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July 15, 2025

The Honorable Kashyap Patel
Director Federal Bureau of Investigation
935 Pennsylvania Avenue, NW
Washington, DC
20535

Dear Director Patel:

We write to respectfully urge the FBI to put an end to its ongoing certification of products from Chinese military-linked and surveillance companies—including companies blacklisted or red-flagged by the U.S. government—that could be used to spy on Americans, strengthen the repressive surveillance state of the People’s Republic of China (PRC), and otherwise threaten U.S. national security. We are prepared to work with the FBI on this issue.

The Federal Bureau of Investigation (FBI) currently certifies biometric devices from 32 Chinese companies, including Hangzhou Hikvision Digital Technology Co., Ltd. (Hikvision),^a a sanctioned Chinese military and surveillance giant. At least fourteen PRC firms with products on the FBI’s Certified Products List maintain concerning ties to the Chinese military and intelligence services.^b

Including these products on the Certified Products List grants these companies the FBI’s seal of approval, which they can leverage to market their products as FBI-approved to customers in the U.S. government, elsewhere in the United States, and around the globe. This sends a dangerous signal to potential buyers that these companies’ products are trustworthy and heightens the risk that these products will be procured by U.S. government entities or contractors despite the security risks. It also sends conflicting messages about U.S. policy toward companies with ties to the PRC’s military-industrial complex.

We are particularly alarmed by the FBI’s 2025 certification of Hikvision’s HK300 PIV single finger capture device.^c

^a Also known as “杭州海康威视数字技术股份有限公司”, “海康威视”.

^b The FBI Certified Products List is a list of products that are tested and compliant with the FBI’s Next Generation Identification (NGI) Image Quality Specifications (IQS).

^c Federal Bureau of Investigation, *Certified Products List*, FBI Criminal Justice Information Services Division (accessed Apr. 5, 2025), available at <https://fbibiospecs.fbi.gov/certifications-1/cpl>.

This approval is fundamentally at odds with the U.S. government’s own national security determinations regarding Hikvision:

1. In 2019, the U.S. Department of Commerce placed Hikvision on the Entity List because it is “implicated in human rights violations and abuses” in the Xinjiang Uyghur Autonomous Region;¹
2. Hikvision is prohibited from receiving federal contracts under Section 889 of the FY2019 National Defense Authorization Act because it produces “video surveillance ... equipment” considered a national security risk;² and
3. Hikvision was designated in 2021 under Executive Order 13959 as a company linked to China’s military-industrial complex.³

Hikvision is directly involved in China’s mass surveillance apparatus that targets Uyghurs and other ethnic minorities. It supplies and installs technologies used for tracking and monitoring.⁴

By certifying these devices, the FBI “provide(s) assurances[...] that certified products meet or exceed minimum FBI interoperability standards,”⁵ granting legitimacy to companies that pose a national security threat and suggesting that their products are safe for use by law enforcement or for other purposes. Even if listed Hikvision products cannot “route or redirect user data” and, therefore, fall beyond the scope of Section 889, the products are nonetheless part of a company deeply embedded in the PRC’s internal surveillance regime and military build-up.

We identified at least 32 PRC-based companies whose products are currently on the FBI’s Certified Products List that warrant scrutiny. A list of those entities is provided in **Appendix A**.

Based on our targeted review of several of these firms, we identified more than a dozen with concerning ties to PRC intelligence agencies (i.e., the Ministry of State Security, the Ministry of Public Safety), involvement in provincial or municipal surveillance efforts, or partnerships with entities sanctioned by the U.S. government.

Firm	Intelligence Tied to Chinese intelligence agencies ^d	Surveillance Has partnered with or supplied products for PRC surveillance ^e	Sanctioned Entities
Beijing Hisign Technology	X	X	X
BRMICRO	X		
Chongqing Huifan Technology	X		
Eyecool		X	

^d Including the Ministry of State Security or the Ministry of Public Safety.

^e Including state and provincial surveillance efforts.

Joyusing Technology			X
Luxshare Precision			X
Miaxis	X	X	X
Shenzhen Betterlife Electronic Science and Technology Co.			X
Shenzhen Cama Biometrics	X	X	
Shenzhen Dotu Technology		X	X
Shenzhen WINUIM Information Tech	X	X	
Tlink Technology	X	X	
Zhejiang Wellcom Technology	X	X	
ZTEway Technology		X	X

Details on these firms' problematic ties are detailed in **Appendix B**.

