

## ***Bloody Persecution: Plight of the Falun Gong***

By Jennifer L. Zegel\*

### I. Rise and Fall of the Falun Gong

#### A. Introduction

Religious persecution in China has become a profitable governmental endeavor and must immediately cease. Falun Gong<sup>1</sup> ("FG") is a subsection of Qigong,<sup>2</sup> the predominant religion of China, which is similar to Buddhism. Evidence confirms that practitioners of FG have been abused, raped, beaten, tortured, and murdered for refusing to renounce their practices.<sup>3</sup> Reports of organ harvesting of live FG practitioners are on the rise, notably the Kilgour-Matas Report.<sup>4</sup> China has signed, but has yet

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<sup>1</sup> LI HONGZHI, ZHUAN FALUN ii (Eng. ed., 1999) ("Falun Gong is a method of mind and body cultivation. It seeks to develop practitioners' heart and character in accordance with the principles of Truthfulness-Compassion-Forbearance.").

<sup>2</sup> Seth Faison, *Subversion Trials Due for Leader of a Sect in China*, N.Y. TIMES, Aug. 25, 1999, at A1.

<sup>3</sup> Annual Report on Int'l Religious Freedom 2005 China, 109th Cong., 2d Sess. xvii (2005) [hereinafter *IRFR 2005*].

<sup>4</sup> See David Matas & David Kilgour, *Report into Allegations of Falun Gong Practitioners in China*, (July 2006), available at <http://investigation.go.saveinter.net> (last visited Nov. 19, 2007); See also David Matas & David Kilgour, *Bloody Harvest: Revised Report into Allegations of Organ Harvesting of Falun Gong Practitioners*, Prepared for the Coalition to Investigate the Persecution of the Falun Gong, Jan. 31, 2007, at 38,

to ratify the United Nations Declaration of Human Rights.<sup>5</sup> In addition, it has grossly breached the provisions against freedom of religion,<sup>6</sup> freedom of speech<sup>7</sup>, and freedom from abuse and torture.<sup>8</sup>

The Ministry of Civil Affairs outlawed FG because they feared it advocated superstitions and could jeopardize social

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[hereinafter Revised Report] *available at* [www.organharvestinvestigation.net](http://www.organharvestinvestigation.net) (last visited Nov. 18, 2007) ("David Matas is an international human rights lawyer and David Kilgour is the former Canadian Secretary of State for Asia and the Pacific.").

<sup>5</sup> *E.g.*, *Human Rights and the Rule of Law in China: Hearing Before the Cong. Exec. Comm. on China*, 109th Cong., 2d Sess. 23 (2005)[hereinafter 109th Cong.] (statement of Jerome A. Cohen, Prof. of law at NYU) ("It has been eight years, and many experts expect they will have ratified that Convention by the time of the Olympics."). *Id* at 6.

<sup>6</sup> On December 10, 1948, the General Assembly of the United Nations adopted the Universal Declaration of Human Rights. Full text *available at* <http://www.unhchr.ch/udhr/lang/eng.htm>. Art. 18 states, "Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change religion or belief, and freedom either alone or in community with others in public, to manifest his religious belief in teaching, practice, worship and observance." When the nation-states sign and ratify the declaration they are bound by customary law. *Id*.

<sup>7</sup> *Id*. Art. 19 states, "Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media regardless of frontiers."

<sup>8</sup> *Id*. Art. 5 states, "No one shall be subjected to torture or to cruel, inhumane or degrading treatment or punishment."

stability.<sup>9</sup> Since the FG subsection was deemed illegal in 1999, the government has been heinously torturing practitioners for refusing to recant their beliefs.<sup>10</sup> The world has been slow to react and halt this ongoing persecution. People from countries around the world must stop going to China for organ transplants.<sup>11</sup> They must stop fearing that pressuring the Chinese to end the abuse will sour trade relations,<sup>12</sup> or that there could be repercussions with the 2008 Olympics.<sup>13</sup>

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<sup>9</sup> *Study: China's Army Harvesting Body Parts From Live Prisoners, Particularly Falun Gong Members*, FOXNEWS, Feb. 1, 2007, <http://www.foxnews.com/story/0,2933,249622,00.html> (last visited Nov. 18, 2007).

