



## **Michigan-China Economic and Security Review Group**

9 September 2024

Mr. Paul Rosen  
Assistant Secretary of the Treasury for Investment Security  
1500 Pennsylvania Avenue, NW  
Washington, D.C. 20220

RE: Proposed Gotion Michigan Project - Covered Transaction

Transmitted Via E-mail:



Dear Mr. Rosen:

I am following up on our past correspondence to you with respect to our concerns involving the proposed Gotion Michigan project.

As you know, Gotion voluntarily filed a declaration in the Spring of 2023 with respect to the project. In its released analysis of June of 2023, CFIUS found that it was a real estate transaction, and thus not covered.

We have found that in February 2020 the Department of Treasury instituted a [regulation](#) that appears to cover the Gotion project as it includes Grayling Army Airfield, that is located within the National All-Domain Warfighting Center. The designation covers

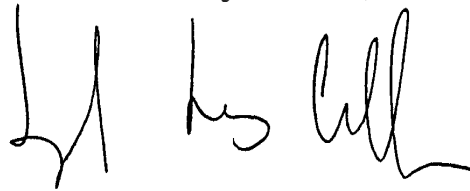
everything within or that functions as part of the port (under 31 CFR 802.211).

It appears the Department of Treasury may have overlooked this regulation when reviewing Gotion's declaration.

In light of this, I respectfully request you reexamine Gotion's declarations under the regulations governing joint use military airfields, and scrutinize the project accordingly.

I look forward to your response.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Joseph Cella". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke at the end.

Joseph Cella  
Director