We respectfully request that the FBI immediately review all PRC-based companies whose products are on the Certified Products List and check them against existing U.S. government sanctions, entity lists, and security determinations; develop a comprehensive policy that addresses the full range of security implications of certifying products from foreign adversary companies that pose a national security risk; and provide a written response within 30 days detailing the steps taken to address these concerns and prevent future inconsistencies in the certification process. Should the FBI's position be that the law needs to be changed, we welcome your input on potential legislation.

Thank you for your attention to this critical national security matter. We are ready to work with the FBI to ensure that our nation's technological infrastructure remains secure from potential foreign threats.

Sincerely,



John Moolenaar
Chairman



Raja Krishnamoorthi
Ranking Member

APPENDIX A

PRC Companies with FBI-Certified Products

Beijing Eyecool Technology
Beijing Hisign Technology
Beijing Techshino Technology
BioID Technologies Limited
BRMICRO Electronic Technology
ChangChun E-vida Technology
Changchun Fangyuan Opto-Electronic Tech
Changchun Syndey Technologies Inc.
Chongqing Huifan Technology
EKEMP International Limited
Esim Technology
FaithIOT (Shenzhen)
Futronic Technology Company
Hangzhou Hikvision Digital Technology
Hongda Opto-Electron
JiangXi Fingerchip Intelligent Technology
Joyusing Technology
Luxshare Precision Industry
Miaxis Biometrics
Shanghai OXi Technology
ShenZhen Ming Tian Biometrics Identification Technology Limited
Shenzhen Betterlife Electronic Science and Technology
Shenzhen Cama Biometrics
Shenzhen Chipsailing Technology
Shenzhen Dotu Technology
Shenzhen Herofun Bio-Tech
Shenzhen Lirox Information Technology
Shenzhen Shenzhoudun Security Systems
Shenzhen WINUIM Information Technology
Tlink Technology
Zhejiang Wellcom Technology
ZTEway Technology

APPENDIX B

Survey of PRC Military & Surveillance Ties

1. Beijing Hisign Technology

Hisign maintains partnerships with Huawei and Inspur, companies identified by the Department of Defense as “Chinese Military Compan[ies].”⁶

“Hisign maintains partnerships with [PRC Military Companies] Huawei and Inspur.”

2. BRMICRO⁷

BRMICRO develops fingerprint chips, algorithms, and verification systems for China’s security and identification infrastructure. The company maintains an R&D team of 45 personnel and positions itself as a leading SoC developer for fingerprint recognition.⁸ BRMICRO has direct ties to China’s security apparatus through its participation in the Security Document Summit, co-organized by the Ministry of Public Security’s First Research Institute.⁹

“BRMICRO has direct ties to China’s security apparatus.”

3. Chongqing Huifan Technology

CHT asserts that their smart door locks were “designated as a special brand product for the 2022 Hangzhou Asian Games by the [PRC’s] Ministry of Public Security.”¹⁰

4. Beijing Eyecool Technology

Eyecool established in 2016 by the founder of Techshino, has long served China’s “military” and “public security” sectors.¹¹ Before its rebranding, Techshino served clients including the PLA General Armaments Department,¹² the Tai’an Traffic Police,¹³ and over 100 banks,¹⁴ providing biometric systems for identity authentication and security.

In 2010 and 2012, for example, Techshino received Ministry of Public Security certifications for its HI-Ukey digital certificate system and fingerprint scanners used in China’s second-generation national ID program. In 2013 and 2018, Techshino received PLA certifications for military information security (SmartFPI V2.0) and military-grade product safety (dual-eye iris access control system), enabling deployment in classified environments and at “important military targets.”¹⁵ After 2016, Eyecool absorbed Techshino’s biometric IP into a full-stack AI platform and appears to have scaled its fingerprint and smart key systems into facial and iris recognition technologies.¹⁶ These systems now underpin the CCP’s pervasive surveillance infrastructure, including “Skynet,”¹⁷ where Eyecool’s platforms reportedly handle over two million daily facial

“[Eyecool] served clients including the PLA General Armaments Department.”

captures in a single city,¹⁸ and continue to support PLA programs¹⁹ and broader public security initiatives like “Sharp Eyes.”²⁰ “Sharp Eyes” (雪亮工程) extends surveillance capabilities from cities to rural and residential areas, promoting “mass prevention and mass governance” by connecting public security systems with community-level monitoring tools.²¹ Eyecool has close ties to the Ministry of Public Security, participating in the April 2019 “National Criminal Technology New Technology and New Equipment Promotion Conference” attended by Director Wang Haiou of the Criminal Investigation Bureau of the Ministry of Public Security²² and the November 2020 “China International Police Equipment Expo” hosted by the Ministry of Public Security.²³ Eyecool has invited CCP party members to its manufacturing center, including former head of the United Front Work Department You Quan, and hosted demonstrations of its technologies for MPS officials.²⁴ Eyecool is majority-owned through entities controlled by its founder Zhou Jun and is headquartered in Xiong’an.²⁵