<sup>10</sup> *Id.*

<sup>11</sup> *Organ Sales Thriving in China: The Sale of Organs Taken from Executed Prisoners Appears to be Thriving in China, an Undercover Investigation by the BBC*, BBC NEWS, Sept. 27, 2006, <http://news.bbc.co.uk/2/hi/asia-pacific/5386720.stm> (last visited Nov. 18, 2007).

<sup>12</sup> Margaret Huang, *U.S. Human Rights Policy Toward China*, 6 FOREIGN POLICY IN FOCUS 8 (2001) (Discussing that for the last several years, U.S. Policy toward the PRC has consistently subordinated human rights concerns to geopolitical or economic interests).

<sup>13</sup> *China's Human Rights Record Deteriorating Despite Promises of Reforms for Olympics, Says Amnesty Int'l in News Report*, Amnesty International USA, Press Release, Sept. 20, 2006, [hereinafter Amnesty Olympic Article] <http://www.amnestyusa.org/document.php?lang=e&id=ENGUSA20060920001> (last visited Nov. 18, 2007) (Discussing concerns that Chinese authorities may be using the forthcoming Olympic Games as incentive to retain unjust systems of re-education through labor practices).

## B. History

In 1992, Li Hongzhi initiated the Falun Gong practice.<sup>14</sup> His teachings emphasize truth-benevolence-compassion.<sup>15</sup> All one must do to practice FG is to read Master Li's teachings and perform the accompanying meditative exercises.<sup>16</sup> Many countries classify the FG as a religious or spiritual group, although the FG do not consider themselves a religious<sup>17</sup> or political group.<sup>18</sup> "We do not have various provisions that people follow, as a religion, nor do we have any temples, churches, or religious rituals. People can come and go learn, or leave as they please,"<sup>19</sup> said Master Li. Beijing puts the tally of FG followers at 70 million.<sup>20</sup> Practitioners do not dispute these numbers; there is just no way of knowing, since there is no central membership list, how many FG practitioners exist.<sup>21</sup>

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<sup>14</sup> ZHUAN FALUN, *supra* note 1, at ii.

<sup>15</sup> *Id.*

<sup>16</sup> *Id.* There are five sets of meditation exercises. *Id.*

<sup>17</sup> *Id.* For more information on Falun Gong visit [www.faludafa.org](http://www.faludafa.org).

<sup>18</sup> *Id.*

<sup>19</sup> LI HONGZHI, ESSENTIALS FOR FURTHER ADVANCEMENT II at 6 (Eng. ed., 2002), available at <http://www.falundafa.org/book/eng/pdf/jjyz2.pdf> (last visited Nov. 18, 2007).

<sup>20</sup> *Id.*

<sup>21</sup> *Id.*

Further, FG practitioners in China are either in detention centers or keep their practice a secret.<sup>22</sup>

FG diverged from other Qigong groups, because Master Li focused his teachings on philosophies in addition to exercise.<sup>23</sup> FG was one of the most popular forms of Qigong before it became illegal.<sup>24</sup> In 1999, Dr. He Zuoxi, member of the Chinese Academy of Sciences, wrote an article discussing the "false qigong".<sup>25</sup> He used the FG as a prime example stating that the practice was detrimental to youths.<sup>26</sup> In response, on April 25, 1999, an estimated 15,000-30,000 FG practitioners held peaceful protests in three cities: Tianjin, Dalian, Xi'an.<sup>27</sup> They protested peacefully outside of Zhongnanhai, the Government's central headquarters in Beijing, insisting on official recognition of

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<sup>22</sup> 109th Cong., *supra* note 5, at 22.

