel, as well as other apparent Chinese contacts. Determining specifically with whom Dr. Wei communicated over this time period is difficult because communications were often to various web-based email addresses not directly traceable to individuals or entities and were in Mandarin Chinese.

In November 2018, Dr. Wei assisted Drs. List, Sellers, Sullivan and Epling-Burnette to open bank accounts in China to receive their personal Talents program monies. For Dr. List, the personal bank account in China was to receive not only Dr. List’s Talents programs income, but also what Dr. List had characterized in communications with Dr. Wei as “other funding” in addition to his personal Talents program payments. Regarding time commitments for the Talents programs, Dr. Wei stated that the substantial (two or three months per year) time commitments he elicited on recorded videos from all Moffitt faculty participants, including Dr. List, were an open “lie” necessary to apply for the Talents programs and to enable the participating Moffitt faculty to receive their Talents programs payments. Prior to the current inquiry, Dr. Wei never reported to Moffitt his participation in any Talents program.

Dr. Howard McLeod

Dr. McLeod operates a research program in China through 1000 Talents Program support and his affiliation with Central South University (“CSU”)/Xiangya Hospital, in Changsha, Hunan Province; he joined this Talents program before coming to Moffitt. He also appears to have or had at least one other Talents program award or appointment through a China-based company, and he maintains substantial

commercial interests in China. Dr. McLeod's participation in Talents program activities is independent of Dr. Wei's efforts. On interview, Dr. McLeod reported having received a Chinese "green card" (i.e., Chinese domestic work permit) when he began 1000 Talents Program work and stated that bank accounts in China receive his Talents program funding, which serves to fund his research, travel and other activities in China. Dr. McLeod reported that he oversees students, advises on and participates in clinical and other research in China, and assists CSU to grow its capacity and knowledge base.

Dr. McLeod has a close relationship and supervised Dr. Yijing (Bob) He, who worked as a full-time Moffitt employee from 2014 to June 2019. Unbeknownst to Moffitt, Dr. He resided and worked entirely in China, and yet used a Florida mailing address owned by Dr. McLeod for his Moffitt human resources file.¹¹ Dr. He appears to have functioned as an agent of Dr. McLeod in China. Dr. He has facilitated a wide variety of opportunities and activities in China, both commercial and academic, for himself and Dr. McLeod. They shared clinical trial oversight and design duties, sought research funds jointly, and engaged in commercial opportunities together.

As a 1000 Talents Program participant, Dr. McLeod reportedly receives an annual salary (which he describes as approximately "10% of previous salary at UNC"), as well as RMB 1,000,000 (~\$142,000 USD) in annual research funding, and ~\$149,000 USD in "start-up" funding for every five-year 1000 Talents Program renewal, which would appear to represent personal income under what we know of the Talents program payment methodology. Dr. McLeod has received Chinese government grants and has co-authored publications in which he has listed CSU/Xiangya as his only employer. At least one patent in his name was filed through CSU/Xiangya in 2017. Every year, he has reported to Moffitt his involvement in a Talents program, but has never disclosed to Moffitt the full extent of his research funding and personal income from the Talents programs.

Dr. Alan List

Dr. List appears to have been involved in at least two separate Talents program activities, opened a personal bank account in China to receive Talents program and other funds, and agreed to receive some additional, non-Talents program payments from TMUCIH while serving as Moffitt's President and CEO. In June 2015, at Dr. Wei's request and Dr. List's direction, Dr. List's secretaries compiled application material for the 1000 Talents Program and sent Dr. List's electronic signature to Dr. Wei for the application. The application included an express pledge in English to work in China for nine months annually for three years and, in Mandarin, referenced his personal compensation as RMB 500,000 (~\$71,000 USD) payment and other benefits. Dr. List, with Dr. Wei holding the camera, recorded a video to support the application, committing to "at least two months of effort" to Talents program activities. In July 2016, Dr. List participated in a 1000 Talents Program award ceremony in Tianjin and he received a Tianjin visiting professorship contract in July 2016, which included an annual one-week commitment for three years in exchange for RMB 10,000 (~\$1,420 USD) per visit. In August 2016, Dr. List signed a form directing that the TMUCIH hematology department receive RMB 600,000 (~\$85,300 USD) from his 1000 Talents Program research funds. In September 2016, Dr. List received the Tianjin Friendship Award of Haihe River, which may have included RMB 50,000 (~\$7,100 USD) payment, although on interview, Dr. List asserted that he could not recall whether he actually received this compensation. In 2017, another Talents program application appears to have