5. Joyusing Technology

Joyusing lists Inspur, a Department of Defense designated “Chinese Military Company,” as a corporate partner and lists several municipal and provincial governments as partners.²⁶

6. Luxshare Precision²⁷

Luxshare manufactures the LX360, a PIV-certified single finger capture device, and maintains documented military and security connections in China.²⁸

Luxshare Precision co-founded silicon carbide technology joint venture Xinlian Power Technology alongside multiple partners of security concern.²⁹ These include CATL, designated as a “Chinese Military Company” by the U.S. Department of Defense, United Nova Technology partially owned by U.S.-restricted SMIC Holdings,³⁰ and SAIC Motor Corporation, which is a direct supplier to the Chinese People’s Liberation Army.³¹ Chinese securities filings confirm Luxshare is “a purchasing agent for DJI,” directly supplying the US-sanctioned company that was designated for having “provided drones to the Xinjiang Public Security Bureau [...] used to surveil Uyghurs.”³² Luxshare’s wholly-owned subsidiary, Kunshan Liantao Electronics, is implicated in forced labor: it received 500 laborers from predominantly Uyghur regions of Xinjiang as part of forcible government-organized labor transfer programs.³³

“Luxshare’s wholly-owned subsidiary ... is implicated in slave labor.”

7. Miaxis

“Miaxis also supplies systems to the Ministry of State Security, China’s intelligence agency.”

Miaxis is the commercial brand of Zhongzheng Intelligent Technology³⁴, a wholly owned subsidiary of Shenzhen Xinguodu (XGD)³⁵ and a key supplier to China’s security and surveillance apparatus.³⁶ XGD partners with the People’s Armed Police and Zhejiang provincial departments of public security, justice, transportation, and disease control, and collaborates with sanctioned defense and surveillance firms including China Aerospace Science and Industry Corporation,³⁷ Aviation Industry Corporation of

China,³⁸ Hikvision,³⁹ Dahua,⁴⁰ and iFlytek.⁴¹ Miaxis also supplies systems to the Ministry of State Security,⁴² China's intelligence agency responsible for both domestic and foreign operations. It is marketed as an "authorized partner" of the Ministry of Public Security⁴³ and was among the first firms certified for second-generation ID fingerprint verification.⁴⁴ In 2022, XGD described itself as "a key supplier" of fingerprint collection equipment to the ministry, though that language has since been removed.⁴⁵

8. Shenzhen Betterlife Electronic Science and Technology

Shenzhen Betterlife is a Shenzhen-based company that produces chips for fingerprint recognition and touch control devices. They vow to become "a leader in intelligence chips for the Internet of Things" and have more than 180 patents. In January 2021, Zhang Chi, Chairman of Shenzhen Betterlife Electronic Science and Technology, led a delegation to visit the Institute of Advanced Studies at the University of Electronic Science and Technology of China (UESTC). Betterlife's Chairman Zhang Chi said that "he hopes to promote cooperation between the two sides in scientific research, achievement transformation and talent training through the joint construction of a joint scientific research platform with the Institute of Advanced Studies," despite UESTC's deep ties to the PLA.⁴⁶ UESTC is on the Commerce Department's BIS Entity List and "UESTC research has been used by state-owned manufacturers of military aircraft, missiles, and military electronics and the PLA Navy on projects such as the JF-17 fighter and the Navy's aircraft carrier program."⁴⁷

9. Shenzhen Cama Biometric

Cama Biometric lists their fingerprint recognition technology as certified by the Ministry of Public Security, and advertises "government," "military," and "military industry" applications of their technology.⁴⁸

"Cama Biometric advertises "government," "military," and "military industry" applications."

