



Congress of the United States
House of Representatives

June 15, 2026

The Honorable Pete Hegseth
Secretary of War
U.S. Department of War
1000 Defense Pentagon
Washington, DC 20301

Dear Secretary Hegseth,

We commend the Department for issuing a robust update of the Chinese military companies list last week.¹ Building on this momentum, we urge strict implementation of the upcoming ban on the Department contracting with companies that retain lobbyists advocating on behalf of Chinese military companies. Consistent with your focus on prioritizing our warfighters and delivering the capabilities they need to defend our nation against foreign adversary threats, it is critical that the Department's contractors avoid partnering with firms and lobbyists that simultaneously advance the interests of companies executing the military ambitions of the Chinese Communist Party.

Section 851 of the Servicemember Quality of Life Improvement and National Defense Authorization Act for Fiscal Year 2025 (P.L. 118-159) bars the Pentagon from contracting with a company (including any parent or subsidiary entities) that maintains a contract with entities lobbying for Chinese military companies identified by the Department pursuant to Section 1260H of the National Defense Authorization Act for Fiscal Year 2021. This provision takes effect on June 30, 2026, and defense contractors seeking to work with the Pentagon face a clear obligation: cut all ties with firms and lobbyists that also lobby on behalf of companies on the 1260H List.

As the Department develops relevant rules and processes to implement Section 851, we offer three recommendations for enforcement consideration. First, the Department should ensure that the prohibition applies both to prospective and current contractors. Second, the Department's contractors should be encouraged to consider the full definition of "lobbying activities," which includes coordination and other supporting work from research to planning that may assist in

¹ "DOW Releases List of Chinese Military Companies in Accordance With Section 1260H of the National Defense Authorization Act for Fiscal Year 2021," U.S. Department of War, June 8, 2026, <https://www.war.gov/News/Releases/Release/Article/4511232/dow-releases-list-of-chinese-military-companies-in-accordance-with-section-1260/>.

lobbying contacts.² Some lobbyists and firms working for 1260H List entities may not trigger certain public lobbying disclosure requirements but may still be engaged in lobbying-related activities. Third, implementation should align with the prohibition's intent to capture U.S.-based subsidiaries of companies on the 1260H List. Chinese companies designated on the 1260H List often operate in the United States through wholly owned subsidiaries and affiliates. Lobbyists representing such clients are inherently advancing the interests of their parent companies designated on the 1260H List. Additionally, a lobbyist or firm can be conducting lobbying activities for or on behalf of a client without any direct contract or payment between the firm and that client.³

We respectfully request a briefing from the Department on Section 851 implementation by June 30, 2026.

Thank you for your attention to this national security matter.

Sincerely,



John Moolenaar
Chairman
House Select Committee on China



Elise Stefanik
Chairwoman
House Republican Leadership

² The definition of “lobbying activities” in Section 851 refers in part to the Lobbying Disclosure Act of 1995 (2 U.S.C. 1602), which states “The term ‘lobbying activities’ means lobbying contacts and efforts in support of such contacts, including preparation and planning activities, research and other background work that is intended, at the time it is performed, for use in contacts, and coordination with the lobbying activities of others.”

³ Secretary of the Senate and Clerk of the House of Representatives, *Lobbying Disclosure Act Guidance*, effective January 1, 2008, last revised February 28, 2025, 11, <https://lobbyingdisclosure.house.gov/ldguidance.pdf>.