<sup>23</sup> See, e.g., Christopher Chancey, Comment, *The Despotic Department in Refugee Law: Creating Legal Fictions to Support Falun Gong Asylum claims*, 6 APLPJ 4, 5 (Winter 2005).

<sup>24</sup> *Id.*

<sup>25</sup> He Zouxu, *I Do Not Approve of Teenagers Practicing Qigong*, 4 TIANJIN QINSHOUNIAN KEJI BOLAN [TIANJIN TEENAGER SCIENCE AND TECHNOLOGY OUTLOOK] (Tianjin, P.R.C.) (Eng. trans., 32 CHINESE L. & GOV'T 95 (1999)).

<sup>26</sup> *Id.*

<sup>27</sup> See, e.g., Erik Eckholm, *China's Rulers on Guard as Spiritual Sect Pushes the Envelope*, N.Y. TIMES, May 2, 1999, at A7.

their constitutional rights to free speech, press, and assembly.<sup>28</sup>

In July of 1999, the People's Republic of China ("PRC"), Ministry of Civil Affairs, declared the FG an illegal organization and an arrest warrant was issued for Li Hongzhi.<sup>29</sup> Many FG practitioners were thrown into "Re-education through Labor" ("RTL"), which is a form of government detention forced upon citizens without charge, trial, or judicial review.<sup>30</sup> Hundreds of thousands of people are believed to be in these facilities, although they are not regarded as prisoners.<sup>31</sup> China viewed the FG as a threat that could disrupt the authority of the PRC, and the ability to maintain social order due to the vastly growing number of practitioners.<sup>32</sup> Yet, the U.S. and other countries classify the FG as a peaceful and nonviolent form of personal belief and practice.<sup>33</sup>

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<sup>28</sup> *Id.*

<sup>29</sup> *E.g.*, H.R.C.R.S. Rep. No. RL33437, 110th Cong., at 4 (2006) [hereinafter H.R. Report].

<sup>30</sup> *China: Reform of Abusive Detention Law Vital to Beijing Olympics Human Rights Commitment*, Amnesty Int'l P.R. Release, Oct. 18, 2007, <http://www.amnestyusa.org/document.php?lang=e&id=ENGASA170512007> (last visited Nov. 18, 2007).

<sup>31</sup> *Id.*

<sup>32</sup> *Id.*

<sup>33</sup> H.R. Con. Res. 188, 107th Cong., 2d Sess. (2004) (enacted)

### C. Evidence of Falun Gong Persecution

In 1999, the Chinese government began a calculated proclamation to decrease the potential influence of the Falun Gong by portraying them as a deviant and weird outlawed group.<sup>34</sup> The Chinese Communist Party ("CCP") set up a dedicated bureaucracy assigned with the task to repress the FG, called the 610 Office, which has representatives all over China, and throughout the world.<sup>35</sup> Through these acts, China has been violating their constitutional provisions guaranteeing, freedom of religion, free speech, and the right to free association.<sup>36</sup> China's National People's Congress promulgated an 'anti-cult' law, Article Three Hundred (300) of the Criminal Code, which retroactively suppressed the FG and other unapproved religious sects throughout the country.<sup>37</sup>

Amnesty International is concerned that the official campaign of public denigration of the FG in the Chinese Media

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<sup>34</sup> Craig Smith, *China Attacks the Falun Gong in New Public Relations Effort*, N.Y. TIMES, Jan. 11, 2001, at A10.

<sup>35</sup> Revised Report, *supra* note 4, at 33.

<sup>36</sup> Zhonghua Renmin Gongheguo Xianfa [Constitution of the People's Republic of China] (adopted May 5, 1982, amended 1999) Art. 35 states, "Citizens of the PRC enjoy freedom of speech, freedom of the press, freedom of assembly, freedom of association..." and Art. 36 states, "Citizens of the PRC enjoy freedom of religious belief." *available at* <http://www.usconstitution.net/china.html> (last visited Jan. 4, 2008).