¹¹ On interview, Dr. McLeod stated that Dr. He's salary was paid by funds of the State of Florida that had been made available to Moffitt to support Dr. McLeod's Moffitt research.

been submitted by Dr. Wei for Dr. List. In June 2018, Dr. List emailed with Dr. Wei about opening a personal bank account in China for Talents program funding, stating: “Kim [Dr. List’s spouse] is fine with opening a bank account. I guess we can deposit the other funds waiting for us there into the account as well. What are the next steps?” On interview, Dr. List did not recall this email exchange and could not relate or describe the significance of this email between him and Dr. Wei. Subsequently, in November 2018, Dr. List, with Dr. Wei’s assistance, opened a personal bank account in Tianjin, at the same time as personal bank accounts were also opened there by Drs. Sellers, Sullivan and Epling-Burnette, which was contemporaneously known to Dr. List. On interview, Dr. List stated that about \$70,000 was deposited into that account but advised that he has not withdrawn any funds from it.

Dr. List admitted signing the 2016 form directing that his 1000 Talents Program funding be directed to TMUCIH, and he acknowledged having opened the personal bank account in Tianjin in November 2018. The precise compensation accompanying his Talent programs activities is not known and he has indicated that he did not know the specifics of his Talents programs-related compensation. Dr. List did not disclose to Moffitt his participation in Chinese Talents programs, any Talents program payments, or his Chinese personal bank account, until specifically asked by Moffitt’s Compliance Office in late September 2019.

Dr. List also served on a TMUCIH/IPCC advisory committee, beginning in or around November 2017, for which he was personally paid \$15,000 for 2018 services; his involvement in this advisory committee, but not his exact compensation, was disclosed as part of the Moffitt faculty disclosure but was not disclosed as part of Dr. List’s board of directors’ disclosure. On interview, Dr. List stated that he thought the amount he received was smaller than \$15,000, but bank information he later produced indicated that he indeed had received \$15,000.

In summary, there were various failures to report Chinese activities and income, and these activities and income represent violations of Moffitt’s policies. Dr. List, along with the other three Moffitt faculty, opened personal bank accounts in China in November 2018 to receive Talents programs compensation – at a time well after these foreign influence issues had been brought to their attention by Moffitt and by the NIH through national academic and medical community announcements and public media reports.

Dr. Tom Sellers

Dr. Sellers was the Principal Investigator and Moffitt lead on the Moffitt’s NCI Core Grant and was involved in one Talents program. At Dr. Wei’s request in June 2017, Dr. Sellers compiled application material for the 1000 Talents Program and sent Dr. Wei his electronic signature for the application (which included an express pledge in English to work in China for two months annually for three years and, in Mandarin, reference to personal compensation of RMB 50,000 (~\$7100 USD) monthly payment and other benefits). Dr. Sellers also acknowledged having recorded, with Dr. Wei’s assistance, a video to support his Talents program application, but that video has not been located. In May 2018, Dr. Wei emailed Dr. Sellers about opening a Chinese bank account in connection with the Talents program. In July 2018, Dr. Sellers emailed Dr. Sullivan stating that he had received a “1000 talent recognition.”

In November 2018, Dr. Sellers opened a bank account in Tianjin. On interview, Dr. Sellers stated that \$35,000 was deposited into the account, with another \$35,000 to be deposited at a later date. Dr. Sellers also stated that he had not withdrawn any funds from this personal Chinese bank account.

