

## Statement of Purpose/Key Factual Allegations

The lawsuit against the Chinese government, the key factual allegations are that in the critical weeks between December 2019 and January 23, 2020, the Chinese Government engaged in misrepresentations, concealment, and retaliation to conceal the gravity and seriousness of the COVID-19 outbreak from the rest of the world.

1. **Denying the risk of human-to-human transmission.** The first known case of human-to-human transmission occurred in early December. By late December, Chinese health officials had plenty of evidence of human-to-human transmission. On December 30, Chinese doctors at Wuhan hospitals posted on social media that they were observing human-to-human transmission. Until January 20, Chinese officials continued to insist that there was no evidence of human transmission—denying solid evidence to the contrary. Additionally, Chinese officials failed to report the potential for human-to-human transmission to the World Health Organization for weeks.
2. **Silencing of whistleblowers.** Between January 1 and 3, 2020, Chinese officials arrested eight doctors and forcibly silenced them as “rumor-mongers”—an action that was broadcast on state media, likely to deter others from speaking out. One doctor at a Wuhan emergency room was disciplined when she told her staff to wear masks when dealing with patients, fearing human-to-human transmission. Additionally, there were reports of journalists covering the outbreak who disappeared.
3. **Failing to contain the outbreak.** While denying human-to-human transmission, Chinese officials took little to no steps to contain the outbreak. By January 13, the Chinese government was aware of spread to Thailand. For the next week, they began treating COVID-19 as a serious and contagious virus without advising the public. During that time, millions of people traveled through Wuhan, and many thousands were infected, making a worldwide outbreak almost inevitable. A potluck event for 40,000 people went forward in Wuhan on January 16. The Chinese government took no serious steps to contain the outbreak until January 23 —when it was far too late.
4. **Hoarding personal protective equipment.** Reports indicate that Chinese officials, while they were concealing the outbreak, began hoarding quality PPE while permitting only defective PPE to be exported to the rest of the world. This hoarding endangered the lives of health care workers and first responders in other countries.

The COVID-19 outbreak has caused hardship in the United States, Viet Nam and across the globe—death, isolation from sick and dying loved ones, massive unemployment, economic dislocation, uncertainty, and trillions of dollars of economic losses. China should be held legally responsible.