<sup>37</sup> See H.R. Report, *supra* note 29, at 24.

has created a "climate of hatred" against the FG.<sup>38</sup> Amnesty Int'l, further reported that the Chinese Government has adopted three tactics to eradicate the Falun Gong: 1) violence against practitioners who refuse to abandon their beliefs, 2) "brainwashing" to coerce FG practitioners in custody to abandon and recant the practice, and 3) a media crusade to transform public opinion against FG.<sup>39</sup> While in RTL, there are multitudes of reports and testimonials regarding the severe torture, rape, illegal imprisonment, forced labor, and psychiatric abuses that the FG regularly face.<sup>40</sup> FG torture cases compromise 66% of all reported cases of torture in China.<sup>41</sup>

#### D. Organ Harvestation of the Falun Gong

In 2006, at a United States Congressional Hearing on Oversight and Investigation it was reported that as many as 40,000 FG practitioners, who have committed no crime, have been sentenced to death in Chinese hospitals and their organs were sold "on-demand."<sup>42</sup> Investigators of the U.S. Congressional

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<sup>38</sup> 109th Cong., *supra* note 5, at 6.

<sup>39</sup> Amnesty Olympic Article, *supra* note 13, at 9.

<sup>40</sup> *Id.*

<sup>41</sup> *Id.*

<sup>42</sup> *Falun Gong: Organ Harvesting and China's Ongoing War on Human Rights: Hearing on H.R. 2447 Before the S.Comm. on Oversight and Investigation*, 109th Cong., 2d.(2006) [hereinafter Sub-Committee].

Committee in Wash., D.C., led by Comm. Chair Rep., Dana Rohrabacher, said, "[N]ow it appears that the ultimate horror may be taking place: Falun Gong are being killed so some corrupt official can profit from the sale of their body parts."<sup>43</sup>

Dr. Kirk Allison, from the Univ. of Minn.'s Program in Human Rights and Medicine, stated the following at the Congressional Hearing: "[T]he systematic program of ideological eradication of the Falun Gong [by China's regime] coincides with an inexplicable increase in whole organ transplantation and international organ transplant tourism to China."<sup>44</sup> The persecution of the FG has become the largest concentration of human rights violations in China since the Cultural Revolution.<sup>45</sup>

The Kilgour-Matas Report contains evidence that FG practitioners in detention centers are systematically given blood tests and physical examinations to be matched for potential transplants of vital organs.<sup>46</sup> The number of executed

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<sup>43</sup> *Id.* See also Deborah L. Shelton, *Organ Trade in China Raises Alarm Over Human Rights*, ST. LOUIS POST-DISPATCH, Sunday, Aug. 20, 2006, at A1 (Discussing the going rates for organs at China's International Organ Transplant Center are: \$62,000 for a kidney, \$98,000-\$130,000 for a liver, \$150,000-\$170,000 for a lung transplant and \$130,000-\$160,000 for a heart).

<sup>44</sup> Sub-Committee, *supra* note 42.

<sup>45</sup> *Id.*

<sup>46</sup> Revised Report, *supra* note 4, at 38.

prisoners, voluntary organ donors, and brain-dead cases in China do not come close to explaining the dramatic increase in organ transplants.<sup>47</sup> The only direct correlation to the rise in organ availability is the detention of FG practitioners.<sup>48</sup> Both have dramatically increased after the outlaw of the FG in 1999.

The Kilgour-Matas Report further notes that since Dec. 22, 2006, at least three thousand and six FG practitioners have died as a result of the CCP's persecution.<sup>49</sup> The anti-FG campaign goes beyond the family unit and places a duty on each practitioner's employer and co-workers to assist the government in pressuring the followers to relinquish their beliefs.<sup>50</sup> Local government leaders are held responsible and severely penalized if individuals, in their jurisdiction, refuse to recant their beliefs.<sup>51</sup> This forces the local government to increase pressure on the community to shun and expose the FG.