10. Shenzhen Dotu Technology

Dotu asserts that they are involved in "domestic and foreign government departments" and lists Tencent – a Department of Defense designated "Chinese Military Company" – on their frontpage.⁴⁹

11. Shenzhen WINIUM Information Technology

WINIUM offers products certified by the Ministry of Public Security and National Cryptography Administration.⁵⁰

12. Tlink Technology

Tlink offers products certified by the Ministry of Public Security and previously participated in the Ministry of Public Security's "ID card fingerprint collection."⁵¹

13. Zhejiang Wellcom Technology⁵²

Wellcom, a wholly-owned subsidiary of Everfine, is a key supplier of fingerprint recognition systems to China's Ministry of Public Security, military, and major state banks.⁵³ The company co-drafted national security standards with the MPS and helped develop China's national ID system.⁵⁴ Wellcom openly markets its biometric platforms to military installations, police agencies, and government security bureaus across 28 Chinese provinces.⁵⁵ Court records reveal Wellcom bribed MPS officials in 2014 to secure fingerprint device approvals.⁵⁶ Its JZT-998FGB scanner received FBI certification in 2025 despite these connections.

"Wellcom openly markets its biometric platforms to military installations, police agencies, and government security bureaus across 28 Chinese provinces."

14. ZTEway Technology⁵⁷

ZTEway Technology is majority owned by founder Han Xiaozhou and supplies fingerprint recognition systems to China's military and intelligence apparatuses. Its fingerprint scanners are certified by the Ministry of Public Security for the national ID card program and deliberately use domestic chips to "eliminate security loopholes and backdoors of foreign chips."⁵⁸ Despite the similar name, ZTEway has no documented corporate or ownership connection to ZTE Corporation. The company has obtained military-grade certifications from the PLA Information Security Evaluation Center and implements China's SM cryptographic standards across its products.⁵⁹ ZTEway maintains relationships with several companies subject to U.S. restrictions, including ZTE, previously restricted under U.S. defense legislation; Aisino, listed in Department of Defense programs; and AVICIT, a subsidiary of sanctioned defense conglomerate AVIC.⁶⁰

"ZTEway supplies fingerprint recognition systems to China's military and intelligence apparatuses."

ENDNOTES

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⁵² Also known as: 浙江维尔科技有限公司, 维尔科技, 浙江维尔科技, Zhejiang Wellcom Biometrics Co., Ltd., Zhejiang Wei'er Science and Technology Co., Ltd.

⁵³ About Us, Zhejiang Wellcom Technology, *available at* <https://web.archive.org/web/20220630132837/http://www.wellcom.cn/index/about/corporate/>; Zhejiang Wellcom Technology Co., Ltd., Baidu, *available at* <https://web.archive.org/web/20250412154647/https://ywtb.mps.gov.cn/gabzh/portal/stdDetail/310013>.

⁵⁴ *Id.*; GA/T 701-2024, Security Protection—Fingerprint Recognition Applications—General Technical Requirements for Access Control Fingerprint Recognition Module (Ministry of Public Security, PRC, issued Sept. 5, 2024, effective Jan. 1, 2025), *available at* <https://web.archive.org/web/20250412154647/https://ywtb.mps.gov.cn/gabzh/portal/stdDetail/310013>.

⁵⁵ Human ID Tablet, Zhejiang Wellcom Technology, *available at* <https://web.archive.org/web/20250412153857/https://www.wellcom.cn/biometrics/humanIDTablet/>; Desktop ID Reader, Zhejiang Wellcom Technology, *available at* <https://web.archive.org/web/20250412154119/https://www.wellcom.cn/biometrics/desktopIDCardReader/>; Finger Printers, Zhejiang Wellcom Technology, *available at* <https://web.archive.org/web/20250412154427/https://www.wellcom.cn/biometrics/fingerPrinters/>.

⁵⁶ Zhang Liuchang & Chen Yufeng, Ministry of Public Security official took advantage of his position to accept bribes of 560,000 yuan and was sentenced to 6 years in prison, Yicai Daily (Nov. 26, 2014), *available at* <https://web.archive.org/web/20250412155033/https://news.sohu.com/20141126/n406388811.shtml>.

⁵⁷ Also known as: Beijing Zhongtian Yiwei Technology Co., Ltd., 北京中天一维科技有限公司

⁵⁸ ZTEway Second-Generation ID Fingerprint Scanner Passed Ministry of Public Security Testing, ZTEway Technology, *available at* https://web.archive.org/web/20131210005048/http://www.zteaway.com/gsxwpage.jsp?a_id=120; About Us, ZTEway Technology, *available at* https://web.archive.org/web/20180709022717/http://www.zteaway.com/gszyw.jsp?a_id=1.

⁵⁹ *Id.*

⁶⁰ Homepage, ZTEway Technology, *available at* <https://web.archive.org/web/20220329013456/http://www.zteaway.com/>.