Sellers disclosed his participation in the 1000 Talents Program and his Chinese bank account in August 2019, after having attended a Moffitt Compliance seminar on the topic of foreign influence on U.S. academic activities. On interview, Dr. Sellers initially stated that he had not participated in a Talents program, but then changed his position when confronted with statements in which he had indicated to others that he had applied for and received a Talents program award.

Dr. Dan Sullivan

Dr. Sullivan was involved in Moffitt/Tianjin activities and in one Talents program. At Dr. Wei's request in June 2017, Dr. Sullivan compiled application material for the 1000 Talents Program and sent Dr. Wei his electronic signature for the application (which included an express pledge in English to work in China for two months annually for three years and, in Mandarin, reference to personal compensation of RMB 50,000 (~\$7,100 USD) monthly payment and other benefits). With Dr. Wei's assistance, Dr. Sullivan also recorded a video to support his Talents program application, in which he pledged to work two months annually. In June 2018, Dr. Sullivan was honored at a 1000 Talents Program ceremony in Tianjin. In November 2018, Dr. Sullivan opened a personal bank account in Tianjin. On interview, Dr. Sullivan stated that \$80,000 was deposited into the account. Dr. Sullivan also stated that he has not withdrawn any funds from his personal Chinese bank account. In January 2019, Dr. Sullivan disclosed to Moffitt Compliance his participation in the 1000 Talents Program and the existence of his personal Chinese bank account. In February 2019, Dr. Sullivan disclosed to his financial advisors that he was being paid "500,000 yuan/annually [~\$71,000 USD] into an account at Chinese Merchant Bank" for "research work." When one of Dr. Sullivan's subordinates commented to him in April 2019 about her being "really nervous about going to China" because of "thousand talents" programs, Dr. Sullivan stated that "[It is] Good to live on the edge;" and when she reiterated her concern, he joked, "Lawyers make you anxious? That is their job." Dr. Sullivan also served on an IPCC advisory committee, beginning in or around November 2017, for which he was paid \$15,000 for 2018, and which he reported in the Moffitt 2018 faculty disclosure process.

Dr. Pearlie K. Epling-Burnette

Dr. Epling-Burnette appears to have been involved in at least one Talents program. In 2015, she compiled application materials for the 1000 Talents Program at Dr. Wei's request and recorded, with Dr. Wei's help, a video to support the application, in which she pledged to work three months annually. In 2017, Dr. Epling-Burnette directed that funds from her 2015 1000 Talents Program award be directed to the TMUCIH hematology department (RMB 600,000 (~\$85,300 USD)). In November 2018, Dr. Epling-Burnette opened a personal bank account in Tianjin into which \$35,000 was reportedly deposited by TMUCIH, with another \$35,000 to be deposited later. On interview, Dr. Epling-Burnette stated that she had withdrawn \$7,000 to \$8,000 in \$400 increments from this account through a Tampa Bay credit union. She also stated that she believed the time commitment she made was for activities at Moffitt supervising Tianjin students. She formally disclosed to Moffitt the \$35,000 award only on the evening before being interviewed as part of the Moffitt investigation.

Conclusions

The participation by the Moffitt leaders and faculty in the Talents programs and other Chinese activities violated multiple Moffitt policies and federal grant standards, including:

- Receiving personal payments from an entity (TMUCIH) with which Moffitt itself does business, without disclosing those payments to the Moffitt Board of Directors and without disclosing those payments in the Moffitt faculty financial disclosure process;
- Agreeing to devote substantial personal time (at least two to three months annually) to these personally compensated activities in China, in direct conflict with their full-time commitments to Moffitt;
- Receiving personal payments and other research support from Tianjin and other Chinese sources, without disclosing this support as part of federal grant applications and in the course of financial disclosures for federal grants purposes;
- Receiving personal cash honoraria and personal travel benefits during their visits to China, without reporting these to Moffitt; and
- Opening personal bank accounts in China to receive these unreported funds.

There is no evidence to date that intellectual property has been stolen or that research or patient care has been compromised.