## II. Action to Aid the Falun Gong

### A. China's Feeble Attempt at Change

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<sup>47</sup> *Id.* at 37.

<sup>48</sup> *Id.*

<sup>49</sup> Revised Report, *supra* note 4, at 34.

<sup>50</sup> *Id.* at 31.

<sup>51</sup> *Id.*

In March of 2006, as a result of international pressure, China announced that it would place a temporary ban on the sale and purchase of organs, as precautionary measures to protect patients' health.<sup>52</sup> In May of 2007, the Chinese government outlawed the sale of human organs and stipulated that violators would be fined and could face criminal penalties.<sup>53</sup> Unsurprisingly, these efforts have not dampened the illegal trade of human organs and many organs still come from unknown donors.<sup>54</sup>

During the September 2007 meeting of the World Medical Assoc., the Chinese Medical Assoc., a semi-government body, announced that it would require its 500,000 member doctors to cease harvesting organs from executed prisoners, even with the prisoners consent, except when needed by the prisoner's immediate family.<sup>55</sup> Prior to the enactment, the Officials

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<sup>52</sup> *China Bans Transplant Organ Sales*, BBC News: Asia-Pacific, March 28, 2006, <http://news.bbc.co.uk/2/hi/asiapacific/4853188.stm> (last visited Jan. 4, 2008).

<sup>53</sup> *Assoc. Press, China: Doctors Agree Not to Take Organs from Prisoners*, N.Y. TIMES, Oct. 6, 2007, at A1.

<sup>54</sup> *Illegal organ transplants to be punished: The Mainland Affairs Council*, THE CHINA POST, Oct. 26, 2007, [www.chinapost.com/tw/taiwan/2007/10/26/128257/Illega-orga.htm](http://www.chinapost.com/tw/taiwan/2007/10/26/128257/Illega-orga.htm) (last visited Jan. 5, 2008).

<sup>55</sup> *Mary-Anne Toy Herald, Olympic Jitters Behind China's Organ Pledge*, THE SYDNEY MORNING HERALD, October 10, 2007, [www.smh.com.au/news/world/olympic-jitters-behind-chinas-organ-](http://www.smh.com.au/news/world/olympic-jitters-behind-chinas-organ-)

admitted that doctors routinely transplanted: kidneys, livers, corneas and other organs, with consent from prisoners sentenced to death row.<sup>56</sup> The Chinese Medical Assoc.'s Vice-Chairman, Chen Zhonghua, conceded that this effort was a result of "huge international pressure" particularly in the lead-up to the Olympics.<sup>57</sup>

However, the Chinese Medical Association has yet to release a timetable regarding the implementation of the prohibition on prisoner transplants.<sup>58</sup> It should be noted that, Liu Zhi, member of the medical association's international department, admitted that the pledge has no legal effect, but he hoped it would influence doctors and government decision makers.<sup>59</sup> Further, people held in RTL are not considered prisoners.<sup>60</sup>

In November of 2007, CBC Newsworld aired a news story called "Beyond the Red Wall" which examines the persecution of

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[pledge/2007/10/09/1191695910392.html](http://pledge/2007/10/09/1191695910392.html) (last visited Jan. 5, 2008).

<sup>56</sup> *Id.*

<sup>57</sup> Sydney Morning Herald, *supra* note 55.

<sup>58</sup> *Id.*

<sup>59</sup> *Id.*

<sup>60</sup> Amnesty P.R. Release, *supra* note 30.

the Falun Gong by the CCP.<sup>61</sup> The story details how some view that the Chinese government has had a "misinformation campaign" against the FG, especially the broadcast of the alleged self-immolation of five FG practitioners, which many agreed was a hoax.<sup>62</sup> The video also discussed the mounting allegations of organ harvesting of FG practitioners and many speak out in favor of boycotting the Beijing Olympics.<sup>63</sup>

#### B. United States Action and Abroad

Falun Gong adherents in the United States, on behalf of victims in China, have filed several civil complaints in U.S. federal courts against PRC leaders for violations of the Torture Victim Protection Act,<sup>64</sup> the Alien Tort Claims Act,<sup>65</sup> and other

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<sup>61</sup> Beyond The Red Wall: The Persecution of the Falun Gong, CBC NEWSWORLD, Aired Nov. 7 & 10, 2007, <http://www.cbc.com/theLens/program/061107.html> (last visited Nov. 7, 2007).

<sup>62</sup> *Id.*

<sup>63</sup> *Id.*

<sup>64</sup> C.R.S. Report for Congress, *China and Falun Gong*, 110th Cong., at 8 (May 25, 2006) See also 18 U.S.C. §§ 2340-2340A (1992) (Stat. 73, "Allows the filing of civil suits in U.S. against the individuals who, acting in an official capacity for any nation, committed torture and/or extrajudicial killing.").

<sup>65</sup> 28 U.S.C. § 1350 (1789) ( ATCA, "Grants jurisdiction to U.S. Federal Courts, any civil action by an alien for a tort only, committed in violation of the laws of the nations or treaty of the U.S." ).

crimes against humanity.<sup>66</sup> The most powerful statute, the Freedom from Religious Persecution Act of 1998,<sup>67</sup> authorizes the President to impose sanctions on countries that violate religious freedom.<sup>68</sup> The President has done nothing to directly impose sanctions on the Chinese government for their homeland violations of religious freedom. However, the House of Representatives passed a resolution demanding China to “cease its persecution and harassment of Falun Gong practitioners in the United States.”<sup>69</sup>

In 2006, the Senate Joint Resolution Committee met concerning the condemnation of the Chinese government’s persecution of practitioners of FG; the committee discussed the testimony of FG followers in the U.S. that have been victims of spying, harassment, intimidation, and violence by agents of the Chinese government.<sup>70</sup> The report suggested, in efforts to encourage China to respect the religious freedom of its citizens, the U.S. government must issue an official public, diplomatic statement to the Chinese Foreign Ministry condemning

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<sup>66</sup> *Id.*

<sup>67</sup> 22 U.S.C. §§ 6401 (1998).

<sup>68</sup> *Id.*

<sup>69</sup> H.R. Con. Res. 188, 107th Cong., 2d. (2004) (enacted).

<sup>70</sup> S.J. Res. 06-027, 65th Gen. Assem., Reg. Sess. (Co.2006) (House of Representatives concurring).

China's repeated violations of basic human rights protected in international covenants to which the PRC is a signatory.<sup>71</sup>

China has been designated a country of particular concern since 1999.<sup>72</sup> Yet, the PRC still continues to evade a publicly recognized condemnation of its practices from the U.S. government. The Bush administration has favored selective intense pressure on individual human rights cases of law, rather than a broader approach used by previous administrations.<sup>73</sup> The PRC has acquiesced to this type of tactic, usually by releasing prisoners of high profile when pressed and allowing U.S. officials to visit immediately after the release. Because of these strategic releases in 2005, the U.S. government has announced that "it would not introduce a resolution criticizing China's human rights record," at the 61st Session of the U.N. Commission on Human Rights.<sup>74</sup>

On October 29, 2006, the Coalition to Investigate the Persecution of FG in China (CIPFG) announced that a team was being organized to conduct an open investigation of Mainland

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<sup>71</sup> *Id.* at 3.

<sup>72</sup> IRFR, *supra* note 3, at 21.

<sup>73</sup> CRS Report, *supra* note 64.

<sup>74</sup> *Id.*

China.<sup>75</sup> The team will be made up of sub-teams from Australia, Asia, Europe, and North America.<sup>76</sup>

Many countries have brought suit on behalf of the FG, for example, Jia Qinglin, former Secretary to the Communist Party Committee in Beijing, has suits pending against him in the Austria, Ukraine, and the World Court for genocide, torture, and active participation in the persecution of FG.<sup>77</sup> Recently in Taiwan, the Cabinet-level Department of Health announced that Taiwanese doctors who have solicited or assisted patients in need of organ transplants in China are subject to penalties for legal and ethical violations in an effort to curb "organ transplant tourism."<sup>78</sup>

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<sup>75</sup> *Coalition to Investigate the Persecution of Falun Gong in China Plans*, FLGJUSTICE, Oct.29, 2006, <http://www.flgjustice.org> (last visited Nov. 19, 2007) (Discussing that the priority of focus will be investigating the forced labor camps, prisons, and other detention centers).

<sup>76</sup> *Id.*

<sup>77</sup> *Ukraine: Falun Gong File Lawsuit Against Top CCP Official Jia Qinglin*, FLGJUSTICE, Nov. 4, 2006, <http://www.flgjustice.org/> (last visited Nov. 19, 2006).

<sup>78</sup> Taiwan Headlines, CAN, Oct. 29, 2007 available at [http://organharvestingininvestigation.net/media/taiwanheadlines\\_102907.htm](http://organharvestingininvestigation.net/media/taiwanheadlines_102907.htm) (last visited Nov. 6, 2007) (Discussing how authorities suspect Taiwanese doctors broker organs between Taiwan hospitals and Chinese organ suppliers).

### C. Suggestions for Resolving the Continuing Injustice

The Kilgour-Matas Report makes multiple suggestions for resolving the persecution against the FG. Most notably, the report recommends that: 1) all of the detention centers and labor camps, must be opened to allow the International Committee for the Red Cross and other humanitarian organizations to inspect the facilities.<sup>79</sup> 2) China, and every nation-state that is a party to the Convention against Torture, should comply with the Optional Protocol to the Convention against Torture.<sup>80</sup> 3) Foreign states should enact extra-territorial legislation penalizing participation in organ harvesting without consent.<sup>81</sup> 4) The oppression, detention, and persecution of the FG practitioners should be immediately halted.<sup>82</sup> 5) The harvesting of organs of FG practitioners should immediately stop.<sup>83</sup> 6) Foreign states should issue travel advisories warning that the organs ready for transplantation in China are mostly procured from unconsenting prisoners and FG practitioners.<sup>84</sup>

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<sup>79</sup> Revised Report, *supra* note 4, at 59.

<sup>80</sup> *Id.*

<sup>81</sup> *Id.* at 60.

<sup>82</sup> *Id.*

<sup>83</sup> *Id.* at 62.

<sup>84</sup> Revised Report, *supra* note 4, at 61.

Supporters of the FG, have begun to suggest a boycott of the 2008 Olympics unless China: ratifies the U.N. Covenant, releases the FG prisoners, and upholds their constitutional guarantees of freedom of religion and the right to free association.<sup>85</sup> Finally, the U.S. Refugee Admissions for each fiscal year should begin to include FG practitioners.<sup>86</sup>

#### D. Conclusion

Countries from all over the world have begun to voice concerns and fears about the human rights violations that are occurring in China; yet, because of China's economic power, action to reverse this tragedy has been slow. China's persecution has morphed into a new hot commodity that has drawn considerable organ transplant tourism.

This gross display of human rights violations must end and until it does, China must be forbidden to host the 2008 Olympic Games. We have come too far as a global society, to openly allow the continuation of murder, torture, and abuse committed by the Chinese in violation of their laws, the laws of the United Nations, and the United States. If action is not taken to rescue the Falun Gong, thousands more practitioners will die while China economically benefits from their persecution.

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<sup>85</sup> Amnesty Olympic Article, *supra* note 13.

<sup>86</sup> Revised Report, *supra* note 4, at 65.

